



DOCUMENT

Anchorage Submission v3 FINAL

List of holders submitted to Anchorage Digital Bank N.

VERSION	DATE	CLASSIFICATION
v1.0	May 30, 2026	Board Confidential

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At a glance. Holder list submitted to Anchorage Digital Bank N.A. for provisioning the Reg S vault for the LNWK security token. 148 total holders, 99.79% cap table coverage, 20 suspended holders handled separately.

Counterparty. Ezra Chairez · Anchorage Digital Bank — Institutional Sales.

Summary

Item	Count	Notes
Green-file holders — immediate submission	105	KYC completed and verified
Yellow holders — KYC documents to be collected	42	To be completed after submission
Provider Grant (NEW)	1	Giulio Gagliano · KYC TBD
TOTAL SUBMISSION	148	
Total % ownership covered	99,79%	vs. 100% cap table
Total shares submitted	27.405.051	
Total post-money \$	\$2.147.459.795	
Suspended holders (managed separately)	20	Released after completion of administrative checks

Breakdown of the 3 categories

Green · 105 holders — complete KYC package, ready for immediate submission for vault provisioning. Passport + selfie + proof of address + W-8BEN already stored in the data room.

Yellow · 42 holders — listed in Counsel's cap-table Excel, but KYC documents still need to be collected via post-submission outreach. Tokens remain in the Treasury vault until KYC is completed.

Blue · 1 holder — Provider Grant (Giulio Gagliano) — will be processed as an authorized user under Aetherneum Holding LLC (Delaware SMLLC). 75% vesting on-chain.

Suspended holders (20 temporarily excluded)

Item	Value
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Total shares on hold	56,383 LNWK
% ownership on hold	0.21%
Post-money \$ on hold	\$4,417,660

These 20 holders **will not be allowlisted in the IdentityRegistry** until Counsel completes the administrative checks. Once cleared, they will receive tokens via a dedicated batch from the Anchorage Treasury vault.

What Anchorage Needs to Provide

Item	Owner	Timeline
Provisioning LNWK Treasury production vault	Vault Provisioning Team	1–3 hours after Asset Support approval
Treasury vault address	Anchorage	Immediately after provisioning
Authorized users set up (Noel + Giulio + Giampiero)	Onboarding	Completed at kickoff on May 21
LNWK Asset Support review	Asset Support	End of week June 6 (expected)
Withdrawal Matrix pre-aligned	Risk Operations	Pre-distribution batch

Compliance regime

- **Reg S Cat 3 1-year lock-up enforced on-chain via **HoldingPeriodRule****
- **MaxHoldersRule = 150 (buffer above the 148 expected)**
- **JurisdictionRule allowlist = non-U.S. countries included in the dossier**
- **WhitelistRule = true (mandatory gating on all transfers)**
- **Securitize DS Protocol = claim KYC + Jurisdiction + Reg S Cat 3 + Holding Period for each holder**

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