# **COMPLIANCE ASSESSMENT**

This is to confirm that:

## Anthony Isaakidis (AI)

has undergone a comprehensive compliance assessment established by the Network Nervous System (NNS) to operate as an Approved Node Provider on the Internet Computer Protocol (ICP) network. The findings outlined in this report reflect the results of that assessment.

## **Assessment Findings:**

### 1. Identification Compliance

Anthony has successfully completed identity verification and submitted all required supporting documentation.

#### 2. Hardware Requirements

According to the Node Transfer Sale Agreement provided by AI, the hardware listed appears to align with Generation 1 configurations, specifically the Dell PowerEdge R6525 model. According to the agreement AI will take over 28 nodes based at the TY2 Equinix Center in Japan. The hardware has not been physically inspected, and this assessment is based solely on the information outlined in the sales agreement as submitted by the node provider.

#### 3. Source of Funds

As part of the enhanced due diligence and screening process, no indications were identified to suggest that the funds used to acquire nodes from Aksinia Stavskaya (AS) originate from money laundering, terrorist financing, or any other illicit activities.

### 4. Ownership and Control

Based on the information shared by AS on the New Node Provider Proposals forum, AS proposed the transfer of 28 nodes located at the TY2 data center in Japan to AI.(https://forum.dfinity.org/t/new-node-provider-proposals/16643/1003)

Both parties have confirmed in a signed Node Machine Handover Statement that they are independent entities and that full control of the nodes will be transferred to AI.

(https://wiki.internetcomputer.org/wiki/File:Node machine handover statement.pdf)

During the assessment AI disclosed, he first engaged with the ICP Forum on the 22<sup>nd</sup> of April 2025, to express his interest in becoming a node provider (https://forum.dfinity.org/t/new-node-provider-proposals/16643/901). According to Internal Message communication provided by AI, he was contacted by AS on the 23<sup>rd</sup> of May 2025 for the first time. On this communication AS offered his nodes in Japan to AI and they began discussions regarding the potential purchase of the nodes. Based on this explanation, no significant red flags have been identified at this time that would indicate any control by AS over the nodes recently acquired by AI.

#### 5. Independence from Other Node Providers

Based on a self-declaration and subsequent verification through documentation review and interview with AI, the following statements can be made:

- As of the date of this assessment, there is no clear indication that AI holds a position of control or comparable roles within any other ICP Node Provider.
- No direct familial, corporate, or financial relationships could be clearly identified at this stage between the AI and any other ICP Node Provider, their respective UBOs, or individuals holding controlling interests.
- Based on the documentation provided and the information available at this stage, AI does not appear to be part of any holding, parent, or subsidiary structure involving, or otherwise affiliated with, any other ICP Node Provider.
- According to the documents submitted and the self-declaration, there is no clear indication at this stage that AI is engaged in any loan arrangements, debt financing, or similar financial relationships with other Node Providers or their respective UBOs.

#### 6. Additional Remarks

According to Internal Message communication provided by AI and subsequent discussion via video call, he was contacted by AS on the 23rd of May 2025, after he had published his intention to become a Node provider in April 2025, whom he had not known prior, and they began discussions regarding the potential purchase of the nodes.

Based on the information and documentation provided by AI, full control of the nodes was transferred on the 18<sup>th</sup> of July 2025. The service order form between AI and Zelayer Inc for service provided on the machines was provided by AI and started on the 18<sup>th</sup> of July 2025 and has a 12-month term renewable automatically.

Additionally, AI submitted the payment slip for the first instalment under the agreement, along with supporting documentation such as bank statements, salary slips, and income declarations to verify the source of funds and confirm the payment. The second instalment will be paid once AI receives the initial rewards from the node operations.

Date of Issuance: 24.07.2025

Assessment Valid As of: 24.07.2026

Signed by:

Maria Fedak Compliance and Regulatory Manager JayBee Consulting AG

#### DISCLAIMER

This Compliance Assessment has been prepared with the utmost care and diligence. It reflects the professional opinion of the issuer based on the information and documentation made available by the Node Provider and the ICP community as well as further information available on online sources at the time of assessment.

The contents of this assessment do not claim to be exhaustive or free from error. While reasonable efforts have been made to verify the accuracy of the information provided, the issuer does not guarantee its completeness or correctness and accepts no liability for any inaccuracies, omissions, or misrepresentations.

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