CONSENT ORDER

BLOCKCHAIN.COM, INC.

Recitals

1. Blockchain.com, Inc. ("Blockchain") is a Delaware corporation with headquarters in Dallas, Texas, and an assigned identifier number of 2024031, by the Nationwide Multistate Licensing System ("NMLS").

2. The States of Colorado, Kentucky, Minnesota, New Hampshire, North Carolina, and South Dakota, (individually, a "Participating State," and collectively, the "Participating States") have each agreed, through their respective state money transmission regulatory agencies, to negotiate and enter into this Consent Order (hereinafter referred to as the "Order").

3. The Participating States are respective members of the Conference of State Bank Supervisors ("CSBS") and the Money Transmitter Regulators Association ("MTRA") and have agreed to address enforcement concerns with Blockchain in a collective and coordinated manner. The Participating States and Blockchain are collectively referred to as the "Parties."

4. Blockchain is licensed as a money transmitter under the respective laws of each Participating State.

5. From on or about March 31, 2025 through April 10, 2025, the Participating States commenced a multi-state examination of Blockchain covering the period of December 19, 2022 to December 31, 2024 (the "Multi-State Examination").

6. The Multi-State Examination was conducted to determine Blockchain's compliance with applicable state and federal laws and regulations, financial condition, the adequacy of its policies and procedures, and its control and supervision of licensed money transmittal operations.

7. The Participating States conducted the Multi-State Examination pursuant to their respective statutory authorities, in accordance with the Protocol for Performing Multi-State Examinations and the Nationwide Cooperative Agreement for MSB Supervision maintained by the CSBS.

8. A report of the Multi-State Examination was issued by the Participating

States to Blockchain on July 17, 2025, which detailed the Participating States' findings (the "Report of Examination").

9. The Participating States found Blockchain engaged in the following violation of federal law:

a. Blockchain failed to timely file suspicious activity reports under 31 C.F.R. § 1022.320(b)(3).

10. The Participating States found Blockchain engaged in state-specific compliance violations and deficiencies including, but not limited to:

a. Failure to maintain sufficient net worth.

b. Failure to maintain permissible investments to the extent required by applicable state law, including a failure to maintain virtual currency in like-kind.

c. Failure to timely file audited financial statements.

d. Failure to timely submit annual and quarterly reporting in accordance with applicable state law, including call reports.

e. Failure to keep NMLS records up to date with personnel changes.

11. Based on the findings in the Report of Examination, the Participating States engaged in direct discussions with Blockchain's senior management to identify steps Blockchain should take to improve compliance, manage risk, and otherwise to ensure safe and sound operations as part of the Multi-State Examination resolution process.

12. Blockchain does not admit any wrongdoing, allegations or implications of fact and does not admit any violations of applicable laws, regulations or rules governing the conduct and operation of its money transmittal business. Blockchain acknowledges that the Participating States have and maintain jurisdiction over the underlying dispute.

13. Blockchain represents that it has implemented, and will continue to maintain, procedures designed to ensure that Blockchain will comply with all regulatory requirements imposed by the Participating States.

14. The Participating States have legal authority to initiate administrative actions based on the conduct described in the Report of Examination, and reserve all rights, duties, and authority to enforce all statutes, rules and regulations under their respective jurisdictions against Blockchain regarding any money transmission activities or other

activities.

15. It is the intention of the Participating States and Blockchain to resolve the violations identified in the Report of Examination through this Order without additional time and expense.

16. Blockchain hereby knowingly, willingly, voluntarily, and irrevocably consents to the execution of this Order pursuant to the authority vested in each Participating State and agrees that it understands all of the terms and conditions contained herein. Blockchain acknowledges that it has full knowledge of its rights to notice and a hearing pursuant to the laws of the respective Participating States. By voluntarily entering into this Order, Blockchain waives any right to notice and a hearing, and review of such hearing, and also herein waives all rights to any other judicial appeal concerning the terms, conditions, and related obligations set forth in this Order. Blockchain further acknowledges that it has had an opportunity to consult with independent legal counsel in connection with its waiver of rights and with the negotiation and execution of this Order, and that Blockchain has either consulted with independent legal counsel or has knowingly elected not to do so.

17. Blockchain represents that the person signing below is authorized to execute this Order and to legally bind Blockchain.

Based upon the foregoing, the Participating States listed below hereby **ORDER** as follows:

I. JURISDICTION

18. The Participating States have jurisdiction over the subject matter of this order and the authority to enforce the terms of this Order in accordance with their respective state law.

II. REPORT OF EXAMINATION

19. Blockchain shall implement measures to comply with its obligations under this Order and will hereafter continue to comply with all regulatory requirements commensurate with the financial services provided by Blockchain. Blockchain shall ensure compliance with all state and federal laws and regulations applicable to a money transmission corporation having the size, complexity and overall risk profile of Blockchain.

20. Blockchain shall take all required actions to correct the following issues,

including updating policies and procedures as necessary to address deficiencies, and to otherwise comply with the correspondent Participating States' laws:

a. Timely file suspicious activity reports in accordance with federal law.
b. Maintain sufficient net worth.
c. Maintain permissible investments as required by applicable state law, including maintaining virtual currency in like-kind.
d. Timely file audited financial statements as required by applicable state law.
e. Timely submit all annual and quarterly reports in NMLS.
f. Keep NMLS records up to date, including any personnel changes.

Corrective actions will be verified during future examinations.

21. The Participating States will determine Blockchain's compliance with the preceding requirements during future examinations. If repeat violations occur, Blockchain may be subject to further disciplinary action, including but not limited to, suspension, revocation, and civil or administrative penalties, as provided by the corresponding Participating States' laws.

III. ADMINISTRATIVE PENALTY

22. Blockchain shall pay an administrative penalty totaling $30,000.00 to be divided equally among the following Participating States:

a. Colorado;
b. Kentucky;
c. Minnesota;
d. New Hampshire;
e. North Carolina; and
f. South Dakota.

The Participating States, except for Minnesota, shall invoice the penalty in NMLS. Minnesota will provide Blockchain with payment instructions. Blockchain shall pay this administrative penalty to each Participating State within 30 days of the Effective Date of this Order.

23. In the event that Blockchain fails to submit any administrative penalty set forth in this Order, in the amounts specified herein and in accordance with the applicable deadlines, or if any transfer of any monetary amount required under this Order is voided by a court order, including a bankruptcy court order, Blockchain shall not object to a

Participating State submitting a claim, nor attempt to defend or defeat such authorized claim, for any unpaid amounts against any surety bond that Blockchain may maintain in such Participating State as a condition of maintaining a license under the jurisdiction of that Participating State.

IV. ENFORCEMENT

24. *No Restriction on Existing Authority.* This Order shall in no way preclude any Participating State from exercising its examination, investigative, enforcement, or any other authority under the laws of the corresponding Participating State.

25. *Enforceability of Order*. Notwithstanding any other relief to the contrary, if Blockchain fails to comply with the terms and conditions of this Order, the Participating States may pursue any action allowed by law concerning any violations stated in the Report of Examination, such action including, but not limited to, suspension or revocation of a license issued by the Participating State to Blockchain, imposition of a civil money penalty against Blockchain, or any other remedy allowed by law. The Parties agree that the failure of Blockchain to comply with any term or condition of this Order with respect to a particular State shall be treated as a violation of an Order of the State and may be enforced as such. Moreover, Blockchain acknowledges and agrees that this Order is only binding on the Participating States and not any other local, state or federal agency, department, or office who is not a signatory on this Order.

V. GENERAL PROVISIONS

26. *Effectiveness.* This Order shall become effective upon execution by all of the named Participating States (the "Effective Date").

27. *Public Record*. This Order shall become public upon the Effective Date.

28. *Disclosure*. Blockchain understands, agrees, and acknowledges that this Order is considered a disciplinary action, and that it shall properly disclose this Order on all future applications and renewal requests filed via NMLS.

29. *Binding Nature*. The terms of this Order shall be legally binding upon Blockchain's officers, owners, directors, employees, heirs, successors and assigns. The provisions of this Order shall remain effective and enforceable except to the extent that, and until such time as, any provisions of this Order shall have been modified, terminated, suspended, or set aside, in writing by mutual Order of the Participating States acting

collectively or severally.

30. *Standing and Choice of Law.* Each Participating State has standing to enforce this Order in the judicial or administrative process otherwise authorized under the laws and regulations of the corresponding Participating State. Upon entry, this Order shall be deemed a final order of each respective Participating State unless adoption of a subsequent order is necessary under the laws of the corresponding Participating State. In the event of any disagreement between any Participating State and Blockchain regarding the enforceability or interpretation of this Order and compliance therewith, the courts or administrative agency authorized under the laws of the corresponding Participating State shall have exclusive jurisdiction over the dispute, and the laws of the corresponding Participating State shall govern the interpretation, construction, and enforceability of this Order.

31. *Titles.* The titles used to identify the paragraphs of this Order are for the convenience of reference only and do not control the interpretation of this Order.

32. *Final Order*. This Order is the final written expression and the complete and exclusive statement of all the agreements, conditions, promises, representations, and covenants between the Parties solely with respect to the subject matter hereof, and supersedes all prior or contemporaneous agreements, negotiations, representations, understandings, and discussions between and among the Parties, their respective representatives, and any other person or entity, with respect to the subject matter covered herein, excepting therefrom any proceeding or action if such proceeding or action is based upon facts not presently known to a Participating State or which were knowingly concealed from a Participating State by Blockchain. The Parties further acknowledge and agree that nothing contained in this Order shall operate to limit a Participating State's ability to assist any other local, state or federal agency, department or office with any investigation or prosecution, whether administrative, civil or criminal, initiated by any such Agency, Department or Office against Blockchain or any other person based upon any of the activities alleged in these matters or otherwise.

33. *North Carolina Order*. This Order does not supersede the prior Consent Order between Blockchain and North Carolina dated December 18, 2024 ("NC Consent Order"), which requires, among other things, that Blockchain maintain a net worth of

$500,000 and timely file its audited financial statements. Docket No. 24-MT-099. The NC Consent Order remains in full force and effect.

34. *Waiver*. The waiver of any provision of this Order shall not operate to waive any other provision set forth herein, and any waiver, amendment and/or change to the terms of this Order must be in writing signed by the Parties.

35. *Severability*. If any provision of this Order shall be found by any court of law to be void, voidable, invalid, or otherwise unenforceable, the remaining portions shall remain in full force and effect.

36. *No Private Right of Action Created*. This Order does not create any private rights or remedies against Blockchain (or any of its affiliates or subsidiaries), create any liability for Blockchain (or any of its affiliates or subsidiaries) or limit defenses of Blockchain (or any of its affiliates or subsidiaries) for any person or entity not a party to this Order.

37. *Counterparts*. This Order may be executed in separate counterparts, by facsimile, by scanned electronic document, or by electronic signature. A copy of the signed Order will be given the same effect as the originally signed Order.

38. Nothing in this Order shall relieve Blockchain of its obligation to comply with applicable state and federal law.

It is so **ORDERED**.

IN WITNESS WHEREOF, in consideration of the foregoing, including the recital paragraphs, and with the Parties intending to be legally bound, do hereby execute this Order this 1st day of November, 2026.

(Signatures on next page.)

WE CONSENT	
COLORADO DIVISION OF BANKING	
Kara Hunter State Bank Commissioner for Colorado	[redacted]
Date	10/21/2026
KENTUCKY DEPARTMENT OF FINANCIAL INSTITUTIONS	
Marni Rock Gibson Commissioner	[redacted]
Date	10/14/2026
MINNESOTA DEPARTMENT OF COMMERCE	
Sara Payne Assistant Commissioner of Enforcement	[redacted]
Date	10/14/2026
NEW HAMPSHIRE BANKING DEPARTMENT	
Emelia A.S. Galdieri Bank Commissioner	[redacted]
Date	10/15/2026
NORTH CAROLINA COMMISSIONER OF BANKS	
Katherine M.R. Bosken Commissioner of Banks	[redacted]
Date	10/21/2026
SOUTH DAKOTA DIVISION OF BANKING	
Bret Afdahl Director	[redacted]
Date	10/15/2026
BLOCKCHAIN.COM, INC.	
Nawvid Ahmed Head of Compliance, US	[redacted]
Date	09/30/2026