SANDJAR GROUP

ATLAS PLATFORM

DOCUMENT No. 1

Financial Model of Interactions between Bank, Client and ATLAS Platform

A Comprehensive Financial Architecture & Transaction Flow Analysis

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I. EXECUTIVE SUMMARY

This document constitutes the formal financial model governing all monetary interactions among three principal parties: (1) licensed banking institutions, (2) platform clients (including buyers, sellers, agents, and investors), and (3) the ATLAS Platform operated by Atlas Overseas FZE.

Purpose. The ATLAS Platform is an integrated digital real estate operating system designed to serve as the foundational financial infrastructure for property transactions in the UAE and, progressively, globally. All financial flows — from initial client onboarding and deposit placement through to settlement, royalty distribution, and post-transaction services — are routed, validated, and recorded through the ATLAS financial architecture.

Scope. This model covers: (i) fiat currency flows between licensed banks and the platform escrow layer; (ii) the function of ATL as the platform's internal unit of account for fee settlement; (iii) ATLX / IP-Share acquisition mechanics through multiple payment rails; (iv) revenue-sharing and royalty allocation logic; and (v) AML/KYC-gated financial controls embedded into every transactional pathway.

Key Financial Metric	Value / Range	Source
UAE Real Estate Transaction Volume (2024)	AED 761B (~USD 207B)	DLD / CBRE
Q3 2025 Market Volume	AED 170.7B (+17.2% YoY)	DLD Quarterly Report
ATLAS Year 5 Revenue Projection	USD 470M – USD 590M	ATLAS Business Plan 2026
Break-Even Target	Year 2 (Projected)	ATLAS Financial Model
Platform Transaction Fee Range	0.5% – 2.5% per transaction	ATLAS Fee Schedule
IP Portfolio Valuation (SANOXY Report #71)	USD [Valuation Amount]	Dr. S. Muminov, Feb 2026

II. PRINCIPAL PARTIES — ROLES & FINANCIAL OBLIGATIONS

The ATLAS financial ecosystem is structured around three interdependent parties whose interactions generate all transactional value within the platform. Each party carries defined financial rights, obligations, and access permissions enforced through the platform's embedded AML/KYC layer.

PARTY 1	THE BANK — Licensed Financial Institution
Role	Regulated custodial and settlement partner. The Bank provides escrow-grade account infrastructure, processes fiat deposits and withdrawals, issues payment confirmations, and receives ATL-denominated fee reimbursements from the platform.
Institutions	ENBD, FAB, ADCB, Mashreq, or any CBUAE-licensed banking partner with UAE banking license. International settlement via SWIFT/SEPA correspondent network.
Financial Obligations	(i) Maintain segregated client sub-accounts by transaction ID; (ii) Provide real-time API-based balance confirmation to ATLAS; (iii) Release funds upon receiving dual-key platform authorization; (iv) Report suspicious activity per CBUAE AML framework.
Revenue Streams	Bank processing fee (0.15% – 0.35% per transaction); FX conversion margin on non-AED payments; Banking-as-a-Service (BaaS) API licensing fees paid by ATLAS.
Integration Model	ISO 20022 message standards; PSD2-equivalent Open Banking API; SWIFT GPI for cross-border settlement; CBUAE real-time gross settlement (RTGS) for domestic high-value transactions.

PARTY 2	THE CLIENT — Platform User
Client Types	Buyer | Seller | Investor (IP-Share / ATLX) | Real Estate Agent | Developer | Tenant. Each type carries distinct financial permission sets within the platform architecture.
Onboarding Gate	No financial transaction is executed without completed AML/KYC verification. Face ID biometric + document liveness check + OFAC/UN/FATF sanctions screening must clear before any wallet activation.
Financial Rights	(i) Deposit funds via bank transfer, custodial crypto wallet, or Apple/Android Pay; (ii) Acquire IP-Shares (ATLX) via documented payment rails; (iii) Receive royalty allocations from IP exploitation revenue; (iv) Access platform escrow protection on all transactional deposits.
Financial Obligations	(i) Pay applicable platform transaction fees in ATL or AED equivalent; (ii) Maintain verified identity for every payment above AED 3,500; (iii) Declare source of funds for transactions above applicable AML thresholds; (iv) Accept platform terms governing financial interactions.

PARTY 3	ATLAS PLATFORM — Atlas Overseas FZE
Entity	Atlas Overseas FZE, a Sandjar Group entity registered in the UAE, operating as the platform's financial infrastructure layer.
Financial Role	The ATLAS Platform acts as the orchestration layer: it initiates, validates, routes, escrows, and settles all transactions between Clients and the Bank. It does not hold client funds in its own balance sheet — all funds are ring-fenced in designated Bank accounts.
Revenue Model	(i) Transaction workflow fees (0.5–2.5%); (ii) ATL functional token fee collection; (iii) IP-Share issuance margin; (iv) Royalty administration fee on managed IP exploitation; (v) Subscription & SaaS revenues from agents and developers.
Regulatory Position	The Platform operates as a technology and IP-rights marketplace. All regulated financial services (custody, settlement, FX) are performed by the licensed Bank partner. ATLAS does not hold a financial services license for money transmission.

III. FINANCIAL TRANSACTION ARCHITECTURE

3.1 Master Transaction Flow — Overview

Every financial transaction on the ATLAS Platform follows a seven-stage lifecycle. The architecture ensures segregation of duties, full traceability, and dual-key authorization before any value transfer is executed.

#	Stage	Description	Responsible Party
1	Client Onboarding & KYC Gate	Client registers on ATLAS. Identity verification (Face ID + liveness + document scan) is completed. AML/sanctions screening clears. Platform wallet is activated. No financial transaction is possible prior to this stage.	ATLAS Platform (AML/KYC Engine)
2	Transaction Initiation	Client initiates a transaction (property deposit, IP-Share purchase, fee payment). Platform generates a unique Transaction ID (TID) and locks the session. An escrow sub-account is opened at the Bank under the TID reference.	ATLAS Platform + Client
3	Payment Instruction & Routing	Platform issues a structured payment instruction to the Bank via API. Instruction includes TID, amount, currency, payment rail (bank transfer / crypto / Apple Pay / Android Pay), and authorized bank sub-account details. Client executes payment.	ATLAS API → Bank
4	Bank Receipt & Confirmation	Bank receives funds into the designated escrow sub-account. Real-time confirmation is transmitted to ATLAS via API webhook. Balance lock is applied — funds cannot be redirected without dual-key platform authorization.	Bank → ATLAS Platform
5	Platform Validation & Smart Contract Trigger	ATLAS validates receipt against the TID. Smart contract records the transaction on the blockchain layer as a timestamped, immutable	ATLAS Smart Contract Engine

		audit entry. IP-Share rights are pre-allocated to the Client's platform wallet pending final settlement.	
6	Settlement & Release	Upon satisfaction of all conditions (document completion, regulatory clearance, counterparty confirmation), ATLAS issues a dual-key release instruction to the Bank. Funds are distributed: Seller/Developer receives principal; ATLAS receives fee in AED; ATL fee component is recorded.	ATLAS Platform + Bank
7	Post-Settlement & Royalty Tracking	Transaction is closed. IP-Share rights are formally registered to the buyer's record. Royalty entitlements are activated. The platform's revenue module captures fee income and initiates recurring royalty payment scheduling where applicable.	ATLAS Platform

3.2 Payment Rails — Accepted Methods & Processing Logic

The ATLAS Platform accepts four distinct payment rails, each with its own processing logic, settlement speed, and fee structure. All rails funnel into the same Bank escrow infrastructure, ensuring consistent risk controls across payment types.

Payment Rail	Currency	Processing Time	Bank Fee	Platform Fee
Bank Transfer (SWIFT / RTGS)	AED / USD / EUR / GBP	Same day (domestic) / T+1–2 (international)	0.15% – 0.35%	0.5% – 1.5%
Custodial Crypto Wallet (USDT/BTC/ETH)	Stablecoin / Crypto → AED conversion	15–60 minutes + 1 confirmation	0.10% conversion fee	0.75% – 1.75%
Apple Pay / Google Pay	AED / linked card currency	Real-time / Instant	1.5% – 2.9% (card network)	0.5% – 1.0%
ATL Platform Token (In-App)	ATL (pegged to AED)	Instant (internal ledger)	Nil	0.25% – 0.75% (discounted)

IV. ATLAS REVENUE MODEL & FEE DISTRIBUTION

4.1 Fee Architecture — Three-Layer Model

The ATLAS revenue architecture operates on three interlocking layers: the Transaction Fee Layer (charged on every platform-executed deal), the ATL Token Layer (governing in-platform fee settlement and utility), and the IP-Share / Royalty Layer (governing ATLX acquisition economics and ongoing royalty distribution).

Layer 1 — Transaction Fees

Transaction fees are assessed at the point of deal execution. Fee amounts are determined by transaction type, deal value, and client tier. All fees are collected in AED or ATL equivalent.

Transaction Type	Deal Value Range	Platform Fee	Bank Processing	Net to ATLAS
Property Sale — Primary (Developer)	AED 500K – AED 50M	1.50%	0.25%	1.25%
Property Sale — Secondary Market	AED 300K – AED 30M	2.00%	0.25%	1.75%
IP-Share / ATLX Acquisition	USD 500 – USD 1M+	1.00%	0.15% – 0.35%	0.65% – 0.85%
Rental Transaction (Annual)	AED 30K – AED 2M	0.50%	0.15%	0.35%
Agent Commission Management	Variable (% of deal)	0.25% surcharge	Nil	0.25%
Mortgage Facilitation (3rd party)	AED 500K+	0.30% referral	Nil	0.30%

Layer 2 — ATL Token: In-Platform Fee Settlement

ATL is the ATLAS Platform's functional payment unit — a non-speculative utility token denominated and pegged to the AED. ATL is used exclusively within the ATLAS ecosystem for fee settlement, escrow deposits, and inter-party transfers. It is not a virtual asset, cryptocurrency, or financial instrument under UAE VARA or CBUAE frameworks.

ATL Attribute	Specification
Denomination	1 ATL = 1 AED (fixed functional peg; not a tradeable exchange rate)
Issuance	Issued by Atlas Overseas FZE on a closed-loop basis; supply controlled by platform transaction volume
Acquisition	Purchased by clients in exchange for AED via platform wallet top-up (Bank transfer, Apple/Android Pay)
Usage	Fee payment (discounted vs. AED cash payments); escrow margin deposit; agent commission splits; developer milestone releases
ATL Fee Discount	Clients paying fees in ATL receive a 0.25%–0.50% discount on standard transaction fee rates
Regulatory Classification	Functional payment unit / in-platform utility token — NOT a virtual asset, security, or financial instrument
Redemption	ATL balances redeemable for AED at 1:1 rate upon account closure, subject to AML verification

Layer 3 — IP-Share / ATLX Acquisition & Royalty Distribution

ATLX represents the structured investment participation layer of the ATLAS Platform. Clients acquire IP-Shares (evidenced as ATLX on the blockchain ledger) in the ATLAS intellectual property portfolio, entitling them to royalty allocations from documented IP exploitation revenue. IP-Shares are not securities, financial instruments, or equity interests.

ATLX / IP-Share Parameter	Detail
Legal Nature	Documented fractional IP entitlement; rights of use, sublicensing, royalty allocation per issuance terms
Underlying Asset	ATLAS IP Portfolio (9 registered works): brand, platform, analytics engines, AI systems, payment architecture
IP Valuation	Professionally valued per IVS 210 / IFRS; Report #71 by Dr. Sandjar Muminov, SANOXY-FZCO, Feb 2026
Payment Methods Accepted	Bank transfer (AED/USD/EUR/GBP) | Custodial crypto wallet (USDT) | Apple Pay | Android Pay
Minimum Acquisition	USD 500 per IP-Share unit (subject to issuance terms)
Royalty Trigger	Royalties paid only upon actual commercial exploitation of underlying IP; no guaranteed return
Royalty Payment Schedule	Quarterly distribution where royalty is earned; paid in AED to registered bank account
Blockchain Record	Each IP-Share issuance recorded as a tokenized ledger entry — evidentiary only; not an independent asset
Transfer Mechanism	Secondary transfer via platform with AML/KYC verification of both parties; platform records transfer

V. ESCROW STRUCTURE, AML CONTROLS & FINANCIAL GOVERNANCE

5.1 Escrow Account Architecture

The ATLAS Platform maintains a segregated escrow architecture through its licensed bank partner. Client funds are never co-mingled with ATLAS operating funds. Each active transaction is assigned a unique Transaction ID (TID), and a corresponding bank sub-account is opened exclusively for that transaction.

Account Type	Function	Control Mechanism
Transaction Escrow Sub-Account	Holds buyer funds for a specific property deal pending settlement conditions	Dual-key release: ATLAS Platform authorization + counterparty document confirmation

IP-Share Acquisition Account	Holds client payments for ATLX / IP-Share purchases pending issuance completion	Smart contract trigger on payment confirmation; released upon IP-Share registration
Fee Collection Account	ATLAS operational account receiving platform fees after each settlement	Automated sweep post-settlement; segregated from client funds at all times
Royalty Reserve Account	Ring-fenced pool of IP exploitation revenue pending quarterly distribution to IP-Share holders	Quarterly reconciliation; distribution schedule governed by royalty allocation model
ATL Liquidity Account	Backs ATL token issuance with equivalent AED reserve	1:1 reserve maintenance; audited quarterly by external auditor

5.2 AML/KYC Financial Controls

All financial transactions on the ATLAS Platform are governed by an integrated AML/KYC control framework aligned with CBUAE AML/CFT Federal Decree-Law No. 20 of 2018, FATF Recommendations, and DLD's real estate AML guidelines. The following controls are embedded at every transaction touchpoint.

Control	Threshold / Trigger	Action Required
Identity Verification	All transactions	Face ID + liveness detection + government ID scan + OFAC/UN/EU sanctions screening
Source of Funds Declaration	AED 55,000+ (USD 15,000+) equivalent	Client submits documented source of funds; bank officer review required for approval
Enhanced Due Diligence (EDD)	PEPs, high-risk jurisdictions, transactions > AED 500,000	Enhanced background check, senior officer sign-off, 5-year document retention
Suspicious Transaction Reporting	Any transaction matching STR indicators	Automatic freeze of transaction; CBUAE Financial Intelligence Unit notification within 24 hours
Crypto-Specific Screening	All custodial wallet transactions	Blockchain analytics screening (Chainalysis / Elliptic); wallet address risk scoring before fund acceptance
Transaction Velocity Monitoring	Unusual frequency patterns	AI-driven monitoring; alerts on anomalous patterns; account review triggered above risk threshold

5.3 Financial Governance & Reporting

The ATLAS financial model operates under a governance framework designed to maintain regulatory compliance, investor transparency, and operational integrity across all transaction categories.

Governance Element	Implementation Detail
External Audit	Annual audit of platform financial flows, ATL reserve accounts, and royalty distribution by a Big-4 or equivalent firm

Bank Reconciliation	Daily automated reconciliation of all escrow sub-accounts against ATLAS internal ledger; exceptions flagged within 2 hours
Blockchain Immutability	All transaction records written to blockchain ledger as immutable, timestamped audit entries — available for regulatory inspection on demand
Regulatory Reporting	Quarterly financial reports to CBUAE (AML compliance); DLD transaction data integration for real estate deal reporting; VARA notifications for any crypto-adjacent activity
Client Financial Statements	Real-time dashboard showing all transactions, escrow balances, ATL holdings, IP-Share registers, and royalty accruals — accessible 24/7 within platform
Dispute Resolution Fund	2% of all transaction fees ring-fenced as a dispute resolution reserve; managed by an independent trustee; accessible per platform arbitration process

5.4 Financial Model Integration with Subsequent Documents

This document constitutes the foundational financial architecture for the entire ATLAS Legal Suite. The following table maps how the financial model interconnects with Documents 2–9 of the ATLAS documentation framework:

Doc	Document Title	Financial Model Integration Point
2	Seller – Buyer – GR – ATL Operations	Transaction fee allocation, commission structures, escrow release conditions, DLD registration fee flows
3	ATL — Functional Token: Process & Interaction	ATL issuance mechanics, AED peg maintenance, fee discount model, wallet architecture, ATL reserve audit
4	AML / KYC Policy	Detailed control procedures, threshold triggers, STR protocols, crypto screening — all embedded in the financial flow
5	GDPR Policy	Financial data handling, transaction record retention periods, cross-border data transfer on payment processing
6	IP-Share Acquisition: Payment Methods & Legal Structure	Payment rail specifications, crypto-to-fiat conversion, custodial wallet protocols, bank transfer documentation
7	Terms & Conditions (All User Types)	Fee schedules, royalty payment terms, escrow conditions, ATL usage rights, refund and dispute procedures
8	User Policy / Authorization & Verification	Face ID + financial authorization linkage, payment approval biometrics, court-admissible transaction verification
9	White Paper	Financial model summary, revenue projections, token economics, investment thesis — all derived from this document