

WithMetis Group Crypto Asset(s) Acceptance

Last updated: June 11th, 2022

1. PURPOSE

1.1 The purpose of this policy is to identify the crypto assets that WithMetis will offer to its Users.

1.2 WithMetis will use a risk-based approach to identify assets that may be offered by WithMetis to Users. This risk-based approach is an industry-standard approach that mitigates potential high-risk assets which might be implicated in an activity such as fraud, money laundering, or other prohibited activity.

2. SCOPE

2.1 WithMetis reserves the right to revise this policy at any time and for any reason.

2.2 Certain elements of this policy may be superseded by changes in the law of WithMetis' governing jurisdiction.

3. CRITERIA

3.1 *Liquidity*. The asset should have equal to or greater than an average of \$10 million USD in average daily volume as measured in the preceding 30 calendar days. The volume data from Coinbase Prime, Binance, FTX, Kraken, Gemini, and Bitstamp as shown by coingecko.com will be used to assess this criterion.

3.2 *Privacy*. WithMetis does not accept digital assets that are explicitly or implicitly designed to provide anonymity which might violate applicable regulations, including but not limited to anti-money laundering and tax reporting (so-called "privacy coins").

3.3 *Regulation*. WithMetis does not accept

- 3.3.1 Assets that would be classified as a security or a regulated financial instrument either in the jurisdiction where they are issued, in the jurisdiction where WithMetis operates, or any other jurisdiction at the discretion of WithMetis.
- 3.3.2. Assets should not require WithMetis to report a value-added tax in Cyprus or Lithuania.
- 3.3.3. Assets that would violate any other applicable laws, regulations, third-party rights and can not be in violation of public interests, public ethics or other's legitimate interests would not be offered to the User.

3.4 *Reputation*.

- 3.4.1. Crypto Assets must be listed on at least 1 major exchange based in the European Union (EU) or the United States (US). A major exchange is one that is based in either the US or the EU and in the top-10 exchanges by volume on coingecko.com.
- 3.4.2. The legal entity issuing the crypto asset, including but not limited to the directors, executive team and advisors should not be subject to negative publicity including but not limited to official sanctions lists of states or individuals that are published by various authorities on a national and international level including by not limited to the OFAC Specially Designated

Nationals and Blocked Persons or the European Union Consolidated Financial Sanctions list, or court judgments.

- 3.4.3. The crypto asset has not been an active participant in trading manipulation or illegal trading including but not limited to scams, wash trading, or pump and dump schemes.

4. INITIAL AND ONGOING MONITORING

4.1 Before any asset is made available by WithMetis to the Users, it will be subject to a written risk assessment as specified above.

4.2 All accepted assets will be subject to an annual review or may be subject to review at the request of the corporate directors.

4.3 Ongoing monitoring for crypto asset changes to this policy, including but not limited to adverse media or changes to liquidity will be conducted using industry-standard methods.

5. RESPONSIBLE PERSON

5.1 The corporate director will be responsible for updating this policy on no less than an annual basis.

5.2 The corporate director will be responsible for conducting an initial review of assets, ongoing monitoring of assets, and an annual review of assets.

5.3 The corporate director will be responsible for directing WithMetis executives to de-list any asset which is not in compliance with this policy.