

DISCLOSURE POLICY

1. Compliance with Sanctions Programs.

- 1.1. We prohibit activity that would violate, or assist in violation of, sanctions programs administered by: (1) the U.S. Department of Treasury's Office of Foreign Assets Control; (2) the U.S. Department of State; (3) Her Majesty's Treasury of the United Kingdom; (4) the European Union; and (5) the United Nations Security Council.
- 1.2. We maintain a sanctions compliance program and will not establish a relationship with any person or entity that: (1) is the target of countrywide sanctions imposed by any U.S. government sanctions authority; (2) is a perceived sanctions risk, even if such person or entity is not currently subject to any sanctions; (3) does business, is located, organized, or resides in Belarus, Burundi, Central African Republic, Cuba, D.R. Congo, Iran, Iraq, Libya, North Korea, Russia, Somalia, Syria, South Sudan, Venezuela, Yemen, or Zimbabwe.

2. Risk disclosures.

- 2.1. Virtual currency is not legal tender, is not backed by the US government, and accounts and value balances are not subject to Federal Deposit Insurance Corporation or Securities Investor Protection Corporation protections.
- 2.2. Legislative and regulatory changes or actions at the state, federal, or international level may adversely affect the use, transfer, exchange, and value of virtual currency.
- 2.3. Transactions in virtual currency may be irreversible, and, accordingly, losses due to fraudulent or accidental transactions may not be recoverable.
- 2.4. Some virtual currency transactions shall be deemed to be made when recorded on a public ledger, which is not necessarily the date or time that the customer initiates the transaction.
- 2.5. The value of virtual currency may be derived from the continued willingness of market participants to exchange fiat currency for virtual currency, which may result in the potential for permanent and total loss of value of a particular virtual currency should the market for that virtual currency disappear.
- 2.6. The volatility and unpredictability of the price of virtual currency relative to fiat currency may result in significant loss over a short period of time.