

BITIFEX EXCHANGE

WHITEPAPER

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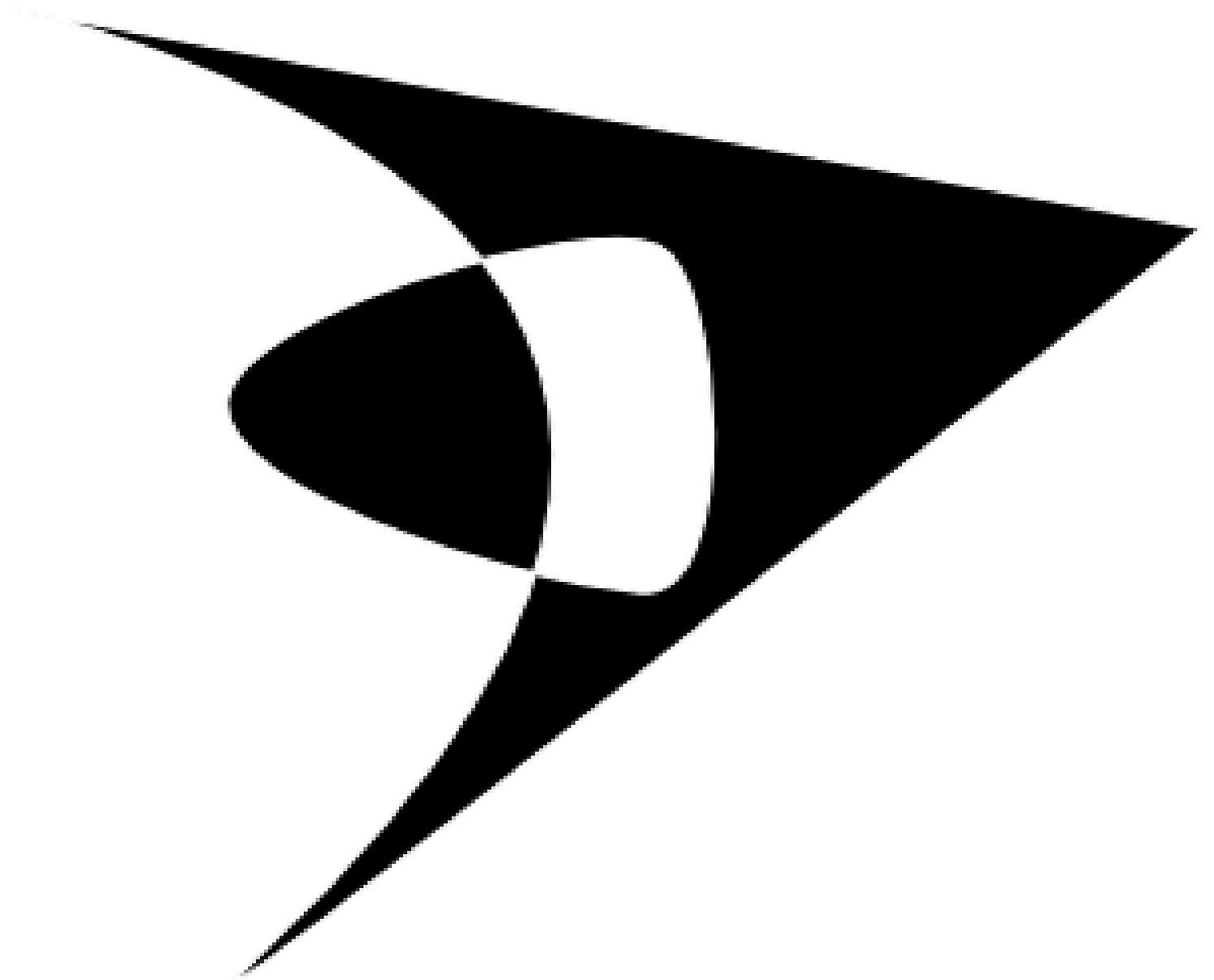


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ABSTRACT

This paper presents a high-level overview of **BITIFEX : International Crypto Exchange**. BITIFEX is intended to be a world class, state-of-the-art, ultra-scalable crypto trading platform, that will offer high performance, low latency execution and a seamless user experience and will revolutionize the Asian cryptocurrency market with its simplicity and security features.

The BITIFEX exchange will allow users to trade cryptocurrencies (BTC, ETH, LTC, BCH, etc.) on a crypto to crypto model, and will strive to incorporate fiat (USD/GBP/SGD/CAD/AUD/JPY/EUR) to cryptocurrency purchases on the BITIFEX exchange, subject to regulatory environment, and listing of new tokens pursuant to Initial Coin Offerings. BITIFEX is also offering BITX ("**BITX**") in a token crowdsale for the purpose of trading on the BITIFEX exchange.

The vision of BITIFEX is to develop a platform that not only allows individuals to trade cryptocurrencies, but also facilitates ease in transfers and information dissemination. The BITIFEX exchange will enable users to easily manage all their wallets and passwords by implementing a user-friendly and secure global address book, thereby providing ease of use to users. Further, the BITIFEX exchange will provide end-to-end automation for trades and provide essential information regarding the mobility of cryptocurrencies traded, liquidity of such currencies listed for trading, and other ancillary information such as P&L statements developed by leveraging APIs with domestic and international business partners.

BITIFEX has been formed to develop the BITIFEX exchange. Many of our founders and advisors have extensive international technology experience and a proven track record in building high-volume, data-driven secure enterprise platforms.

This document illustrates the vision of the BITIFEX team, explains the problems that we intend to solve, and lays out our business plan for achieving our goals.

IMPORTANT NOTICE

PLEASE ENSURE THAT YOU ARE READING THE LATEST VERSION OF THE WHITEPAPER AVAILABLE ON THE BITIFEX WEBSITE BEFORE YOU MAKE A DECISION TO PARTICIPATE IN THE BITX SALE. THE LATEST VERSION OF THE WHITEPAPER AMENDS AND REPLACES ANY PRIOR VERSIONS OF THE WHITEPAPER THAT YOU MAY HAVE REVIEWED.

This Whitepaper is for informational purposes only and describes the intention of BITIFEX to potential users and token holders. The contents of this Whitepaper do not constitute a prospectus, nor form part of any opinion on any advice to sell, or any solicitation of any offer to purchase any BITX, nor the fact of its presentation form the basis of, or be relied upon in connection with, any contract or investment decision. Prospective purchasers of the BITX should carefully consider all risks and uncertainties and regulations associated with BITX and the BITIFEX exchange solution, as set out in this Whitepaper and, more particularly, in the section titled “Risks and Uncertainties” and other sections toward the end of the Whitepaper.

THE RELATIONSHIP BETWEEN BITIFEX AND A PURCHASER OF BITX IS TO BE GOVERNED ONLY BY A SEPARATE BITIFEX TOKEN SALE AGREEMENT (“**TOKEN SALE AGREEMENT**”). IN THE EVENT OF ANY INCONSISTENCIES BETWEEN THE TOKEN SALE AGREEMENT AND THIS WHITEPAPER, THE FORMER SHALL PREVAIL. THE TOKEN SALE AGREEMENT IS A PART OF AND INCORPORATED WITHIN BY REFERENCE, AND IS TO BE READ ALONG WITH THIS WHITEPAPER.

The Token Sale Agreement shall include the application form submitted by purchasers to apply for the purchase of the BITX, which shall be in such form as the directors of BITIFEX may determine from time to time and shall be deemed to include the terms and conditions providing for the sale, purchase and storage of BITX located on the website.

No regulatory authority has examined or approved of any of the information set out in this Whitepaper. No such action has been or will be taken under the laws, regulatory requirements or rules of any jurisdiction.

Cautionary Note on Forward-Looking Statements

All statements contained in this Whitepaper, statements made in press releases or in any place accessible by the public and oral statements that may be made by BITIFEX or its directors, executive officers or employees acting on behalf of BITIFEX, that are not statements of historical facts, constitute “forward-looking statements”. Some of these statements can be identified by forward-looking terms such as “aim”, “anticipate”, “believe”, “could”, “estimate”, “expect”, “forecast”, “if”, “intend”, “may”, “plan”, “possible”, “potential”, “predict”, “probable”, “project”, “should”, “target”, “would”, “will” and other similar expressions. However, these terms are not the exclusive means of identifying forward-looking statements. All statements regarding BITIFEX’s financial position, business strategies, plans and prospects and the future prospects of the industry which BITIFEX is involved in, are forward-looking statements. These forward-looking statements, including but not limited to, statements as to BITIFEX’s revenue and

profitability, prospects, future plans, other expected industry trends and other matters discussed in this Whitepaper regarding BITIFEX and BITIFEX , are matters that are not historic facts, but only predictions.

These forward-looking statements involve known and unknown risks, uncertainties and other factors that may cause the actual future results, performance or achievements of BITIFEX to be materially different from any future results, performance or achievements expected, expressed or implied by such forward-looking statements.

All forward-looking statements made by or attributable to BITIFEX or persons acting on behalf of BITIFEX are expressly qualified in their entirety by such factors. Given that risks and uncertainties that may cause the actual future results, performance or achievements of

BITIFEX to be materially different from that expected, expressed or implied by the forward looking statements in this Whitepaper, undue reliance must not be placed on these statements.

These forward-looking statements are applicable only as of the date of this Whitepaper. BITIFEX disclaims any responsibility to update any of those forward-looking statements or publicly announce any revisions to those forward-looking statements to reflect future developments, events or circumstances, even if new information becomes available or other events occur in the future.

Market and Industry Information and No Consent of Other Persons

This Whitepaper includes market and industry information and forecasts that have been obtained from internal surveys, reports and studies, where appropriate, as well as market research, publicly available information and industry publications. Such surveys, reports, studies, market research, publicly available information and publications generally state that the information that they contain has been obtained from sources believed to be reliable, but there can be no assurance as to the accuracy or completeness of such included information.

Save for BITIFEX and its directors, executive officers and employees, no person has provided their consent to the inclusion of their name and/or other information attributed or perceived to be attributed to such person in connection therewith in this Whitepaper and no representation, warranty or undertaking is or purported to be provided as to the accuracy or completeness of such information by such person and such persons shall not be obliged to provide any updates on the same.

While BITIFEX has taken reasonable actions to ensure that the information is extracted accurately and in its proper context, BITIFEX has not conducted any independent review of the information extracted from third party sources, verified the accuracy or completeness of such information or ascertained the underlying economic assumptions relied upon therein. Consequently, neither BITIFEX, nor its management team, directors, executive officers and employees acting on its behalf, make any representations or warranties as to the accuracy or completeness of such information and shall not be obliged to provide any updates on the same.

Terms Used

To facilitate a better understanding of the BITX being offered for purchase by BITIFEX, of the BITIFEX exchange, and of the businesses and operations of BITIFEX, certain technical terms and abbreviations, as well as, in certain instances, their descriptions, have been used in this Whitepaper. These descriptions and assigned meanings should not be treated as being definitive and may not correspond to standard industry meanings or usage.

Words importing the singular shall, where applicable, include the plural and *vice versa*. References to persons shall include corporations.

INTRODUCTION

Cryptocurrency is defined by Investopedia as a decentralized digital or virtual currency that uses cryptography for security¹, making it difficult to counterfeit. There are a number of benefits to using cryptocurrencies:

Increased Security - The decentralized model ensures that no single party has control over a cryptocurrency, as transaction information is not stored on a central hub.

Reduced Fraud - Individual cryptocurrencies are digital and cannot be counterfeited or reversed arbitrarily by the sender, as with credit card charge-backs (this is not to be confused with fraudulent ICOs, which are unrelated to cryptocurrency itself.)

Identity Theft Protection - Cryptocurrency uses a “push” mechanism that allows the cryptocurrency holder to send exactly what they want to the merchant or recipient, with no personal data that could lead to identity theft.

Faster Settlements - With cryptocurrency, transactions can be recorded within hours or even seconds, as there is no need for a financial intermediary acting as a clearing house.

Lower Transaction Fees - Removing the financial intermediary automatically results in reduced transaction costs.

Global Accessibility - Unlike fiat currencies which are controlled by individual governments, the idea of cryptocurrency is that it is accessible to everyone (aside from where prohibited by regulations).

Where is Asia on the Crypto Map?

The economy of Asia comprises more than 4.5 billion people (60% of the world population)², but very few crypto exchanges bridge the divide between fiat and cryptocurrencies. Majority of the current active exchanges in Asia allow crypto deposits, withdrawals and trades against crypto-majors such as BTC/ETH, but not with fiat. While developed countries such as Japan have begun regulating the Crypto markets, many countries such as South Korea and China have only begun a study of the markets. They may eventually regulate them. There is a lot more FUD – fear, uncertainty and doubt - in the other nations of Asia. BITIFEX intends to be the leading crypto exchange in Asia that bridges this divide.

Asia is the world’s largest economy and the fastest growing economic region. It is at the cusp of explosive growth in technologies such as mobile, Internet, digital payments, cloud computing and IoT, driven by a large number of Internet users.

The majority of active crypto traders are between the ages of 25 and 44:

¹ Investopedia “What is a Cryptocurrency” (n.d.) Retrieved on April 25, 2018. <https://www.investopedia.com/terms/c/cryptocurrency.asp>

² Wikipedia “The Economy of Asia” (n.d.) Retrieved on April 25, 2018. https://en.wikipedia.org/wiki/Economy_of_Asia

- 38.2% of crypto traders are age 25-34³
- 25.5% of crypto traders are age 35-44

The median age of Asia is 30.7 years: a perfect fit for the average crypto trader.

The Asian market is perfectly positioned for growth. All that is needed are the right tools, information and awareness to make Asia the new crypto hub.

We see three primary issues preventing Asia's mass adoption of cryptocurrencies:

- **Lack of knowledge:** The world of crypto exchange is complex. There is no centralized hub where crypto-enthusiasts and traders can get all the information they need to become active with crypto trading.
- **Platform limitations:** There is no single platform that meets all of the needs for crypto exchange.
- **Regulatory requirements and compliance:** These present an issue with regards to buying and exchanging local fiat to forex.

The currently active Asia-focused crypto exchanges let users buy and sell only a few cryptocurrencies (mostly the majors) with inadequate liquidity and inefficient bid/ask spreads. There are currently very few efficient exchanges that allow users to purchase multiple cryptocurrencies with global fiat majors.

Having a one-stop state-of-the-art technology platform that will let users buy cryptocurrencies, whilst also letting them exchange cryptocurrencies for alt-coins, will help pave the way for mass adoption.



Issue 1: Lack of Knowledge

The cryptocurrency community has been growing slowly but steadily for a number of years, but is still in the early stages of expansion. Reputable media outlets have started reporting on the progress - mostly the price - of bitcoins and other cryptocurrencies. As more exciting news stories are reported and the world's curiosity towards cryptocurrency grows, more people are attracted to the fascinating world of

³ Bitcoin user demographics: European males age 25-34 (n.d.). Retrieved on April 25, 2018, from <https://news.bitcoin.com/bitcoin-user-demographics-european-males-age-25-34/>

digital currencies. However, while many people want to invest in blockchain technology, the complexity of entering crypto-markets has been a barrier to entry.

Converting fiat currencies directly into bitcoin and other cryptocurrencies isn't easy for a layperson. The process typically requires some degree of technical skill and knowledge, an understanding of security, and trust in a system which is unlike any that most people have experienced previously. There's no phone call to a broker to make a trade, no speaking with an advisor in an office, but of course there are still ways of being swindled. Currently, the process of buying cryptocurrencies is a tremendous multi-step hassle.

An individual first needs to learn how to buy bitcoin from various platforms (e.g. Bitcoin ATM, websites, apps). Then, they have to send it to an exchange and figure out how to make a trade for the desired cryptocurrency.

These steps are complex, intimidating, and in some cases, incomprehensible. Even for experienced traders with technical knowledge, the process of converting fiat currencies into digital currencies can be slow, limiting, frustrating, and occasionally risky. Due to these inconveniences, we believe that qualified, interested traders are still turning their backs on the crypto-markets and are consequently missing opportunities.

The proliferation of information on the internet today makes it even more challenging for new cryptoenthusiasts to find the information they need to make informed decisions. There is plenty of information, but most of it is not educational in nature. Wouldn't it be logical to have all the current news, market values, video tutorials, and technology updates in one place where traders can quickly and easily access the right information from the right sources at the right time?

Issue 2: Platform Limitations

There are numerous crypto exchanges in the market today. The quality of crypto exchange platforms has come a long way over the last few years but has not yet reached the maturity that we expect from trading platforms. We believe that the sub-optimal user experience that we observe in most crypto exchanges is due to a lack of technical and operational depth.

The first limitation that most platforms face is performance issues. High volatility in any market provides excellent opportunities for power traders, producing an increased trading volume. The vast majority of crypto exchanges have difficulty with scalability, resulting in issues with latency, transaction processing, and overall user experience. Frequent traders often turn to multiple platforms to fulfill their needs.

The constant churn of traders across multiple exchange platforms in turn leads to lower trading volumes, a high bid/ask spread, and an unhealthy market - which results in low user volume. This is a problem that many exchange platforms suffer from, which we intend to address in the BITIFEX exchange.

The second limitation, and arguably the most important challenge in crypto exchanges, is the lack of security. This challenge is unique for crypto exchanges due to the nature of cryptocurrencies. Most

popular crypto exchanges are centralized systems which offer enhanced performance and efficiencies. Given that the centralized systems are enabling the trade of decentralized assets, the exchanges end up being a great target for hackers and internal malicious users. If the right security controls are not put in place from inception, this can become a serious risk.

The third prevalent technical limitation that we see in crypto-exchange platforms is the lack of a streamlined user experience. There are multiple personas associated with crypto trading:

- Expert traders and crypto enthusiasts
- Expert traders, new to crypto
- Crypto experts, new to trading
- New to crypto and trading

We believe that a cryptocurrency exchange platform needs to serve all of the above-mentioned users, providing a flexible user interface that delivers the information that they need, to be successful in their crypto trading journey. BITIFEX will be designed to assist users with the information they need right now, and also guide them along their journey to becoming expert traders and crypto enthusiasts.

Issue 3: Regulatory Requirements & Compliance

There is a growing concern about cryptocurrencies being used for nefarious activities. Cryptocurrencies by their very nature are harder to track and do not capture the users identification (pseudo-anonymous). Cryptocurrencies usually run on decentralized networks where the user identity is not really issued by an authority, but instead can be generated in a pseudo-anonymous fashion. This gives rise to concern around such issues as anti-money laundering (AML) and counter-terrorism financing (CTF).

Since cryptocurrencies and tokens are fairly new, there are no clear and strict guidelines available, which has kept a large percentage of the potential customer base from entering into this market. The problem becomes more complex because governments in different countries are still forming opinions, hence there is a lot of FUD.

Cryptocurrencies saw a huge growth in 2017. A large segment of early adopters made significant gains, which requires them to report their earnings and file taxes, yet, most exchanges do not provide documentation or any guidance on staying compliant with tax obligations.

THE BITIFEX VISION

Our vision for BITIFEX is to see millions of people make billions of crypto transactions – by purchasing and trading in the Crypto markets - more quickly, more easily, and with the highest level of security protection. Information on transactions and coins should be, at the most, a click away.

It is our mission to enable users to enter the crypto-markets, and we plan to achieve this by simplifying the purchase of cryptocurrencies. We intend to make our mobile and web applications the easiest way to purchase cryptocurrencies with fiat and exchange cryptocurrencies.

The BITIFEX exchange will feature a central information hub where users will receive any crypto-media they may need for participating in digital currency and blockchain projects. In short, we will tackle user limitations by building the one and only platform that has everything that crypto-enthusiasts will ever need. We plan to overcome developer tool limitations through the creation of Software Development Kits (SDKs) which will allow our mobile and web apps to make use of decentralized applications.

The true growth potential of the cryptocurrency world becomes obvious when observing the facts. The number of Blockchain wallets has been growing since the creation of the Bitcoin virtual currency in 2009, reaching almost 24 million Blockchain wallet users at the end of March 2018.⁴ Assuming this to be true, the current number of unique active Asian users of cryptocurrency wallets is estimated to be between 1520 million, which represents less than 1% of Asia's population. The full potential of the crypto-markets (Asian & Global) clearly remains largely untapped at the time of writing this Whitepaper.

With community support and ICO funding, the BITIFEX team plans to push the number of active users in Asia to the fullest potential - to over 20 million in the first two years of the BITIFEX exchange going live, by enabling a whole new wave of crypto-enthusiasts who are waiting for a simple, yet, scalable platform, to help them easily convert fiat into cryptocurrency.

THE BITIFEX SOLUTION

Envisioned to solve all the current issues in the crypto exchange market, the BITIFEX exchange will be unlike any other exchange platform available today. The platform will be designed and built for performance, scalability, and security, and will provide a secure multi-payment gateway and state-of-the-art wallets. Customer experience will be at the forefront. The app will be accessible through a simple yet elegant UX/UI design.

Common issues with current Crypto Exchanges:

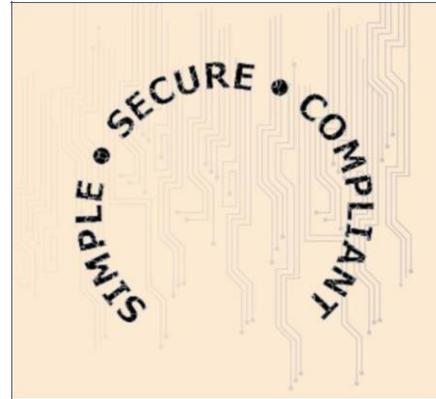
- No international exchange accepts multiple fiat deposits – most only accept Crypto
- Inefficient, mostly taking inventories of Crypto
- Built quickly, resulting in technical compromises
- Performance issues at high volumes
- Not scalable: high latency and down times

⁴Number of Blockchain wallet users worldwide from 1st quarter 2015 to 1st quarter 2018 (n.d.). Retrieved on April 20, 2018, from <https://www.statista.com/statistics/647374/worldwide-blockchain-wallet-users>

- Potential security loopholes
- Poor user experience

BITIFEX exchange Key Differentiators

- Unique technical architecture
- Simple, easy-to-use UI
- High-performance, low-latency
- Secure multi-payment gateway
- State-of-the-art wallets
- Scalable, resilient, fault-tolerant, and highly secure
- Compliant with laws within a reasonable time



BITIFEX Features and Functionality



BITIFEX Exchange Technology: Our cutting-edge technology platform will contain matching algorithms and an efficient architecture for trading across spot, margin, future markets and more. The platform will be scalable, resilient, fault-tolerant, and highly secure.



Simple to Use Design: Our simple to use UX/UI will consist of state-of-the-art responsive designs, built with ease of use in mind.



BITIFEX Device Compatibility: Our platform will be designed to operate on all popular web browsers and devices. We will offer apps for iOS and Android, a responsive web design for mobile browsing, and open REST APIs for exchange to exchange and other trading integrations.



BITIFEX Multilingual support: Our platform will seek to support popular languages to maximize market reach. Additional languages may be enabled based on demand.



BITIFEX Documents and Reports: Our platform will include document generation capabilities and support custom earnings reports to help our users to stay compliant with their local tax laws as they emerge.



BITIFEX Information Hub: Our platform will host an information hub for all the cryptocurrencies that are tradable and will offer user-friendly technologies such as chatbots to provide

them with the information they need.



BITIFEX Architecture

BITIFEX is being built as a distributed and sharded system which, through the use of microservices-based architecture, can be scaled infinitely. Our team has experience in successfully building high throughput, low-latency systems at industrial scale, including experience building industrial internet, IOT and other scalable secure big platform applications, and have patents filed for the same⁵. We plan to utilize this wealth of technical experience and intend to design the BITIFEX exchange to feature low-latency data stores and a caching mechanism to deliver high performance and avoid single points of failure. The BITIFEX UI will be highly responsive and give instant feedback to users. This architecture will be similar to that of Web 2.0 companies such as Google, Amazon, and Facebook that have horizontally scalable systems.

BITIFEX Use of Blockchain

The first version of BITIFEX will be a centralized crypto exchange which will support multiple cryptocurrencies and hence, interact with the blockchain networks of the cryptocurrencies that are supported. In recent times, we have seen an explosion in the crypto space both in terms of cryptocurrencies and tokens. We intend to build a unique abstraction layer for the BITIFEX crypto fulfillment system, which will allow us to quickly add new fiat currencies as well as cryptocurrencies and tokens. This will help us to scale and meet customer demands for new currencies as the ecosystem evolves.

SECURITY POSTURE

Security is of the utmost importance for any successful business. This section provides an overview of how BITIFEX will address security concerns in BITIFEX .

Our highest responsibility as an exchange will be to ensure that we keep the funds of our customers safe and secure from both external and internal malicious attackers and other security threats. We intend to follow industry standard practices to build and operate a secure system. Here are four key foundational practices that we intend to follow to ensure highest security standards:



Secure Development Lifecycle (SDL): Building a secure system does not happen by accident.

There are industry standard best practices that exist which most startups choose to ignore. We believe that the best SDL practices need to be followed as soon as we start development (adding band-aids always leads to issues). Best practices such as threat modeling and STRIDE analysis, static code analysis (SAST), dynamic code analysis (DAST), and penetration testing are just a few of the steps that are part of our development lifecycle. This ensures that we will detect and eliminate any implementation-related security issues during development.



Use Industry-Standard Cryptos / Never Invent Crypto: We intend to use the encryption standards

recommended by NIST publications such as (AES - 256, SHA256 / SHA3) and never use any proprietary encryption schemes. All in-flight data, including internal traffic, will be over encrypted channels. In most crypto-exchange systems, TLS is terminated at the load balancer and the traffic is in clear over the internal network. This, however, presents a higher risk of being impacted by malicious internal applications. Our plan is that:

- All sensitive data at rest will be encrypted using AES-256-bit encryption;
- All data in transit will use TLS 1.2 and our website will be hosted with EV (Extra Validation) certificates;
- All passwords/keys/passphrases will be stored using one-way hashes (SHA3);
- Crypto-wallets will be shared in different geographic regions so that compromise of one region does not expose all the keys;
- We will follow the principle of least privilege:
 - Processes will be run under the least privilege required for them to execute, and
 - Only the ports required for operations will be open.



Operational Security: Attackers look to exploit system vulnerabilities. BITIFEX operations will follow all

the basics such as system hardening (avoiding open ports, avoiding weak/default passwords, patch management, etc.) and no single point of failure, and in addition build an in-depth architecture of defense. We intend to put security measures at every layer of the software, all the way from the network boundary to the VMs and containers where the software runs. This will ensure that even if one layer is breached; it does not result in the loss of sensitive data. We will also keep the majority of funds offline to reduce the risk of being hacked.



Compliance Security: Internal malicious actors are a huge risk in any exchange. The BITIFEX exchange will implement strict security measures to maintain separation of concerns. We also intend to put access and audit controls in place to prevent BITIFEX employees from having unlimited and untracked access to any customer data. Strong audit, tight access control and policy governance will be used to manage the internal risks. All data at rest will be encrypted. Users will be required to have two-factor authentication enabled. Moreover, highly sensitive data will be protected using sharded encryption keys, so no single employee can access the data. BITIFEX is intended to be the most trustworthy exchange in the market. In order to achieve this, we will internally implement policies which are in line with privacy and security regulations such as GLBA, PCI-DSS and ISO-27001. We intend to work aggressively to conduct audits to receive these certifications.

Centralized vs. Decentralized Exchange

The first version of the BITIFEX exchange will be based on a centralized model. At the same time, we will track the growth of DEX (Decentralized Exchanges) (such as IDEX, Oasis DEX, Waves DEX, etc.) because we understand that a decentralized exchange model may have inherent security benefits. In the interest of solving the problems listed in this Whitepaper in an expedient and user-friendly manner, we intend to keep a close watch on the decentralized space and intend to invest in R&D resources to ensure that we realize the value proposition of this technology as it evolves.

COMPLIANCE POLICY

We plan to build a strong foundation with a solid customer identification and verification (Know Your Customer (KYC)) policy to avoid anti-money laundering (AML) and counter-terrorism financing (CTF) related issues to meet local regulatory requirements. There is a growing concern about cryptocurrencies being used for nefarious activities, and as a result, several governments globally have started regulating the Crypto space. As blockchain technology itself is still relatively new, we want to take a conservative approach and implement a robust process that will comply with the local regulations both from an account funding as well as trading perspective. Our policy will protect users and promote transparency to the regulators. This will enable us to make the entire process of buying and selling cryptocurrencies seamless. It will also help all the users to get authentic transaction documents as needed for tax filing purposes.

We plan to enforce funding and withdrawal limits based on the prevailing regulations in Asia. We will also issue annualized realized P&L (Profit and Loss) statements to our customers to facilitate tax filing.

Know Your Customer (KYC)

Basic customer identification and verification procedures are as follows:

1. **No KYC:** For basic exchange usage, for example, real-time quotes and chart information relevant to trading cryptocurrencies.
2. **Basic KYC:** The following documentation would be collected for all users who wish to set up accounts and actively trade and transact on the BITIFEX exchange:

Identity Proof (any one of the below)

- Government issued National ID Card
- Passport
- Voter ID card
- Driver's License
- Any Other Valid Government issued Identity Document

Address Proof (any one of the below)

- Passport/Driver's License
- Utility bill (within the last 3 months)
- Bank Statement with voided check
- Certificate / ID Card issued by Post Office

*eKYC is accepted where available

Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) Policy

Money laundering is defined⁶ as the process where the identity of the proceeds of crime are so disguised that it gives the appearance of legitimate income. Criminals specifically target financial service firms through which they attempt to launder criminal proceeds without the firm's knowledge.

In response to the scale and negative effect of money laundering, many Asian countries have passed legislations designed to prevent money laundering and to combat terrorism.

Our AML and CTF Policies will be designed to meet the Asian AML and CTF legislative obligations, including the need to have adequate systems and controls in place to mitigate the risk of the firm being used to facilitate financial crime. This policy will set out the minimum standards which must be complied with and will include:

1. The appointment of an executive who has sufficient level of seniority and independence to oversee compliance with relevant legislations and regulations, as may be applicable.

⁶International Compliance Association "What is Money Laundering" (n.d.) Retrieved April 25, 2018. <https://www.intcomp.org/careers/a-career-in-aml/what-is-money-laundering>

2. Establishing and maintaining a secure and rigorous process towards assessing and managing the money laundering and terrorist financing risks to BITIFEX .
3. Establishing and maintaining customer identification and verification.
4. Identifying any politically exposed person through name matching against lists of known parties.
5. Monitoring customer transactions against their expected behavior and recorded profile, and red flagging suspicious transactions.
6. Determination of customers' risk in terms of propensity to commit money laundering, terror financing, etc.
7. Data analysis to determine customer behavior.

Users' personal data will be completely secured, encrypted and protected with our technology.

Data Privacy and Security

BITIFEX intends to develop privacy policies and practices that strive to protect the privacy rights of BITIFEX 's users. In order to prevent unauthorized access or disclosure, BITIFEX will put in place suitable physical, electronic and managerial procedures to safeguard and secure user data, which will include, without limitation, the following standards:

1. Data will be stored in a secure computing environment protected by secure firewalls to prevent unauthorized access and only people who need to access the purchaser data will be granted access. All team members of BITIFEX will be provided security training and will be required to adhere to a comprehensive set of security policies, procedures, and standards related to their jobs.
2. When users use secure areas of the BITIFEX exchange, Secure Sockets Layer (SSL) protocol will be used with 256-bit encryption. This means that all the information sent between the user's computers and the BITIFEX secure computer environment will be encrypted so that it cannot be read in transit. Secure areas of the site will have a time-out feature. If users leave a secure session inactive for some time, the site will time-out to prevent unauthorized access.

It is possible that BITIFEX may be required by law, court order, or other legal process to provide information about our customers to outside parties, including for compliance purposes for regimes. It is BITIFEX's policy to ensure adherence to the due process of law in all such instances, and if required to provide information under these circumstances, BITIFEX will, whenever possible, attempt to inform users whose information has been requested, unless prohibited by law.

BITIFEX may also retain copies of personal information to comply with legal obligations, pursuant to the data retention policies, or for such reasonable period as is required to address potential disputes.

Assets

BITIFEX considers all cryptocurrencies to be foreign assets that are being traded based on basic supply and demand. To that extent, we want to ensure that our state-of-the-art technology platform will deliver seamless access to the best and competitive prices, on a global basis, for these cryptocurrencies in Asian fiat majors.

Our platform will be designed to exhibit real-time prices in local fiat for all tradable altcoins and tokens through our web portal as well as mobile applications.

BITIFEX CHAIN

We intend to introduce the BITIFEX Chain, which will be a utility token and is intended to be used as the medium of settlement of transactions within the trading platform. BITIFEX Chain will be used to pay for all fees on the platform – exchange fees, withdrawal fees, listing fees and other fees as applicable.

Revenue Model

All fees are charged in BITX. The revenue model and fee structure are subject to change without prior notice.

Revenue would come from the following sources:

Category	Description
Deposits	Free crypto deposits. Incoming wires will be charged a nominal fee based on the banks involved. Major fiat currencies (USD/GBP/AUD/JPY/SGD/CAD/EUR) will be accepted.
Trades	BITIFEX will charge 0.2% per trade. Other variations might be later introduced but BITIFEX plans to have a cap of 0.2% per trade. For example, if there is a trade in BTC, the 0.2% of the transaction will be charged as fee in BITX, which enforces auto conversion of equivalent BTC to BITIFEX
Withdrawals	All crypto withdrawals will be charged nominal gas fees. Wire fees will be additional. Repatriation only with adequate documentation meeting local banking norms.

Listing Fee	BITIFEX will selectively list coins/tokens and other assets and will charge for the listing
Margin Fee	Margin trading interest charges per market norms.

BITX Usage Fee Structure

The trading fee structure using BITX will be very competitive. When trading with BITX, there will be only a flat 0.1% fee, which is a 50% discount on each trade, during the first year. This fee will be one of the lowest fees in the industry. This coin will have the usability to pay any kind of fee incurred on the exchange. If a user pays using BITX, the user will receive a 50% discount on these fees during the first year, a 25% discount in the second year, and a 10% discount the third year. BITIFEX will also offer exchange users a one-of-a-kind special offer. Exchange users who hold 750,000 or more BITX in their account will not be charged any fee for trading. These holding numbers are subject to change and will be reviewed and revised after 1 year of platform launch with respect to special offer participation numbers and market conditions. We aim for the BITIFEX exchange to eventually become a decentralized exchange as and when the technological capabilities support such a transformation. At that time, BITX will be used as one of the key base assets as well as gas to be spent.

Token Sale Model

Maximum Cap: Overall US \$10 Million

Presale: \$2 Million Crowdsale; \$8 Million (Pegged at 1 ETH = \$800)

Token Name: BITX

Standard: Ethereum ERC20

Total Token Supply: 22,999,888,777 BITX of which:

- **20,000,000,000** to be sold in the token sale.
- **400,000,000** to be retained as BITIFEX reserves for allocation to founders, team, advisors, data providers and other partners and released for purchase from time to time depending on demand. Maximum of 16% (160,000,000) will be allocated to founders, executive team and advisors.
- **1,000,000,000** to be allocated for marketing programs during and post crowd sale.
- **65,714,286** to cover the token sale and exchange listing costs.

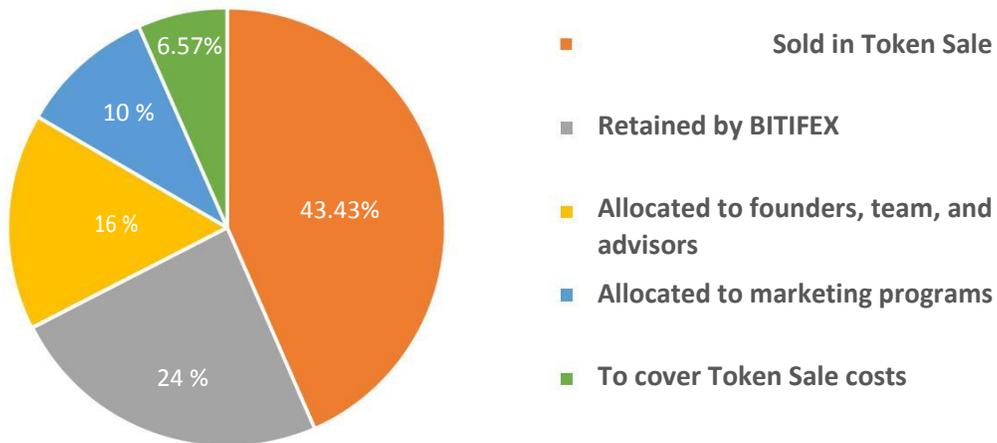
Note:

- BITIFEX reserves are locked up for a period of 8 calendar months, commencing from May 2018, and may be released in phases only after the completion of the aforementioned 8 months' period.

Further, no more than 25% of the total tokens issued by BITIFEX pursuant to the BITX sale may be transferred/released by BITIFEX, from its holdings, in any calendar year.

- Anything remaining from the aforementioned allocations shall be moved into the BITIFEX reserves.

Allocation of Tokens



Sale of tokens shall be limited to ensure that token holders can be serviced appropriately and are able to derive maximum utility from the BITIFEX exchange.

Purchase of Tokens

Token Price: 1 BITX = 0.00003125 ETH

Minimum Purchase: 3200 BITX or 0.1 ETH

Key Dates

Pre-Sale Announcement Release Date: 14-May-2018

Pre-Sale End Date: 21-May-2018

Token Sale Release Date: 11-June-2018

Token Sale End Date: 11-July-2018

Resale/Exchange Trading of BITIFEX 's: August 2018

Bonuses

Presale Only: 42%

Main Token Sale (from June 11 2018): Early

Bird Bonus: 10% for the first 48 hours

Volume Bonus:

BITIFEX 's Bought	Bonus %	Bonus BITIFEX 's
100,000	5%	5,000
500,000	10%	50,000
1,000,000	15%	150,000
2,400,000	20%	480,000
3,200,000	25%	800,000

Note: To enquire about purchases above 4,000,000 BITIFEX Coins, kindly write to us at support@BITIFEX.io

THE RIGHTS OF BITIFEX AND BITX HOLDERS

BITIFEX Pte Ltd (BITIFEX)

BITIFEX Pte Ltd (BITIFEX) is a private company incorporated under the applicable law of Singapore (“Singapore Law”).

BITX-holders

An BITX-holder is not a shareholder of BITIFEX Pte Ltd and does not have rights under the Singapore Law as such.

BITX-holders are not entitled to any right or interest in or to shares of BITIFEX , have no rights to appoint or remove the board of directors of BITIFEX , as applicable, and have no right to participate in the day to day operations of BITIFEX . BITX confer no governance rights of any kind with respect to BITIFEX and all decisions involving BITIFEX will be made by the board of directors of BITIFEX . BITX-holders are not entering into a partnership or trust relationship with BITIFEX , directors, shareholders, employees or agents and BITX do not represent a debt or equity interest in or to BITIFEX .

Variation of offering terms

Subject to applicable law, BITIFEX may amend this Whitepaper without the approval of BITX-holders, to vary the offering terms in any of the following ways:

- (a) by making any change that, in the opinion of the directors of BITIFEX , will not adversely affect the BITX-holders in any material respect; or
- (b) by making a change that is necessary or desirable to satisfy any requirements, conditions or guidelines contained in any opinion, directive, order, statute, ruling or regulation of any relevant regulator, court of competent jurisdiction, government or government entity, including any tax authority, provided that such change is made in a manner that minimises, to the extent practicable, any adverse effect on the BITX-holders; or
- (c) by making any change that the directors of BITIFEX consider may or is likely to adversely affect the BITX-holders in a material respect, provided that any such amendment does not become effective until after the affected BITX-holders have been given written notice of the change as of a date that is prior to the effective date of the amendment.

The company may enter into side letters with certain prospective or existing BITX-holders whereby such BITX-holders may be subject to terms and conditions that are more advantageous than those set out in this Whitepaper. Such terms and conditions may, for example, provide for: special rights to

make future participation in BITIFEX ; special BITX return rights, a reduction or rebate in fees and/or other terms; rights to receive reports in relation to BITIFEX on a more frequent basis and such other rights as may be agreed with such BITX-holders. The modifications are solely at the discretion of the directors of BITIFEX and may, among other things, be based on the size of the relevant BITX-holder's participation, an agreement by the BITX-holder to maintain such participation for a significant period of time, or other commitment by the BITX-holder.

Indemnification

The BITX Sale Terms include a broad indemnity from every user in favour of BITIFEX . By agreeing to the Token Sale Agreement, each user indemnifies and holds harmless BITIFEX and its directors, members, partners, shareholders, officers, employees, agents and affiliates (collectively, the **Indemnified Parties**) against any loss of any nature whatsoever arising to any of them as a result of any of them acting upon instructions given in relation to any BITX purchased by the user.

In addition, every user indemnifies and holds harmless the Indemnified Parties against any loss arising as a result of a delay or failure to process its application for BITX return request if the user has failed to provide such evidence as is required by such parties to satisfy any applicable law (including anti-money laundering laws and regulations).

Finally, the Token Sale Agreement include certain other exculpation and indemnity provisions from the user in favour of BITIFEX and its directors, members, partners, shareholders, officers, employees, agents and affiliates in connection with actions, inactions or omissions, that such parties may take in relation to: (a) BITX transferred in breach of the transfer restrictions; (b) data protection in relation to the user's Client Information; (c) tax exchange information, and it is vital that each user and prospective user reads, understands, acknowledges and accepts such provisions including taking independent legal advice.

CONTACT US

For more information, contact SUPPORT@BITIFEX.IO

ADDITIONAL TERMS AND CONDITIONS

Disclaimer of Liability

To the maximum extent permitted by the applicable laws, regulations and rules, BITIFEX shall not be liable for any indirect, special, incidental, consequential or other losses of any kind, in tort, contract or otherwise (including but not limited to loss of revenue, income or profits, and loss of use or data), arising out of or in connection with any acceptance of or reliance on this Whitepaper or any part thereof by the users.

No Representations and Warranties

BITIFEX does not make or purport to make, and hereby disclaims, any representation, warranty or undertaking, in any form whatsoever, to any entity or person, except as specifically set forth under this Whitepaper.

No Advice

No information in this Whitepaper should be considered or construed to be investment, business, legal, financial or tax advice regarding the BITIFEX exchange and the BITX sale. Users should consult their own legal, financial, tax or other professional adviser regarding the BITIFEX exchange, the BITX and its businesses and operations. Users should make their own investigations, including evaluation of the merits and risks involved. Users should be aware that they may be required to bear the financial risk of any purchase of BITX for an indefinite period of time.

No Further Information or Update

No person has been or is authorized to give any information or representation not contained in this Whitepaper in connection with BITIFEX and its business and operations, the BITIFEX exchange and the BITX sale and, if given, such information or representation must not be relied upon as having been authorized by or on behalf of BITIFEX.

The BITX sale shall not, under any circumstances, constitute a continuing representation or create any suggestion or implication that there has been no change, or development, reasonably likely to involve a material change in the affairs, conditions and prospects of BITIFEX, or in any statement of fact or information contained in this Whitepaper, since the date hereof.

Restrictions on Distribution and Dissemination of Whitepaper

The distribution or dissemination of this Whitepaper or any part thereof may be prohibited or restricted by the laws, regulatory requirements and rules of any jurisdiction.

This Whitepaper, any part thereof and any copy thereof must not be taken or transmitted to any country where distribution or dissemination of this Whitepaper is prohibited or restricted. In the case where any restriction applies, the users are to inform themselves about, and to observe, any restrictions which are applicable to their possession of this Whitepaper or such part thereof (as the case may be) at their own expense and without liability to BITIFEX.

Persons to whom a copy of this Whitepaper has been privately distributed or disseminated, provided access to, or who otherwise have the Whitepaper in their possession, shall not circulate it to any other persons, reproduce or otherwise distribute this Whitepaper or any information contained herein for any purpose whatsoever nor permit or cause the same to occur.

Restriction on Sale

Sale of BITX is not available to residents of any country where laws or restrictions conflict with financial security and/or regulatory compliance rules.

Tax Implications

BITIFEX makes no representations concerning the tax implications of the sale of BITX or the possession or use of BITX. Users bear the sole responsibility to determine if the purchase BITX or any cryptocurrencies or the potential appreciation or depreciation in their value has tax implications in their jurisdiction. BITIFEX will not be liable for any tax liability associated with or arising from the users' purchase, possession or use of BITX.

Representations and Warranties by Users

This Whitepaper is solely for users' information and may not be reproduced, disclosed or distributed to any other person, unless authorized by BITIFEX. By accessing and/or accepting possession of any information in this Whitepaper or such part thereof (as the case may be), or acting on it, users represent and warrant to BITIFEX and agree to be bound by the disclaimers, limitations and restrictions described herein, and in addition to the following:

- (a) users agree and acknowledge that the BITX do not constitute securities in any form in the jurisdiction of which they are a citizen, resident (tax or otherwise) or permanent residency holder;
- (b) users agree and acknowledge that this Whitepaper does not constitute a prospectus or offer document of any sort and is not intended to constitute an offer of securities or a solicitation for investment in securities which is registered with the appropriate regulatory authorities in the jurisdiction of which they are a citizen, resident (tax or otherwise) or permanent residency holder;
- (c) users agree and acknowledge that no regulatory authority has examined or approved of the information set out in this Whitepaper, no action has been or will be taken under the laws, regulatory requirements or rules of any jurisdiction, and the publication, distribution or dissemination of this Whitepaper to the users does not imply that the applicable laws, regulatory requirements or rules of the jurisdiction of which they are a citizen, resident (tax or otherwise) or permanent residency holder have been complied with;

- (d) users agree and acknowledge that the distribution or dissemination of this Whitepaper, any part thereof or any copy thereof, or acceptance of the same by the users is not prohibited or restricted by the applicable laws, regulations or rules in their jurisdiction, and where any restrictions in relation to possession are applicable, the users have observed and complied with all such restrictions at their own expense and without liability to BITIFEX;
- (e) users agree and acknowledge that purchase of BITX is not to be interpreted, classified or treated as:
 - (i) any kind of currency other than cryptocurrency;
 - (ii) debentures, stocks or shares issued by any person or entity;
 - (iii) rights, options or derivatives in respect of such debentures, stocks or shares;
 - (iv) units in a collective investment scheme;
 - (v) derivatives of units in a business trust;
 - (vi) units in a business trust; or
 - (vii) any other security or class of securities;
- (f) users have a basic degree of understanding of the operation, functionality, usage, storage, transmission mechanisms and other material characteristics of cryptocurrencies, blockchainbased software systems, cryptocurrency wallets or other related token technology and mechanisms;
- (g) users are fully aware and understand that in the case where they wish to purchase any BITX, there are risks associated with BITIFEX and its business and operations, the BITIFEX Coin sale;
- (h) users agree and acknowledge that BITIFEX is neither liable for any indirect, special, incidental, consequential or other losses of any kind, in tort, contract or otherwise (including but not limited to loss of revenue, income or profits, and loss of use or data), arising out of or in connection with any acceptance of or reliance on this Whitepaper or any part thereof by the users; nor liable for rights under a contract for differences or under any other contract the purpose or pretended purpose of which is to secure a profit or avoid a loss;
- (i) users are competent to contract, i.e., in case of individuals, they are over eighteen (18) years of age, and in case of legal entities, they are duly authorized by such legal entity to act on its behalf;
- (j) users agree to not use the BITIFEX exchange and the BITX in support any criminal activity, in contravention of criminal and international laws, illegal activities or acts contrary to principles of morality; and
- (k) all of the above representations and warranties are true, complete, accurate and non-misleading from the time of users' access to and/or acceptance of possession this Whitepaper or such part thereof (as the case may be).

Country Specific Disclaimers And Restrictions

The BITX are not intended to constitute securities in any jurisdiction. However, in the event a securities regulator was to take a contrary view that the BITX constitute securities, this offering is also intended to qualify for exemption from registration in certain jurisdictions where this offer may be made.

The distribution of this Whitepaper, the Token Sale Agreements generally and the offering or purchase of BITX, may be restricted in certain jurisdictions and are not permitted within any jurisdiction specifically identified as a “**Restricted Jurisdiction**” by BITIFEX . As per the current version of the Whitepaper, all jurisdictions which do not form a part of the Appendix (see below) shall be considered as Restricted Jurisdictions. More specifically any jurisdiction will be deemed to be a Restricted Jurisdiction if in such jurisdiction the BITX qualify as a security which renders such BITX or BITIFEX itself subject to regulation in that jurisdiction or where the BITX or BITIFEX is otherwise subject to legislation triggering prospectus, maintenance of capital, asset backing or any other regulatory requirements, provided that this list may be varied by BITIFEX by publication on its website.

The distribution or receipt of this Whitepaper and the Token Sale Agreement generally do not constitute an invitation to any recipient thereof to subscribe for BITX in or from any jurisdiction where it is necessary for BITIFEX to comply with some registration or other legal requirement either: (i) to make that invitation lawful; or (ii) to make the use of the Token Sale Agreement lawful. No such recipient may treat this Whitepaper and/or the Token sale terms generally as an invitation to subscribe for BITX. No such recipient may themselves use, promote or distribute this Whitepaper or the Token sale terms generally. No such recipient is an **Eligible Purchaser** (defined below) for the purposes of this Whitepaper.

An Eligible Purchaser means a person to whom BITIFEX can lawfully make an invitation to subscribe for the BITX without compliance with any registration or other legal requirements, who is able to acquire and hold the BITX without breaching the law or requirements of any country, regulatory body or government authority and who satisfies such eligibility requirements as may be determined by the directors of BITIFEX from time to time, including as set forth above and for the avoidance of doubt shall not include any person in a Restricted Jurisdiction;

This Whitepaper and the Token Sale Agreement generally do not constitute an offer or solicitation:

by anyone in a jurisdiction in which such offer or solicitation is not lawful or in which the person making such offer or solicitation is not qualified to do so;

to anyone to whom it is unlawful to make such offer or solicitation or where the acquisition of, holding of and/or disposal of BITX is restricted, regulated or otherwise unlawful in any way whatsoever by the regulations and laws of the jurisdiction to which they are subject (and for the avoidance of doubt no such person is an Eligible Purchaser for the purposes of this Whitepaper); or

to anyone where the regulations and laws of the jurisdiction to which they are subject would operate to impose regulatory compliance or other obligations on BITIFEX by virtue of their acquisition of, holding of

and/or disposal of BITX (and for the avoidance of doubt no such person is an Eligible Purchaser for the purposes of this Whitepaper).

It is the responsibility of every person in possession of this Whitepaper and the Token Sale Terms generally and every person wishing to apply for BITX to:

inform himself, herself or itself of, and to observe all applicable laws and regulations of, any relevant jurisdiction;

take independent legal and tax advice with respect to their prospective acquisition of, holding of and/or disposal of BITX;

confirm that the acquisition of, holding of and/or disposal of BITX is not restricted, regulated or otherwise unlawful in any way whatsoever by the regulations and laws of the jurisdiction to which they are subject; and

confirm that the regulations and laws of the jurisdiction to which they are subject do not operate to impose regulatory compliance or other obligations on BITIFEX by virtue of their acquisition of, holding of and/or disposal of BITX.

Please review the various jurisdiction specific, general selling restrictions, set out in the [Appendix](#).

Risks and Uncertainties

Project Risks

Prospective purchasers of BITX and users of the BITIFEX exchange should carefully consider all the risks and uncertainties associated with the BITX and Platform and evaluate all the information set out in this Whitepaper prior to any purchase of BITX. If any of such risks and uncertainties develop into actual events, the inherent utility of the BITX and the BITIFEX exchange could be materially and adversely affected.

Below are some illustrative risks associated with this BITIFEX exchange and Coin sale. This list is not meant to be exhaustive as the market and regulatory environment are quickly evolving.

Security Risk

Our solution involves the collection, storage and transmission of our users' confidential and proprietary information, including personal or identifying information, as well as financial data. Unauthorized access or security breaches could result in the loss of information and utility, litigation, indemnity obligations and other liability. If our security measures are breached, or unauthorized access to the data of our users' is otherwise obtained, our solution may not be perceived as being secure, users may reduce the use of or stop using our solution adversely affecting the utility of the BITIFEX exchange.

Blockchain-based Market

The Blockchain-based market is not as mature as the market for on-premise enterprise software, and it is uncertain whether Blockchain-based market will achieve and sustain high levels of demand and market acceptance. If the Blockchain-based market develops slower than BITIFEX expects or declines, our utility may slow or stall, and the BITIFEX exchange could be adversely affected.

Blockchain-based Solution Volatility

The BITIFEX products are very complex and may contain undetected defects or errors. The BITIFEX products are often used in connection with large-scale computing environments with different operating systems, system management software, equipment and networking configurations, which may cause errors or failures of products, or other aspects of the computing environment into which our products are deployed. Real or perceived errors, failures, or disruptions in the BITX and BITIFEX exchange could adversely affect our users' satisfaction with our solutions and/or our industry reputation and the BITIFEX exchange utility could be harmed.

Limited Operating History

BITIFEX is at the development stage with little or no operating history and only nominal capital. Additionally, though the BITIFEX management team has varied and extensive business backgrounds and technical expertise, they have limited prior experience operating a cryptocurrency trading platform. Because of the limited operating history, it is difficult to evaluate our future prospects. BITIFEX may encounter risks and difficulties and, in order to overcome these risks and difficulties, BITIFEX intends to:

- Execute its business plan and marketing strategy successfully;
- Attract participants to ensure adequate market liquidity;
- Provide a secure and stable platform and provide quality services;
- Leverage initial relationships with its market participants;
- Provide and implement adequate security procedures and safeguards; and
- Attract, hire, motivate and retain qualified personnel.

If these objectives are not achieved, BITIFEX may not realize sufficient success.

No Assurance of Profitability

BITIFEX has not yet generated revenues. There can be no assurance that BITIFEX will be profitable.

BITX

Absence of Rights

The BITX does not grant any rights, explicit or implied, in BITIFEX. The BITX is not a tool for owning any assets of BITIFEX.

Refund or Resale

BITIFEX is not obliged to redeem the BITX, or to otherwise refund their holders, for whatever reasons. BITX' value upon resale is not and will not be guaranteed, including their inherent value. Aside from that, a resale may be limited by laws and regulations that differ from the laws and regulations applicable to the BITX holder. Further, the resale market for BITX may not be active.

Blockchain and Software

Processing of Blockchain

In blockchains, block production can occur at arbitrary times, so there is a risk of untimely performance. The user should be aware of this and consider its probability. The blockchains may not process a transaction at the exact moment user expects it, and user may not receive BITX on the same day that it completes the necessary action.

Network Overload

The blockchain networks are subject to congestion, and transactions can be lost or delayed. Individuals and groups can deliberately cause congestion of our entire network to try and gain an advantage.

Functionality

The BITIFEX exchange may become obsolete or lose relevance due to the fast pace of innovations.

Failure to Protect Intellectual Property

Software occasionally contains or may subsequently contain errors or vulnerabilities, some of which may only be discovered after the product or service has been released. Any errors or vulnerabilities discovered in the BITIFEX 's code after release could result in damage to its product, reputation or loss of market participants, any of which could adversely impact BITIFEX's business and operating results.

Third parties may infringe or misappropriate BITIFEX's proprietary technologies or other intellectual property rights, and its trade secrets may be vulnerable to disclosure of misappropriation by employees, contractors and other persons. Various parties may challenge, invalidate or circumvent any patents, trademarks and other intellectual property rights BITIFEX may have, or later acquire. In addition, litigation may be necessary to enforce BITIFEX's intellectual property rights, protect its trade secrets or determine the validity and scope of the proprietary rights of others.

Security

Lost Private Keys

BITX may be stored in a digital wallet or other storage requiring a digital key (or combination of keys). The loss of keys associated with a digital wallet or storage, will result in the loss of access to their balances. Additionally, a third party may get access to the private keys from the holder's wallet or storage, and, consequently, access to the BITX they contain. BITIFEX is not liable for any such losses.

BITIFEX Infrastructure Security

Hackers or other bad actors may try to intervene in the BITIFEX exchange, or otherwise interfere with aspects of how BITIFEX functions. These may include malware attacks, denial-of-service attacks and other digital disruptions.

BITIFEX aims to be highly secure and rapidly scalable and shall use commercially reasonable efforts to make the BITIFEX exchange secure from malicious attacks and prevent loss of funds thereby. However, we cannot guarantee that it shall be resistant to all attacks that can be launched or envisaged against a crypto exchange.

Cryptocurrency Wallet Incompatibility

A wallet or cryptocurrency storage system used by the holder must be technically compatible with the BITX. Failure to use a compatible technology may result in the BITX holder not gaining access to their BITX.

BITIFEX Development

Team Dependency

This project exists as a result of the efforts of the BITIFEX management team, who are responsible for maintaining the competitiveness of the ecosystem. To lose members of the management team (or to fail to attract and retain additional staff) could have a significant adverse impact on BITIFEX. The competition for staff with relevant experience is high due to the small number of qualified specialists. This shortage of personnel seriously affects the ability to attract additional qualified management, which may have a significant negative impact on BITIFEX.

Application of proceeds

The BITIFEX management team has discretion in the application of proceeds of the BITX sale in the event new opportunities arise or if circumstances change. The decisions of the management team may not always be beneficial or profitable.

Third-Party Dependency

In the event that BITIFEX works with multiple third parties, BITIFEX exerts no control over the actions of the third parties. The utility of the BITIFEX exchange may be severely hampered if there is a failure on the part of the third parties in performing the tasks agreed upon. There is no guarantee that these third parties will do their job properly.

Failure to Manage Growth

Rapid expansion may strain operations, infrastructure, management, internal controls and financial systems, and such strains could adversely impact BITIFEX's ability to provide a stable, liquid market. BITIFEX may not be able to effectively manage the growth or expansion of their business operations. To support growth, BITIFEX intends to hire new employees which may strain BITIFEX's ability to

integrate and properly train these new employees. Inadequate integration and training of employees may result in inefficiencies that may reduce revenues or net income.

Acquisition of Businesses or Products

If appropriate opportunities present themselves, BITIFEX may acquire businesses, technologies, services or products that are believed to be strategically viable. BITIFEX may be unable to integrate them into the existing business, and/or which may impair BITIFEX's financial performance. There are currently no understandings, commitments or agreements with respect to any acquisition, except for those that are necessary to begin operations.

Competition

The market for BITIFEX 's Platform has competition, and as with any industry, such competition could adversely impact BITIFEX 's revenues and net income.

BITIFEX 'S Activities

Conflict of Interest

BITIFEX may be involved in transactions with affiliated entities. Conflicts of interest may arise within BITIFEX or between BITIFEX and affiliated parties. Transactions with related parties may fail to comply with the arm's length principle.

Emerging Markets

BITIFEX may operate in the emerging markets countries subject to high risks, including significant legal, economic and political risks.

Government

Immature Regulatory Framework

Developments in regulations around the world may alter the nature of our utility or restrict the use of crypto assets, crypto exchanges or the operation of a blockchain network upon which we rely in a manner that adversely affects BITIFEX 's utility.

As crypto assets and crypto exchanges have grown in popularity and market size, local governmental authorities and agencies have begun to take an interest in, and in some cases, regulate their use and operation. In the case of cryptocurrencies, regulators have created new frameworks or have published guidance as to how existing regulatory frameworks apply to crypto assets, and cryptocurrencies specifically.

Regulators globally, including, but not limited to, Canada, Germany, Japan, China, Australia and Singapore, have issued some form of guidance regarding their position on initial coin offerings and token sales. Our utility and the use of BITX could be adversely affected by depending on whether and how a given regulatory agency decides to exert authority over a blockchain network or platforms trading crypto assets.

BITIFEX may stop distributing coins, developing the BITIFEX exchange, or its activities in a specific jurisdiction, including allowing for transactions, i.e., purchases, withdrawals and any exchanges by any persons in the event that such actions are found to be illegal, or legislative changes make them economically impractical in any jurisdiction.

Licenses and Permissions

Although, as of the date of publication of this Whitepaper, there are no statutory requirements for the BITIFEX exchange or BITX holders to obtain any licenses or permissions for operations with cryptocurrencies, it may so happen that such requirements be introduced in the future in certain jurisdictions where BITIFEX operates. Regulatory authorities may establish requirements for cryptocurrency traders, including requirements for compliance with various standards, getting licenses, identification, reporting, and the like. In this case, trading in BITIFEX could be suspended for an indefinite period.

State Regulation

BITIFEX operates in a new industry and may be subject to increased supervision and control. Withdrawal or amendment of regulatory authorizations with respect to all or part of the business carried on by BITIFEX or with respect to the fitness and propriety of one or more individuals to perform their current roles (including any of the Directors) might oblige BITIFEX to cease certain operations relating to the business of BITIFEX.

BITIFEX's property and operations are regulated by various public authorities and may be subject to inspections. An inspection may conclude that BITIFEX has violated certain laws, decrees, or regulations, which may not be refutable or rectifiable at the time.

The failure by BITIFEX to obtain prior regulatory authorization in a jurisdiction where it has operated or the refusal of a regulator to grant that authorization in a jurisdiction where it may wish to operate could prevent BITIFEX from maintaining or expanding the BITIFEX exchange. Failure to comply with the applicable laws or orders resulting from the inspections may lead to significant penalties, ranging from fines to administrative or criminal prosecution of BITIFEX's officials.

Actions of Public Authorities

Many public authorities show a high degree of freedom in the ability to take action on the basis of statutory powers of exercise of discretion and judgment. Under the influence of commercial or political considerations, they act selectively, arbitrarily, without prior notice, or in a manner contrary to the law. This creates risks for BITIFEX's operations. Furthermore, such conditions may allow competitors to gain various privileges and preferences from public authorities, equating to direct competitive advantages.

Privacy Concerns

Our applications require the storage and transmission of the proprietary and confidential information of users, including personal or identifying information, as well as financial data. A wide variety of domestic and foreign laws and regulations apply to the collection, use, retention, protection, disclosure, transfer,

disposal and other processing of personal data. These data protection and privacy-related laws and regulations are evolving and may result in regulatory and public scrutiny and escalating levels of enforcement and sanctions. In addition to government regulation, privacy advocates and industry groups may propose new and different self-regulatory standards.

Because the interpretation and application of privacy and data protection laws are still uncertain, it is possible that these laws may be interpreted and applied in a manner that is inconsistent with our existing data management practices or the features of the BITIFEX solution. These legislative and regulatory initiatives may adversely affect the demand for our application. Privacy concerns and laws or other domestic regulations may drive the adoption of the BITIFEX exchange but at the same time may reduce its effectiveness.

IF YOU ARE IN ANY DOUBT AS TO THE ACTION YOU SHOULD TAKE, YOU SHOULD CONSULT YOUR LEGAL, FINANCIAL, TAX OR OTHER PROFESSIONAL ADVISOR(S).

APPENDIX

BITIFEX

SELLING RESTRICTIONS

Restrictions on sales in selected jurisdictions

BITIFEX believes the legends below are applicable and accurate. However, such legends have not been prepared, verified or approved by legal counsel to BITIFEX in each jurisdiction. Please note that terms not defined in this Appendix shall have the meaning ascribed to them in the Whitepaper.

To the extent any of the confidentiality provisions contained in some legends below impose greater confidentiality restrictions than those already imposed herein, such additional confidentiality provisions shall be interpreted to apply only to the extent that such provisions are reasonably necessary to comply with the securities laws of the applicable jurisdiction.

For prospective purchasers of Argentina

No public offering of BITX is being made to investors resident in Argentina. BITX are being offered only to a limited number of institutional investors and sophisticated individual investors capable of understanding the risks of their investment. The National Securities Commission of Argentina has not passed upon the accuracy or adequacy of this Whitepaper or otherwise approved or authorized the offering of BITX to investors resident in Argentina.

For prospective purchasers of Australia

BITIFEX is not, and is not required to be, a registered foreign body corporate in Australia, and this Whitepaper is not a prospectus lodged or required to be lodged with the Australian Securities and Investments Commission. BITX in the BITIFEX will only be offered in Australia to persons to whom such securities may be offered without a prospectus under Chapter 6D of the Corporations Act 2001 (Cth). The BITX subscribed for by investors in Australia must not be offered for resale in Australia for 12 months from allotment except in circumstances where disclosure to investors under the Corporations Act 2001 (Cth) would not be required or where a compliant prospectus is produced. Prospective investors in Australia should confer with their professional advisors if in any doubt about their position.

For prospective purchasers of Austria

BITX may only be offered in the Republic of Austria in compliance with the provisions of the Austrian Capital Market Act, the Austrian Investment Funds Act and other laws applicable in the Republic of Austria governing the offer, issue and sale of the BITX in the Republic of Austria. BITX are being offered exclusively to a limited number of investors in Austria and are therefore not subject to the public offering requirements of the Austrian Capital Market Act or the Austrian Investment Fund Act. BITX are not registered or otherwise authorized for public offer either under the Austrian Capital Market Act, the Austrian Investment Fund Act or any other securities regulation in Austria. The recipients of this Whitepaper and other selling material in respect to BITX have been individually selected and are targeted exclusively on the basis of a private placement. This offer may not be made to any persons other than the recipients to whom this Whitepaper is personally addressed. Any investor intending to offer and resell BITX in Austria is solely responsible that any offer and resale takes place in compliance with the applicable provisions of the Austrian Capital Market Act, the Austrian Investment Fund Act or any other applicable securities regulation.

For prospective purchasers of the state of Bahrain

This offer is a private placement. It is not subject to the regulations of the Central Bank of Bahrain that apply to public offerings of securities and the extensive disclosure requirements and other protections that these regulations contain. This Whitepaper is therefore intended only for financially sophisticated institutional investors in Bahrain. The BITX offered pursuant to this Whitepaper may only be offered in minimum subscriptions of \$250,000 or its equivalent in foreign currencies. The Central Bank of Bahrain assumes no responsibility for the accuracy and completeness of the statements and information contained in this Whitepaper and expressly

disclaims any liability whatsoever arising from reliance upon the whole or any part of the contents of this Whitepaper.

For prospective purchasers of Belgium

BITIFEX has not been and will not be registered with the Belgian Banking, Finance and Insurance Commission (Commissie voor het Bank-, Financie- en Assurantiewezen / Commission Bancaire, Financière et des Assurances) (**CBFA**) as a foreign collective investment institution referred to under Article 127 of the Belgian Act of July 20, 2004 relating to certain forms of collective management of investment portfolios. This Whitepaper and the offering of the BITX have not been and will not be notified to, and have not been approved or disapproved by, the CBFA. The public offering of the BITX in Belgium within the meaning of the Belgian Act of July 20, 2004, and the Belgian Act of June 16, 2006 on the public offering of investment instruments and the admission of investment instruments to listing on a regulated market has not been authorized by BITIFEX. The offering may therefore not be advertised, and the BITX may not be offered, sold, transferred or delivered to, or subscribed to by, and no Whitepaper, information circular, brochure or similar document may be distributed to, directly or indirectly, any individual or legal entity in Belgium, except (i) subject to the restriction of a minimum investment of €250,000 per investor, or (ii) in any other circumstances in which the present offering does not qualify as a public offering in accordance with the aforementioned Act of July 20, 2004. This Whitepaper has been issued to the intended recipient for personal use only and exclusively for the purpose of the offering. Therefore, it may not be used for any other purpose, nor passed on to any other person in Belgium.

For prospective purchasers of Bermuda

BITX may not be marketed, offered or sold directly or indirectly to the public in Bermuda and neither this Whitepaper, which is not subject to and has not received approval from either the Bermuda Monetary Authority or the Registrar of Companies and no statement to the contrary, explicit or implicit, is authorized to be made in this regard, nor any offering material or information contained herein relating to BITX, may be supplied to the public in Bermuda or used in connection with any offer for the subscription or sale of BITX to the public in Bermuda. Bermuda investors may be subject to foreign exchange control approval and filing requirements under the relevant Bermuda foreign exchange control regulations, as well as offshore investment approval requirements.

For prospective purchasers of Brazil

BITIFEX is not listed with any stock exchange, organized over the counter market or electronic system of securities trading. The BITX have not been and will not be registered with any securities exchange commission or other similar authority, including the Brazilian Securities and Exchange Commission (Comissão de valores Mobiliários or the **CVM**). The BITX will not be directly or indirectly offered or sold within Brazil through any public offering, as determined by Brazilian law and by the rules issued by the CVM, including Law No. 6,385 (Dec. 7, 1976) and CVM Rule No. 400 (Dec. 29, 2003), as amended from time to time, or any other law or rules that may replace them in the future.

Acts involving a public offering in Brazil, as defined under Brazilian laws and regulations and by the rules issued by the CVM, including Law No. 6,385 (Dec. 7, 1976) and CVM Rule No. 400 (Dec. 29, 2003), as amended from time to time, or any other law or rules that may replace them in the future, must not be performed without such prior registration. Persons wishing to acquire BITX in Brazil should consult with their own counsel as to the applicability of these registration requirements or any exemption therefrom. Without prejudice to the above, the sale and solicitation of the BITX is limited to qualified investors as defined by CVM Rule No. 409 (Aug. 18, 2004), as amended from time to time or as defined by any other rule that may replace it in the future.

This Whitepaper is confidential and intended solely for the use of the addressee and cannot be delivered or disclosed in any manner whatsoever to any person or entity other than the addressee.

For prospective purchasers of Brunei

This Whitepaper has not been delivered to, licensed or permitted by the Authority as designated under the Brunei Darussalam Mutual Funds Order 2001.

For prospective purchasers of Canada

This Whitepaper is not, and under no circumstances is to be construed as, a public offering of securities or an offering of securities in any jurisdiction in which such offering would be unlawful. No securities commission or similar authority in Canada has in any way passed upon the merits of the BITX offered hereby and any representation to the contrary is unlawful. Persons who will be acquiring BITX pursuant to this Whitepaper will not have the benefit of a review of the material by any securities regulatory authority in Canada.

By accepting their subscription agreements, BITIFEX shall be granting to purchasers in the provinces of Canada, who have received this Whitepaper, a contractual and/or statutory right of action for damages or rescission against BITIFEX if this Whitepaper, or any amendment thereto, contains a misrepresentation.

This right of action is in addition to any other right or remedy available to the shareholder at law.

For prospective purchasers of the Cayman Islands

No offer or invitation to subscribe for BITX may be made to the public in the Cayman Islands, and no BITX may be issued, transferred to, registered in favor of, or beneficially owned by, any person resident or domiciled (other than an exempted or ordinary non-resident company incorporated in the Cayman Islands) in the Cayman Islands.

For prospective purchasers of China

No invitation to offer, or offer for, or sale of, the BITX will be made to the public in China or by any means that would be deemed public under the laws of China. The offer of BITX is personal to the investor to whom this Whitepaper has been addressed by BITIFEX . Business entities incorporated under the laws of China (excluding foreign investment business entities) will apply for approval from the Chinese government authorities before purchasing the BITX. Furthermore, all business entities incorporated under the laws of China and Chinese citizens residing in China will obtain the prior approval from the Chinese foreign exchange authority before purchasing the BITX.

For prospective purchasers of Denmark

In order to invest in BITIFEX , the investor must invest at least €50,000. BITX are being offered to a very limited number of selected Danish investors and therefore no action has or will be taken that would allow an offering of such BITX to the public in Denmark. Further, this Whitepaper has not been and will not be registered with the Danish Financial Supervisory Authority or the Danish Business Authority under the relevant Danish acts and regulations on the offering in Denmark of BITX. Accordingly, this Whitepaper may not be made available nor may BITX otherwise be marketed and offered for sale in Denmark other than in circumstances which are deemed not to be marketing or an offer to the public in Denmark.

For prospective purchasers of Finland

BITX will be offered in Finland exclusively to investors qualifying as **professional investors** as defined under the Finnish Act on Mutual Funds (sijoitusrahastolaki, 29.1.1999, as amended, the **MFA**). Accordingly, prospective investors should acknowledge that this Whitepaper is not a fund prospectus as meant in the MFA and the marketing of BITX is not subject to marketing permission from the Finnish Financial Supervisory Authority (Rahoitustarkastus; **FIN-FSA**). Furthermore, even if BITX were to be construed as **securities** as defined in the Finnish Securities Markets Act (arvopaperimarkkinalaki, 26.5.1989/495, as amended, the **SMA**), based on the exemptions set forth in Decree 452/2005 issued by the Ministry of Finance, the offering of BITX would be exempted from the prospectus requirements of the SMA. Accordingly, prospective investors must acknowledge that this Whitepaper is not a prospectus within the meaning set forth in the SMA. Prospective investors should also note that neither the sponsor of BITIFEX nor any of its affiliates is an investment firm (sijoituspalveluyritys) as meant in the Finnish Investment Firms Act (laki sijoituspalveluyrityksistä, 922/2007, as amended and restated) and they, are not subject to the supervision of the FIN-FSA. The FIN-FSA has not authorized any offering for the subscription of BITX; accordingly, BITX may not be offered or sold in Finland or to residents thereof except as permitted by Finnish law. This Whitepaper has been prepared for private information purposes only and it may not be used for, and shall not be deemed, a public offering of BITX. This Whitepaper is strictly for private use by its holder and may not be passed on to third parties or otherwise distributed publicly.

For prospective purchasers of France

This Whitepaper (including any amendment, supplement or replacement thereto) is not being distributed in the context of a public offering in France within the meaning of Article L. 411-1 of the French Monetary and Financial Code (Code monétaire et financier). This Whitepaper has not been and will not be submitted to the French Autorité des marchés financiers (**AMF**) for approval in France and accordingly may not and will not be distributed to the public in France.

Pursuant to Article 211-3 of the AMF General Regulation, French residents are hereby informed that:

- 1 the transaction does not require a prospectus to be submitted for approval to the AMF;
- 2 persons or entities referred to in Point 2°, Section II of Article L.411-2 of the Monetary and Financial Code may take part in the transaction solely for their own account, as provided

in Articles D. 411-1, D. 411-2, D. 734-1, D. 744-1, D. 754-1 and D. 764-1 of the Monetary and Financial Code; and

- 3 the financial instruments thus acquired cannot be distributed directly or indirectly to the public otherwise than in accordance with Articles L. 411-1, L. 411-2, L. 412-1 and L. 621-8 to L. 621-8-3 of the Monetary and Financial Code.

This Whitepaper is not to be further distributed or reproduced (in whole or in part) in France by the recipients of this Whitepaper. This Whitepaper has been distributed on the understanding that such recipients will only participate in the issue or sale of BITX for their own account and undertake not to transfer, directly or indirectly, BITX to the public in France, other than in compliance with all applicable laws and regulations and in particular with Articles L. 411-1 and L. 411-2 of the French Monetary and Financial Code.

For prospective purchasers of Germany

This Whitepaper has not been and will not be submitted to, nor has it been approved by, the Bundesanstalt für Finanzdienstleistungsaufsicht (the German Financial Services Authority or **BaFin**) and no prospectus has been or will be published in Germany. The BITX have not been registered for public distribution in Germany. Therefore, BITX may be offered and sold or distributed in the territory of the Federal Republic of Germany only if the offer is made to credit and financial services institutions as defined by the German Banking Act (Kreditwesengesetz), public or private insurance companies, investment companies, investment stock corporations and pension funds, including any general partner commissioned by any such entity. This Whitepaper and any other document relating to the BITX, as well as information contained therein, may not be supplied to the public in Germany or used in connection with any offer for subscription or sale of the BITX to the public in Germany. This Whitepaper and other offering materials relating to the offer of the BITX are strictly confidential and may not be distributed to any person or entity other than the recipients hereof.

For prospective purchasers of Greece

Neither BITIFEX nor this Whitepaper has been, or is intended to be, registered with and approved by the Greek Capital Market Committee. The BITX are therefore not eligible for advertising, placement or public circulation in Greece. The information provided in this Whitepaper is not an offer, or an invitation to make offers, to sell, exchange or otherwise transfer BITX in Greece to or for the benefit of any Greek person or entity. This Whitepaper is not to be distributed or reproduced, in whole or in part, in Greece by the recipients of this

Whitepaper. This Whitepaper has been distributed on the understanding that its recipients will only participate in the issue of the BITX outside of Greece on their own account and undertake not to transfer, directly or indirectly, the BITX to the public in Greece.

For prospective purchasers of Guernsey

BITIFEX is a Cayman Islands exempted company and has not been authorized by the Guernsey Financial Services Commission under the Protection of Investors (Bailiwick of Guernsey) Law, 1987, as amended. Accordingly, any marketing material or prospectus in relation to BITIFEX may not be circulated within the Bailiwick of Guernsey, and there should be no onward distribution of the same.

For prospective purchasers of Hong Kong

Warning

The contents of this document have not been reviewed or approved by any regulatory authority in Hong Kong. You are advised to exercise caution in relation to the offer. If you are in any doubt about any of the contents of this document, you should obtain independent professional advice.

This Whitepaper does not constitute an offer or invitation to the public in Hong Kong to acquire BITX. Accordingly, unless permitted by the securities laws of Hong Kong, no person may issue or have in its possession for the purposes of issue, this Whitepaper or any advertisement, invitation or document relating to the BITX, whether in Hong Kong or elsewhere, which is directed at, or the contents of which are likely to be accessed or read by, the public in Hong Kong other than in relation to BITX which are intended to be disposed of only to persons outside Hong Kong or only to **professional investors** (as such term is defined in the Securities and Futures Ordinance of Hong Kong (Cap. 571) (the **SFO**) and the subsidiary legislation made thereunder) or in circumstances which do not result in this Whitepaper being a **prospectus** as defined in the Companies Ordinances of Hong Kong (Cap. 32) (the **CO**) or which do not constitute an offer or an invitation to the public for the purposes of the SFO or the CO. The offer of the BITX is personal to the person to whom this Whitepaper has been delivered by or on behalf of BITIFEX, and a subscription for BITX will only be accepted from such person. No person to whom a copy of this Whitepaper is issued may issue, circulate or distribute this Whitepaper in Hong Kong or make or give a copy of this Whitepaper to any other person. You are advised to exercise caution in relation to the offer. If you are in any doubt about any of the contents of this Whitepaper, you should obtain independent professional advice.

For prospective purchasers of Iceland

This Whitepaper has been issued to the recipient, for personal use only, exclusively in connection with a private placement of BITX. Accordingly, this Whitepaper may not be used by the recipient for any other purpose nor forwarded to any other person or entity in Iceland. The offering of BITX described in this Whitepaper is a private placement under Icelandic law and the BITX may only be offered and sold (as well as resold) in Iceland to institutional investors as provided under the Icelandic Act on Undertakings for Collective Investments in Transferable Securities (**UCITS**) and Investment Funds No. 30/2003 (the **UCITS Act**) and a limited number of non-institutional investors resident in Iceland. Also, any subsequent transfer or resale of BITX in Iceland will need to comply with the applicable provisions of the UCITS Act. Prospective Icelandic investors should consult with their own tax advisors as to the tax consequences of an investment.

For prospective purchasers of Indonesia

This numbered Whitepaper is for the exclusive use of the person named on the front cover of this Whitepaper. If the number on the front cover of this Whitepaper does not appear in red, there is a presumption that this Whitepaper has been improperly reproduced and circulated, in which case BITIFEX and its affiliates disclaim any responsibility for its content or use. This Whitepaper may not be photocopied, reproduced or distributed, in whole or in part, to any other person at any time. Distribution of this Whitepaper to any person other than in compliance with the terms of this Whitepaper is unauthorized. If the offeree does not proceed with the transaction or if it is so requested, it will return this Whitepaper to BITIFEX promptly. BITX will not be offered or sold, directly or indirectly, in the Republic of Indonesia or to Indonesian citizens, nationals or corporations, wherever located, or entities or residents in Indonesia in a manner which constitutes a public offering of the BITX under the laws and regulations of Indonesia.

For prospective purchasers of Ireland

This Whitepaper and the information contained herein are private and confidential and are for the use on a confidential basis only by the persons to whom such material is addressed. This Whitepaper may not be reproduced, redistributed or passed on to any other person or published in whole or in part for any purpose. The offering of the BITX is being extended to a small number of persons resident in Ireland by way of private placement. This Whitepaper does not constitute an invitation to the public in Ireland, or any section thereof, to subscribe for or purchase any BITX or other securities in any company, and accordingly is not a prospectus within the meaning of the Prospectus Directive Regulations. This Whitepaper does not constitute

an offer or solicitation to anyone other than the addressee and does not constitute a facility for participation by the public in Ireland within the meaning of the Unit Trusts Act, 1990.

For prospective purchasers of Israel

The BITX described in this Whitepaper have not been registered and are not expected to be registered under the Israeli Securities Law - 1968 (the **Securities Law**) or under the Israeli Joint Investment Trust Law - 1994. Accordingly, the BITX described herein will only be offered and sold in Israel to qualified investors described in Section 15A(b)(1) of the Securities Law. If any recipient in Israel of a copy of this Whitepaper is not qualified as such, such recipient should promptly return this Whitepaper to BITIFEX . Neither BITIFEX nor its directors and/ or shareholders are a licensed investment advisor under the Securities Law for the Regulation of Provision of Investment Advice, Marketing Investments and Portfolio Management - 1995 and BITIFEX does not maintain insurance as required under such law. Any investment advice which may be deemed provided under Israeli law in connection an investment is a one-time occurrence and BITIFEX will not provide any ongoing investment advisory services to the investor.

For prospective purchasers of Italy

BITIFEX is not a UCITS fund. The offering of the BITX in Italy has not been nor will it be authorized by the Bank of Italy and the Commissione Nazionale per le Società e la Borsa (**CONSOB**). The BITX are offered upon the express request of the investor, who has directly contacted BITIFEX or its sponsor on the investor's own initiative. No active marketing of BITIFEX has been made nor will it be made in Italy, and this Whitepaper has been sent to the investor at the investor's unsolicited request. The investor acknowledges and confirms the above and hereby agrees not to sell or otherwise transfer any BITX or to circulate this Whitepaper in Italy unless expressly permitted by, and in compliance with, applicable law.

For prospective purchasers of Japan

BITX are a security set forth in Article 2, Paragraph 2, Item 6 of the Financial Instruments and Exchange Law of Japan (the **FIEL**). No public offering of BITX is being made to investors resident in Japan and in accordance with Article 2, paragraph 3, Item 3, of the FIEL, no securities registration statement pursuant to Article 4, paragraph 1, of the FIEL has been made or will be made in respect to the offering of BITX in Japan. The offering of BITX in and investment management for BITIFEX in Japan is made as **Special Exempted Business for Qualified Institutional Investors, etc.** under Article 63, Paragraph 1, of the FIEL. Thus, BITX are being offered only to a limited number of investors in Japan. Neither BITIFEX nor any of its affiliates is or

will be registered as a **financial instruments firm** pursuant to the FIEL. Neither the Financial Services Agency of Japan nor the Kanto Local Finance Bureau has passed upon the accuracy or adequacy of this Whitepaper or otherwise approved or authorized the offering of BITX to investors resident in Japan.

For prospective purchasers of Jersey

No public offering of BITX is being made to investors resident in Jersey. BITX are being offered only to a limited number of institutional and sophisticated individual investors in Jersey.

For prospective purchasers of Kuwait

The BITX have not been licensed for offering in Kuwait by the Ministry of Commerce and Industry, the Kuwait Central Bank or any other relevant Kuwaiti governmental agency. The offering of the BITX in Kuwait on the basis of a private placement or public offering is, therefore, restricted in accordance with Decree Law No. 31 of 1990, as amended, and Ministerial Order No. 113 of 1992, as amended. No private or public offering of the BITX is being made in Kuwait, and no agreement relating to the sale of the BITX will be concluded in Kuwait. No marketing or solicitation or inducement activities are being used to offer or market the BITX in Kuwait.

For prospective purchasers of Luxembourg

No public offering of the BITX is being made to investors resident in Luxembourg. The BITX are being offered only to a limited number of sophisticated and professional investors in Luxembourg. The Commission de Surveillance du Secteur Financier of Luxembourg has not passed upon the accuracy or adequacy of this Whitepaper or otherwise approved or authorized the offering of the BITX to investors resident in Luxembourg.

For prospective purchasers of Malaysia

The offering made under this Whitepaper does not constitute and should not be construed as constituting an offer or invitation to subscribe for or purchase any securities in Malaysia. BITIFEX, by the dispatch of this Whitepaper, has not made available any securities for subscription or purchase in Malaysia. This Whitepaper is distributed in Malaysia for information purposes only. This Whitepaper does not constitute, and should not be construed as offering or making available any BITX for purchase in Malaysia.

For prospective purchasers of Mexico

The offering made pursuant to this Whitepaper does not constitute a public offering of securities under Mexican law and therefore is not subject to obtaining the prior authorization of the Mexican National Banking and Securities Commission or the registration of BITX with the Mexican National Registry of Securities.

For prospective purchasers of the Netherlands

**Attention! This investment falls outside AFM supervision.
No license and no prospectus required for this activity.**



Where an offer is made exclusively to qualified investors within the meaning of section 1:1 of the Dutch Act on Financial Supervision (Wet op het financieel toezicht), the directors are not under an obligation to have the offering Whitepaper approved by the Dutch Authority for the Financial Markets or by a competent authority of another member state of the European Economic Area in accordance with Prospectus Directive 2003/71/EC and Prospectus Regulation 809/2004/EC.

For prospective purchasers of New Zealand

No public offering of the BITX is being made to investors in New Zealand. The BITX are being offered to investors in New Zealand pursuant to exemptions from the prospectus requirements under the Securities Act of 1978. The New Zealand Securities Commission has not passed upon the accuracy or adequacy of this Whitepaper or otherwise approved or authorized the offering of the BITX to investors resident in New Zealand.

For prospective purchasers of Norway

This Whitepaper does not constitute an invitation or a public offer of securities in the Kingdom of Norway. It is intended only for the original recipient and is not for general circulation in the Kingdom of Norway. The offer herein is not subject to the prospectus requirements laid down in the Norwegian Securities Trading Act. This Whitepaper has not been nor will it be registered with or authorized by any governmental body in Norway.

For prospective purchasers of Oman

This Whitepaper, and the BITX to which it relates, may not be advertised, marketed, distributed or otherwise made available to the general public in Oman. In connection with the offering of the BITX, no prospectus has been registered with or approved by the Central

Bank of Oman, the Oman Ministry of Commerce and Industry, the Oman Capital Market Authority or any other regulatory body in the Sultanate of Oman. The offering and sale of the BITX described in this Whitepaper will not take place inside Oman. The BITX are being offered on a limited private basis, and do not constitute marketing, offering or sales to the general public in Oman. Therefore, this Whitepaper is strictly private and confidential, and is being issued to a limited number of sophisticated investors, and may neither be reproduced, used for any other purpose, nor provided to any other person than the intended recipient hereof.

For prospective purchasers of Portugal

This offering is addressed only to institutional investors, as so qualified pursuant to the Portuguese Securities Code (Decree Law 486/99 dated November 13, 2000, as amended), and a limited number of identified investors, and does not qualify as marketing of participation units in undertakings for collective investments, as per Article 1 No. 3 ex vi Article 15 of the Undertakings for Collective Investment Law.

For prospective purchasers of Qatar

The BITX described in this Whitepaper have not been offered, sold or delivered, and will not be offered, sold or delivered at any time, directly or indirectly, in the State of Qatar in a manner that would constitute a public offering. This Whitepaper has not been reviewed or registered with Qatari government authorities, whether under Law No. 25 (2002) concerning Investment Funds, Central Bank Resolution No. 15 (1997), as amended, or any associated regulations. Therefore, this Whitepaper is strictly private and confidential, and is being issued to a limited number of sophisticated investors, and may neither be reproduced, used for any other purpose, nor provided to any person other than the intended recipient hereof.

For prospective purchasers of Singapore

In the event this Whitepaper is being furnished to a purchaser in Singapore, it is being furnished on a confidential basis and solely for the purchaser's information and may not be reproduced, disclosed or distributed to any other person. By accepting this document, the purchaser (i) represents and warrants that they are either an **institutional investor** (as defined under Section 4A of the Singapore Securities and Futures Act (the **SFA**)), a **relevant person** (as defined under Section 305 of the SFA), or persons to whom an offer is being made (as referred to in Section 305(2) of the SFA); and (ii) agree to be bound by the disclaimers, limitations and restrictions described herein.

The purchaser acknowledges that the offer of interest herein is made in reliance on the exemption(s) provided under Section 302B(1), Section 304, and Section 305 of the SFA and is not made in or accompanied by a prospectus that is registered by the Monetary Authority of Singapore and pursuant thereto, the purchaser further acknowledges and unconditionally undertakes that the interests offered and accepted herein are in accordance with the terms and conditions of this document and shall not be subsequently sold to any person, unless the offer resulting in such subsequent sale is made in compliance with the SFA and/or in reliance on any applicable exemption(s) provided under the SFA.

For prospective purchasers of Saudi Arabia

Neither this Whitepaper nor the BITX have been approved, disapproved or passed on in any way by the Capital Market Authority or any other governmental authority in the Kingdom of Saudi Arabia, nor has BITIFEX received authorization or licensing from the Capital Market Authority or any other governmental authority in the Kingdom of Saudi Arabia to market or sell the BITX within the Kingdom of Saudi Arabia. This Whitepaper does not constitute and may not be used for the purpose of an offer or invitation. No services relating to the BITX, including the receipt of applications and the allotment or redemption of the BITX, may be rendered by BITIFEX within the Kingdom of Saudi Arabia.

For prospective purchasers of South Africa

Neither this Whitepaper nor the BITX have been approved, disapproved or passed on in any way by the Financial Services Board or any other governmental authority in South Africa, nor has BITIFEX received authorization or licensing from the Financial Services Board or any other governmental authority in South Africa to market or sell BITX within South Africa. This Whitepaper is strictly confidential and may not be reproduced, used for any other purpose or provided to any person other than the intended recipient.

For prospective purchasers of South Korea

Neither BITIFEX nor any of its affiliates is making any representation with respect to the eligibility of any recipients of this Whitepaper to acquire BITX under the laws of Korea, including, but without limitation, the Foreign Exchange Transaction Law and Regulations thereunder. BITX are being offered and sold in Korea only to persons prescribed by Article 301, Paragraph 2 of the Enforcement Decree of the Financial Investment Services and Capital Markets Act, and none of the BITX may be offered, sold or delivered, or offered or sold to any person for reoffering or resale, directly or indirectly, in Korea or to any resident of Korea except pursuant to

applicable laws and regulations of Korea. Furthermore, BITX may not be re-sold to Korean residents unless the purchaser of the BITX complies with all applicable regulatory requirements (including, but not limited to, governmental approval requirements under the Foreign Exchange Transaction Law and its subordinate decrees and regulations) in connection with purchase of the BITX.

For prospective purchasers of Spain

The BITX may not be offered or sold in Spain except in accordance with the requirements of the Spanish Securities Market Law (Ley 24/1988, de 28 de Julio, del Mercado de Valores) as amended and restated, Royal Decree 1310/2005, on securities admission to trade on secondary official markets, public offerings or subscriptions, and prospectus required to such effects, and/or subject and in compliance with the requirements contained in such regulations (Real Decreto 1310/2005, de 4 de noviembre, por el que se desarrolla parcialmente la Ley 24/1988, de 28 de julio, del Mercado de Valores, en materia de admisión a negociación de valores en mercados secundarios oficiales, de ofertas públicas de venta o suscripción y del folleto exigible a tales efectos) (R.D. 1310/2005), and subsequent legislation. This Whitepaper is neither verified nor registered with the Comisión Nacional del Mercado de Valores, and therefore a public offer of the BITX will not be carried out in Spain.

For prospective purchasers of Sweden

This Whitepaper has not been nor will it be registered with or approved by Finansinspektionen (the Swedish Financial Supervisory Authority). Accordingly, this Whitepaper may not be made available, nor may the BITX offered hereunder be marketed and offered for sale in Sweden, other than under circumstances which are deemed not to require a prospectus under the Swedish Financial Instruments Trading Act (1991:980) (Sw. lag (1991:980) om handel med finansiella instrument). Accordingly, the offering of the BITX will only be directed to persons in Sweden who subscribe for BITX for a total consideration of at least €50,000 per investor.

For prospective purchasers of Switzerland

Under the Collective Investment Schemes Act of June 23, 2006 (the **CISA**), the offering, sale and distribution of units in foreign collective investment schemes in or from Switzerland are subject to authorization by the Swiss Financial Market Supervisory Authority. The concept of **foreign collective investment schemes** covers, inter alia, foreign companies and similar schemes (including those created on the basis of a collective investment contract or a contract of another

type with similar effects) created for the purpose of collective investment, whether such companies or schemes are closed-ended or open-ended. Units in a foreign investment scheme which has not been authorized by the Swiss Financial Market Supervisory Authority may only be promoted in or from Switzerland provided that no public solicitation, offering or advertising is carried out by persons operating in or from Switzerland. There are reasonable grounds to believe that BITIFEX would be characterized as a foreign collective investment scheme from a Swiss legal point of view. As the BITX have not been and cannot be registered or authorized for distribution under the CISA, any offering of the BITX, and any other form of solicitation of investors in relation to BITIFEX (including by way of circulation of offering materials or information, including this Whitepaper), must be made by way of private placement, e.g., by limiting the offer to investors considered as qualified investors as defined in the CISA and in Circular 08/8 Public Offering of the Swiss Financial Market Supervisory Authority dated November 20, 2008. Failure to comply with the above-mentioned requirements may constitute a breach of the CISA.

For prospective purchasers of Taiwan

The BITX have not been registered in the Republic of China, nor is approval by the Financial Supervisory Commission, Executive Yuan, the Republic of China (**FSC**) compulsory. Subscribers should review the financial information and relevant documents, consult with an independent consultant, and bear the risk and of this investment. Subscribers within the territory of the Republic of China are required to meet certain requirements set forth in the Rules Governing Offshore Funds and conditions promulgated by the FSC. Subscribers cannot resell the BITX nor solicit any other purchasers for this offering.

For prospective purchasers of Thailand

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