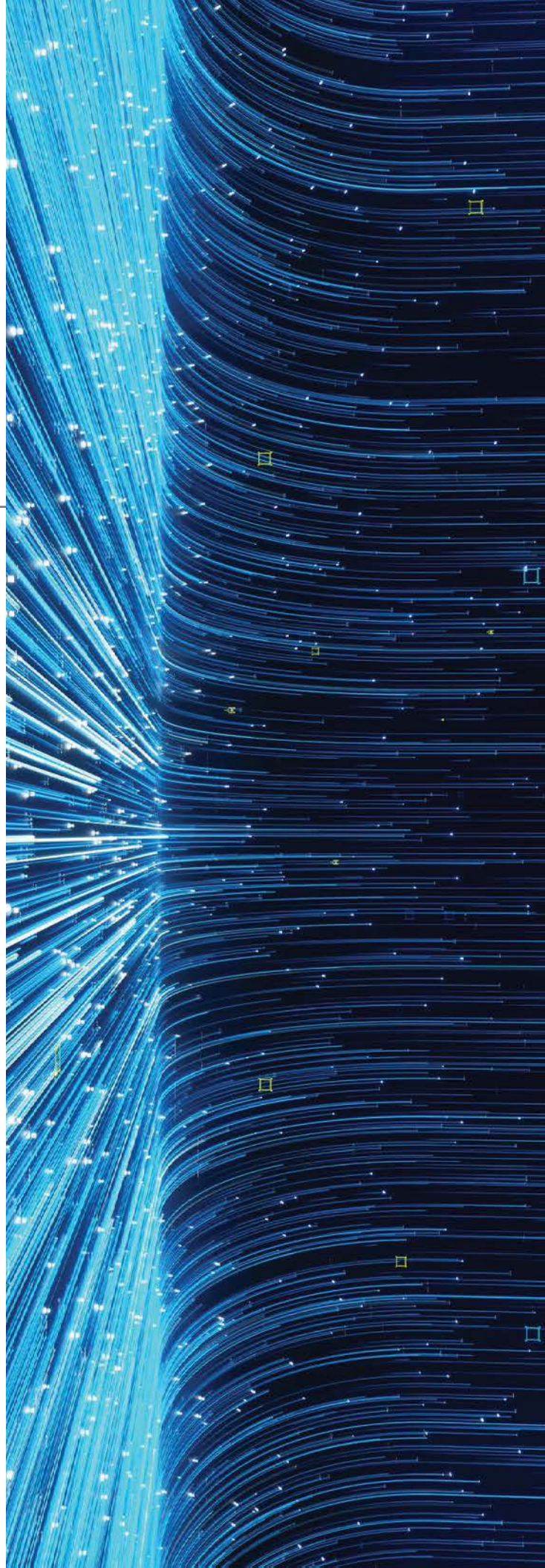




A piece from our
U.S. counterparts

Fidelity Digital AssetsSM Institutional Custody Solution



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Fidelity Digital AssetsSM Custody

At Fidelity Digital Assets, security is at the core of our business. Assets are managed in an omnibus fashion while segregated at the books and record level to provide on-chain privacy and maximum liquidity and security. We adhere to a robust combination of operational, cyber, and physical controls to keep clients' assets and personal information safe.

To maintain our rigid security protocols, we **do not...**

- Rehypothecate clients' assets
- Utilize third-party custodians for digital assets
- Allow for a single point of failure
- Permanently leave more than 2% of assets in hot wallets
- Sell client data

Offline, cold-vaulted storage

Assets are held in cold storage with 24x7 on-site security, hardened room structure, and multi-person and multi-organization access controls.

Multi-site storage

Accessing assets in "deep cold storage" require private keys to be authorized in varied geographic locations by separate teams of Fidelity Digital Assets associates. Our multi-site design allows for full redundancy should any site become completely unavailable due to unforeseen events.

Multi-tiered approval structure

Dynamic entitlement structure and multi-step authentication for transactions to mitigate fraud and protect your assets.

Optimized Custody

Assets are managed in an omnibus fashion while segregated at the books and record level to provide on-chain privacy and maximum liquidity and security.



Controls:

Operational

- Maker/checker requirement
- Dynamic entitlement structure
- User-based authentication (2FA) and entitlements
- Multi-site and tiered approval structure
- Fidelity Digital Assets maintains SOC 1 Type 2 audits and has been issued a SOC 2 Type 1 report by a 'Big Four' accounting firm.¹

Physical

- 24x7 security on-premises, alarms, and remote monitoring
- Hardened cold storage facilities (tempest shielded, radio frequency blocked)
- Multi-factor, multi-person and multi-org room physical access controls

Cyber Security

- Multi-signature for transfers
- Offline, certified Hardware Security Module (HSM) hardware for all online and offline private keys
- Fully redundant facilities and systems, in addition to backups

¹ The description of the audits and reports pertain to products and services of Fidelity Digital Asset Services, LLC. Fidelity Digital Assets, Ltd. has entered into a sub-custody agreement with Fidelity Digital Asset Services, LLC to provide its clients access to institutional-grade custody of digital assets, trade execution, and other products and services.

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