

CFIX Anti-Bribery and Corruption Policy

1. INTRODUCTION

C F I X Virtual Assets Broker & Dealer Services L.L.C S.O.C (“CFIX”, “we”, “our”, or “us”) is a virtual assets broker-dealer based in the UAE, operating under the regulatory framework of the Dubai Virtual Assets Regulatory Authority (VARA). CFIX is committed to conducting all operations ethically, honestly, and in full compliance with applicable laws and regulations.

This Anti-Bribery and Corruption (ABC) Policy is published on our website in accordance with VARA’s Compliance and Risk Management Rulebook and our commitment to transparency and stakeholder communication regarding our ethical standards.

2. ZERO TOLERANCE POLICY

CFIX adopts a strict zero-tolerance approach to bribery and corruption. This applies to all jurisdictions in which CFIX operates, whether directly or through third parties. All staff, executives, and Board members are expected to act honestly, ethically, and with integrity in all business dealings.

The following conduct is strictly prohibited:

- Offering, promising, giving, soliciting, or accepting bribes, facilitation payments, or other improper inducements — whether directly or through intermediaries
- Retaliation against any individual who reports suspected bribery or corruption
- Any activity that may result in a breach of applicable anti-bribery and corruption laws
- Circumvention of internal controls, approval hierarchies, or due diligence processes designed to prevent bribery and corruption
- Facilitating, soliciting, or encouraging any third party to perform acts that constitute bribery or corruption
- Concealing, ignoring, or failing to report any suspicious activity, conflict of interest, or potential ABC violation

3. LEGAL AND REGULATORY FRAMEWORK

This policy ensures full compliance with applicable domestic and international frameworks, including:

- UAE Federal Law No. 31 of 2021 (Penal Code), specifically provisions criminalising bribery in both public and private sectors
- UAE Federal Decree-Law No. 10 of 2025 Combating Money Laundering, the Financing of Terrorism, and the Financing of Arms Proliferation

- Virtual Assets Regulatory Authority (VARA) Compliance and Risk Management Rulebook
- United Nations Convention Against Corruption (UNCAC), ratified by the United Arab Emirates

4. SCOPE

This policy applies without exception to:

- All personnel of CFIX, including full-time employees, part-time staff, contract workers, interns, secondees, and any individual acting in a representative capacity on behalf of CFIX
- All members of the Board of Directors
- All third parties engaged by CFIX, including agents, brokers, consultants, vendors, and service providers
- All legal entities within the CFIX structure, including subsidiaries and affiliates

5. GOVERNANCE AND OVERSIGHT

Board Responsibility

The Board of Directors holds ultimate accountability for CFIX's stance on anti-bribery and corruption. The Board is responsible for defining CFIX's ABC risk appetite, setting the tone for a culture of integrity and zero tolerance, overseeing the design and effectiveness of the ABC framework, and ensuring compliance with all applicable laws, VARA rulebooks, and international obligations.

Three Lines of Defense

CFIX implements a Three Lines of Defense framework:

- First Line: Business functions are responsible for the identification, ownership, and management of ABC risks in day-to-day operations
- Second Line: Compliance, Legal, and Human Resources provide policy oversight, regulatory interpretation, monitoring of risk exposure, and enforcement of ABC policies
- Third Line: Internal Audit performs independent assessments of the adequacy and effectiveness of ABC controls and reports findings to the Board

Compliance Officer

CFIX has formally appointed the Compliance Officer as the designated Responsible Individual for ABC Policy oversight. The Compliance Officer is responsible for overseeing the internal control environment, ensuring the policy is updated in accordance with regulatory changes, escalating material breaches to the Board and VARA, and coordinating investigations into alleged violations.

6. PROHIBITED ACTIVITIES

Bribery

Bribery involves the offering, promising, giving, soliciting, or receiving of any undue advantage — whether financial or non-financial — in order to influence the actions of an individual in a position of power. This is strictly prohibited in all business dealings, whether involving public or private sector counterparties.

Facilitation Payments

Facilitation payments are unofficial and improper payments made to public officials or third parties with the intent of expediting routine governmental or administrative functions. These are categorically classified as bribes under UAE law and are strictly prohibited by CFI, irrespective of local practices or perceived business norms.

Gifts and Hospitality

CFIX permits the giving or receiving of modest gifts and hospitality only when such gestures are reasonable in value and customary, do not influence or appear to influence any business decision, are declared and approved in accordance with internal thresholds and procedures, and comply with all applicable laws. Gifts or hospitality exceeding established thresholds require prior written approval from the Compliance Officer and entry in the Gifts and Hospitality Register.

Charitable Donations and Political Contributions

CFIX strictly prohibits charitable or political contributions to government officials, political parties, or affiliated entities without prior written approval from the Board of Directors. All such contributions must be subject to risk-based due diligence, made directly to verified charitable institutions, and never made through intermediaries.

Employment and Internship Practices

CFIX prohibits the use of employment or internship offers as a means to improperly influence decision-making, gain preferential treatment, or secure business advantages. All recruitment decisions must be based solely on merit, qualifications, and suitability for the role.

7. THIRD-PARTY DUE DILIGENCE

CFIX applies a risk-based due diligence framework to all third-party relationships to prevent indirect involvement in bribery or corruption. Due diligence includes:

- Verification of identity, beneficial ownership, and legal status
- Assessment of the business rationale and scope of engagement
- Sanctions screening, PEP status checks, and reputational review
- Scrutiny of litigation history and political affiliations
- Anti-bribery compliance clauses, audit rights, and termination rights in all contracts

High-risk engagements, including those involving government-linked entities or Politically Exposed Persons, are subject to enhanced due diligence and must be pre-approved by Compliance. All third parties are subject to periodic re-screening and risk reassessment.

8. DETECTION AND CONTROLS

CFIX implements integrated preventive and detective controls as part of its broader compliance framework, including:

- Segregation of duties, multi-layered payment authorisations, and alert-based transaction monitoring
- Vendor audits, asset reconciliations, and periodic internal audits
- Compliance monitoring and assurance testing to identify ABC red flags
- Integration of bribery typologies into CFI's transaction monitoring system, with alerts escalated to the Money Laundering Reporting Officer
- Semi-annual bribery risk assessments and targeted scenario simulations

9. REPORTING SUSPECTED VIOLATIONS

All employees, contractors, and associated persons are obligated to report any actual, suspected, or attempted bribery or corruption without delay. Reports can be made through:

- Email: compliance@cfix.com
- Dedicated online reporting portal: <https://ethics.cfix.com/report> (allows anonymous submissions)
- Whistleblowing hotline: +971 4 7706717 (available during business hours; voicemail outside business hours)
- Direct reporting to the Compliance Officer or, where senior management is involved, to a designated Board member

All reports are treated with the highest degree of confidentiality. CFI strictly prohibits any form of retaliation against individuals who make reports in good faith.

10. INVESTIGATION PROCEDURES

Upon receipt of a report, the Compliance Officer initiates a formal investigation, which includes:

- Opening a formal investigation file and documenting all relevant facts
- Appointing an independent investigator where appropriate
- Notifying the Board of the existence and progress of the investigation
- Preparing a comprehensive written investigation report upon completion

- Implementing remedial actions as determined by the Board, which may include disciplinary measures, enhanced controls, additional training, and formal reporting to VARA and other relevant authorities

All investigation records and remedial action summaries are retained for a minimum of eight (8) years and made available to VARA upon request.

11. WHISTLEBLOWER PROTECTION

CFIX guarantees full protection and confidentiality for whistleblowers acting in good faith. Protections include:

- Immunity from retaliation, harassment, or adverse employment actions
- Confidential handling of all disclosures, with identities disclosed only to the extent necessary for investigation or as required by law
- Strict prohibition on unauthorised disclosure of whistleblower identities

Any individual who engages in retaliatory conduct will be subject to disciplinary action, up to and including termination, and may face legal consequences.

12. CONSEQUENCES OF NON-COMPLIANCE

Violations of this policy may result in:

- Internal disciplinary action, up to and including immediate termination
- Mandatory disclosure of unlawful conduct to VARA and other relevant regulatory authorities
- Referral to law enforcement for criminal prosecution under applicable UAE laws
- Civil or contractual liability

13. TRAINING AND AWARENESS

All CFIX employees, including Board members, are required to complete mandatory annual anti-bribery and corruption training. Training is delivered upon hiring and repeated annually, covering the key principles of this policy, applicable laws, identification of bribery red flags, whistleblowing protocols, and reporting channels.

Employees in high-risk functions — including Compliance, Risk, Procurement, Finance, and roles engaging with public officials — receive enhanced, role-specific training.

14. RECORD-KEEPING

CFIX retains all ABC-related records securely for a minimum of eight (8) years, including whistleblower disclosures, internal investigation files, Suspicious Activity Report filings, external regulatory correspondence, Board-level approvals, third-party due diligence

documentation, risk assessments, and compliance decisions. Records are available for regulatory inspection upon request.

15. POLICY REVIEW

This policy is reviewed at least annually by the Compliance Officer to ensure ongoing alignment with applicable laws, VARA rulebooks, and international anti-corruption standards. The Board of Directors approves the policy upon initial issuance and at each annual review, and endorses interim revisions when urgent legal or regulatory changes arise. All revisions are version-controlled and communicated to all relevant stakeholders.

16. CONTACT INFORMATION

To report a concern or for questions about CFI's Anti-Bribery and Corruption Policy:

Email: compliance@cfi.com

Whistleblowing Portal: <https://ethics.cfi.com/report>

Address: Compliance Officer, CFI, Office 704, International Business Tower, Business Bay, Dubai, UAE

Phone: +971 4 7706717