CoinMetro

MOVING CRYPTO FORWARD

Whitepaper

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No promises of future performance or value are or will be made with respect to Tokens, including no promise of inherent value, no promise of continuing payments, and no guarantee that COIN (XCM) Tokens will hold any particular value. Unless prospective participants fully understand and accept the nature of CoinMetro's proposed business and the potential risks inherent in COIN (XCM) Tokens, they should not participate in the CoinMetro Token Sale.

COIN (XCM) Tokens are not being structured or sold as securities. COIN (XCM) Tokens are not a participation in CoinMetro and COIN (XCM) Tokens hold no rights in CoinMetro. COIN (XCM) Tokens are sold with an intended future functionality on the platform to be developed by CoinMetro and all proceeds received during the Token Sale may be spent freely by CoinMetro on the development of its business and platform.

This Whitepaper does not constitute a prospectus or offering document and is not an offer to sell, nor the solicitation of an offer to buy any investment or financial instrument in any jurisdiction. COIN (XCM) Tokens should not be acquired for speculative or investment purposes with the expectation of making an investment return. No regulatory authority has examined or approved 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. The publication, distribution or dissemination of this Whitepaper does not imply that applicable laws, regulatory

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CoinMetro is in the process of undertaking further legal and regulatory analysis of the intended functionality and mechanics of COIN (XCM) Tokens. Following the conclusion of this analysis, we may be required to amend the intended functionality of COIN (XCM) Tokens in order to ensure compliance with any legal or regulatory obligations that apply to us. We shall update this Whitepaper and publish a notice on our website in the event that any changes are made to the COIN (XCM) Token functionality.

CAUTION REGARDING FORWARD-LOOKING STATEMENTS

This whitepaper contains forward-looking statements or information (collectively "forward-looking statements") that relate to CoinMetro's current expectations and views of future events. In some cases, these forward-looking statements can be identified by words or phrases such as "may", "will", "expect", "anticipate", "aim", "estimate", "intend", "plan", "seek", "believe", "potential", "continue", "is/are likely to" or the negative of these terms, or other similar expressions intended to identify forward-looking statements. CoinMetro has based these forward-looking statements on its current expectations and projections about future events and financial trends that it believes may affect its financial condition, results of operations, business strategy, financial needs, or the results of the token sale or the value or price stability of COIN (XCM) Tokens.

In addition to statements relating to the matters set out here, this whitepaper contains forward-looking statements related to CoinMetro's proposed operating model. The model speaks to its objectives only, and is not a forecast, projection or prediction of future results of operations. Forward-looking statements are based on certain assumptions and analysis made by CoinMetro in light of its experience and perception of historical trends, current conditions and expected future developments and other factors it believes are appropriate, and are subject to risks and uncertainties. Although the forward-looking statements contained in this whitepaper are based upon what CoinMetro believes are reasonable assumptions, these risks, uncertainties, assumptions, and other factors could cause CoinMetro's actual results, performance, achievements, and experience to differ materially from its expectations which are expressed, implied, or perceived in forward-looking statements. Given such risks, prospective participants in this token sale should not place undue reliance on these forward-looking statements.

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1. About Us

We are not a crypto company, we are a traditional financial institution that understands the complexities and benefits of blockchain and crypto. We are actively working with regulators in a number of jurisdictions to further improve the industry's regulatory framework.

Through a tokenized ecosystem, CoinMetro provides users a friendly gateway, allowing them to get involved in the crypto and wider fintech space with an ease of access not yet seen in the industry.

Our team's extensive experience in the finance, retail trading, compliance, IT and legal sectors gives us the perfect platform of knowledge to build upon. We understand the importance of regulatory compliance and this is a primary focus for us, at the forefront of all business actions.

Stemming from the founding team's collective background in traditional finance, CoinMetro delivers a user-focused framework that offers mobility between blockchain-based digital assets and traditional markets, combining the four major components of the digital economy:

1. A set of three fast, feature-rich, licensed crypto exchanges and trading platforms, facilitating the easy buying and selling of crypto assets;
2. A tokenized asset management platform;
3. An electronically-traded crypto fund investment gateway; and
4. A turnkey tokenization framework we call ICO Express.

… as well as four major components of the traditional financial space including;

1. Payment ledgers;
2. Debit card services;
3. IBAN accounts; and
4. Currency conversion, including crypto to fiat and vice versa.

Our CEO & Founder, Kevin Murcko, has decades worth of experience in the foreign exchange (FX) industry, being hailed as one of the most transparent CEOs in FX.

CoinMetro has transparency at its core. Building on our team's vast experience, as well as our strong knowledge of the underlying technology within financial trading environments and the liquidity needs of currency markets, CoinMetro is well-positioned to support and understand the needs of the wider fintech space, helping to drive it forward.

CoinMetro is headquartered in Tallinn, Estonia.

CoinMetro's partners and Token Buyback Program

Integral to CoinMetro is the relationship to our strategic partner, FXPIG, an established Forex ("FX") broker. FXPIG's proven track record and experience in providing financial services will help CoinMetro to deliver its planned "Token Buyback Program." The Token Buyback Program is one of the ways CoinMetro will look to initially stabilize the price of COIN and support market growth (See Section 4.0.4 for more information). Sharing of technology and human resources between CoinMetro and FXPIG will allow the CoinMetro Exchange to offer features, opportunities, and token sale bonuses above and beyond the scope of many current platforms

2. Background

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2.1 The Problems we Solve

The digital economy is maturing and blockchain technology is changing the way we do business. The financial sector is leading the way in blockchain and digital assets. While some potential uses of blockchain technology may be years away, the digital economy is already here. The industry needs a bridge between traditional and emerging asset classes. Experienced traders have teamed up with experienced developers to build this bridge.

CoinMetro is much more than a crypto exchange. We are a fintech company, working to improve and modernize the financial services sector, which is still somewhat rigid and structurally conservative in nature. Such characteristics are not in keeping with other sectors in the 21st Century. Put simply, the market is crying out for an innovative, technology driven, technology savvy solution like CoinMetro. Our team, with its tremendous experience and knowledge in the financial services sector, is ready to provide it.

2.2 Competitive Landscape

2.2.1 The FinTech Sector

Over the past few years, the EU's progressive regulators have made it easier for leading challenger banks including Atom Bank, Tandem Bank, Monzo, Starling Bank, Revolut (all UK based) and N26 (based in Germany) to obtain the financial license necessary to operate.

The fastest-growing challenger banks — Revolut, Monzo, and N26 — have acquired 2.5m customers through viral growth strategies and without a bank charter.

The other 3 companies — Tandem, Starling, and Atom — waited to launch products until receiving their charters, which took two years. To date, they collectively have only 52,000 customers.

Challenger banks are focused on rebundling retail banking services in 2018 and creating one platform for underbanked customers – a market that CoinMetro is also seeking to tap into.

	Atom Bank	Tandem	Starling Bank	Monzo	N26	Revolut
B2C	✅	✅	✅	✅	✅	✅
Regulatory Strategy	Bank Charter	Bank Charter	Bank Charter	Bank Charter	Bank Charter	E-Money License
Products launched prior to license	❌	❌	❌	✅	✅	✅
First Product	Personal Finance App	Personal Finance App	Licensed Digital Current Account	Debit Card + Digital Current Account	Debit Card + Digital Current Account	Optional Debit Card + Currency Exchange App
PRIVATE FUNDING						
Total Reported Funding	$514m	$40m	$70m	$138m	$188m	$86m
Latest Funding Date	Q1'18	Q3'17	Q1'16	Q4'17	Q1'18	Q3'17

2.2.2 The Crypto Sector

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To date, a number of prevailing issues, besides compliance, have dogged the crypto-exchange landscape, with the existing major exchanges seemingly incapable of offering a fully-rounded user-experience and struggling for high ratings amid strong interest from the public. Some of the main issues include:

- Platforms being unresponsive, unattractive and/or difficult to use making them inaccessible to the mainstream;
- A poor level of customer support and/or slow response times;
- Limited support for fiat to crypto exchanging;
- A lack of traditionally accepted investment tools;
- Long wait times for account opening, high fees, unstable uptime;
- Lack of liquidity for a growing number of ERC-20 tokens (altcoins); and
- Failure to adapt to regulatory changes;
- Lack of security and user/market trust due to irregular hacks.

CoinMetro has a number of high-profile competitors already operating in the Crypto space, including:

Name	Year Founded	Headquarters	Estimated 24 Hour Turnover
Binance	2017	Malta	$931,311,489
Bitfinex	2012	Hong Kong	$459,073,023
Coinbase Pro	2012	United States	$145,124,441
Kraken	2011	United States	$136,635,738
KuCoin	2013	Singapore	$15,756,208

Source: CoinMarketCap

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2.3 How Is CoinMetro Different from Other Exchanges

Aside from the clear comparison above, CoinMetro differentiates itself from existing players as it aims to create a solution that is easy to use, accessible to all and, above all, provides a fully-rounded, consistent experience to its user base.

More specifically, our service will take the following areas as major focal points in all operational endeavours:

- Helping to establishing and adhere to industry-wide regulation;
- The highest-level of customer support, 24/7;
- Transparency in all areas of our business;
- Ease of access to all users, regardless of their knowledge level;
- An open door to innovation, not restricting ICOs by imposing high access fees;
- Community-centrism;
- A client journey that starts with education, a key risk mitigation tool; and
- Inclusion of traditional financial products.

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2.4 FXPIG: Our Strategic Partner

Since 2011, FXPIG has been a public and profitable Forex brokerage company with a focus on transparency, high volume traders, and customer service. From its inception, FXPIG has operated as a Straight-Through-Processing (STP) broker, sending all client trades for real execution on the market and earning a commission on volume. Additionally, FXPIG has developed a second revenue stream with its managed (PAMM) account options, which allow clients to work with vetted professional traders. The combination of STP and PAMM accounts has resulted in a low attrition rate of clients, high long-term revenue, and high user satisfaction. CoinMetro proposes to adapt proven aspects of FXPIG's unique PAMM account models to fit the contours of the digital economy through our innovative Tokenized Asset Management (TAM) features.

A crossover of team members and technology from FXPIG, as well as our Token Buyback Program (see section 4.0.5 for further details), will enable us to bring years of industry experience, existing ties, and established models into the development of the user-focused CoinMetro platform. Our team has experience building relationships with banks and payment gateways, establishing international partnerships, managing liquidity, working with regulators, analyzing markets, developing trading systems, and growing a dedicated user base.

FXPIG has over six years of experience dealing in both unregulated and regulated environments. This has made us very agile and aware of the global regulatory outlook. While regulation can take years to be finalized, adoption can happen quite quickly. If you take the FX space as an example, the retail FX industry was virtually unregulated in the early 2000's, or simply grouped under regulations that did not fit the underlying market. Today, there are essentially four main regulatory bodies: the CTFC in the USA, the FCA in the UK, the ASIC in Australia, and CySEC in Cyprus. The latter houses more FX Brokers than the other three combined. We expect that regulation of cryptocurrencies will come in a similar wave. As recent research from one international consulting firm concluded, "Future controls on cryptocurrencies are generally trending towards tightened regulation that focuses on requiring exchange licensing and validation as well as AML, KYC, and other money transmission protections." Companies that are unfamiliar or inexperienced with these processes will face challenges moving forward. CoinMetro intends to comply with laws and regulations applicable to it in the relevant jurisdictions.

For more information pertaining to FXPIG's business model, its current relative financials, and a brief view at its predicted growth over the next five years, please see 'FXPIG Appendix 1.'

2.5 Registration, Licensing, and Regulations (Multiple Jurisdictions)

It is CoinMetro's policy to be and remain compliant with all regulatory, legal and statutory requirements as applicable to our business and the industry. We are committed to ensuring that all staff and third parties working with us are aware of their obligations under the regulatory system and our own compliance program.

It is our intention to stay up to date with all rules, regulations and laws and to comply with each to the fullest degree. We operate a robust and structured compliance program which revolves around developing procedures for and identifying, assessing, maintaining and monitoring all compliance functions and processes.

Hileman & Rauchs emphasize that the biggest challenges faced by current cryptocurrency exchanges are maintaining relationships with payment gateways,

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banks, and traditional financial institutions. Based on an analysis of non-public data from over 150 companies in the cryptocurrency space, their study notes, “Small exchanges seem to have considerable difficulties with either obtaining or maintaining banking relationships…”

Running a multi-faceted fintech platform means that we will require multiple licenses in multiple jurisdictions to remain compliant with regards to the services we plan to provide. The CoinMetro Token Sale took place in Hong Kong and was compliant with the regulatory environment there. Moving forward, CoinMetro intends to provide services in jurisdictions where it is licensed, or where no license is required. Before the end of 2018, CoinMetro intends to apply for further licensing in several jurisdictions that cover the full range of planned services.

As of 9 May 2018, CoinMetro is officially licensed (FIU: FRK000121) to provide virtual currency wallet services. This license enables the operation of the crypto services side of our business, dealing in crypto transactions legally within the territory of Estonia, where CoinMetro is headquartered. As of 9 May 2018, CoinMetro is also officially licensed (FIU: FVR000143) to provide fiat to virtual currency and virtual currency to virtual currency exchange services within the territory of Estonia. This license allows us to operate our exchange, dealing in both fiat and crypto, serving clients both within the EU and worldwide, subject to applicable law, and accept payments via multiple gateways, including SEPA transfers, SWIFT transfers, credit cards, and external wallet systems, from European Union residents.

CoinMetro is committed to ensuring compliance with the rules, standards and regulations as laid out by its regulating and governing bodies and confirms that it has developed and implemented the appropriate procedures, systems, controls and measures to manage and mitigate risk.

As a regulated business, we have a deep understanding of the comprehensive compliance standards that we are obliged to meet and confirm that we have in place effective and efficient tools and controls for meeting these obligations under the current regulatory system. CoinMetro goes above and beyond current regulatory requirements and has decided to use exactly the same standards as banks and other financial institutions employ. Our internal Compliance Manual, which spans over 300 pages, is based on and follows the requirements and guidance as set by the UK Financial Conduct Authority in the FCA Handbook.

Our Compliance Program is defined as a system which aims to:

- Identify the standards, rules and regulations to be complied with;
- Set out the policies, procedures and measures for following and adhering to these expectations;
- Audit and monitor the systems and controls to ensure compliance and effectiveness;
- Mitigate against applicable risks and effective breaches; and
- Train and support staff in complying with regulatory, legal and contractual obligations.

CoinMetro’s objectives regarding compliance are to:

- Ensure that compliance is at the foundation of our company and that it is an integral part of all business and company functions and processes;
- Ensure that all staff are aware of the regulations and their obligations regarding compliance and to provide sufficient and adequate support and training on all compliance matters;
- Adhere to all Compliance Manual policies and procedures at all times;
- Carry out frequent compliance audits and monitoring programs to ensure that functions and procedures are compliant, fit for purpose and adhered to by all staff; and
- Appoint a Compliance Officer who is responsible for developing, implementing, maintaining and monitoring all compliance functions and processes within the company.

We are also currently in talks to begin the process of acquiring an Estonian

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investment firm license from the the Estonian Financial Services Authority ("Finantsinspektsioon"). This license would cover our ETCF and TAM platforms, and allow us to offer these services to a wide range of countries around the world, again subject to the laws of each applicable jurisdiction. We will look to acquire additional licenses in order to expand our regulatory footprint and remain compliant as CoinMetro grows and as new regulations come to light around the world.

2.6 Banking Partnership

CoinMetro is one of the only companies in the crypto space that has been onboarded by a banking partner (LHV) for both client deposits and our companies' operational accounts. The onboarding process for CoinMetro was very rigorous and took therefore more than 5 months to complete. Within that timeframe all of our Compliance and Risk procedures were reviewed by our banking partner.

Currently we are in talks with several international banks to expand our banking partnerships.

3. The CoinMetro Ecosystem

CoinMetro is an all-in-one platform for the digital economy, providing a link between traditional finance and the digital asset economy. We are a fully-stocked financial services company with products that can bring us multiple sustainable revenue streams and add real, lasting value to the wider fintech sector.

The crypto side of the CoinMetro ecosystem is comprised of four main components:

1. A set of three fast, feature-rich, licensed crypto exchanges and trading platforms, facilitating the easy buying and selling of crypto assets;
2. A tokenized asset management platform;
3. An electronically-traded crypto fund investment gateway; and
4. A turnkey tokenization framework we call ICO Express.

The traditional finance side of the CoinMetro ecosystem is comprised of the following main components:

1. Payment ledgers;
2. Debit card services;
3. IBAN accounts; and
4. Currency conversion, including crypto to fiat and vice versa.

All services offered will be accessible via a streamlined, secure web application which has full integration with industry-leading blockchain platforms. The entire CoinMetro ecosystem will be supported by 24/7 customer support.

Client segments initially consist of retail customers mostly. Once a solid book of soft liquidity has been established on the back of retails order flow, the company will look to package and sell this liquidity in blocks up the chain to a more institutional level market segment.

All of this will be enabled through trading technology built in-house, including our own proprietary internal matching engine, which works in close communication with our digital wallet management system. The latter is underpinned by BitGO, our custom charting software which makes use of the Chart IQ libraries, all of which sits on a DDoS protected network managed by Cloudflare.

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3.1 Product Pricing and Range

The platform is intended to be accessible from both a web browser and via our own CoinMetro-branded iOS and Android apps. API access and FIX 4.4 connectivity will be available. Following the approach of our strategic partner, FXPIG, API and FIX access will be open to anyone who requests it, with no minimum volume requirements or access fees.

We intend that holders of CoinMetro ecosystem's proprietary token, XCM, will be offered discounts on fees based on their overall XCM holdings. The more XCM they own, the higher the discount will be. This will likely incentivize clients to buy and hold XCM, further reducing the available supply and maintaining a stable market price.

3.1.1 Exchange Fee Structure (Bonus)

Our proposal intends that takers on the exchange, or clients who place orders that are filled immediately, will pay a commission on all executed orders, starting from a MAXIMUM of 0.10%. Makers on the exchange, or clients who place limit orders below the ticker price on the buy side, and above the ticker price on the sell side, will receive rebates that account for up to 50% of any fee charged to the taker that eventually hits their resting orders. If two makers' orders are eventually matched (i.e. neither side is matched immediately) neither will be paid a rebate, but no commissions will be charged to either side.

3.1.2 Tokenized Asset Management (TAM)

Through TAM, clients will be able to work with a manager of their choice by investing in that manager's token. Similar to earning a commission, managers will profit from fees based on the high-water mark principle (HWM), (i.e. the highest peak in value for a given account and investors will benefit based on the growth of their investment. With a few clicks, investors will be able to quickly move funds between manager-specific tokens, XCM, and other crypto or fiat assets. Blockchain-based tokenization will facilitate a secure and transparent process, where each trade can be linked back to specific investors and managers, giving users a complete overview of their digital assets at all times. CoinMetro will benefit from higher trade volumes as well as a fixed percentage of the TAM managers' HWM performance fees.

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3.1.3 ETCF

Electronically Traded Crypto Fund (ETCF) is one of CoinMetro's unique concepts, in which our team of professional investors hand-picks baskets of digital assets using a variety of metrics and baskets them into a single offering.

ETCFs are designed for our clients to easily diversify their portfolios without time-consuming research, as well as to provide liquidity to new tokens entering the CoinMetro marketplace. In addition to being able to diversify into an array of specific industries, our clients will also be able to invest in funds based on their risk profile.

3.1.4 Crypto Academy

Crypto Academy is CoinMetro's unique and comprehensive cryptocurrency educational programme that helps our clients learn the basics of blockchain and cryptocurrencies.

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The online lessons come in the form of engaging short video lectures and written materials, whereas the comprehensive structure of the course allows our clients to learn at their own pace.

The basic educational programme is free for everyone and only requires registration on our platform.

3.1.5 Debit Card

To provide clients with instant access to their CoinMetro wallet balances we plan to offer a number of CoinMetro debit card variants. With these cards, which will be tied to unique IBANs, clients will be able to withdraw cash instantly at ATM locations worldwide without the need for moving funds onto the card beforehand.

We will provide both a free and a premium debit card product and are currently in discussions with a number of providers.

The premium card will come with a fixed monthly cost. However, it will include a list of available perks to offset the fee.

Having done an extensive amount of market research in this space (see section 6.1), we are well placed to offer very low rates to our customers – which should aid product uptake – while still remaining extremely competitive in the market.

3.1.6 IBAN

IBAN stands for International Bank Account Number.

CoinMetro will be able to issue its clients instant IBAN accounts in all the cryptocurrencies available on the platform. Our clients will be allowed to fund their IBAN accounts, use them to send and/or receive payments, as well as to activate an attached debit card (see 3.1.3).

3.1.7 Lending

CoinMetro's unique lending platform is intended to give passive investors an opportunity to earn interest on their cryptocurrency balances and create potential for under-capitalized traders to increase their profits. Our lending platform is envisaged to work by letting lenders state their daily rate on which they are prepared to lend; borrowers will be able to accept and immediately use the underlying assets as margin. CoinMetro plans to offer BTC, LTC, and ETH lending options.

3.1.8 Leverage

Liquidity provider relationships, fostered by our strategic partner, FXPIG, allows us to offer clients access to 1:50 leverage when trading non-deliverable OTC digital assets, either via our browser based platform or through an API or FIX connectivity. Leverage on our matching engine will be capped at 1:10 initially when trading using borrowed margin by way of our give and take lending platform. Higher leverage will be made available to clients with a proven track record of low risk operations on a case

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by case basis. Via our partnership with FXPIG, CoinMetro intends to offer FIX and API access to our exchange by way of a Prime of Prime model where FXPIG is the margin/credit provider. This will give individual and institutional traders access to exchange grade liquidity, spreads, and execution quality, paired with CFD like available leverage.

3.1.9 Risk Limitation

We propose that CoinMetro's underlying risk management strategy will use designated margin wallets to mitigate damages and prevent losses when trading using borrowed margin on our give and take lending platform. Position losses will be covered by funds in a trader's margin wallet, which serve solely as collateral. If the net value of a trader's account falls below the required maintenance margin, their position will be forced into liquidation.

To open a position, we propose that a trader will be initially required to allocate 30% margin based on the desired position size. Should the net value of the account fall below 15% of the value of the margin position, the account will be liquidated.

3.1.10 Ecosystem growth

We believe that giving people additional opportunities to earn by engaging with the platform will incentivize client participation, retention, and enthusiasm. It also ensures more liquidity within the engine, which keeps spreads low and generates higher overall volumes. We intend for users to be rewarded for participation in COIN, and for the scope of rewarded activities to grow and change as the platform develops. At release of the CoinMetro platform users will be rewarded for simply signing up to CoinMetro and creating a wallet, using the exchange for the first time, referring friends to the platform, and completing user feedback forms designed to help the team improve the platform.

3.1.11 Decentralization and Atomic Swaps

Generally, cryptocurrency exchanges are at least "semi-centralized," given that assets are often held by the exchange on behalf of its client base. The move toward fully decentralized exchange mechanisms has begun, and CoinMetro plans to take a proactive approach to this technology. The CoinMetro team sees technology like Polkadot, Cosmos, and Aion approaching, and understands that atomic swaps and cross chain communication will be extremely significant going forward.

CoinMetro intends to offer atomic swap-like 'peer-2-peer secure exchanges' using time locked smart contracts where no third party intervention is needed to complete the transaction. The smart contract will act as a form of timed escrow, ensuring that both parties are protected in the event that one party defaults on the transaction. It is intended that this exchange mechanism will carry fees that will be almost zero from our side, as it will be considered an added service for clients who are trading smaller volumes and those that do not require immediate execution.

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users the opportunity to buy multiple tokens at once will help stabilize prices of those tokens during initial sell swings as the token becomes tradable.

As with our TAM platform, all ETCF's will be priced in COIN. We believe that pricing these products in COIN will contribute to token price stability, and as usage of the platform accelerates we expect to see this positively affect the underlying price

3.2 ICO Express Platform

CoinMetro aims to offer a powerful turnkey ICO Express Platform that will give vetted ICO's access to transparent and secure funding rounds. CoinMetro's team of senior engineers will formally review all aspects of token sale proposals, including project feasibility, idea novelty, financial justification, and legal compliance. It is our intention that approved projects will have access to CoinMetro's complete Token Express Platform and a dedicated support team.

Through our proposed interface, users will be able to issue tokens and ICO contracts using input parameters. Tokens issued through CoinMetro will be liquid and immediately tradable on the CoinMetro exchange following the token sale. The ICO Express platform will also offer an automatic smart contract mechanism capable of creating smart contracts and deploying them on the Ethereum, NEO and NEM blockchains. It is also proposed that the Token Express Platform will offer the option of including a client's token inside CoinMetro's ETCF board when launched (see paragraph 3.3.2).

3.2.1 Easy DAO Registration

CoinMetro's ecosystem aims to allow projects to register and deploy their business as a specialized smart contract or Mosaic on the Ethereum, NEO or NEM blockchain. This will allow users to formalize their business transactions without the explicit need of a 'paper corporation.'

3.2.2 Fiat and Cryptocurrency Deposits

We envisage that CoinMetro's planned infrastructure and banking relationships will enable fiat and cryptocurrency deposits on one platform. It is intended that users will be able to make deposits through a wide range of channels, including credit card, e-wallet, local bank deposit, SWIFT transfer, SEPA transfer, and multiple cryptocurrencies.

3.2.3 Smart Contracts

Smart contracts and digital tokens will be easily issuable on the ETH, NEO and NEM blockchains through the Coinmetro platform's planned interface. As new blockchain innovations emerge, there is potential to integrate new features and platforms into CoinMetro's ecosphere.

Smart contracts provide users with automated, low-fee transactions that provide a higher level of security than those that rely on standard localized databases. To reduce latency all smart contracts related to live trading will be created or written post-

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trade. As blockchain technology becomes faster, we will explore the option to write all trade data in real time inside a distributed ledger. Smart contracts will manage approval workflows between counterparties and calculate trading settlement amounts with a level of accuracy not found in standard database technology.

3.2.4 Quick to Market

Through our vetting process and token interface, the CoinMetro ecosystem aspires to foster innovation by giving projects the infrastructure and tools they need to raise funds, gain support, and launch atop a stable platform. Tokens issued through CoinMetro will be liquid and immediately tradable on the exchange following the token sale.

3.2.5 White Labeling Opportunities

CoinMetro proposes creating unique white-labelling opportunities for enterprise clients through our token sale platform. Clients will be able to white label our digital wallet and portal setup, allowing them to offer crypto and fiat payments to their own user-base and token sale participants. CoinMetro plans to allow token issuers to create and customize their own branded interface and backend while taking advantage of the tools, such as easy token issuance, provided by our larger ecosystem architecture. When initial token sales end, tokens will be immediately tradable on the main exchange, with the option to add the token to one or more of our curated ETCF baskets for additional liquidity.

3.3 CoinMetro Platform Design

3.3.1 User Interface

Blockchain, as an underlying protocol, has the potential to radically transform the business landscape across many major industries. A developer-focused community is striving to advance the technology, while at the same time a lack of usability is widely recognized as a major barrier to entry into what is already possible within the blockchain space.

A 2017 article from Cointelegraph honed in on the crucial role of user experience in relation to building sustainable businesses in the blockchain space: “Creating user interfaces that can enable the easy application of Blockchain solutions without any special coding skills or extra computer language specialization appears to be an important aspect of industry development if Blockchain is to go mainstream.”

User experience is a core aspect of the vision for CoinMetro. We aim to provide a feature-rich platform that combines secure backend infrastructure with a highly intuitive front-end interface. Simple sign-up, instant access, direct payment processing, asset mobility, and unparalleled customer support are defining features of our vision for the platform.

3.3.2 Customer Support

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CoinMetro intends to include a dedicated customer support center and thorough documentation for the purposes of ensuring that the platform is suited to users coming from all levels of experience. In addition to a 24/7 dedicated help desk, we plan to integrate a friendly, on-brand AI bot, “Frank”, designed to assist clients with troubleshooting, questions, and quick reference guides. CoinMetro’s customer support network plans to include a live-chat option via Intercom, an extended FAQ section, knowledge base, Slack channel, and supplemental videos to walk through important features.

4. Security

CoinMetro has established an industry-leading security program, dedicated to ensuring that customers have the highest level of confidence in our custody of their data. Our security program is aligned to the ISO 27000 standards and will be regularly audited and assessed by third parties and customers. We are in the process of getting our ISO 27001 certification and finalizing the implementation of our Information Security Management System (ISMS) in the next 6 to 9 months.

CoinMetro has defined roles and responsibilities to delineate which roles in the organization are responsible for operating the various aspects of our Information Security Management System (ISMS).

4.1 Key Aspects of CoinMetro’s Security Program

4.1.1 Product Security

- Establish secure development practices and standards;
- Ensure project-level security risk assessments;
- Provide design review and code review security services for detection and removal of common security aws;
- Manage CoinMetro’s bug bounty program; and
- Train developers on secure coding practices.

4.1.2 Operations Security

- Build and operate security-critical infrastructure including CoinMetro’s public key infrastructure, event monitoring, and authentication services;
- Maintain a secure archive of security-relevant logs; and
- Consult with operations personnel to ensure the secure configuration and maintenance of CoinMetro’s production environment.

4.1.3 CSIRT

- Respond to alerts related to security events on CoinMetro systems;
- Manage security incidents; and
- Acquire and analyze threat intelligence.

4.1.4 Risk and Compliance

- Coordinate penetration testing;
- Manage vulnerability scanning and remediation;
- Coordinate regular risk assessments, and define and track risk treatment;

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- Manage the security awareness program;
- Coordinate audit and maintain security certifications;
- Respond to customer inquiries; and
- Review and qualify vendor security posture.

CoinMetro divides its systems into separate networks to better protect more sensitive data. Systems supporting testing and development activities are hosted in a separate network from systems supporting CoinMetro's production website. Customer data submitted into the CoinMetro services is only permitted to exist in CoinMetro's production network, its most tightly controlled network. Administrative access to systems within the production network is limited to those engineers with a specific business need.

Network access to CoinMetro's production environment from open, public networks (the internet) is restricted. Only a small number of production servers are accessible from the internet. Only those network protocols essential for delivery of CoinMetro's service to its users are open at CoinMetro's perimeter. CoinMetro deploys mitigations against distributed denial of service (DDoS) attacks at its network perimeter. Changes to CoinMetro's production network configuration are restricted to authorized personnel.

In CoinMetro's hosted production environment, control of network devices is retained by the hosting provider. For that reason, Intrusion Detection / Intrusion Prevention (IDS/IPS) are performed using host-based controls. For example, CoinMetro logs, monitors, and audits system calls and has developed alerts for system calls that indicate a potential intrusion.

4.1.5 Penetration Testing

CoinMetro engages independent entities to conduct regular application-level and infrastructure-level penetration tests. Results of these tests are shared with CoinMetro management. CoinMetro's Security Team reviews and prioritizes the reported findings and tracks them to resolution.

4.1.6 Protecting Customer Data

The focus of CoinMetro's security program is to prevent unauthorized access to customer data. To this end, our team of dedicated security practitioners, working in partnership with peers across all our teams, takes exhaustive steps to identify and mitigate risks, implement best practices, and constantly evaluate ways to improve.

4.1.7 Data Encryption in Transit and At Rest

CoinMetro transmits data over public networks using strong encryption. This includes data transmitted between CoinMetro clients and the CoinMetro platform. CoinMetro supports the latest recommended secure cipher suites to encrypt all traffic in transit, including use of TLS 1.2 protocols, AES256 encryption, and SHA2 signatures, as supported by the clients. CoinMetro monitors the changing cryptographic landscape and upgrades the cipher suite choices as the landscape changes, while also balancing the need for compatibility with older clients.

Data at rest in CoinMetro's production network is encrypted using FIPS 140-2 compliant encryption standards. This applies to all types of data at rest within CoinMetro's systems —

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relational databases, database backups, etc. CoinMetro stores encryption keys in a secure server on a segregated network with very limited access. Keys are never stored on the local filesystem, but are delivered at process start time and retained only in memory while in use.

The CoinMetro service is hosted in data centers maintained by industry-leading service providers (AWS). Data center providers offer state-of-the-art physical protection for the servers and related infrastructure that comprise the operating environment for the CoinMetro service. These service providers are responsible for restricting physical access to CoinMetro's systems to authorized personnel.

Each CoinMetro customer's data is hosted in CoinMetro's shared infrastructure and segregated logically by the CoinMetro application. CoinMetro uses a combination of storage technologies to ensure customer data is protected from hardware failures and returns quickly when requested.

4.1.8 Network Security

CoinMetro divides its systems into separate networks to better protect more sensitive data. Systems supporting testing and development activities are hosted in a separate network from systems supporting CoinMetro's production website. Customer data submitted into the CoinMetro platform is only permitted to exist in CoinMetro's production network, its most tightly controlled network. Administrative access to systems within the production network is limited to those engineers with a specific business need.

Network access to CoinMetro's production environment from open, public networks (the internet) is restricted. Only a small number of production servers are accessible from the internet. Only those network protocols essential for delivery of CoinMetro's service to its users are open at CoinMetro's perimeter. CoinMetro deploys mitigations against distributed denial of service (DDoS) attacks at its network perimeter. Changes to CoinMetro's production network configuration are restricted to authorized personnel.

In CoinMetro's hosted production environment, control of network devices is retained by the hosting provider. For that reason, Intrusion Detection / Intrusion Prevention (IDS/IPS) are performed using host-based controls. For example, CoinMetro logs, monitors, and audits system calls and has developed alerts for system calls that indicate a potential intrusion.

4.1.9 Classifying and Inventorying data

To better protect the data in our care, CoinMetro classifies data into different levels and species the labeling and handling requirements for each of those classes. CoinMetro's ISMS considers data classifications in its encryption standards, its access control and authorization procedures, and incident response standards, among other security documents. Customer data is classified at the highest level.

Data classifications are maintained as part of the asset management process. CoinMetro inventories hardware, software and data assets at least annually to maintain correct data classification levels.

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4.1.10 Authorizing Access

To minimize the risk of data exposure, CoinMetro adheres to the principle of least privilege — workers are only authorized to access data that they reasonably need to handle in order to fulfill their current job responsibilities. To ensure that users are so restricted, CoinMetro employs the following measures:

- All systems used at CoinMetro require users to authenticate, and users are granted unique identifiers for that purpose.
- Each user's access is reviewed at least quarterly to ensure the access granted is still appropriate for the user's current job responsibilities.

Workers may be granted access to a small number of internal systems, such as the corporate CoinMetro instance, by default upon hire. Requests for additional access follow a documented process and are approved by the responsible owner or manager and tracked by CoinMetro's HR, IT and IT Security Teams.

4.1.11 Authentication

To further reduce the risk of unauthorized access to data, CoinMetro employs multi-factor authentication for administrative access to systems with more highly classified data. Where possible and appropriate, CoinMetro uses private keys for authentication. For example, at this time, administrative access to production servers requires operators to connect using both an SSH key and a one-time password associated with a device-specific token. Where passwords are used, multi-factor authentication is enabled for access to higher data classifications. The passwords themselves are required to be complex (auto-generated to ensure uniqueness, longer than 12 characters, and not consisting of a single dictionary word, among other requirements).

CoinMetro requires personnel to use an approved password manager. Password managers generate, store and enter unique and complex passwords. Use of a password manager helps avoid password reuse, phishing, and other behaviors that can reduce security.

4.1.12 System Monitoring, Logging, and Alerting

CoinMetro monitors servers, workstations and mobile devices to retain and analyze a comprehensive view of the security state of its corporate and production infrastructure. Administrative access, use of privileged commands, and system calls on all servers in CoinMetro's production network are logged.

CoinMetro's Security Team collects and stores production logs for analysis. Logs are stored in a separate network. Access to this network is restricted to members of the Security Team. Logs are protected from modification and retained for at least two years. Analysis of logs is automated to the extent practical to detect potential issues and alert responsible personnel. Alerts are examined and resolved based on documented priorities.

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4.1.13 Endpoint Monitoring

CoinMetro workstations run a variety of monitoring tools that may detect suspicious code or unsafe configuration or user behavior. CoinMetro's Security Team monitors workstation alerts and ensures significant issues are resolved in a timely fashion.

4.1.14 Responding to Security Incidents

CoinMetro has established policies and procedures (also known as runbooks) for responding to potential security incidents. All incidents are managed by CoinMetro's dedicated Computer Security Incident Response Team. CoinMetro defines the types of events that must be managed via the incident response process. Incidents are classified by severity. Incident response procedures are tested and updated at least annually.

4.1.15 Data and Media Disposal

Customer data is removed immediately upon deletion or message retention expiration. CoinMetro hard deletes all information from currently running production systems (excluding team and channel names, and search terms embedded in URLs in web server access logs). Backups are destroyed within 14 days. CoinMetro follows industry standards and advanced techniques for data destruction.

CoinMetro defines policies and standards requiring media be properly sanitized once it is no longer in use. CoinMetro's hosting provider is responsible for ensuring removal of data from disks allocated to CoinMetro's use before they are repurposed.

4.1.16 Protecting Secrets

CoinMetro has implemented appropriate safeguards to protect the creation, storage, retrieval, and destruction of secrets such as encryption keys and service account credentials.

4.1.17 Workstation Security

All workstations issued to workers are configured by CoinMetro to comply with our standards for security. These standards require all workstations to be properly configured, kept updated, run monitoring software, and be tracked by CoinMetro's endpoint management solution. CoinMetro's default configuration sets up workstations to encrypt data, have strong passwords, and lock when idle. Workstations run up-to-date monitoring software to report potential malware and unauthorized software and mobile storage devices.

Controlling system operations and continuous deployment

We take a variety of steps to combat the introduction of malicious or erroneous code to our operating environment and protect against unauthorized access.

4.1.18 Controlling Change

To minimize the risk of data exposure, CoinMetro controls changes, especially changes to production systems, very carefully. CoinMetro applies change control requirements to systems

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that store data at higher levels of sensitivity. These requirements are designed to ensure that changes potentially impacting Customer Data are documented, tested, and approved before deployment.

4.1.19 Prevention and Detection of Malicious Code

In addition to general change control procedures that apply to our systems, CoinMetro's production network is subject to additional safeguards against malware.

4.1.20 Server Hardening

New servers deployed to production are hardened by disabling unneeded and potentially insecure services, removing default passwords, and applying CoinMetro's custom configuration settings to each server before use.

4.2 Tech Stack

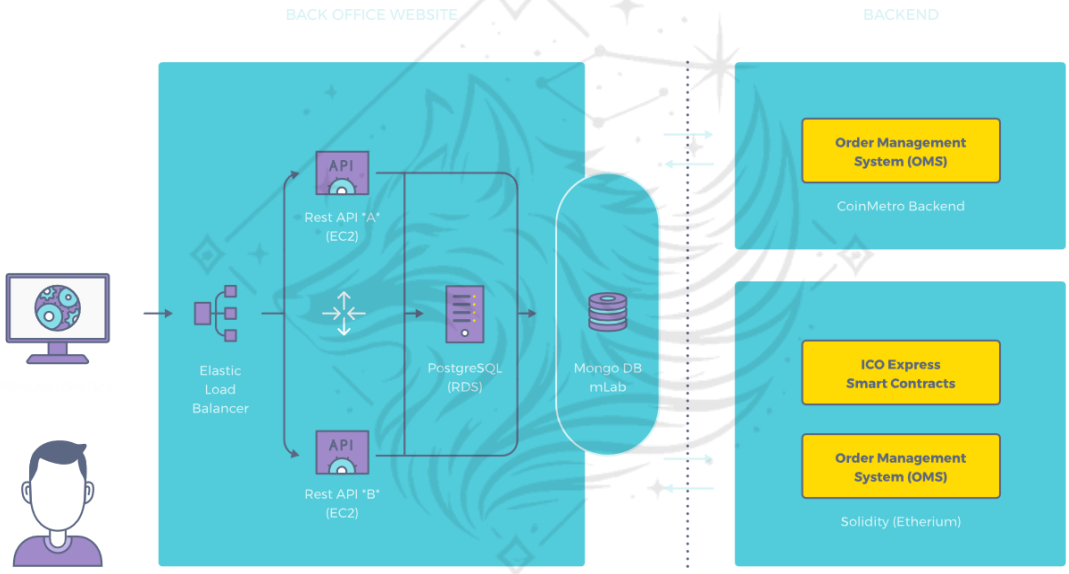


Image 3 - CoinMetro Backoffice components

4.2.1 Web Application

CoinMetro's core user interface will be built using ReactJS. React is flexible and scalable, making it perfect for designing interactive UIs. To build a fully functional dynamic application, we will supplement ReactJS with Gulp to automate tasks and manage content and template changes. The combination of the two offers a powerful alternative to existing task-runners, allowing us to streamline our development workflow and optimize existing code.

4.2.2 REST API

Our platform's REST API will be developed using NodeJS, TypeScript and Express. With a keen awareness of best practices, CoinMetro's REST architecture will emphasize performance,

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scalability and security while remaining highly flexible, simple, and stable. This layer is intended to provide a secure, reliable connection between the frontend interface and the CoinMetro database. The API will employ essential input validation to prevent cross-site request forgery attacks and cross-site scription (XSS) or SQL breaches. We propose that main authorization will be performed using tokens in request headers with all the resource collections being processed in standalone units whenever possible. The API's internal functionalities are envisaged to be quite complex; however, the external layer is planned to be been kept open and remain simple to work with. Access permissions will be restricted and closely monitored, with end users only able to gain access to specific portions of the full API workflow. Frequent onsite security audits are intended to ensure that the API is constantly evolving based on real world production level risk analysis.

The CoinMetro API will be available to our partners, enabling them to build third-party services and applications that communicate with our core database.

4.2.3 Database

CoinMetro plans to use the open-source, document-oriented database program, MongoDB, to handle authentication, network isolation, and encryption. Fully elastic and natively "blockchain" structure supportive, Mongo is built to scale and is highly available by default. Role-based access controls enhance data security, while optimized dashboards highlight key historical metrics. MongoDB Atlas has been independently audited and confirmed to meet privacy and compliance standards.

In addition to Mongo, CoinMetro will deploy PostgreSQL, a powerful, open-source, fully ACID compliant object-relational database system. Backed by over 15 years of active development, PostgreSQL's proven architecture has earned it a strong reputation for reliability, data integrity, and performance.

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4.2.4 Order Management System

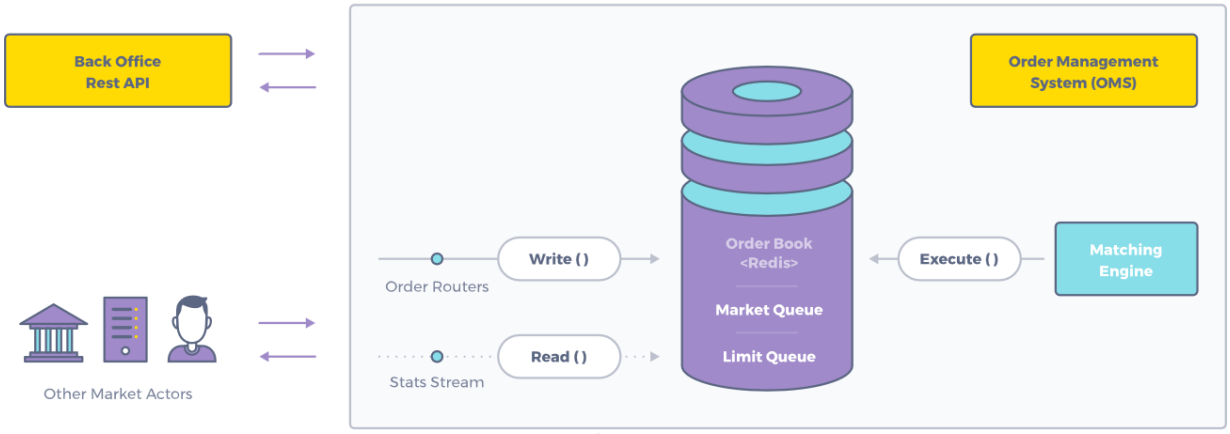


Image 3 - Order Management System components

CoinMetro's Order Management System will be a basic, low-level component, that serves the exchange, the TAM, as well as the ETCF platform. It will be based on Redis, an in-memory database that supports a high speed of write/read operations. Submitted via a TCP/IP socket, order queues will be optimized for high-speed matching through our engine's Redis implementation.

Integration of Redis with NodeJS/TypeScript will provide cache, lock and path-optional backends, as well as a placeholder module for easier integration of contributed modules.

4.2.5 Public Blockchain Use

To ensure transparency, CoinMetro proposes using a public blockchain to provide accessible and immutable storage for historic values, including:

- Order Matching Engine: execution times, volumes, slippage reports, and other information related to system wide transparency.

- Token Express: data on distributed tokens, token sale contribution data, smart contract timelines, and other data pertinent to the transparency of the platform as a whole.

- TAM: TAM managers trading statistics, amount of tokens sold and at what price, daily statement snapshots including profit and loss from previous days and the resulting token price.

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- Using NEM's public blockchain, optional Mirror applications will let companies share their indicators, reinforcing data authority via unchangeable blockchain storage.

It is proposed that a CoinMetro private NEM blockchain be used for storing sensitive information, ensuring data immutability. Even in the event of a compromised database, a full NEM backup will exist containing a 100% in-tact blockchain record of all pertinent data and user verification statuses.

5. CoinMetro's Token Sales - 2017/18

5.1.1 Pre-Token Sale Summary

The pre-Token Sale started on December 21st, 2017, and was preceded by a 10-day Whitelist campaign via telegram. The pre-Token Sale ended on January 11, 2018.

Results:

- A total of $3,109,748 USD was contributed;
- 52,975,457 XCM tokens were sold.
- The total number of contributors was 2,095.

5.1.2 Token Sale Summary

The Token sale started on February 21st, 2018 and ended on March 31st, 2018.

Results:

- A total of $14,805,984.69 USD was contributed;
- 127,665,508 XCM tokens were sold.
- The total number of contributors was 6,978.

5.1.3 Value of COIN after the Token Sale

CoinMetro placed no guarantee as to the price of COIN following the sale, nor that CoinMetro's exchange or any secondary market would be available. It was stated that COIN price would depend on a number of factors.

5.1.4 Vesting Rules for Certain Pre-Token Sale Participants

COIN purchased at 0.03 and 0.05 EUR are subject to a special vesting schedule to support a stable pricing environment following token distribution.

Participants who bought in at 0.03 EUR were informed that they'd have access to 20% of their total purchase after an initial vesting period of 90 days following distribution. The other 80% would be vested for an additional 90 days. Also, participants who bought in at 0.05 EUR would have access to 33% of their total purchase after an initial vesting period of 90 days following distribution. It was also said that the other 67% would be vested for an additional 90 days.

Participants buying in at all other price points were told that they would see their purchases distributed in their entirety on the date of distribution.

5.2 The Long Term Stability of COIN

Many ERC20 tokens focus on speculation rather than utility, which is not encouraged by CoinMetro. Long-term value, for those tokens, starts at utility and their price also relies on

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supply and demand. In order to manage supply, help reduce volatility and enable persons who need COIN to obtain them, CoinMetro created a three-pronged approach as outlined here:

It is planned that all fees payable to CoinMetro, either on our exchange, via our investment vehicles, such as the TAM and ETCF platforms, or for our ICO-related services via the ICO Express gateway, will be paid in COIN.

Each time a fee is paid, whether it is priced in BTC, ETH, USD, or any other currency, an equivalent amount of COIN will be purchased on the exchange to cover said fees. Thus, the buy side on our exchange platform will be very active. In the event that no sell orders are present to support the needed conversions, resting COIN sell orders from CoinMetro's liquidity reserve will be added to the book at a price equal to the indicative market value.

We intend that holders of COIN tokens will be offered discounts on fees based on their overall COIN holdings. The more COIN they own, the higher the discount will be. This will likely incentivize clients to buy and hold COIN, further reducing the available supply. NOTE - This is part and partial to the LIFETIME discounts that were offered to our pre-Token Sale and Token Sale contributors, which are not based on their total individual contribution.

5.2.1 Bonus Structure for Token Sale Participants

- Token Sale participants are privy to private invitations and exclusive opportunities concerning all future Token Sales offered by any of CoinMetro's founders, as well as special pricing on select Token Sales launched via our ICO Express Platform.

5.2.2 Bonus Structure for Pre-Token Sale and Token Sale Participants

- Pre-Token Sale contributors will be eligible for a bonus of up to 500%, based on the final COIN value, should we reach our 300,000,000 COIN hardcap during the pre-Token Sale/Token Sale event. NOTE - Although this discount is sizeable this is only for the first 2.5% of tokens sold, with the discount diminishing as more tokens are sold. The reality is that most larger token sale events offer substantial discounts to private investors prior to their public pre-sale events, so while this may appear excessive it is in fact commonplace with the difference here being that CoinMetro has decided to offer these 'friends and family' discounts to the community at large rather than to a small select group of private investors.
- Once 200 million COIN are sold during the Token Sale, participants will be granted lifetime discounts on applicable fees tied to services on both CoinMetro and FXPIG's platforms.
- It is intended that Token Sale participants will be privy to private invitations and exclusive opportunities concerning all future Token Sales offered by any of CoinMetro's founders, as well as special pricing on select Token Sales launched via our ICO Express Platform.

5.2.3 Risk Disclaimer

For the CoinMetro platform to move forward into the operational stage, the Token Sale must reach its minimum sale target of EUR 3 million. In the event that the CoinMetro Token Sale fails to reach this minimum, COIN purchasers will be provided with the opportunity for a refund on the COIN purchased.

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In the event that the CoinMetro Token Sale reaches its goal without selling all available COIN, unsold COIN will be permanently eliminated and will not be circulated/sold.

Token Sale participants should be aware that, as with any developing industry, there are risks involved (including the failure to build the intended platform). CoinMetro has worked hard to mitigate these risks by partnering with the industry-leading blockchain platforms, such as Ethereum, NEO and NEM, globally recognized payment processors such as BitGo. The potential for future regulation, security vulnerabilities in one of our third-party service providers, volatility in cryptocurrency markets, and other circumstances may present unforeseen challenges that may impact the CoinMetro platform and/or the value of COIN. Please refer to our Terms and Conditions for more details concerning official company policies.

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6 The Team

6.1 Kevin Murcko, CEO

A Crypto Enthusiast before the term was even a “thing”, Kevin brought transparency to Forex via his unique FXPIG brand and he continually pushes to close the profit gap between institutional and retail traders. FXPIG is not the largest FX broker, but that is by design based on his vision. It was created to change the industry, and it did just that. FXPIG brought transparency to the forefront and it started a growing trend of client-centric shops that actually focus on their client’s profitability rather than their losses. While FXPIG is still very unique in the FX space, it is proud to see the change it helped foster as it pushes through the industry. Kevin has always been a supporter of in-house tech development and FXPIG remains one of the few companies in FX to develop and trade on their own technology. This mantra is at the core of the CoinMetro philosophy as well. With his sights now set on blockchain, Kevin is ready to guide CoinMetro down a similar path; one that will eventually change the way this market operates.

6.2 Sylvain Legay, CFO

Our by-the-book numbers guy, a corporate veteran turned startup aficionado, Sylvain helped shape FXPIG into the well-run FX brokerage company that it is today. With a background in corporate finance in one of the most highly regulated industries- the pharmaceutical industry, he is a stickler for strict internal protocols, which is definitely something this industry needs to pay more attention to. Under his watch FXPIG was able to streamline its finances and push its revenue to record levels while weeding out unnecessary expenditures. Sylvain’s 12-year stint in pharma also showed him the need for compliance and how it plays an important role in a company’s overall wellbeing. Jumping from the corporate world to running the books of a niche Forex broker was a bit of a culture shock, but Sylvain has proven to be an asset on many levels and we are happy to have him onboard this project..

6.3 Ingvar Ülpre, Head of Legal

Ingvar is a seasoned lawyer with several years of experience working in law firms in London and Brussels. His background covers financial services, litigation, UK & EU regulatory and antitrust and – as of more recently – crypto and blockchain. He has experience advising large and small corporates alike, including crypto companies, from a multi-jurisdictional standpoint. At CoinMetro, his key responsibility is liaising with regulators and managing the processes for obtaining the relevant regulatory authorisations and licensing required to operate the business. He is also involved in managing the relationships with CoinMetro’s partners and is responsible for overseeing all internal legal matters. He is a qualified Solicitor in England & Wales and a qualified Attorney in the State of New York.

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