



## K33 Custody Policy

K33 is committed to keeping your crypto-assets and funds safe. Our custody arrangements follow MiCA requirements and are designed to ensure transparency, security and proper segregation of client assets. The summary below provides an overview of our Custody Policy.

### Policy principles

In order to safeguard clients' rights in relation to their crypto-assets and fiat funds, K33 shall:

- **keep all client assets fully segregated** from the company's own funds, whether held in client bank accounts, pooled wallets or individually segregated Vault wallets.
- **maintain precise and up-to-date internal ledgers** to ensure that each client's assets can always be clearly identified and distinguished.
- **provide continuous transparency** by giving clients access to electronic statements upon request.
- **apply strict security and risk controls** to minimise the risk of loss, including blockchain analytics, ownership checks, whitelisting requirements and verification of withdrawals.

### How your assets are held

K33 keeps clients' crypto-assets and fiat funds securely stored and fully segregated from the company's own assets. Crypto-assets are either held in pooled Client Wallets or, if preferred, in individually segregated Vault wallets that are visible on the blockchain. Fiat funds are held in dedicated client bank accounts with a Norwegian bank. In all cases, K33 treats all funds and crypto assets we safeguard as the sole property of the client.

### Vault service

Clients who opt for the Vault service receive an individually segregated wallet on the blockchain, ensuring clear separation from all other client assets. K33 securely manages the private keys for these wallets and performs transfers on behalf of the client.



## Use of third parties

K33 uses Fireblocks' secure infrastructure which is utilising Multi Party Computing (MPC) technology, to ensure that all coins are held securely in a multi-signature setup. Fireblocks provides merely the underlying technology to K33 for our Custody service and does not have access to the funds stored in our customer wallets.

We do not use any other crypto-asset service providers for the custody and administration of crypto-assets on behalf of customers. If authorised third-party providers are engaged in the future, clients will be informed before any such arrangements take effect, and all providers will be required to meet MiCA's regulatory standards.