Bitpanda Broker MENA FZCO

Virtual Asset Standards

Bitpanda Broker MENA FZCO - VA Standards

These Virtual Asset Standards (the "**Standards**") set out the criteria upon which Bitpanda Broker MENA FZCO ("**Bitpanda**") evaluates each proposed Virtual Asset before its listing on Bitpanda's broker platform and certain measures that Bitpanda implements to provide VA Activities in an orderly manner.

The Standards have been established pursuant to the requirement set out in, and constitute 'VA Standards' for the purposes of, Rule VIII.A.1 of the Market Conduct Rulebook (the "**Rulebook**") published from time to time by the Dubai Virtual Assets Regulatory Authority ("**VARA**"). Capitalised terms not otherwise defined herein shall have the meanings given to them in the Rulebook. The Standards are published on Bitpanda's website in accordance with Rule VIII.A.3 of the Rulebook.

Pursuant to Rule VIII.A.2 of the Rulebook, Bitpanda conducts due diligence on all Virtual Assets in respect of which Bitpanda provides VA Activities, including in respect of the following criteria, as prescribed in Rule VIII.A.4 of the Rulebook:

1. **Market Capitalisation**

- The Virtual Asset's market capitalisation, fully diluted value and liquidity, and whether such metrics have trended downwards over time.

2. **Design, Features and Function**

- Reviewing the Virtual Asset's design, features and use cases, whether intended and unintended by the issuer or relevant developers.

3. **Legal and Regulatory Compliance**

- The features of the Virtual Asset which may materially affect Bitpanda's compliance with applicable laws, Regulations, Rules or Directives, including those relating to AML/CFT, sanctions, securities, and intellectual property.
- The regulatory treatment of the Virtual Asset by VARA and other appropriate authorities, including those outside of Dubai, in particular whether the issuance of the Virtual Asset has received any regulatory approvals.

- Whether the Virtual Asset is prohibited by VARA or any other appropriate authorities in jurisdictions in which Bitpanda will provide VA Activities in respect of the Virtual Asset.

4. The DLT Protocol

- The security and immutability of the Virtual Asset's underlying DLT protocol.

5. The Roadmap

- The Virtual Asset's future development and roadmap, as communicated by its issuer and/or developers.

6. Market Manipulation

- Whether the Virtual Asset may be susceptible to price manipulation for any reason and relevant mitigations that will be implemented by Bitpanda.

7. Conflicts of interest

- Whether potential or actual conflicts of interest may arise should Bitpanda provide any VA Activities in respect of the Virtual Asset and whether there are any relevant mitigations that can be implemented by Bitpanda.

8. The Issuer

- The background of the Virtual Asset's issuer, including its relevant experience in the Virtual Asset sector, and whether the Virtual Asset has been subject to any investigations or claims in relation to fraud or deceit.

9. Rights to Other Assets

- Whether the Virtual Asset represents rights to any other assets and, if so, the enforceability of such rights.

As required by Rule VIII.A.2 of the Rulebook, Bitpanda implements the following measures, as prescribed in Rule VIII.A.4 of the Rulebook, to ensure that it provides VA activities in an orderly manner:

1. **Sufficient Assets Available**

- Bitpanda ensures that sufficient assets are available to satisfy any obligation with respect to any VA Activities.

2. **Dynamic Terms and Conditions**

- Bitpanda ensures that its terms and conditions applicable to its VA Activities in respect of the Virtual Assets (the "**Terms and Conditions**") reflect, to the extent possible, the operation of any existing underlying physical market and, if applicable, serve to avoid adverse impacts on such market.
- Bitpanda periodically reviews its Terms and Conditions for, where applicable, appropriate correlation to the physical market to ensure that the Terms and Conditions conform to standards and practices in that physical market.