CONFIRMO — VARA REGULATORY DISCLOSURES

Mandatory Website Disclosures & Compliance Documentation (VARA Broker-Dealer License)

Document Version:	1.0
Last Updated:	August 2026

1. Entity & Licensing Details

Full Legal Entity Name	Confirmo FZE
Commercial Registration (CR) / Free Zone License No.	4302 (DWTCA)
VARA Regulatory Status	Approval to Incorporate & NOC received; finalizing responses to VARA feedback
VARA License / Application Reference No.	License / Application Ref: ATI/11/25/015
Registered Dubai Address	Floor 23, Premises 23.01-EO56, Sheikh Rashid Tower, Dubai World Trade Centre Complex, Sheikh Zayed Road, Dubai, UAE
Official Contact Emails	Compliance: compliance@confirmo.com | Complaints: complaints@confirmo.com

2. Senior Management & Board Disclosures

In accordance with the Public Disclosure standards set forth by the Virtual Assets Regulatory Authority (VARA):

> *Neither Confirmo nor any member of its Board of Directors or Senior Management has been subject to any criminal convictions, regulatory enforcement actions, or disqualification proceedings in the United Arab Emirates or any international regulatory jurisdiction.*

3. VARA Standard Risk Warnings

VARA Mandatory Risk Warning: Virtual assets are subject to high market risks, extreme price volatility, and potential complete loss of capital. Virtual asset transactions are final and irreversible.

Prior to engaging in transactions with Confirmo, clients must understand the following core risks:

- **Market & Volatility Risk:** Virtual assets exhibit extreme price volatility driven by sentiment, global market dynamics, liquidity changes, and regulatory shifts. Past performance is not indicative of future results.

- **Transaction Irreversibility:** Transactions executed on distributed ledgers (blockchain networks) are permanent and irreversible once confirmed on-chain. Erroneous or accidental transfers cannot be reversed by Confirmo or VARA.
- **No Government Guarantees:** Virtual assets are not legal tender in the UAE (unless specifically designated fiat-backed stablecoins under UAE regulatory standards) and are not covered by central bank or investor compensation schemes.
- **Technology & Operational Risk:** Underlying networks are susceptible to cyberattacks, software bugs, smart contract vulnerabilities, network forks, and outages beyond Confirmo's control.
- **Liquidity & Volatility Stress:** During extreme volatility or network congestion, market illiquidity may impact execution speed, pricing, or temporary transaction processing capabilities.

4. Order Execution & Best Execution Policy Summary

- **Best Execution Standard:** In accordance with VARA's Broker-Dealer Services Rulebook, Confirmo takes all reasonable steps to obtain the best possible execution result for client orders, considering price, total cost, speed, likelihood of execution and settlement, size, and market impact.
- **Execution Capacity:** Confirmo acts in either an Agent capacity (routing client orders to vetted third-party liquidity providers/venues) or a Principal capacity (filling orders directly against liquidity inventory). Confirmo clearly discloses its capacity prior to execution and on trade receipts.
- **Fee & Spread Transparency:** All applicable broker commissions, platform service fees, and conversion spreads are displayed transparently prior to trade confirmation and itemized on post-trade execution receipts.
- **No Inducements:** Confirmo does not pay or receive third-party inducements, rebates, or monetary benefits that create a conflict of interest or compromise its duty of best execution.

5. Safeguarding & Segregation of Client Assets

- **Strict Asset Segregation:** In compliance with VARA Asset Safeguarding standards, all client fiat funds and virtual assets held with Confirmo are strictly segregated from Confirmo's own corporate operational capital. Client assets are held in designated omnibus client accounts and segregated wallet structures.
- **No Re-hypothecation:** Confirmo does not lend, pledge, re-hypothecate, or otherwise use client virtual assets or funds for its own account, operations, or investments without explicit prior written consent from the client.

6. Governance, Personal Account Dealing & Complaints

- **Conflicts of Interest Management:** Confirmo maintains comprehensive internal policies and organizational controls to identify, prevent, and manage potential conflicts of interest between client orders, employee interests, and company operations.
- **Personal Account Dealing (PAD):** Confirmo enforces strict employee trading restrictions to prohibit front-running, insider dealing, or personal trading that conflicts with client order execution.
- **Complaints Handling Procedure:** Clients may submit formal grievances to complaints@confirmo.com. Confirmo acknowledges complaints within 48 hours and provides a formal written resolution within 15 business days. Unresolved complaints may be escalated directly to VARA.