



UNIQUE
INVESTMENTS

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INTRODUCTION

Arbtrust Venture is a cutting-edge high-tech quant fund that operates with the intermediation of negotiations through the pure arbitrage mechanism. Arbtrust is an American company licensed with the SEC and duly registered and established in Florida.

Our office is at the heart of Miami's financial district. Arbtrust is part of a larger group of companies headquartered in South America with operations in different industries such as agribusiness, software development, banking, and finance.



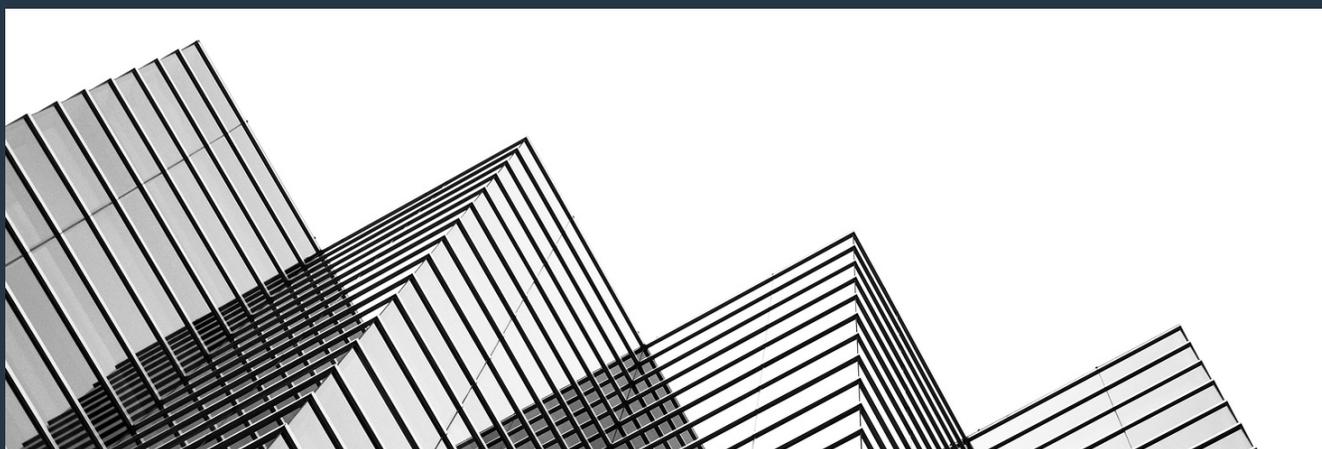
After the outstanding success of our operations in South America since 2018, settling the operations of Arbtrust in the United States at the beginning of 2021 was the big step in the pursuit of a broader mission: to make it possible for investors to access the digital-assets market without being susceptible to the industry volatility and to do so in a simplified and efficient way through our registered and licensed fund.

We developed the cutting-edge technology we use and have a specialized team working to ensure your investments grow sustainably and securely. We pursue the highest rates of return and the best overall client experience, focusing on risk management and continuous technology development.

Our vision is on the long-term, and we are relentless in the search for the optimization of our models to continue to generate consistent results and easy access to the digital assets market. Our unique proposal and structure offer a solid operations system for the intermediation of digital assets negotiations.

Arbtrust's primary purpose is to prioritize technology and offer consistent investment opportunities in the digital asset market, always exceeding investors' expectations.

Our mission is to be the most innovative and leading quant fund operating with the intermediation of digital assets' negotiation in the United States, offering the most suitable products in the category for qualified investors.



Our team is made up of more than forty people based in different locations across the globe, who are constantly working to ensure all areas of our business, system, and operations are up to date. Nonetheless, we have a specific team in overseeing the operations of Arbtrust in the United States. Arbtrust has sister companies, some of which were the foundation of our success and were established decades ago.

WHY ARBTRUST

01

WE ARE A LICENSED, REGISTERED U.S COMPANY:

We are not based in a distant foreign country. Our headquarters is right in the heart of the Miami financial center, Brickell. You are welcome to stop by!

02

HIGH LIQUIDITY:

There is no reason to lock up your investments. Once you place a withdrawal request, you will receive your money back within two business days.

03

CUSTOMER-CENTERED:

You have complete control of your investments directly from your user-friendly account, either on your phone or your computer. Deposits, withdrawals, fund's daily return, documents - everything is in one place.

04

NON-CORRELATED INVESTMENTS:

Our investments are not correlated to the vicissitudes of the stock market and the impact of macroeconomic factors.

05

CURRENCY HEDGING :

Our investments are based on US dollars and stablecoins, USDT, and USDC. At Arbtrust, non-US investors have an extra benefit with currency protection.

WHY ARBTRUST

06

INFLATION HEDGE:

As a quant fund, we work as a hedge against rising prices because our value is created from statistical techniques, mathematical modeling, and automated algorithms.

07

HIGHER ABSOLUTE RETURNS:

We always aim to deliver consistently higher nominal returns than publicly traded stocks and bonds. In 2021, we had an annual return of 28.65%, and YTD (Jan-nov), we are at a 24.31% return.

08

REDUCED VOLATILITY:

Because our investment strategy is based on immediate transactions that only occur if there is a difference in the price of the same asset and, therefore, a spread to be made, there are no surprises at the end of the month; in the past years, we have continuously delivered a consistent return.

09

SPECIALIZED TECH & RISK MANAGEMENT TEAM:

We have dedicated teams focused on the research & development of our system and software, as well as risk assessment and management systems that work under the supervision of our IT managers.

MESSAGE FROM OUR LEADERS

At Arbtrust, we focus on the continuous development of our cutting-edge technology and proprietary approach so you can enjoy a simpler and unique way of investing.

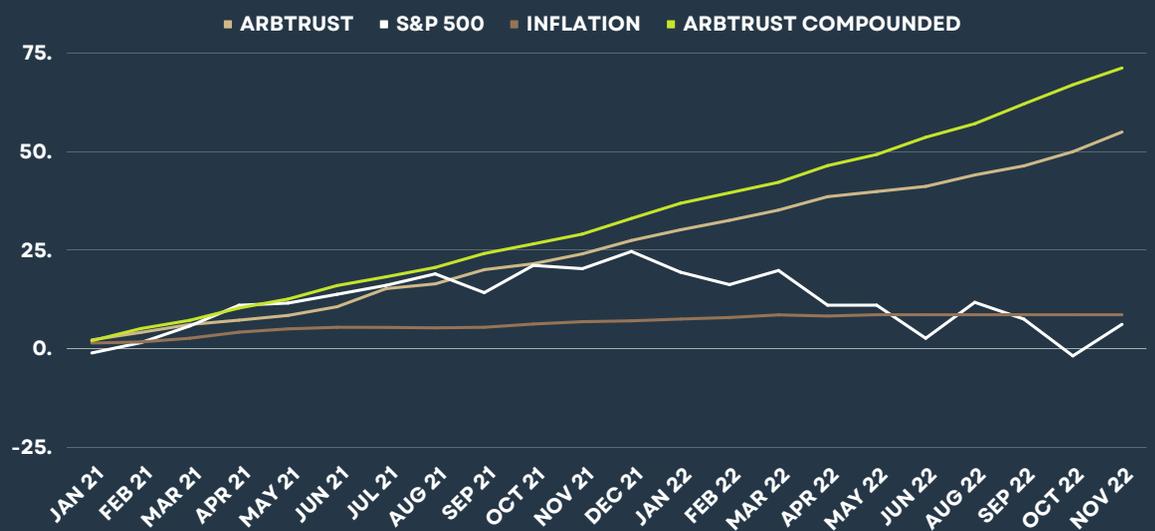
We are committed to you. At Arbtrust, you will not be facing complicated terms and a variety of explanations to dissuade you from the most important topic: your investments. We created a customer-centered platform in which you have full control of your investments. There is no need to wait to withdraw your investments and you don't have to email or call us in advance - just access your account, request a withdrawal and you will receive it within two full business days. In your app, you can also review your account information, our daily performance, tax documents, ethics & compliance, and ensure your personal information is up to date.

”

Full control of your investments, unheard liquidity, transparency, outstanding consistent returns, and simple access to your account. **Our commitment to you.**

PERFORMANCE

Ever since we deployed Arbtrust’s algorithm and system, we have obtained an average monthly return of more than 2% a month for the past four years. During this time, we never had a month with a negative return. The U.S. operations started in February 2021, and for this reason, we have split the performances between our global and US fund.



BENCHMARKS

Our main goals are to exceed the inflation rate, the S&P 500, and the HFRX Global Hedge Fund.

YEAR	ARBTRUST SIMPLE	ARBTRUST COMPOUNDED	S&P 500	INFLATION	HFRX GLOBAL
2021	28.86%	32.98%	28.71%	4.72%	2.64%
YTD	25.51%	71.11%	-24.77%	9.1%	-4.49%
TOTAL	54.37%	71.11%	-3.2%	9.1%	-2.29%

GLOBAL FUND:

Our fund in South America has been operating since 2018 and during these years we have achieved an average NET annual net return of more than 28%.

MONTH / YEAR	MONTHLY NET RETURN	ACCUMULATED RETURN	COMPOUNDED ACCUMULATED NET RETURN
21-Jan	2.00%	2.00%	2.00%
21-Feb	3.01%	5.01%	5.07%
21-Mar	2.00%	7.01%	7.17%
21-Apr	2.90%	9.91%	10.28%
21-May	2.06%	11.97%	12.55%
21-Jun	3.04%	15.01%	15.97%
21-Jul	1.91%	16.92%	18.19%
21-Aug	2.01%	18.93%	20.56%
21-Sep	2.93%	21.86%	24.10%
21-Oct	1.96%	23.82%	26.53%
21-Nov	1.97%	25.79%	29.02%
21-DEC	3.07%	28.86%	32.98%
22-Jan	2.89%	31.75%	36.83%
22-Feb	1.94%	33.69%	39.48%
22-Mar	1.91%	35.60%	42.14%
22-Apr	2.97%	38.57%	46.37%
22-May	1.93%	40.50%	49.19%
22-Jun	2.93%	43.43%	53.56%
22-Jul	2.23%	45.66%	56.99%
22-Aug	2.19%	47.85%	60.42%
22-Sep	2.14%	49.99%	63.86%
22-Oct	2.17%	52.16%	67.41%
22-Nov	2.21%	54.37%	71.11%

STANDARD DEVIATION: The Fund's standard deviation is 0.223% - which means we have delivered a stable return in the past two years.

ALPHA: The Alpha in relation to the S&P since the fund inception in the U.S. is 57.57%.

DELTA: The Delta is flat. There is no difference in the asset price given we use USDT and this stablecoin has parity to the USD

THE STRATEGY

Arbtrust Venture is a cutting-edge high-tech quant fund that operates with the intermediation of negotiations through the pure arbitrage mechanism. Arbtrust is an American company licensed with the SEC and duly registered and established in Florida.

Our office is at the heart of Miami's financial district. Arbtrust is part of a larger group of companies headquartered in South America with operations in different industries such as agribusiness, software development, banking, and finance.



METHODOLOGY:

Our methodology is not based on the traditional notion of value, trading, buying low to sell high, or any other type of market manipulation and speculation. We aim as a company to have an immediate response to our transactions and to not depend on an asset's increasing or decreasing value. Our strategy is designed around our technology, expertise, and market research. Arbtrust is a quant, event, and technology-driven investment fund that developed its unique methodology for active digital assets and currencies investments. The core methodology used by Arbtrust Venture on the investments is the immediate execution of pure arbitrage with currencies and digital assets. Pure arbitrage is the investment strategy in which we simultaneously buy and sell a security or asset in different markets to take advantage of a price difference.

WHAT IS ARBITRAGE?

Arbitrage is one of the oldest ways of doing business and people have been using it for decades. In simple terms, arbitrage is an intermediation of a negotiation in which the intermediary does not necessarily have to hold the asset being negotiated. According to Harvard Business School, there are several strategies and tactics that can be employed within the alternative investments industry. They frequently contrast with the typical trade of “buy and hold” tactics leveraged by most long-term stock and bond investors—and are usually more complicated. Arbitrage is one alternative investment strategy that can prove exceptionally profitable when leveraged by a sophisticated investor.

ONE TOOL IN THE ALTERNATIVE INVESTMENT ARSENAL:

Arbitrage, in its many forms, can be an effective tool for investors seeking low-risk yields. Because yield is often small, it requires high volumes to realize the benefits of arbitrage and generate enough profit to overcome transaction fees. For this reason, arbitrage is generally not a strategy individual investors can leverage for themselves. It is, however, often used by hedge funds and other institutional investors that are capable of high volumes.

Arbitrage is an investment strategy in which an investor simultaneously buys and sells an asset in different markets to take advantage of a price difference and generate a profit. While price differences are typically small and short-lived, the returns can be impressive when multiplied by a large volume. Arbitrage is commonly leveraged by hedge funds and other sophisticated investors.

There are several types of arbitrage, including pure arbitrage, merger arbitrage, and convertible arbitrage. Global macro is another investment strategy related to arbitrage, but it's considered a different approach because it refers to investing in economic changes between countries.

TYPES OF ARBITRAGE:

1. PURE ARBITRAGE

Pure arbitrage refers to the investment strategy above, in which an investor simultaneously buys and sells a security in different markets to take advantage of a price difference. As such, the terms “arbitrage” and “pure arbitrage” are often used interchangeably. Many investments can be bought and sold in several markets. For example, a large multinational company may list its stock on multiple exchanges, such as the New York Stock Exchange (NYSE) and London Stock Exchange. Whenever an asset is traded in multiple markets, it's possible prices will temporarily fall out of sync. It's when this price difference exists that pure arbitrage becomes possible. Pure arbitrage is also possible in instances where foreign exchange rates lead to pricing discrepancies, however small.

Ultimately, pure arbitrage is a strategy in which an investor takes advantage of inefficiencies within the market.

2. MERGER ARBITRAGE

Merger arbitrage is a type of arbitrage related to merging entities, such as two publicly traded businesses. Generally speaking, a merger consists of two parties: the acquiring company and its target. If the target company is a publicly traded entity, then the acquiring company must purchase the outstanding share of said company. In most cases, this is at a premium to what the stock is trading for at the time of the announcement, leading to a profit for shareholders. As the deal becomes public, traders looking to profit from the deal purchase the target company's stock—driving it closer to the announced deal price. The target company's price rarely matches the deal price; however, it often trades at a slight discount. This is due to the risk that the deal may fall through or fail. Deals can fail for several reasons, including changing market conditions or a refusal of the deal by regulatory bodies, such as the Federal Trade Commission (FTC) or the Department of Justice (DOJ).

In its most basic form, merger arbitrage involves investors purchasing shares of the target company at its discounted price, then profiting once the deal goes through. Yet, there are other forms of merger arbitrage. An investor who believes a deal may fall through or fail, for example, might choose to short shares of the target company's stock.

3. CONVERTIBLE ARBITRAGE

Convertible arbitrage is a form of arbitrage related to convertible bonds, also called convertible notes or convertible debt. A convertible bond is, at its heart, just like any other bond: It's a form of corporate debt that yields interest payments to the bondholder. The primary difference between a convertible bond and a traditional bond is that, with a convertible bond, the bondholder has the option to convert it into shares of the underlying company later, often at a discounted rate. Companies issue convertible bonds because doing so allows them to offer lower interest payments. Investors who engage in convertible arbitrage seek to take advantage of the difference between the bond's conversion price and the current price of the underlying company's shares.

This is typically achieved by taking simultaneous positions—long and short—in the convertible note and underlying shares of the company. Which positions the investor takes and the ratio of buys and sells depends on whether the investor believes the bond to be priced. In cases where the bond is cheap, they usually take a short position on the stock and a long position on the bond. On the other hand, if the investor believes the bond to be overpriced, or rich, they might take a long position on the stock and a short position on the bond.

FUND STRATEGY

Nowadays, several funds are working under the arbitrage strategy, and there are different types of arbitrage, including pure arbitrage, merger arbitrage, and convertible arbitrage. Another type of arbitrage is the global macro investment strategy. Pure arbitrage is: “Pure arbitrage refers to the investment strategy in which an investor simultaneously buys and sells a security in different markets to take advantage of a price difference. As such, the terms “arbitrage” and “pure arbitrage” are often used interchangeably. Many investments can be bought and sold in several markets. For example, a large multinational company may list its stock on multiple exchanges, such as the New York Stock Exchange (NYSE) and London Stock Exchange. Whenever an asset is traded in multiple markets, its prices may temporarily fall out of sync. It’s when this price difference exists that pure arbitrage becomes possible. Pure arbitrage is also possible when foreign exchange rates lead to pricing discrepancies. Ultimately, pure arbitrage is a strategy in which an investor takes advantage of inefficiencies within the market.”

Arbtrust’s pure arbitrage strategy is operated with the digital form of the US dollar, the USDT, or USDC, taking advantage of the high volatility of the same asset (Bitcoin) across different markets (the Exchanges). Our software, systems, and algorithms can identify the highest buying price and the lowest selling for the same asset (Bitcoin) at any of the markets (Exchanges) where we have an account. When our software identifies a profit spread that can be made if we simultaneously execute the open orders for buying and selling on the book order, the system – or the operators – will have the opportunity to take action and perform the transaction accordingly. If executed, the transaction will happen in 0.034 seconds and only occurs when a profit can be made. Please see an example of the transactions setup on the next page.

SOFTWARE & ALGORITHM CONTROL:

The transactions and the system are monitored and controlled daily as the software runs. Without constant updates and interventions, no set format can continuously monitor the system alone. The flow is governed by our IT engineers and technology developers, who watch the algorithm and the system performing live. Given the high-tech nature of our operations, there are constant updates and changes on the exchanges that we need to adapt to – for example, the most prestigious exchange in the world changes its API connections weekly. If we are not connected to the exchange, the algorithm cannot perform. Servers also change their location, and the integrations and connections must constantly be updated so we have a whole team dedicated to our system's maintenance.

RISK MANAGEMENT

Although our strategy does not allow the execution of transactions with a negative spread, which limits the risks inside our operations, there are idiosyncratic risks that need to be considered. In order to

The Risk Management Policy ("the Policy") of Arbtrust Venture ("the Manager") seeks to demonstrate the methodology, criteria and parameters applied to monitor exposure to risk factors inherent to the investments made. Analyzing the daily information of the investment vehicles under its management, their limits, and volatility of assets concerning exposure to markets, considering their relationship with the scenarios presented. The Manager seeks to identify potential events that may affect the results of the Fund.

The Manager has methods for managing the risks indicated in this Policy. The primary value of risk management is transparency and the ability to adapt to investment policies in compliance with the current legislation. The risks inherent to the Manager's operations are controlled and evaluated daily. Although risk management is adequate, it does not constitute a guarantee and, therefore, it does not eliminate the possibility of loss for the investor.

2. IDIOSYNCRATIC RISKS

"Idiosyncratic Risk" is an endemic risk to an individual asset, a group of assets, an industry, or in some cases, a particular asset class. Idiosyncratic risks can also be referred to as unsystematic or specific risks. Idiosyncratic risks account for most of the variation in the uncertainty surrounding an individual industry, asset, or class of assets over time, rather than market risk. The idiosyncratic risks have little or no correlation with risks that reflect larger macroeconomic forces, such as market risks and general economic risks.

Idiosyncratic risk is inherent in any individual company or investment. Every company has specific strengths and weaknesses, competitive landscape, management style, and external threats. Thus the business risk for any one company will be essentially unique.

2.1. The digital dollar

Arbtrust operates with USDT and USDC to perform the arbitrage and intermediation of transactions. For this reason, it is crucial to clearly understand these assets, what they are and what they represent.

2.1.1 USDT

The US Dollar's first and most popular digital form is the Tether (USDT), a stablecoin that sustains the trades and negotiations in the digital asset industry. The USDT is pegged to the U.S. dollar, unaffected by the market volatility that can dramatically impact the valuation of cryptocurrencies and digital assets, such as Bitcoin. The USD Tether aims to provide a stable digital asset that maintains a stable valuation. This makes USDT a stablecoin: its value is pegged to the price of the U.S. dollar. Therefore, Tether should always keep the same value as its peg; it provides steady, reliable liquidity to get in and out of other the digital assets and cryptocurrencies world, and it allows trades without facing unpredictable losses (or gains) from volatile price changes. Tether's 24-hour trading volume ranges from \$60 to \$89 billion, and it is the most liquid digital coin. The critical point about Tether is that it is tied to a real-life commodity, the USD.

2.1.2 USDC

The USD Coin or USDC is another form of digital US dollar with its value tied to the U.S. dollar. USDC is another stablecoin, and one USDC should always equal one dollar. USDC is currently the second-largest stablecoin, with a market capitalization of \$73 billion, behind the USDT - the largest stablecoin. Similar to USDT, USDC is backed by real assets and referred to as a fiat-collateralized stablecoin.

To maintain its stable value equal to the US Dollar, the USDC is backed by cash and short-term U.S. government bonds as collateral. For every USDC token in circulation, \$1 is held in collateral.

2.1.3 Operating with USDT and USDC

When an investor decides to invest with Arbtrust, 80% of the capital is generally converted into USDT and USDC; the remaining 20% is kept in a non-interest-bearing bank account for operational costs and immediate withdrawals.

Because Arbtrust performs arbitrage of digital assets, the company must have capital in the US dollar digital form to operate its pure arbitrage strategy by taking advantage of the differences in prices of digital assets in different markets at the same time. The fact that the investments made by our investors are kept in USDT and USDC during the whole time is the main reason why we can offer such high liquidity of 2 business days. Arbtrust does not do trade; this means we do not buy an asset seeking value appreciation over time. Instead, we operate with immediate transactions that happen in milliseconds, guaranteeing liquidity for our investors. Nonetheless, the possibility that either of these coins might lose its stable value against the US Dollar, represents a potential idiosyncratic risk for our investors.

In order to manage this risk that is inherent to the market where we operate, Arbtrust does have an AI system that identifies potential disruptions within these stablecoins. If for any reason, one of them loses its peg against the US dollar, we can quickly and easily move them either to USDT or USDC, withdrawing it subsequently. However, the USDT and USDC are the foundation of the digital world and cryptocurrency industry, which shows their strength and importance to the global economy.

2.2 The exchanges

A digital asset, a crypto exchange, is a platform where these securities can be bought and sold. They function similarly to online brokerage platforms, providing the tools you need to buy and sell digital currencies. Exchanges reflect the current market prices of the digital currencies they offer. Inside the exchange, one can convert the digital currencies into the U.S. Dollar to leave as cash within the account or withdraw to a fiduciary bank account. Exchanges work like stock exchanges; one can buy, sell, operate futures and run long-short strategies. The main difference is that in a stock exchange one can do that with companies' shares like Coca-Cola and Tesla. On digital currency exchange platforms, one can trade USDT, Bitcoin, Ethereum, and other digital assets.

When choosing an exchange to work with, there are key factors we extensively review; some of them are:

- i) the time that the exchange has been in the market
- ii) the exchange history
- iii) exchange liquidity since its inception
- iv) the technology they use
- v) their servers, where are they located; what is the security behind it
- vi) order book; we have algorithms and automated systems that can identify if a specific exchange has a robot operating transactions on its book order

Considering the investments made at Arbtrust are held in USDT/USDC; they must be left inside a digital currency exchange in order to allow us to operate our pure arbitrage strategy. Exchanges might represent a risk for a potential investor. If an exchange runs into liquidity issues and fails to comply with its obligations, it might mean a problem in withdrawing the money from there. Arbtrust does perform several actions in order to have greater risk control on this matter. When choosing an exchange, it's essential to look at factors such as supported assets, fees, payment methods, security, market history, owners' background and history, reserves, and liquidity. Arbtrust always considers these factors when selecting an exchange to work with.

In addition, Arbtrust works with several exchanges - and this happens for two reasons. First, we need to operate with different exchanges because this is where we can profit from the same asset price anomaly in different markets. Having accounts in several exchanges not only increases our speed of operations and profit opportunities but also dramatically enhances our risk management. If one exchange has liquidity issues and has problems continuing its operations, we still have our operations running in several other businesses - which mitigates this specific idiosyncratic risk.

2.2.1 Liquidity

Our research team looks daily at the data entry and exit on the exchange assets; this is our most used analysis to predict a potential liquidity issue in an exchange that we use. As mentioned above, one of the critical points we extensively analyze when using an exchange are liquidity, cash-in and cash-out format, servers, and technology used.

3. Physical Disruption

Arbtrust's servers used to perform daily operations are based on AWS and Google Cloud. The AWS Cloud spans 90 Availability Zones within 28 geographic regions worldwide, with announced plans for 21 more Availability Zones and seven more AWS Regions in Australia, Canada, India, Israel, New Zealand, Spain, and Thailand. The AWS Global Cloud Infrastructure is the most secure, extensive, and reliable cloud platform, offering over 200 fully featured services from data centers globally. Whether you need to deploy your application workloads across the globe in a single click or build and deploy specific applications closer to your end-users with single-digit millisecond latency, AWS provides you with the cloud infrastructure where and when you need it. AWS has the largest and most dynamic ecosystem, with millions of active customers and thousands of partners globally. Customers across virtually every industry and of every size, including start-ups, enterprises, and public sector organizations, are running every imaginable use case on AWS. Customers are increasingly choosing AWS to host their cloud-based infrastructure and realize increased performance, security, reliability, and scale wherever they go. Security at AWS starts with our core infrastructure. Custom-built for the cloud and designed to meet the most stringent security requirements in the world, our infrastructure is monitored 24/7 to help ensure the confidentiality, integrity, and availability of your data. All data flowing across the AWS global network that interconnects our data centers and Regions is automatically encrypted at the physical layer before it leaves our secured facilities. You can build on the most secure global infrastructure, knowing you always control your data, including the ability to encrypt it, move it, and manage retention at any time. AWS delivers the highest network availability of any cloud provider. Each region is fully isolated and comprised of multiple AZs, which are fully isolated partitions of our infrastructure. To better isolate any issues and achieve high availability, you can partition applications across multiple AZs in the same region. In addition, AWS control planes and the AWS management console are distributed across areas. They include regional API endpoints, designed to operate securely for at least 24 hours if isolated from the global control plane functions without requiring customers to access the region or its API endpoints via external networks during any isolation. More information can be found at: <https://aws.amazon.com/security/> and <https://cloud.google.com/security>. In these servers, we have cryptographed access control (CAC), securing data by encrypting it with a key so that only Arbtrust authorized managers with access to the key can decrypt the data and perform further encryptions. In addition, our platforms and accounts can only be accessed through our IPs, which have several security layers.

2.4 Technological Disruption

The essence of Arbtrust operations is the continuous search for spread - differences in prices for the same digital asset, at the same time, in different markets. If a technological disruption establish a new pattern in the industry, in which digital assets and digital currencies have the same price in all the markets they are negotiated - our strategy and operations will have to be changed. As much as technological disruption is a reality because the industry changes quite fast - new opportunities also arise from this movement. Within Arbtrust, we have a department called "Labs" which is, in essence, an R&D team that is constantly evaluating and analyzing other types of arbitrage operations that take place within and outside the digital market. For more information on what our R&D team has been studying, please contact us at arbtrust@arbtrustus.com

3. Concentration Risk

In the stock market, concentration risk is the potential for a loss in value of an investment portfolio or a financial institution when an individual or group of exposures move together in an unfavorable direction. In the digital market, concentration risks are the maintenance of assets in one or just a few exchanges. Considering the market of digital assets is somewhat already concentrated, the risk of portfolio concentration is even more sensitive than other types of financial assets; therefore, a risk management policy involves the maintenance of several accounts in different exchanges that comply with our policies above.

4. Volatility Risk

Although digital assets are known for its high volatility, this is not something that presents a risk in our operations mode. On the contrary, we need the high volatility in the industry in order to continue to successfully operate our arbitrage strategy given the essence of this approach is the difference in prices for the same asset, in different markets. The fact that the investments are kept in the digital form of US Dollar eliminates the general volatility risk inherent to digital assets. We suggest you review topic 2.1.3 on this document for a broader understanding of the US digital dollar.

5. Drawdown

The drawdown estimates the most significant loss accumulated by the investment based on historical data without the time window restriction. Drawdowns are essential for measuring the historical risk of different investments, comparing fund performance, or monitoring personal trading performance. Arbtrust has never had losses in a period of a month, quarter, or year. We cannot estimate a drawdown without losses in the past five years of operations.

6. Policy Review

This Policy must be reviewed at least annually, taking into account the following, but not limited to:

- (i) regulatory changes;
- (ii) eventual deficiencies found;
- (iii) relevant modifications to the Vehicles;
- (iv) significant changes in the Manager's processes, systems, operations, and business model.

This Policy may also be revised at any time, whenever the Compliance, Risk Team, and/or Manager deems it relevant. The revision of this Policy is intended to allow permanent monitoring, measurement, and adjustment of the risks inherent to each of the securities portfolios and to improve internal controls and processes.

OUR TEAM





DENIS CRUZ

Denis is a serial entrepreneur with businesses across South America in different industries. After graduating from law school seventeen years ago, Denis developed a real estate construction company and managed structured equity investments to increase the company's growth. As his first venture, it became the foundation of his upcoming success. Later on, Denis developed his own fitness franchise with units across South America, an innovative business in the boating industry and health software management. As a visionary businessman, eight years ago Denis focused all his efforts on the development of software and businesses in the digital assets industry. In the very beginning, Denis was a top 3 high-frequency trader in Brazil and later on, as we developed a robust software, he channeled his energy and vision to the development of our parent company in South America. Today, he is a partner in our operations in the US and in Dubai. Denis is also licensed with the Brazilian Association of Financial and Capital Market Institutions (ANBIMA).



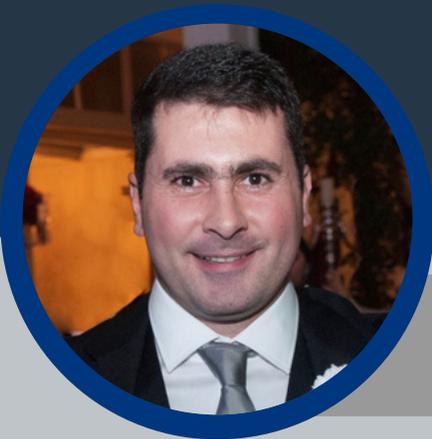
VITORIO RIZZOTTO

Vitorio's career started in the early 80s in the banking industry, at the former "Banco Nacional". In a few years, he became one of the youngest bank directors, later he moved to one of the largest Brazilian banks, Unibanco, and finally, Vitorio went as an executive director to the Spanish bank "Banco Santander", where managed the operations in Brazil and in Chile. Vitorio remained as a key director at Banco Santander for more than 20 years and in 2014, taking advantage of his incredible experience, he structured different funds for the approval of the Brazilian Securities Exchanges Commission (CVM) and also managed several international processes of merges and acquisitions. Another business Vitorio developed was a financial compliance company and venture capital that invested in start-ups. It was in 2017 when Vitorio joined our operations as one of our regional directors and decided to focus all his energy and time on the structuring and expansion of our business.

**DOUGLAS BRUNET**

Douglas is the director of our operations in Brazil and South America, where he has been successful with the management and expansion of our operations for the past five years. Under his administration, is one of our private hedge funds and our digital bank, which he managed to structure and expand brilliantly, achieving more than 5,000 clients.

Douglas holds a master's degree in finance and marketing. He is specialized in business intelligence and has more than eight years of experience managing the development of markets and marketing strategies internationally.

**EDUARDO SBARAINI**

Eduardo is one of the owners of our group of companies and the history of his family business started in 1940 in agribusiness. His family business was one of the first in Brazil to sell commodities on the New York Stock Exchange and with their exponential success soon they owned all the assets at one of the largest Brazilian banks in the 90s (former Bamerindus), which was later purchased by HSBC. Nowadays, Eduardo's family business is still running successfully working with commodities in the agribusiness such as soy, corn, livestock, and timber. Their net worth today is estimated to be around \$3,000,000,000.00 and their structure was one of the backbones that allowed the growth and development of our financial business.



GABRIEL STORCK

Gabriel is a partner at Arbtrust. He holds degrees in business and communication (University of Wisconsin), in addition to courses in Alternative Investments at Harvard, Foundations of Finance at Yale, and International Marketing in South Korea (Yonsei). Gabriel has the FINRA license and the CAIA certificate. In the past 13 years, Gabriel expanded his international experience by living in Brazil, Mexico, the United States, England, and Italy.

In addition, Gabriel has more than eight years of managerial experience in the international market directing the development and expansion of European companies based in different countries (United Kingdom, Italy, Spain, and France) and their growth in 12 source markets (Mexico, Brazil, Colombia, Puerto Rico, D. Republic, Uruguay, Paraguay, Chile, Argentina, Peru, Ecuador, and Costa Rica).

FUND MANAGER ARBTRUST ADVISORS LLC

We can say, Everton Luis dos Santos, our Fund Manager at Arbtrust Advisors is the brain behind the brilliance of our system operations and software development. With a stunning understanding of the digital world, he continues to enhance the performance, security, and speed of our systems. Everton has more than seventeen years of experience with the development of financial software for banks and HTF (high-frequency trading) for companies across Latin America. He is responsible for the strategies behind our software and he also oversees the daily operations of more than 20 tech developers that are continuously working to increase our efficiency.

THIRD PARTY ACCOUNTING FIRM MIGHTY SOLUTIONS LLC

FUND ADMINISTRATOR PROXY FINANCIAL

KYC PROCESSES



KYC PROCESS

The KYC process necessarily requests private personal information from Investor. The Fund and its representatives will obtain additional information about Investor, such as account balances and amounts and dates of additional capital contributions and redemptions. The Fund and its representatives do not disclose this information to third parties, other than service providers who must obtain access to the information to permit the Fund and the Investment Manager to conduct their affairs (for example, auditors, accountants, prime brokers, attorneys, and other consultants). The Fund and the Investment Manager restrict access to such information internally to the personnel who need the information to conduct the Fund's and the Investment Manager's business. The Fund and the Investment Manager obtain contractual assurances from third-party service providers where the Fund and/or the Investment Manager consider it necessary or otherwise appropriate to do so and maintain physical and procedural safeguards to provide reasonable protection for the confidentiality of nonpublic personal information about Members. While the Fund and its representatives will use their best reasonable efforts to keep confidential Investor's investment in the Fund and the information Investor provides to the Fund, (i) there may be circumstances in which a law or regulation relating to combating terrorism or money laundering may require the release of such information to law enforcement or regulatory officials; (ii) the Fund may present such information to regulatory bodies or other parties as may be appropriate to establish the availability of exemptions from specific securities and similar laws, or the compliance of the Fund and/or the Investment Manager with applicable laws; and (iii) the Fund may disclose such information relating to Investor's investment in the Fund when required by judicial process, to the extent permitted under privacy laws or to the extent the Fund considers the information relevant to any issue in any lawsuit or similar proceeding to which the Fund is a party or by which it is or may be bound. Suppose Investor has instructed the Fund to send duplicate reports to third parties under this Agreement. In that case, Investor may revoke this instruction at any time by sending a written notice to the Fund indicating that a previously authorized third party is no longer allowed to receive Investor's reports.

Investor shall provide the Investment Manager and the Fund with any information, representations, certificates or forms relating to Investor (or Investor's direct or indirect owners or account holders) that are requested from time to time by the Investment Manager in order for (i) the Fund; (ii) any entity in which the Fund holds (directly or indirectly) an interest (whether in the form of debt or equity); (iii) any member of any "expanded affiliated group" (as defined in section 1471(e)(2) of the Internal Revenue Code (the "Code")) of which any person described in clause (i) or (ii) is a member; or (iv) the Investment Manager or any of its affiliates, to (A) enter into, maintain or comply with the agreement contemplated by section 1471(b) of the Code; (B) satisfy any requirement imposed under sections 1471 through 1474 of the Code in order to avoid any withholding required under sections 1471 through 1474 of the Code (including any withholding upon any payments to Investor); (C) comply with any reporting or withholding requirements under sections 1471 through 1474 of the Code or (D) comply with any fiscal or regulatory legislation, rules or practices adopted pursuant to any intergovernmental agreement entered into in connection with sections 1471 through 1474 of the Code. Investor shall take such additional actions as the Investment Manager may request in good faith in connection with the preceding. Suppose the Investor fails to provide any of the information. In that case, representations, certificates, or forms (or undertake any of the actions) required under this paragraph, the Investment Manager shall have full authority to (1) terminate the Investor's interest in the Fund or (2) take any other steps the Investment Manager determines, in its sole discretion, are necessary or appropriate to mitigate the consequences of Investor's failure to comply with this paragraph to the Fund, the Investment Manager, a Fund affiliate or the other Partners.



KYC PROCESS

If Investor fails to comply with this paragraph, Investor shall, unless otherwise agreed by the Investment Manager in writing, to the fullest extent permitted by law, indemnify and hold harmless the Investment Manager and the Fund (and/or its affiliates or the other Partners, as applicable) from any costs or expenses arising out of such failure, including any withholding tax imposed under sections 1471 through 1474 of the Code or as a result of any intergovernmental agreement described in clause (D) above on the Fund, and any expenses, withholding or other taxes imposed as a result of such failure. Any such indemnification payments for such costs or expenses shall not constitute a contribution to the capital of the Fund.

Please provide the following information for Investor unless you are completing this Application as a representative of Investor (for example, an officer of a corporation that is subscribing or a custodian for the account of a minor). If you are acting as a representative, provide this information for yourself.

Other positions/background related to financial, business, accounting, economics, tax or investment matters that demonstrate investment sophistication:

INVESTMENT OBJECTIVES

Order of investment objectives of Investor.

Reminder: This investment is most appropriate for persons seeking capital appreciation. Please number Investor's preferences from 1 (most preferred) to 3 (least preferred):

_____ Liquidity***

_____ Current income**

_____ Capital appreciation *

*** An investor seeking "liquidity" generally will favor investments that can be liquidated for cash in a short time frame, even if the investment is less likely to grow in value over time than "capital appreciation" investments and is less likely to generate regular distributions of income than "current income" investments.

** An investor seeking "current income" generally will favor investments on which the investor anticipates that dividends, interest, royalties or similar distributions of income are likely to be paid regularly (for example, quarterly or annually) while the investor holds the investment. Such investments may (or may not) be relatively difficult to liquidate for cash in a short time frame, though often they are easier to liquidate than are investments held for capital appreciation.

* Although these guidelines vary among investors, an investor seeking "capital appreciation" generally will favor investments that are expected to increase in value over a substantial holding period, but are not expected to (though they may) generate substantial (if any) income distributions (dividends or interest, for example) during that time frame and may (or may not) be relatively difficult to liquidate for cash in a short time frame.



KYC PROCESS

INVESTMENT EXPERIENCE

Please provide the following information for Investor unless you are completing this Application as a representative of Investor (for example, an officer of a corporation that is subscribing or a custodian for the account of a minor). If you are acting as a representative, provide this information for yourself.

The approximate number of years you have been investing: _____years

ACCREDITED INVESTOR STATUS

Reason For This Questionnaire. Investor must be an "accredited investor" as defined in Rule 501(a) of Regulation D under the Securities Act of 1933. By marking the appropriate box(es) in this questionnaire, Investor indicates each category under which Investor is an accredited investor (list of categories continues on next page).

Check one or more of the boxes on this page and the next page:

A. Individual – Income Test. An individual who had income in excess of \$200,000 in each of the two most recent years (or had joint income with his or her spouse in excess of \$300,000 in each of those years) and has a reasonable expectation of reaching the same income level in the current year.

B. Individual – Net Worth Test. An individual who has a net worth (or joint net worth with his or her spouse) in excess of \$1,000,000. For the purpose of calculating Investor's net worth, ignore both the value of Investor's primary residence and any indebtedness on that residence, except that (1) if such indebtedness exceeds such value, count the excess as a liability (even if Investor is legally or practically not liable for the excess indebtedness); and (2) if non-acquisition indebtedness on the residence has increased in the last 60 days (for example, Investor has borrowed on a line of credit secured by Investor's primary residence), count the net increase as a liability.

C. IRA – Beneficiary Makes Investment Decisions and is Accredited. An individual retirement account ("IRA") whose beneficiary is an individual who (1) makes investment decisions for the IRA, and (2) is an accredited investor on the basis of Box A or B above

D. IRA – Person Other than Beneficiary Makes Investment Decisions and Decision-Maker is Accredited. An individual retirement account ("IRA") whose investment decisions are made by an individual or entity other than the IRA beneficiary, and that decision-maker is an accredited investor under Category(ies) _____ in this Questionnaire. In the blank, please insert the letter of each Category in this Questionnaire that applies to the decision-maker.

E. Revocable Trust other than IRA – Income or Net Worth Test Applied to Grantor(s) and Decision-Maker. A revocable trust (other than an IRA), and (1) each grantor of the trust is an accredited investor on the basis of Box A or B above, and (2) the person who makes investment decisions for Investor is an accredited investor under Category(ies) _____ in this Questionnaire. In the blank, please insert the letter of each Category in this Questionnaire that applies to the decision-maker.



KYC PROCESS

ACCREDITED INVESTOR STATUS

- F. Self-Directed Pension Plan other than IRA – Income or Net Worth Test Applied to Participant.** A self-directed pension plan (other than an IRA), and the participant who directed that assets of his or her account be invested in the Fund is (1) an accredited investor on the basis of Box A or B above, and (2) the only participant whose account is being invested in the Fund.

- G. Other Pension Plan.** A pension plan that is not a self-directed plan, and either (1) the plan has total assets in excess of \$5,000,000; or (2) the plan's investment decisions are made by a plan fiduciary that is a bank, savings and loan association, insurance company or registered investment adviser.

- H. Irrevocable Trust.** An irrevocable trust that consists of a single trust (1) with total assets in excess of \$5,000,000, and (2) which was not formed for the specific purpose of investing in the Fund, and (3) whose purchase is directed by a person who has such knowledge and experience in financial and business matters that he or she is capable or evaluating the merits and risks of the prospective investment.

- I. Corporation, Partnership, Business Trust.** A corporation, a partnership, or similar business trust, or an organization described in Section 501(c)(3) of the Internal Revenue Code, that was not formed for the specific purpose of acquiring an interest in the Fund, with total assets in excess of \$5,000,000.

- J. Other Entities.** Any of the following entities that has a net worth of at least \$5,000,000:
 - a bank, as defined in Section 3(a)(2) of the Securities Act of 1933;
 - acting for its own account;
 - acting in a fiduciary capacity;
 - a savings and loan association or similar institution, as defined in Section 3(a)(5)(A) of the Securities Act of 1933;
 - acting for its own account;
 - acting in a fiduciary capacity;
 - a broker-dealer registered under the Securities Exchange Act of 1934;
 - an insurance company, as defined in Section 2(13) of the Securities Act of 1933;
 - an investment company registered under the Investment Company Act of 1940;
 - a "business development company," as defined in Section 2(a)(48) of the Investment Company Act of 1940;
 - a small business investment company licensed under Section 301(c) or 301(d) of the Small Business Investment Act of 1958, as amended;
 - a "private business development company" as defined in Section 202(a)(22) of the Investment Advisers Act of 1940.



KYC PROCESS

QUESTIONS TO DETERMINE WHETHER INVESTOR IS A COVERED PERSON UNDER RULE 506

Reason For This Questionnaire. In its offering of Interests, the Fund may rely on a registration exemption that is available under Regulation D under the Securities Act of 1933. That exemption may be unavailable or limited if one or more “Covered Persons” has experienced a “Disqualifying Event.” The questions below aim to determine whether Investor is a “Covered Person.” If Investor is a Covered Person, the Investment Manager may ask additional questions to determine whether Investor has experienced a “Disqualifying Event.” Capitalized terms are defined alphabetically below the questions.

Definitions Used In This Questionnaire:

“Covered Person” means an individual or entity described in Category B, C or D above.

“Executive Officer” means a company’s president, any vice president in charge of a principal business unit, division or function (such as sales, administration or finance), any other officer who performs a policy-making function, or any other person who performs similar policy- making functions.

“Management Person” of an entity means a Investment Manager of a partnership, a managing member or manager of a limited liability company, a director of a corporation or similar entity, a trustee of a trust, an Executive Officer, or an Officer Participating in the Offering. If Investor has none of such titles or functions but is commonly referred to as a “principal” of the entity, assume that Investor is a Management Person of the entity for the purposes of this Questionnaire.

“Officer Participating in the Offering” means a company’s president, vice president, secretary, treasurer or principal financial officer, comptroller or principal accounting officer, as well as any person who routinely performs corresponding functions, if such person is participating in the Fund’s offering of Interests. Such a person may or may not also be an Executive Officer. “Participation” in the offering means more than transitory or incidental involvement. For example, it may include activities such as participation or involvement in due diligence activities, involvement in the preparation of disclosure documents, or communication with the Fund, the Investment Manager, prospective investors, or other offering participants.

“Promoter” means an individual or entity that is a “promoter” of the Fund under the broad definition of that term in Rule 405 under the Securities Act of 1933. In general, “promoter” includes anyone who, either alone or with others, directly or indirectly, takes the initiative in founding or organizing the business of the issuer (the Fund, here), or, in connection with such founding or organization, directly or indirectly receives 10% or more of any class of the issuer’s securities or 10% or more of the proceeds from the sale of any class of the issuer’s securities (other than securities received solely as underwriting commissions or solely in exchange for property).

“Solicitor” means an individual or entity that has received or may receive compensation for soliciting investors in the Fund’s offering of Interests (whether or not a broker-dealer).

“Twenty Percent Owner” of an entity means an individual or entity that owns 20% or more of the equity securities of the entity, based on total voting power rather than on ownership of any particular class of securities.



KYC PROCESS

ADDITIONAL INFORMATION REQUESTED:

- **Print Full Name of the Investor**
- **Taxpayer Identification Number (EIN or SSN)**
- **Name of Authorized Signer (if any)**
- **Taxpayer Identification Number of the Authorized Signer (if any)**
- **Signature of Authorized Signer**
- **Date signed**
- **Driver's License or Passport Copy of the Investor:**
- **Driver's License or Passport Copy of the Authorized Signer (if any):**
- **Full Mailing Address of Investor:**
- **Proof of mailing address**
- **Email Address of Investor**
- **Phone Number of Investor**
- **Secondary Phone Number of the Investor**

ANTI-MONEY

LAUNDERING



ANTI-MONEY LAUNDERING

As part of the Company's responsibility for the prevention of money laundering, the Company and the Manager will require a detailed verification of an investor's identity and the source of the payment from any person or business delivering completed Subscription Documents to the Company.

In order to comply with proposed regulations aimed at the prevention of money laundering in the United States, the Company is required to verify the identity of all prospective investors and the source of their funds, to the extent required under the USA PATRIOT Act, and to determine if such investors are Prohibited Investors (as defined in the Company's Subscription Documents) identified on the various lists maintained by the U.S Government. If the Company determines that any investor is a Prohibited Investor, the Company may, among other things, freeze that investor's assets in the Company and notify appropriate legal authorities.

The Company and the Manager reserve the right to request documentation as they deem necessary to verify the identity of a prospective investor and to verify the source of the relevant subscription amounts. The amount of detail required will depend on the circumstances of each application for subscription. Although cash deposits are never accepted into our accounts, the securities industry is unique and can be used to launder funds obtained elsewhere and to generate illicit funds within the industry itself through fraudulent activities. Examples of types of fraudulent activities include insider trading, market manipulation, Ponzi schemes, cybercrime, and other investment-related fraudulent activity.

Terrorist financing may not involve the proceeds of criminal conduct, but rather an attempt to conceal either the origin of the funds or their intended use, which could be for criminal purposes. Legitimate sources of funds are a key difference between terrorist financiers and traditional criminal organizations. In addition to charitable donations, legitimate sources include foreign government sponsors, business ownership and personal employment. Although the motivation differs between traditional money launderers and terrorist financiers, the actual methods used to fund terrorist operations can be the same as or similar to methods used by other criminals to launder funds. Funding for terrorist attacks does not always require large sums of money and the associated transactions may not be complex.

Our AML policies, procedures and internal controls are designed to ensure compliance with all applicable BSA regulations and FINRA rules and will be reviewed and updated on a regular basis to ensure appropriate policies, procedures and internal controls are in place to account for both changes in regulations and changes in our business.

A standard process of verification carried by the Company requests any individual to:

1. provide the Company with a copy of the driver's license or passport
2. proof of address, such as a utility bill or bank statement issued no more than 90 days prior to the date of the Subscription's Agreement signature
3. proof that the bank account used to send the investment to the Company belongs to the same individual
4. provide the Company with a form stating the bank account that should receive withdrawals, such bank account must be registered under the same name of the individual investing on the Company. For corporate subscribers, the Company may require production of copies of their certificates of incorporation or other formation documents (and an changes of name) and information concerning their principals and/or beneficial owners. Failure to provide the necessary evidence may result in subscription applications being rejected or in delays in the processing of withdrawals.



ANTI-MONEY LAUNDERING

In addition to the information we must collect under FINRA Rules 2090 (Know Your Customer) and 2111 (Suitability) and the 4510 Series (Books and Records Requirements), and Securities Exchange Act of 1934 (Exchange Act) Rules 17a-3(a)(9) (Beneficial Ownership regarding Cash and Margin Accounts), 17a-3(a)(17) (Customer Accounts) and Regulation Best Interest, we have established, documented and maintained a written Customer Identification Program (CIP). We will collect certain minimum customer identification information from each customer who opens an account; utilize risk-based measures to verify the identity of each customer who opens an account; record customer identification information and the verification methods and results; provide the required adequate CIP notice to customers that we will seek identification information to verify their identities; and compare customer identification information with government-provided lists of suspected terrorists, once such lists have been issued by the government.

Pending the provision of satisfactory evidence as to identity, the evidence of title in respect of the Interests may be retained at the absolute discretion of the Manager. If within a reasonable period of time following a request for verification of identity, the Manager has not received evidence as requested aforesaid, the Manager and the Company may, in their absolute discretion, refuse to allot the Interests applied for, in which even subscription moneys will be returned without interest to the account from which such moneys were originally debited. The Company, the Manager, and the Investment Manager and any agent of the Company, the Manager and the Investment Manager will be held harmless and will be fully indemnified by a potential subscriber against any loss arising because of a failure to process a subscription or withdrawal request if such information requested by any of them or the Manager has not been provided by the applicant.

If the Company, the Manager, or the Investment Manager has a suspicion that a payment to the Company (by way of subscription or otherwise) or a payment from the Company (by way of withdrawal or otherwise) contains the proceeds of criminal conduct, the Company, the Manager or the Investment manager may report such suspicion to the appropriate authorities. Neither the Company, the Manager, the Investment Manager, nor any agent of the Company, the Manager or the Investment Manager will incur any liability for adhering to the Company's responsibilities under its anti-money laundering program and will be indemnified by the Subscriber for any losses which the Company, the Manager, the Investment Manager or their respective principals, employees or agents may incur for doing so.

The Manager and the Company reserve the right to request such information as is necessary to verify the identity of a prospective investor. In the event of delay or failure by a prospective investor to produce any information required for verification purposes, the Manager may refuse to accept the prospective investor and the subscription monies relating thereto or may refuse to process a withdrawal request until proper information has been provided.

To avoid assisting terrorists and certain other persons designated by the U.S. government as wrong-doers, the Fund takes steps to comply with applicable anti-money laundering laws. Those steps include (among others) obtaining certain representations and warranties from Investors, and taking reasonable steps to verify the identity of Investors. Without limiting the foregoing, Investor agrees to provide any information and execute and deliver such documents as deemed necessary by the Investment Manager in their sole discretion, to verify the accuracy of Investor's representations, warranties, and covenants herein or to comply with any law or regulation to which the Fund.



ANTI-MONEY LAUNDERING

the Investment Manager or the Investment Manager may be subject, including but not limited to the Investment Manager's anti-money laundering and anti-terrorist financing program and related responsibilities.

□ A. Investor understands that the Fund prohibits the investment of funds by any persons or entities that are acting, directly or indirectly, (i) in contravention of any U.S. or international laws and regulations, including anti-money laundering regulations or conventions, (ii) on behalf of terrorists or terrorist organizations, including those persons or entities that are included on the List of Specially Designated Nationals and Blocked Persons maintained by the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC"), as the list may be amended from time to time, (iii) for a Senior Foreign Political Figure, any Immediate Family member of a Senior Foreign Political Figure or any Close Associate of a Senior Foreign Political Figure, unless the Investment Manager, after being specifically notified by Investor in writing that it is such a person, conducts further due diligence, and determines that such investment shall be permitted, or (iv) for a Foreign Shell Bank (such persons or entities in (i) - (iv) being collectively referred to below as "Prohibited Investors").

□ B. Investor understands that, if any of the foregoing representations, warranties or covenants ceases to be true or if the Fund no longer reasonably believes that it has satisfactory evidence as to their truth, notwithstanding any other agreement to the contrary, the Fund may, in accordance with applicable regulations, be obligated to freeze Investor's investment, either by prohibiting additional investments, declining or suspending any withdrawal requests and/or segregating the assets constituting the investment, or Investor's investment may immediately be involuntarily withdrawn from the Fund, and the Fund may also be required to report such action and to disclose Investor's identity to OFAC or other authority. If the Fund is required to take any of the foregoing actions, Investor agrees that Investor shall have no claim against the Fund or the Investment Manager or their respective affiliates, directors, members, partners, shareholders, officers, employees and agents for any damages as a result of any of the aforementioned actions, and Investor further agrees that it shall indemnify and hold harmless all of such persons from any such claim that may be asserted against them by any person.

□ C. Investor represents, warrants and agrees that: (i) Investor is not a Prohibited Investor, nor is any person or entity controlling, controlled by or under common control with Investor a Prohibited Investor, and (ii) to the extent Investor has any Beneficial Owners, (a) Investor has carried out thorough due diligence to establish the identities of such Beneficial Owners, (b) based on such due diligence, Investor reasonably believes that no such Beneficial Owner is a Prohibited Investor, (c) Investor holds the evidence of such identities and status and will maintain all such evidence for at least five years from the date of Investor's complete withdrawal from the Fund, and (d) Investor will make available such information and evidence, and any related additional information that the Fund may request, in accordance with applicable regulations.

□ D. Investor agrees that all subscription payments transferred to the Fund on behalf of Investor shall originate directly from a bank or brokerage account in the name of Investor. Investor agrees further that any withdrawal proceeds paid to Investor will be paid to the account from which Investor's investment in the Fund was originally received, unless the Investment Manager, in its sole discretion, agrees otherwise with Investor.



DEFINITIONS OF CAPITALIZED TERMS IN ANTI-MONEY LAUNDERING PROVISIONS ON PRECEDING PAGE

Beneficial Owner is any individual or entity that will have a beneficial ownership interest in Investor's Interest in the Fund, including but not limited to: (i) shareholders of a corporation; (ii) partners of a partnership; (iii) members of a limited liability company; (iv) investors in a fund- of-funds; (v) the grantor of a revocable or grantor trust; (vi) the beneficiaries of an irrevocable trust; (vii) the individual who established an IRA; (viii) the participant in a self-directed pension plan; (ix) the sponsor of any other pension plan; and (x) any person being represented by Investor in an agent, representative, intermediary, nominee or similar capacity. If the Beneficial Owner is itself an entity, the information and representations set forth herein must also be given with respect to its individual beneficial owners. If Investor is a publicly traded company, it need not conduct due diligence as to its beneficial owners.

Close Associate of a Senior Foreign Political Figure is a person who is widely and publicly known internationally to maintain an unusually close relationship with the Senior Foreign Political Figure, and includes a person who is in a position to conduct substantial domestic and international financial transactions on behalf of the Senior Foreign Political Figure.

FATF-Compliant Jurisdiction is a jurisdiction that (1) is a member in good standing of FATF and (2) has undergone two rounds of FATF mutual evaluations.

FATF means the Financial Action Task Force on Money Laundering.

Foreign Bank means an organization that (1) is organized under the laws of a non-U.S. country (2) engages in the business of banking, (3) is recognized as a bank by the bank supervisory or monetary authority of the country of its organization or principal banking operations, (4) receives deposits to a substantial extent in the regular course of its business, and (5) has the power to accept demand deposits, but does not include the U.S. branches or agencies of a non- U.S. bank.

Foreign Shell Bank means a Foreign Bank without a Physical Presence in any country, but does not include a Regulated Affiliate.

Immediate Family of a Senior Foreign Political Figure typically includes such person's parents, siblings, spouse, children and in-laws.

Non-Cooperative Jurisdiction means any non-U.S. country that has been designated as non- cooperative with international anti-money laundering principles or procedures by an intergovernmental group or organization, such as the FATF, of which the United States is a member and with which designation the United States representative to the group or organization continues to concur. For a current list of Non-Cooperative Countries and Territories, refer to the Financial Action Task Force website (see link above at definition of "FATF-Compliant Jurisdiction").

Physical Presence means a place of business that is maintained by a Foreign Bank and is located at a fixed address, other than solely a post office box or an electronic address, in a country in which the Foreign Bank is authorized to conduct banking activities, at which location the Foreign Bank (1) employs one or more individuals on a full-time basis, (2) maintains operating records related to its banking activities, and (3) is subject to inspection by the banking authority that licensed the Foreign Bank to conduct banking activities.



DEFINITIONS OF CAPITALIZED TERMS IN ANTI-MONEY LAUNDERING PROVISIONS ON PRECEDING PAGE

Regulated Affiliate means a Foreign Shell Bank that (1) is an affiliate of a depository institution, credit union or Foreign Bank that maintains a Physical Presence in the United States or a non- U.S. country, as applicable, and (2) is subject to supervision by a banking authority in the country regulating such affiliated depository institution, credit union or Foreign Bank.

Prohibited Investor means:

(1) a person or entity whose name appears on one or more of the various lists issued and maintained by the U.S. Office of Foreign Assets Control ("OFAC"), including the List of Specially Designated Nationals and Blocked Persons, the Specially Designated Terrorists List and the Specially Designated Narcotics Traffickers List;

(2) a Foreign Shell Bank; or

(3) a person or entity who is a citizen or resident of, or which is located in, or whose subscription funds are transferred from or through, a Foreign Bank in a Non-Cooperative Jurisdiction or Sanctioned Regime.

Sanctioned Regimes means targeted foreign countries, terrorism sponsoring organizations and international narcotics traffickers in respect of which OFAC administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals.

Senior Foreign Political Figure means a senior official in the executive, legislative, administrative, military or judicial branch of a foreign government (whether elected or not), a senior official of a major foreign political party, or a senior executive of a foreign government- owned corporation. In addition, a Senior Foreign Political Figure includes any corporation, business or other entity that has been formed by, or for the benefit of, a Senior Foreign Political Figure.

USA Patriot Act means the **Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA PATRIOT) Act of 2001 (Pub. L. No. 107- 56)**.

FORM CRS



FORM CRS

INTRODUCTION

Arbtrust Venture LLC (the "Fund"), is a private company duly licensed with the Securities and Exchange Commission. We understand it is important that you understand how we invest your money, fees, and the risks involved in order to determine if the investment is right for you.

Arbtrust is a fund that invests in alternative assets through simultaneous intermediation of buy and sell orders for the same asset in different markets. In essence, we are a group of tech developers, IT engineers, traders, managers, and investors that work with cutting-edge technology in order to provide a consistent ROI for our clients. We are not an investment advisory firm and do not offer investment advice, portfolio management, or investment management advice.

The services we provide and the fees we charge are distinct from investment advisory services and fees, and it is important that you understand the differences. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about broker-dealers, investment advisers, and investing.

Will you provide me with investment services and advice?

Arbtrust invests in its pure-arbitrage strategy using its software and algorithm that can identify different prices for the same asset in different markets - at the same time. We are not investing your money in buying assets. Instead, your investments with Arbtrust will remain in the digital form of dollar, USDT/UDSC, and will be used to perform immediate and simultaneous intermediation of negotiations.

Arbtrust does not offer investment recommendations or advice to its clients. However, our investors can track their daily return rate and, therefore, the strength of our operations via their app and user account.

Investments in alternative assets/digital assets carry risks related to the industry and are suitable only for those who understand and are willing to assume the economic, legal, and other risks. Therefore, you should carefully consider your investment objectives, experience level, and risk appetite before deciding to invest. For more information, please refer to our Risk Management document.

What are the fees involved?

Arbtrust assesses a 2% annual management fee (2% of your portfolio value), meaning that 2% of the assets under management is charged to your account annually, split monthly.

We also charge a performance fee of 20% annually. It means that 20% of the gross profit from dividends is charged when dividends are received. The monthly, quarterly, and annual return rates you see in your account are NET; the performance and management fees will already be discounted.



FORM CRS

How do your financial professionals make money?

Our financial professionals receive salaries and discretionary bonuses, which are based on overall firm growth. They receive additional compensation when they obtain new clients for us. We do not incentive or encourage any investor to increase the assets in their account. This is your decision and our job is to provide you with the information you need to make your decision.

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money, and what conflicts of interest do you have?

Arbtrust does not advise or recommend investment strategies, securities, or accounts. We are not an investment advisor, as defined by the Investment Advisers Act of 1940. If you seek such advice, we recommend you work with an investment advisor that can act as your agent. All the investment decisions Arbtrust makes are always in your best interest. Given we do not trade stock from companies, nor do we manage funds and assets, there is no reason for you to concern about conflicts of interest. Our fund is a quant tech-driven hedge fund that operates with pure arbitrage. We are not analyzing which assets to buy or companies to invest, to sell them - or part of them - in the future. Our gains and transactions are immediate.

Do you or your financial professionals have a legal or disciplinary history?

No. Our firm and employees of our firm have no legal or disciplinary history to disclose.

Additional Information

For additional information about our services or to request a copy of this relationship summary. Please contact us at arbtrust@arbtrustus.com

CODE OF ETHICS



CODE OF ETHICS

The partners at Arbtrust Venture LLC. (“Managers”) strive to create and maintain a culture where all those who have a position, function, position, employment, commercial, professional, contractual or trust relationships with the Company are able to witness a solid expansion of our business and the exercise of our code of ethics as interconnected factors.

This Code of Ethics ("the Code") aims to establish the rules, principles, concepts and values that should guide the ethical standard of conduct of the Employees in their internal performance and with the financial and capital markets, as well as in their relations with the various investors and the general public.

STANDARDS OF CONDUCT

All employees, contractors and related business must:

- **Be respectful.** Although opinions may differ, it is important to remain civil and respectful. Work together to foster a productive environment where everyone is allowed to have an opinion without repercussions.
- **Be inclusive.** We are welcoming of people from all backgrounds on our team, including members of any race, ethnicity, culture, class, orientation, education, age, size, family status, political or religious beliefs and mental and physical ability.
- **Be considerate.** Treat others how you would like to be treated in the workplace. Each person on this team is important and essential, and each person’s decisions and actions affect our outcomes and morale.
- **Be professional.** Conducting yourself professionally includes being kind to others. Maintain professional interactions when communicating with others at all times.
- **Be honest and transparent.** We are dedicated to the full disclosure of our professional life and activities.
- **Aim for excellence, always.** It is important to achieve for excellence in everything it is done, even the small things. To strive for a better work environment will ensure a greater customer experience.
- **Be accountable for shortcomings or mistake.** We take actions and strive to deliver excellence and we commit to hold ourselves accountable for any action that the person we are morally responsible for. Accepting accountability if there is any harm caused includes righting unintentional wrongs.
- **Know and understand their obligations towards the Manager, as well as the legal rules that regulate them, in order to avoid any practices that infringe or conflict with the rules and principles contained in this Code and in the regulations in force;**
- **Perform activities with transparency and in compliance with the laws and determinations of the supervisory and inspection bodies of the sector in which they operate**
- **Help the Manager to perpetuate and demonstrate the values and principles set forth herein**
- **Identify, manage and mitigate possible conflicts of interest, in the respective spheres of our activity that may affect the impartiality of the people that perform functions related to resource management;**



CODE OF ETHICS

- Consolidate our reputation as an customer centered avant-grade high-tech company, keeping it complete and solid, strengthening its corporate institutional image;
- Work according to the principles of moral and professional integrity;
- Care for the business as their own company, taking responsibility and being proactive.
- Act guided by the principles of freedom of initiative and free competition, avoiding the adoption of practices that characterize unfair competition and/or unfair conditions, respecting the principles of the free market;
- Immediately inform the Manager of any situation that he/she deems to merit greater scrutiny.

Our team believes in strength in diversity. Every person has a different perspective and valuable input to offer, whether it's solving a problem or contributing to new ideas. Not understanding someone's perspective does not mean that their view is incorrect. Remember to keep the focus on creative resolutions and continuous learning.

The Manager has adopted the standards of conduct described above to create a work environment free from discrimination of any kind, including moral, sexual or other types of harassment in the workplace.

Relationship with the Media

The Manager sees in the media a relevant channel of information for the various segments of the Manager and is open to meeting their requests, whenever possible and there are no legal or strategic obstacles, which will be explained to journalists when they occur. The Manager's representatives before any means of communication are exclusively its managing partners, indicated in the company's article of incorporation, who may delegate this function whenever they deem appropriate. The other Employees may only provide information to third parties in general (including, but not limited to, matters related to the Manager's activities), reporters, interviewers or journalists with the express authorization of the Manager. Additionally, notwithstanding the foregoing, Employees must respect customers, competitors, suppliers, regulatory and governmental bodies.

SEC FILINGS

Arbtrust LLC is a Company based in Florida. Any prospective investors that wish to subscribe to units of Aabrtrust LLC operations should contact us. This is not an offer to buy or sell, nor is it a solicitation of an offer to buy or sell, the Units or any other security or to participate in any advisory services or trading strategy. Any offering or solicitation will be made only to certain qualified investors who are “accredited investors” as defined under Regulation D of the Securities Act, and any investments by U.S. persons will only be permitted to potential investors who demonstrate that status. Investors in the Shares must have the financial ability, sophistication, experience, and willingness to bear the risks of such investment. Arbtrust Venture LLC (the “Fund”) operates pursuant to SEC rule 506(b) of regulation D. The membership interests of the fund have not been registered under the securities act of 1933 (the “securities act”), or the securities laws of any state. Historical returns, economic, market, or other performance it is not an indication of future results. Potential investors must have the financial ability, sophistication, experience, and willingness to bear the risks of an investment. Any potential investments made in the company involve risk. Potential investors should carefully consider the long-term nature of an investment in the Units prior to making an investment decision.

*SEC filings can be found on the website:
<https://www.sec.gov/edgar/searchedgar/companysearch>*

SUBSCRIPTION AGREEMENT PRIVATE PLACEMENT MEMORANDUM & OPERATIONS AGREEMENT

These documents are available upon request.
Please email us at arbtrust@arbtrustus.com to
receive a copy of them.



ARBTRUST

Arbtrust LLC is a Company based in Florida. Any prospective investors that wish to subscribe units of the Arbtrust LLC operations should contact us through the contact form. This website is not an offer to buy or sell, nor is it a solicitation of an offer to buy or sell, the Units or any other security or to participate in any advisory services or trading strategy. Any offering or solicitation will be made only to certain qualified investors who are "accredited investors" as defined under Regulation D of the Securities Act, and any investments by U.S. persons will only be permitted to potential investors who demonstrate that status. Investors in the Shares must have the financial ability, sophistication, experience, and willingness to bear the risks of such investment. Arbtrust Venture LLC (the "fund") operates pursuant to SEC rule 506(b) of regulation D. The membership interests of the fund have not been registered under the securities act of 1933 (the "securities act"), or the securities laws of any state. Historical returns, economic, market or other performance it is not an indication of future results. Potential investors must have the financial ability, sophistication, experience, and willingness to bear the risks of an investment. Any potential investments made in the company involve risk. Potential investors should carefully consider the long term nature of an investment in the Units prior to making an investment decision. Units of the company are not insured by the FDIC.