SERVICE SHEET

Solutions for Crypto Asset Service Providers

Crypto Asset Solutions

FTI Consulting offers comprehensive anti-money laundering ("AML")/counter terrorist financing ("CTF"), Counter Proliferation Financing ("CPF"), sanctions, and other financial crimes compliance services for cryptocurrency companies, alternatively called convertible virtual currency or virtual currency businesses. These include cryptocurrency exchanges, crypto OTC broker dealers, standalone digital asset custodians, custody divisions of commercial banks, crypto investment funds and investable crypto index providers, payment platforms and payment processors accepting virtual currencies, as well as hosted wallet providers (collectively referred to as CASPs).

FTI Consulting professionals have assisted several fintech and cryptocurrency companies with a variety of financial crime compliance needs, using our deep level of expertise and cutting-edge technical capabilities. Our team of experienced specialists regularly consult with both industry leading and innovative upstart cryptocurrency companies as an independent and trusted advisor. In fact, we are avid crypto investers ourselves and believe in practicing what we preach!

WE PROVIDE A WIDE RANGE OF SERVICES



Developing Risk Management and Compliance Programs ("RMCP")



Drafting requisite documentation such as policies and standards to give effect to the overall RMCP



Conducting end-to-end reviews of CASPs



Conducting assessments of digital on-boarding approaches to ensure that they are addressing the requisite risks while still adhering to legislative requirements and ensuring a positive customer experience



Design of sanctions screening programs and the independent assessment of technology solutions used for sanctions screening



HOW WE CAN HELP



Risk Management and Compliance Programs - RMCP

- Designing the overall program
- Setting out governance of the program
- Drafting the Apex RMCP document
- Devising the document hierarchy for the program
- Drafting various RMCP related documents
- Conducting CASP Wide Risk Assessments
- Conducting Risk Factor Assessments
- Designing Customer Risk Assessment frameworks
- Designing and assessing digital onboarding approaches
- Assist in designing transaction monitoring regimes
- Providing advisory services on the overall RMCP



Conducting AML/CTF reviews

- Conducting reviews of entire RMCPs setting out governance of the program
- Conducting focused reviews on identified elements of the RMCP such as onboarding, customer screening, ongoing monitoring and other requisite obligations
- Identifying gaps within programs
- Providing implementable recommendations to improve controls



Designing and assessing sanctions screening programs

- Recommending sanctions risk appetite considerations
- Identifying relevant lists against which to screen
- Drafting investigative procedures for sanctions screening alerts
- Identifying practical implementation challenges when implementing a sanctions screening program
- Assessing the effectiveness of sanctions screening solutions used by CASPs
- Drafting regulatory reporting methodologies
- Mapping end-to-end processes depicting the different lines of defence and their roles and responsibilities in each process.
- Reviewing training program content and providing training on various AML, CTF, PF and Sanctions streams

OUR DIFFERENTIATORS

Our clients value both our proven experts knowledge and the broad perspective we have developed. FTI's nimble, flexible operating style also enables a range of engagement delivery models.

More advanced capabilities

— End-to-end Solutions:

Our suite of services across all segments provide an opportunity to address the most critical issues facing digital asset firms.

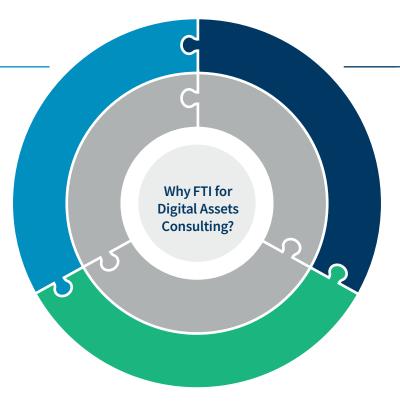
Technical Expertise:

In all aspects of digital asset firms including underlying blockchains; risk models; trading; compliance; due diligence; accounting etc.

Regulatory Expertise:

Trusted advisor on evolving regulatory policy engaged by several crypto natives; deep experience with regulators and AML and sanctions programs.

- Advanced data analytics platform to analyse digital asset transfers and blockchain related transactions.
- Range of capabilities enables us to tailor solutions to be both proactive and reactive.



FTI logo advantages

- FTI brand image and traditional strengths in forensics; Financial Crime Compliance; and regulatory compliance play well to satisfy demand in this space.
- Buyers are typically seeking an **expert partner** rather than staff augmentation/secondment services. Our positioning as an "expert" firm is an important differentiation from the bigger consulting firms.

Nimble, adaptable management

- Global: Teams around the world, able to deploy quickly
- Flexible delivery: Management structures makes the firm more nimble than other providers in:
 - Cross-disciplinary delivery
- Cross-geography delivery
- Defensible: Proven and consistent playbooks in traditional services applicable to digital assets.
- Partnerships: With reputable researchers at top universities and with blockchain analytics firms.
- We do not face any conflict of interest in auditing as were are not auditors.

About FTI Consulting

FTI Consulting, Inc. is a global business advisory firm dedicated to helping organisations manage change, mitigate risk and resolve disputes: financial, legal, operational, political & regulatory, reputational and transactional.

Individually, each practice is a leader in its specific field, staffed with experts recognised for the depth of their knowledge and a track record of making an impact. Collectively, FTI Consulting offers a comprehensive suite of services designed to assist clients across the business cycle –from proactive risk management to the ability to respond rapidly to unexpected events and dynamic environments.



Senior Managing Director Forensic Litigation Consulting kevin.west@fticonsulting.com MANET BASSON

Managing Director Forensic Litigation Consulting manet.basson@fticonsulting.com AMIT DAYAL

Managing Director Forensic Litigation Consulting amit.dayal@fticonsulting.com

