

Financial Institution Client Resource Center

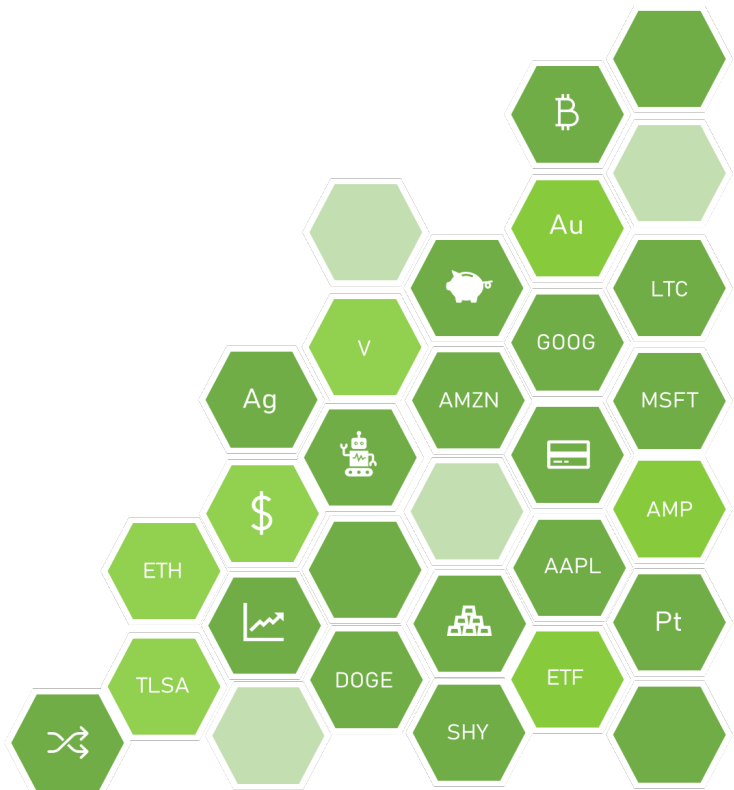
Unifimoney Due Diligence and Risk Assessment

Document prepared with the assistance of FS Vector



Version 1.0

Date May 2022



In strict commercial confidence

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Dear Reader,

We at Unifimoney fully subscribe to the principles of responsible innovation and consider risk and compliance a critical asset both of our business and yours.

We hope this document gives you all the information you need to complete a robust and complete due diligence and risk assessment of our business.

If there are questions that we don't address fully or you would prefer to discuss with us please don't hesitate to contact us at compliance@unifi.money and we will be happy to assist.



Unifimoney member of the ICBA ThinkTech Accelerator 2022 Cohort

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Introduction

Unifimoney provides this due diligence documentation and a risk self-assessment for review and leverage for your financial institution's (FI) purposes. Our compliance management program for digital wealth management products and services should complement your Financial Institutions compliance program in accordance with your prudential regulatory requirements.

Who should read this document and why?

This due diligence package focuses on Company, Compliance, and Risk Management matters and is intended to provide your Institution's executives and compliance personnel with the necessary information about Unifimoney to form a view on these matters before committing to our partnership.

How should this document be used?

We hope that you will find value in this due diligence package as you manage your compliance review and oversight processes, and when having conversations with regulators on your third party relationships.

Document prepared with the assistance of FS Vector <https://fsvector.com/>



FS Vector is a strategic consulting firm for financial services clients in a rapidly evolving industry and complex regulatory environment. Since its inception, the firm has been dedicated to serving as a trusted partner at each stage of growth – from early stage ventures to global organizations.

They provide unique expertise at the intersection of technology, government, and traditional finance. The team delivers a variety of resources their clients need in one firm, including advisory, advocacy, and training services.

Guiding Principles

We believe the Banks and Credit Unions can effectively compete against Mega Banks and Fintechs when they offer a better value proposition than them by combining their strengths in banking and customer service with new technology based products and services.

Banking regulators have for a long time determined that a bank may engage in activities that are part of, or incidental to, the business of banking.¹ This includes acting as a “finder” for external vendors of financial and nonfinancial products.

Many financial institutions already offer traditional advisory based wealth management services in partnership with external vendors but this excludes the massive increase in consumer adoption of self directed digital investing and increased interest in alternative assets which are excluded from the majority of traditional advisors business.

The world of investing has changed radically with the combined impact of increased access via digital channels, reduced economic barriers to entry such as commission free trading and new innovations like cryptocurrencies. This has created a massive adoption by consumers in self directed investing.

But Banks and Credit Unions have been effectively excluded from this market by the cost, resources, time, complexity and risk of deploying their own digital wealth management solutions.

Until now.

What We Do

Unifimoney is a turnkey digital wealth management platform for financial institutions that can be deployed with no additional technical integration (we integrate with existing digital banking platforms), low cost and high speed.

Unifimoney has contracted with best-in-class financial services platforms to provide your customers an easy-to-use interface that seamlessly organizes and aggregates diverse investment portfolios for your customers.

¹ [Activities Permissible for National Banks and Federal Savings Associations](#), Office of the Comptroller of the Currency.



Unifimoney dedicates significant attention and oversight of the partner selection and integration process to deliver the right partner for the right product without your customers having to leave the Unifimoney platform.

The Unifimoney Platform was designed to complement your relationship with your customers to promote long term trust and satisfaction with your institution. Unifimoney and our partners will never sell your customers' data or engage in marketing activities for other products and services to your customers. The customer cannot link their other bank or investment accounts to Unifimoney.

How we help Financial Institutions

Financial Institutions are facing unprecedented competition from multiple directions including Neobanks, Investment Apps and Big Brand Banks. Competition is increasingly based on the digital experience and breadth of services offered. The need to deliver technical led innovation at speed and scale has never been greater.

Unifimoney helps FI's become a money superapp by offering a comprehensive range of self direct investment services accessed via the bank or credit unions existing digital infrastructure.



**Attract and
Retain New
Customers**



**Drive Digital
Engagement**



**Defend Against
Capital Flight**



**New Revenue
Streams**

An Integration Platform

Technology has driven significant change in the investment landscape with the relatively static world of traditional Registered Investment Advisor (RIA) market evolving to now include new providers, asset classes and business models creating a significantly more complex market than ever before, and providing consumers with greater choice than ever in how to manage their wealth.

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Investment Market Participants

Product Offering	Consumer Risk Level	Regulator(s)	Unifimoney	Fintech Robos (e.g., Wealthfront)	Traditional RIA (e.g., LPL / Raymond James)	Traditional Online Brokers (e.g., eTrade)	Fintech Brokers (e.g., Robinhood)	NYDIG
In-Person Advisory	Low	SEC	✗	✗	✓	✗	✗	✗
RIA Robo	Low	SEC	✓	✓	✗	✗	✗	✗
Self-Directed Investments	Medium	SEC / FINRA	✓	✗	✗	✓	✓	✗
Options/ Margin/ Futures (Advanced Trading)	High	SEC / FINRA / CFTC	✗	✗	✗	✓	✓	✗
Precious Metals	Low	SEC	✓	✗	✗	✗	✗	✗
Crypto	High	Various (NYDFS / SEC/ CFTC)	✓	✗	✗	✗	✓	✓
Other Alternative Assets	High	Various (SEC / Private Transactions)	✓	✗	✗	✗	✗	✗

Source: Company websites, FSVector

Comparison with FI's Prudential Regulatory Regime

Product Offering	Consumer Protection	Safety & Soundness	BSA/AML	Deposit Insurance
OCC	✓	✓	✓	✗
FDIC	✓	✓	✓	✓
NCUA	✓	✓	✓	✗
Federal Reserve	✓	✓	✓	✗
CFPB	✓	✗	✗	✗

Source: FSVector

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Unifimoney's investment product regulatory regime

Unifimoney is a turnkey digital wealth management platform and acts as an integrator that offers products to FI's customers through our regulated partners.

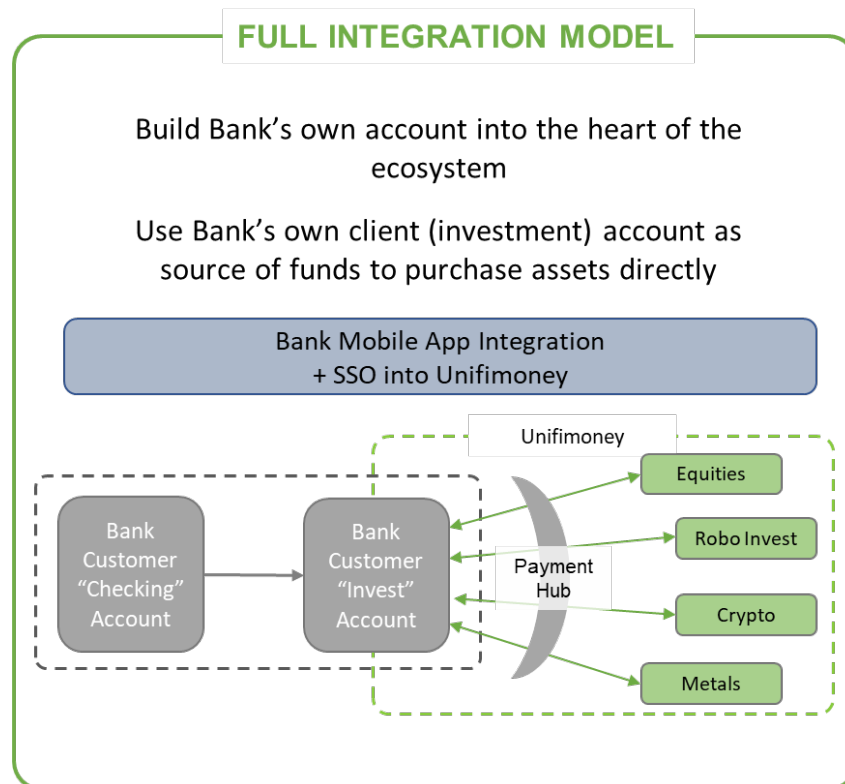
Product Offering	Provided by	Regulatory Licenses	Insured	Investor Protection
RIA (Robo)	Unifimoney	<ul style="list-style-type: none"> • SEC registered investment advisor • State licensed advisors 	<ul style="list-style-type: none"> • SIPC insurance • Fidelity bond Requirement 	<ul style="list-style-type: none"> • Compliance Program • Examinations • Supervisory Procedures Manual
Self-Directed Trading	Apex LLC	<ul style="list-style-type: none"> • Broker Dealer • SEC registered • FINRA member • State licenses 	<ul style="list-style-type: none"> • SIPC insurance 	<ul style="list-style-type: none"> • Compliance Program • Examinations • Supervisory Procedures Manual
Precious Metals	Gold Bullion International (GBI)	<ul style="list-style-type: none"> • SEC registered • State licenses 	<ul style="list-style-type: none"> • Insured in level three vaults 	<ul style="list-style-type: none"> • Compliance Program • Examinations • Supervisory Procedures Manual
Crypto	Gemini Trust Company	<ul style="list-style-type: none"> • NYDFS regulated Trust Company • NY Bitlicense • State licenses 	<ul style="list-style-type: none"> • Not insured as investment product 	<ul style="list-style-type: none"> • Compliance Program • Examinations

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Unifimoney Ecosystem

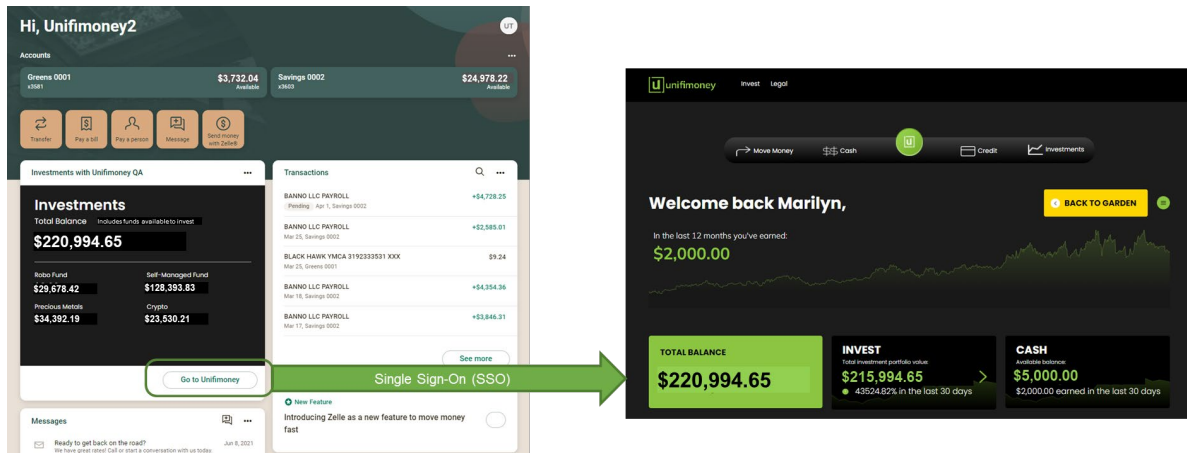
FI customers access the Unifimoney Platform through their digital banking channels both mobile app or web via Single Sign On (SSO).



Source: Unifimoney



Illustrative User Interface Showing Unifimoney Embedded in Digital Channels



For the majority of FI's Unifimoney is not a white label platform (for FI's with a Broker Dealer license we can act as such) and a clear delineation must be made between the bank's regulated business and ours.

Before a bank customer can trade with Unifimoney they must complete a full onboarding including signing all applicable user agreements. Customers are subject to KYC/AML check and being approved both by Unifimoney and our partners.



Consumer Disclaimer

Whenever a customer navigates from the FI environment into Unifimoney they will see and must actively accept an appropriate disclaimer as below.

In this example, the customer is leaving their native bank environment, *Garden* and accessing the Unifimoney platform.



Invest with Unifimoney

You are now leaving Garden and you are entering Unifimoney Inc, and Unifimoney RIA. Unifimoney Inc. is not a Bank and is not FDIC insured. Unifimoney RIA is an affiliate of Unifimoney Inc and is an SEC registered investment advisor.

Investment Products: Are Not FDIC Insured, Are Not Bank Guaranteed, May Lose Value, Are Not Deposits, Are Not Insured by Any Federal Government Agency, Are Not a Condition to Any Banking Service or Activity. Nothing contained on our Sites constitute investment, legal or tax advice.

The opinions of Unifimoney, Inc and Unifimoney RIA expressed on this Website represent its good faith views and are provided for limited purposes, are not definitive investment advice, and should not be relied upon as such. Information and opinions provided by third parties have been obtained from sources believed to be reliable, but accuracy and completeness cannot be guaranteed.

The content of this website is not designed or intended to provide authoritative financial, accounting, investment, legal or other professional advice, which may be reasonably relied on by its readers. If expert assistance in this area is required, the services of a qualified professional should be sought.

Cancel OK

Source: Unifimoney

Customers can only transfer funds into the Unifimoney environment from their bank account held with your institution (“Host DDA”). On the liquidation of any holdings funds are automatically returned to the host DDA.

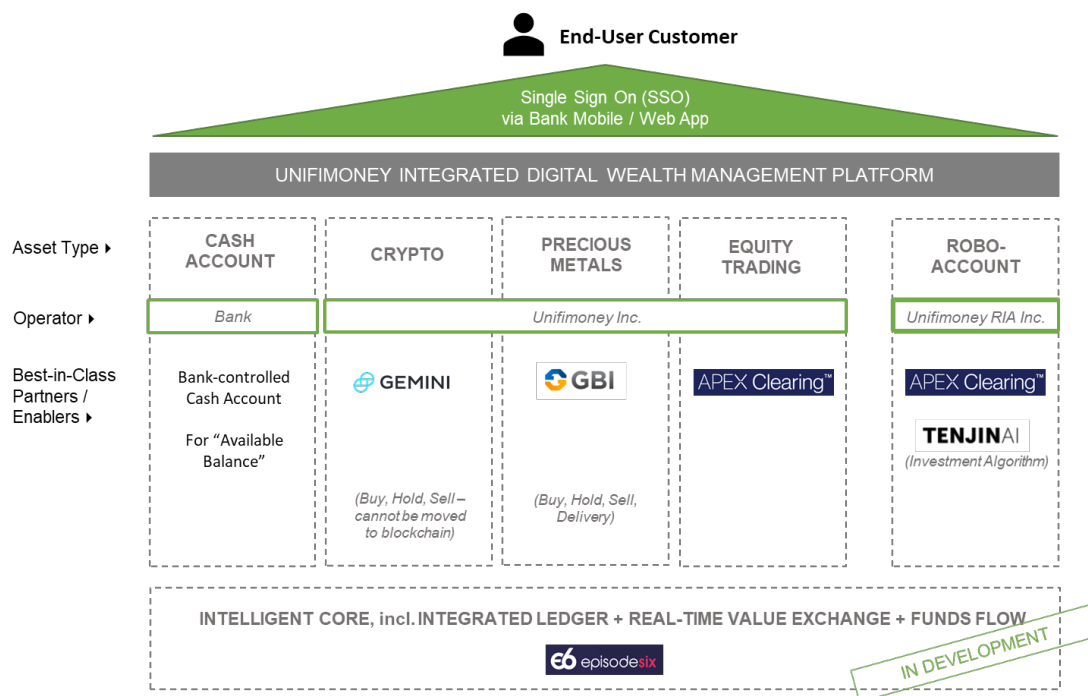
Customers can check their balances and entire transaction history within the Unifimoney Platform portal. Unifimoney will also provide customers with periodic investment statements for each product vertical through the Unifimoney platform.

Product support is a top priority and we maintain US based customer support channels to assist customers with products, services, and technical issues.

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The Unifimoney Integrated Offering



Source: Unifimoney

Who Are Our Product Partners?

Unifimoney has contracted with reputable and well-established financial services platforms to provide your customers with safe and secure investment options. This includes:



Apex Clearing Corporation and Electronic Transaction Clearing, Inc. (d/b/a Apex Pro) ("Apex Pro"), wholly owned subsidiaries of Apex Fintech Solutions LLC, are each registered with the [SEC](#), members of [FINRA](#) and [SIPC](#), and licensed in 53 states and territories. FINRA BrokerCheck reports for Apex Clearing and Apex Pro are available at <http://www.finra.org/brokercheck>

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Unifimoney's cryptocurrency and digital assets products offered through Gemini Trust Company generally fall under certain state money transmitter laws and the BitLicense granted by the New York Department of Financial Services (NYDFS).

- *As a New York Trust Company, Gemini is subject to the capital reserve requirements, cybersecurity requirements, and banking compliance standards.*
- *Gemini is the only crypto platform in the world to have completed SOC 1 Type 2 and SOC 2 Type 2 examinations for both our exchange and custody products. These examinations were performed by Deloitte & Touche LLP.*
- *Gemini conducts audits of their ISO/IEC 27001 Information Security Management System (ISMS) by [Coalfire](#).*
- *Gemini maintains \$290M in digital asset insurance in addition to the capital reserve requirements set forth by NYDFS.*

In the absence of Federal regulatory clarity around digital assets, community banks and credit unions have looked to partners such as Gemini who are regulated by the NYDFS. New York has been on the forefront of analyzing specific crypto projects for their "greenlisting" exchange and custody and operates the BitLicense regulatory regime which has the most rigorous standards in the United States.



Gold Bullion International, LLC (GBI) enables precious metals to be part of your customer's Unifimoney investment experience. Physical precious metals will allow your customers to sleep well knowing they own actual coins and bars, secured and insured in world-class vaults, and available for delivery as requested. Precious metals are ideal for customers concerned about wealth preservation, inflation risk, stabilizing portfolios, reducing volatility and improving risk-adjusted returns.

GBI maintains an end-to-end ecosystem of liquidity, storage & security, settlement and asset logistics, which makes it the perfect partner to complement Unifimoney's suite of products. GBI provides similar services to numerous large wealth managers, such as Merrill and UBS which subjects GBI to stringent security standards and regular audits beyond engagement with regulators.

Unifimoney Product Partner Summary

Product	Regulated Partner	Description
Self-Directed Brokerage Trading	Apex Clearing Corporation	Commission free trading of thousands of stocks and ETFs offered.
Robo ETFs	Apex Clearing Corporation	Low-fee ETFs powered by digital financial advice based on proprietary algorithmic and mathematical rules designed by Unifimoney and our technology partner Quantel.ai.
Precious Metals	Gold Bullion International (GBI), LLC	Precious metals including Gold, Silver and Platinum (fully allocated, take delivery or secure storage).
Cryptocurrency	Gemini Custody	Trading in over 70 cryptocurrencies.

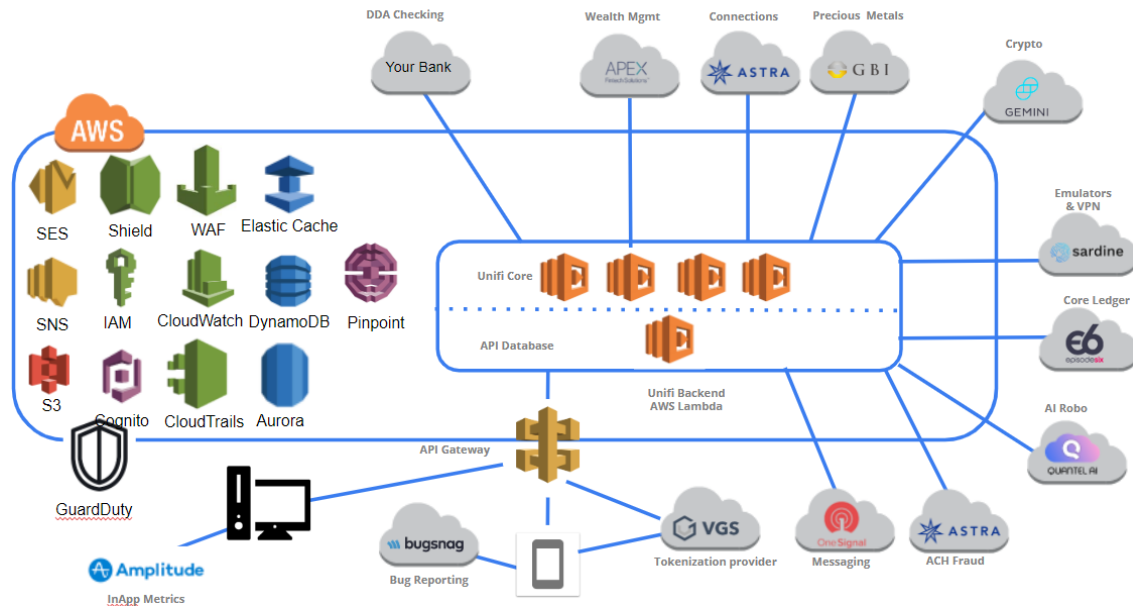
Source: Company Websites and FSVector

Compliance partners

Unifimoney also partners with a number of individual consultants and companies providing regulatory and compliance advisory services including:

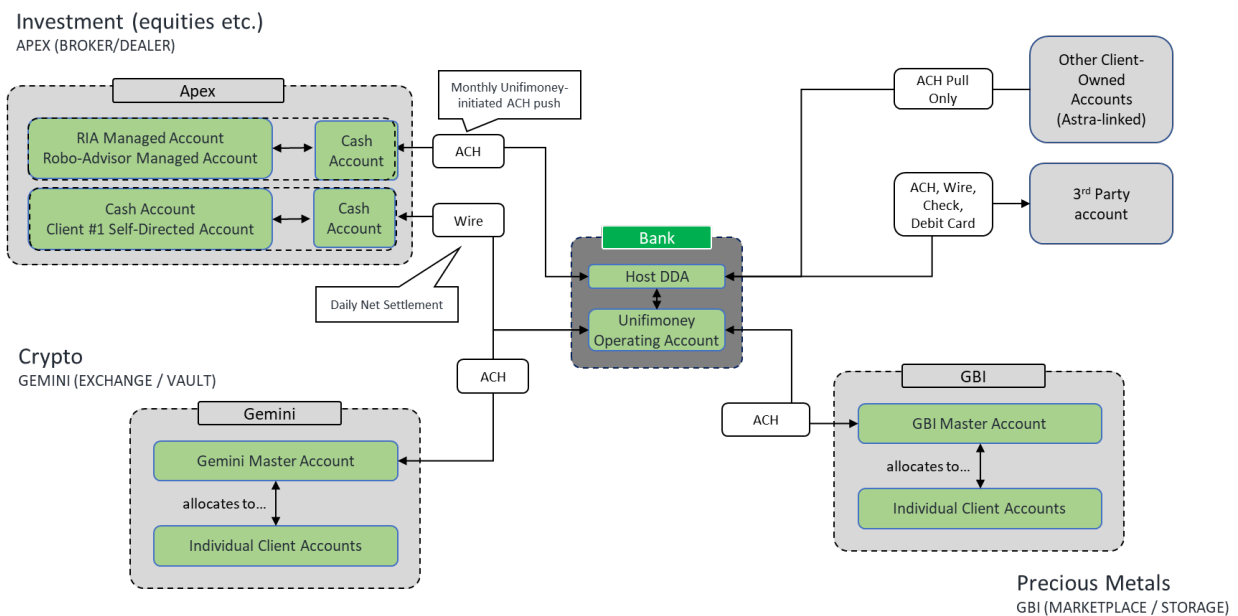


Technology Infrastructure and Partners



https://docs.google.com/presentation/d/1dz089QtQtUQ8-eCkm6OdxknLXzx65KnmBejZKi_evUs/edit#slide=id.gbaff2e8c19_0_0

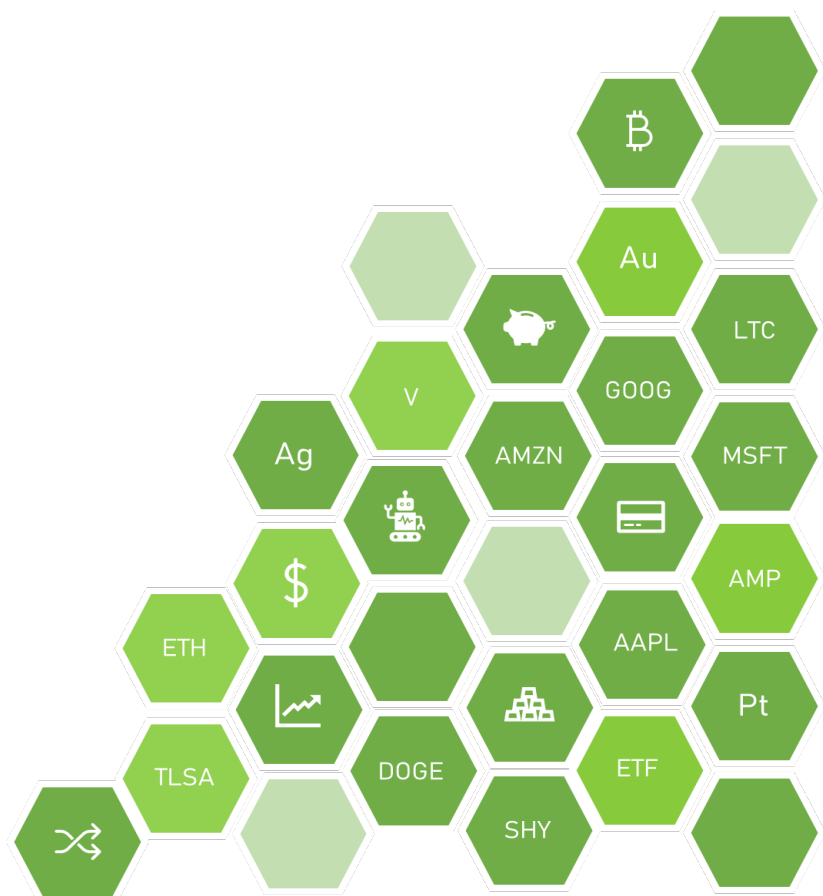
Funds Flow



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Company Due Diligence Data



Company Due Diligence

Unifimoney was founded by a team of experienced financial services professionals, with a depth of experience in banking, investment management, wealth advisory and the disciplines of risk management and compliance.

The team has worked across a diverse range of financial institutions including Visa, Blackrock, Silicon Valley Bank and Commonwealth Bank of Australia.

Unifimoney provides this due diligence information to describe how our company is structured to partner with financial institutions in a compliant and transparent manner.

Who We Are

Headquartered in San Francisco and founded in 2019 by Ben Soppitt (CEO) and Ed Cortis (CTO) the team comprises currently of over 35 staff and contractors.



Ben Soppitt

Ben Soppitt is the Co-Founder and CEO of Unifimoney. It was his concept of a unified money management platform to bring simplicity and ease to saving and investing that was the genesis of the company.



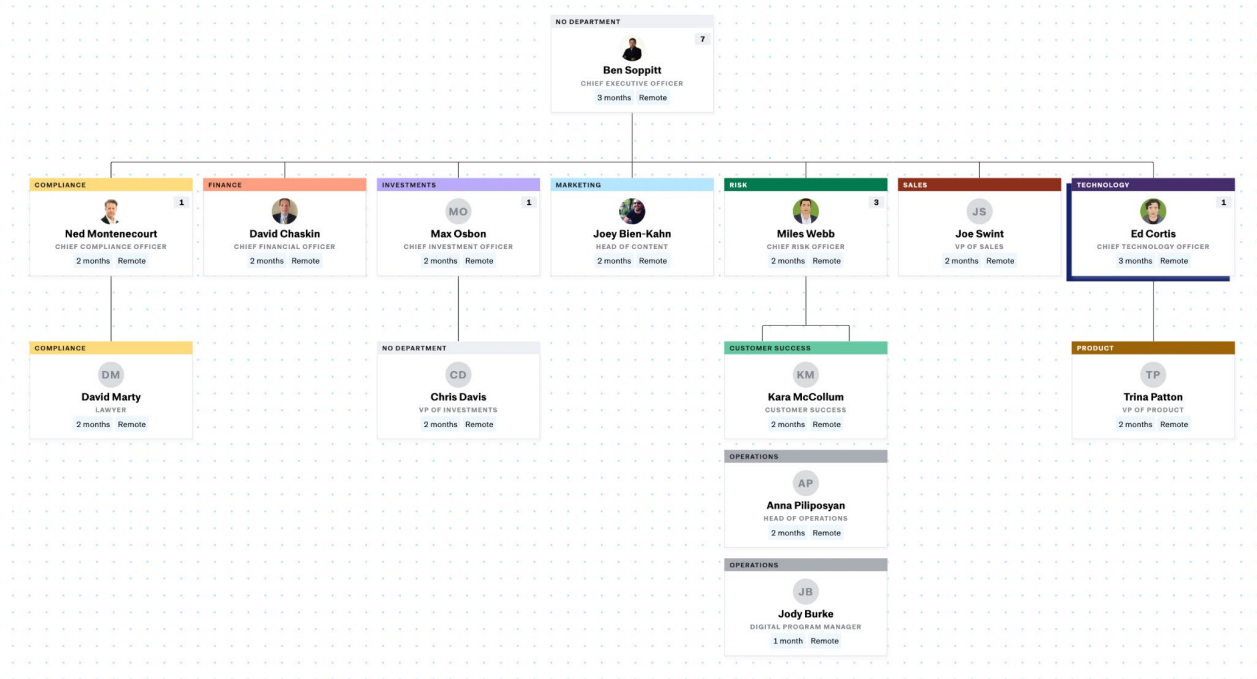
Ed Cortis

Ed Cortis is the Co-Founder and CTO of Unifimoney. Ed brought more than two decades of experience building consumer platforms in regulated businesses including banking and payments to build the solution.



Team Structure

For more information about Unifimoney and our management team, see our [About Unifimoney](#) webpage.



Source: Unifimoney

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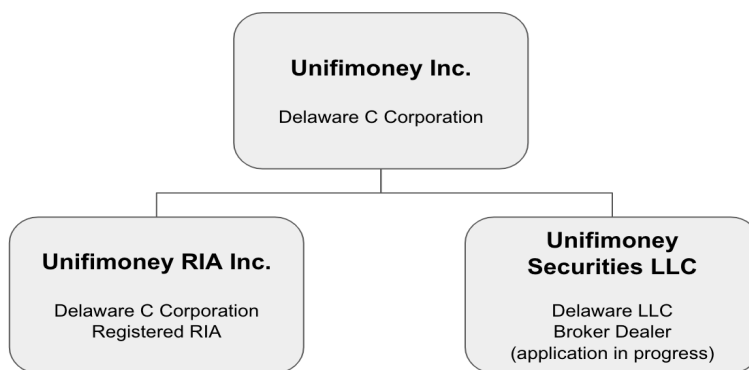
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Corporate Information

Unifimoney consists of 3 entities - Unifimoney Inc. and two fully owned subsidiaries Unifimoney RIA Inc. and Unifimoney Securities LLC.

Corporate Structure



Source: Unifimoney

Principal Place of Business

100 Shoreline Highway, Building B, Suite 100
Mill Valley, CA 94941
USA

State of Incorporation

Delaware

A certificate of Good Standing can be provided upon request.

Unifimoney, Inc. | File Number 7542757

Unifimoney RIA, LLC | File Number 7903660

Unifimoney Securities LLC | File Number 6697551

EIN

Unifimoney Inc. 84-5149173

Unifimoney RIA Inc. 84-5149173

Unifimoney Securities LLC 88-1706089

Formation

2019

Geographic Operations

Unifimoney does not have any business presence outside of the US.

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Corporate Governance

The [management team](#) at Unifimoney are all experienced industry professionals with decades spent in highly regulated businesses including payments (Visa), banking (SVB and Commonwealth Bank of Australia), wealth management (Blackrock) and more.

We consider ourselves a compliance-first business and we understand the high standards to meet our customers' and regulators' expectations.

Investment Committee

Unifimoney has developed a compliance and risk committee consisting of senior advisors who have a depth of experience in compliance, wealth management, bank regulation and background in community banking, regional banking, and credit unions.

Financial

On April 6th 2022, Unifimoney announced its \$10m seed round. Investors include both institutional and Angel Investors and include owners of Community Banks and experienced investors in financial services.

[Crunchbase - Investor List](#)

Institutional Investors Include

Plug and Play
Transformco (Shop Your Way)
Oriza Ventures
Global Millennial Capital
Altair Capital
White Bay Group (New Horizon Bank)
ICBA Ventures
Hard Yaka

Wilson Sonsini (WSGR)

Angel Investors From Companies Include

McKinsey
Google
Salesforce
Trustar Bank



Insurance

We currently hold sufficient levels of Errors & Omissions (E & O) insurance however we are in the process of securing additional corporate certificates of insurance for commercial, professional, and third-party crime or cyber liability to ensure appropriate levels of coverage.

Unifimoney will maintain a Fidelity Bond through Mercer LLC as required per the FINRA & SEC registration requirements to join the Securities Investor Protection Corporation (SIPC) which provides insurance against loss of customer funds.

Licenses

Unifimoney is a Registered Investment Advisor under the name UNIFIMONEY RIA, INC. CRD#:309001/SEC#:801-118883

[FINRA Broker Check](#)

[SEC Public Disclosure](#)

As such, Unifimoney is subject to the following examinations:

- **Registered Investment Adviser** - Annually, the SEC examines Unifimoney and holds our practices against the industry risks of the day. Unifimoney takes examinations seriously and promptly resolves any findings and takes proactive action on any recommendations made by regulators.
- **Broker-Dealer** - Approximately every other year, FINRA conducts examinations of Unifimoney's Self-Directed Trading Brokerage services.

Unifimoney is not a Money Services Business (MSB). Under our current model, we are not required to be a MSB or obtain state money transmission licenses because in all cases our money flows are facilitated within the boundaries of our banking and asset exchange partner licenses and exemptions.



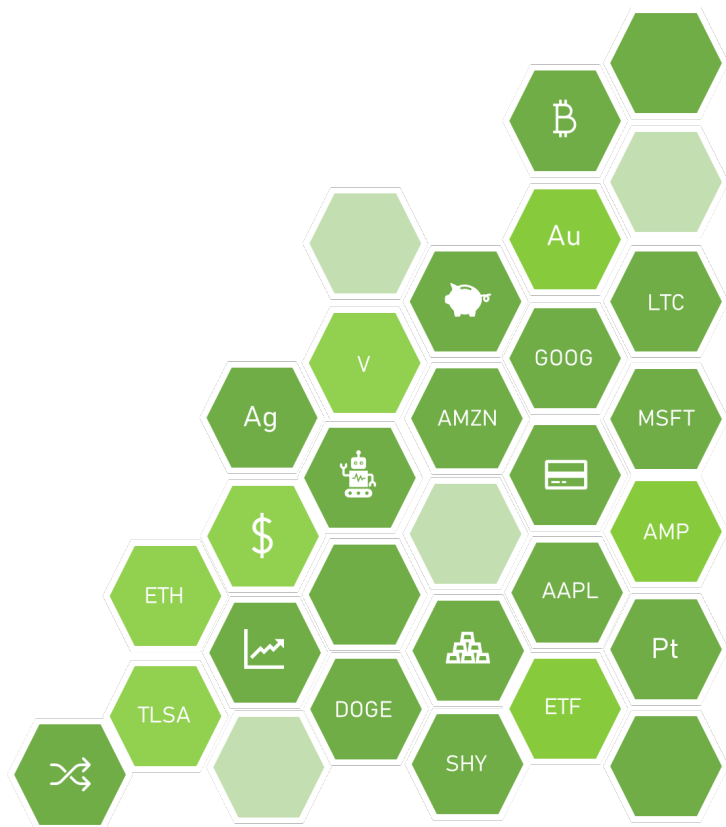
Our Partners are registered and hold all appropriate licenses in the jurisdictions required to provide banking and investment options to your customers. As we onboard Partners to offer additional products and services, Unifimoney will conduct full due diligence, oversight activities and legal reviews to ensure they meet our high standards of compliance and performance.

Legal Agreements and Disclosures

Each customer will need to accept the terms and conditions for Unifimoney and each of its partners upon deciding to utilize their product(s). Links to the disclosures can be found below.

Customer Agreements & Disclosures			
Unifimoney	Apex	GBI	Gemini

Compliance Due Diligence

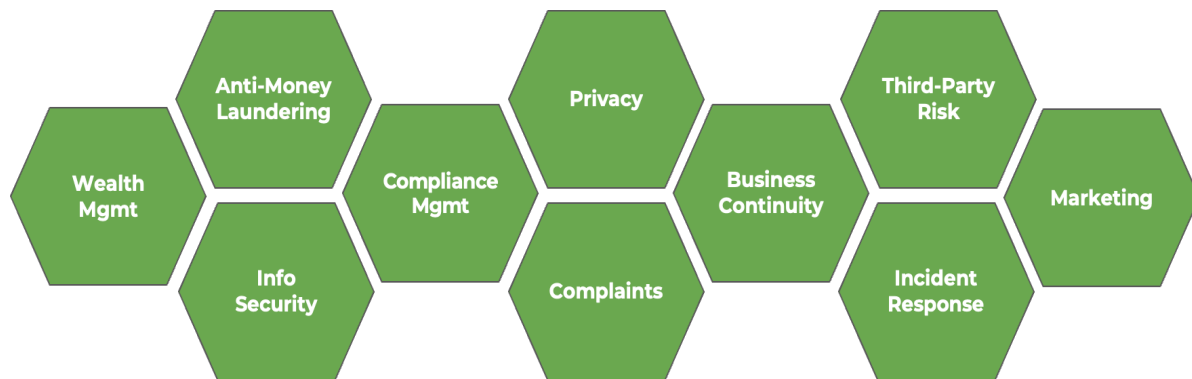


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Compliance Due Diligence

We cover the following 10 key areas in our due diligence overview:



Unifimoney provides this due diligence information to describe how our compliance program for wealth management products and services can complement your existing compliance program to create a single harmonious program that meets your prudential regulatory requirements.

Interagency guidance suggests that the risks to banks from third-party product arrangements vary based on the terms of the agreement between the bank and the third party and the nature of the services offered. When a bank is offering products and services originated by third parties as its own, the bank can be exposed to substantial financial loss and damage to its reputation if it fails to maintain adequate quality control over those products and services and adequate oversight over the third-party activities.²

Unifimoney is committed to full transparency and working closely with your compliance team to ensure both you and your regulator(s) fully understand the risks and mitigation measures we have in place.

² [Third-Party Relationships: Risk Management Guidance](#), OCC Bulletin 2013-29, October 30, 2013.

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Compliance Management System

Governance and Oversight

Unifimoney's Board of Directors appointed a Chief Compliance Officer (CCO) to effectuate and manage the Compliance function at Unifimoney and its subsidiaries. The CCO maintains a depth of knowledge and skills covering Unifimoney's products, services, and partner oversight. The CCO directs the development of periodic compliance reports for the relevant areas of oversight to other senior leadership members and various committees.

Policies and Procedures

On an annual basis, Unifimoney reviews their internal policies and procedures and related documents to determine whether updates are required based on changed compliance requirements and internal processes. Policies exist both at the Unifimoney LLC parent-level as well as entity and product specific policies and procedures for Unifimoney RIA, LLC and Unifimoney Securities LLC.³

Risk Assessment

As the external environment changes or new products and services are introduced, Unifimoney conducts internal risk assessments to identify potential risks or issues that may impact Unifimoney, its partners, and client Institutions and their customers.

Monitoring & Testing

Unifimoney conducts ongoing risk-based monitoring and testing of our operations and related compliance requirements to ensure sufficiency in program performance in accordance with internal company standards and regulatory expectations.

Training & Hiring Practices

Unifimoney maintains a training program to ensure that employees and contractors who provide services to Unifimoney have taken training courses appropriate to their respective

³ RIAs are required to maintain a written compliance program under [SEC Rule 206\(4\)7](#).



roles and responsibilities. The Unifimoney Board of Directors and Senior Management members also take training appropriate to their role and authority in governing the company's operations, including anti-money laundering program oversight.

Unifimoney is an equal opportunity employer. We do not discriminate on the basis of race, color, religion, marital status, age, national origin, ancestry, physical or mental disability, medical condition, pregnancy, genetic information, gender, sexual orientation, gender identity or expression, veteran status, or any other status protected under federal, state, or local law. Unifimoney conducts comprehensive background checks and OFAC checks on employees and contractors.

Anti-money Laundering

Unifimoney Inc. & Unifimoney RIA each maintain documented written BSA/AML Programs with applicable policies, procedures, and appropriate staffing and a designated BSA/AML Officer.

Unifimoney and its Partners will generally adopt and comply with your Institution's BSA/AML requirements. Separately, our Partners maintain robust AML Programs as required by their specific business models and respective regulatory and licensing regimes.

Know Your Customer ("KYC")

The Unifimoney Platform leverages your Institution's Anti-Money Laundering Program's Customer Identification Program (CIP) to onboard customers to the Platform and provide customer data to our partners for the purpose of their CIP and Know Your Customer requirements.

Additionally, to the extent that our Partners require additional identity verification to offer the Unifimoney Platform's products and services, CIP/KYC will be done behind the scenes via encrypted API data transmission to reduce customer confusion and streamline the process. Customer CIP notices will be provided by Unifimoney and our Partners as part of account opening disclosures.

Unifimoney RIA (Robo product offering) will require additional KYC/CIP through our partner [Passbase](#), a leading identity verification provider.

Transaction Monitoring & Fraud

Unifimoney will maintain a transaction monitoring system for RIA business and will request periodic reports from Partners' transaction monitoring activities.

Broadly on the Unifimoney Platform, suspicious activity and fraud activity is expected to be limited given the restrictions of investment use cases to licensed regulated products, and the customer's ability to access the Unifimoney Platform exclusively from within your Institution's accounts.

Suspicious Activity

Unifimoney will monitor the use of the Unifimoney Platform and track, review, and report on unusual, suspicious, or fraudulent use of the Platform. Unifimoney will immediately report any identified unusual or suspicious activity to your Institution in the form of a Unusual Activity Report (UAR) for your consideration in filing a Suspicious Activity Report (SAR) with FinCEN.

In the event of any fraudulent and/or suspicious activity by use of the Unifimoney Platform by your Institution's customer or account holder will result in immediate suspension or termination of such use by the customer or account holder.

Office of Foreign Assets Control (OFAC) Screening

Unifimoney RIA (Robo product) complies with all OFAC regulations through the following internal controls:

- Ensuring that all Customers are screened as required by applicable law and the BSA/AML regulations.
- Requirements through a screening system implemented to comply with OFAC regulations and the BSA/AML Requirements, and;
- Complying with all OFAC and Bank directives regarding the prohibition or rejection of unlicensed trade and financial transactions with OFAC specified countries, entities and individuals.



For Unifimoney's other products and services besides Robo, monitoring for sanctions occurs at your Institution and our Partner's AML operations given that Unifimoney Platform users are your Institution's customers who are screened regularly against the OFAC and related AML sanctions lists.

Cryptocurrency Compliance

Recent OCC Guidance

The Office of the Comptroller of the Currency has recently stated in an [interpretive letter](#)⁴ that U.S. banks must seek and obtain written permission from their bank supervisors before engaging in certain activities involving cryptocurrency. Banks must be able to demonstrate they have appropriate risk management tools before taking on activities like providing custody services for customers' crypto holdings.

A separate joint statement from the Federal Reserve, Federal Deposit Insurance Corporation (FDIC) and the OCC stated that banking regulators intend to clarify in 2022 what role traditional banks can legally play in the cryptocurrency market.

Regulatory Uncertainty

Presently, there have been no common official designations for cryptocurrency or other virtual assets across US federal regulators. Under the current and prior US Administrations, the CFTC and SEC have provided unofficial and conflicting comments on the treatment of these assets. Congress has been reviewing the treatment of these assets closely and proposed legislation has been introduced to provide a regulatory framework that balances regulatory clarity with responsible innovation. Additionally, new legal precedent may be established in the courts through the Ripple lawsuit and other related cases.

With the Biden Executive Order on cryptocurrency, Federal agencies continue to study the different types of virtual assets and implications to the law. It is highly likely that some

⁴ [News Release 2021-121](#) | November 23, 2021 | OCC Clarifies Bank Authority to Engage in Certain Cryptocurrency Activities and Authority of OCC to Charter National Trust Banks



cryptocurrencies will be found to be “commodities” or “securities” under U.S. law, and thus, will be regulated as such.

Our Solution

Fortunately, Banks and credit unions are permitted to partner with digital wealth management and their regulated providers (Gemini) to offer various cryptocurrencies without providing direct cryptocurrency custody or similar services. This is possible due to the [SEC’s Reg R exemption](#) and the [Nondeposit Investment Product \(NDIP\) guidance](#) that allows FIs to refer their customers to a securities broker-dealer (Unifimoney) under appropriate arrangements.

In the absence of regulatory clarity, community bankers and credit unions should take comfort in Gemini’s strict cryptocurrency listing and custody criteria and the “greenlisting” process from the New York Department of Finance Services (NYDFS). NYDFS has been on the forefront of analyzing specific crypto projects for exchange listing/custody in NY State, and maintain the most rigorous standards in the country. Through our partnership with Gemini’s highly secure and compliant platform, Unifimoney offers your customers the opportunity to directly own over 70 cryptocurrencies which differentiates us from our wealth management competitors who may offer limited cryptocurrencies or just Bitcoin.

Furthermore, Unifimoney provides a closed loop environment for Host DDA products, including cryptocurrency trading. In addition, Unifimoney does not offer products currently receiving Federal regulatory attention, including interest-bearing cryptocurrency platforms and other cryptocurrency lending products.

Wealth Management Compliance

SEC Compliance

The [SEC regulates investment advisers](#), primarily under the [Investment Advisers Act of 1940 \(the “Advisers Act”\)](#), and the related rules. One of the central elements of the regulatory program is the requirement that a person or firm meeting the definition of “investment adviser” under the Advisers Act register with the Commission, unless exempt or prohibited from registration.

FINRA Compliance

Unifimoney is working on its registration as a broker-dealer. As a FINRA-regulated broker-dealer, Unifimoney will be subject to stringent exams and oversight. Employees will also be required to complete ongoing continuing education programs each year to ensure industry standards and practices are maintained.

SEC Regulation R Exemption

SEC's [Reg R](#) provides banks broader latitude for their operational activities under bank status, allowing them to provide certain brokerage transactions without registration as a broker-dealer, while still receiving compensation for these activities. Your Institutions can conduct securities transactions for your customers as part of the bank's trust and fiduciary, custodial, and deposit sweep functions, and to refer customers to a securities broker-dealer pursuant to a networking arrangement with the broker-dealer.

Nondeposit Investment Products (NDIP)

In 1994, the FDIC, the Federal Reserve Board of Governors, the Comptroller of the Currency and the Office of Thrift Supervision issued the "Interagency Statement on Retail Sales of Nondeposit Investment Products." ([OCC Examination Procedures](#)) to eliminate customer confusion regarding what is insured and not insured among the various products available from FDIC-insured depository institutions.

Unifimoney will clearly identify the differences between traditional insured deposit products and its investment products. Unifimoney will work with your Institution to adopt written policies and procedures and implement general guidelines before initiating a nondeposit investment product sales program.⁵

Bank deposit products are provided by Piermont Bank Member FDIC. FDIC insurance up to \$250,000 (including principal & interest) per depositor per program bank.

⁵ For more information on program requirements, see the [FDIC's Uninsured Investment Products: A Pocket Guide for Financial Institutions](#).



Your cash and investments are protected by SIPC up to \$500,000, with a limit of \$250,000 for cash. Investment accounts are not FDIC Insured - No Bank Guarantee - May Lose Value.

Privacy

Unifimoney collects and maintains customer nonpublic information NPI/PII in accordance with federal and state regulatory requirements and maintains data privacy and information security controls that restrict information sharing to anyone other than those parties identified in our Privacy policies, notices, and statements.

Data Sharing Arrangements between Unifimoney and Your Institution

Unifimoney's contractual relationship with your Institution involves the sharing of data between your Institution and Unifimoney in accordance with our Privacy Policies. It is recommended that Your Institution review your consumer privacy notices to reflect that customer data will be shared with third parties for their everyday business services and/or affiliates.

To enhance your visibility into customer preferences and asset allocations, Unifimoney creates periodic reporting on customer data analytics and trends and provides to your Institution. In addition, secure APIs between your core banking system and the Unifimoney platform will allow for a real-time aggregated view from the customer's portal.

Unifimoney complies with the California Consumer Privacy Act (CCPA) to the extent required under California state law. Unifimoney will only share your data with our partners as required to perform everyday business services or as required by law.



Privacy Disclosures

The following disclosures are provided to customers and are available publicly on our website or upon customer request in accordance with Regulation P and the Gramm-Leach Bliley Act. Furthermore, Unifimoney consumer privacy notices are provided annually to all customers via the Unifimoney Portal.

Unifimoney Privacy Policy / Notice		
Privacy Policy	Consumer Privacy Notice	
Partner Privacy Policies / Notices		
Apex LLC Privacy Policy	GBI LLC Website Privacy Policy	Gemini Privacy Policy Consumer Privacy Notice

For more information on Unifimoney's privacy and data protection practices, see Information Security section.

Marketing Compliance

Unifimoney LLC may market their products and services to consumers with FI and non-FI partners and on its own behalf through the following channels:

- Social media marketing
- Third party marketing
- Direct mail / email marketing
- Print marketing
- Web Banner marketing
- Blog posts, articles, and other thought leadership

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To assist in ensuring all appropriate marketing collateral is compliant Unifimoney has created a guide for FI clients as well as a full portfolio of compliant marketing collateral for FI use. These can be found in the Marketing section of the FI Resource Guide.

UDAAP

Unifimoney conducts internal marketing and advertising reviews for applicable regulations prior to publishing any external marketing or advertising information, which includes Unfair, Deceptive, or Abusive Acts or Practices (UDAAP).

FDIC Insurance

The Unifimoney portal does not provide any reference to FDIC insurance or any bank account specific information that would be considered inaccurate or misleading.

Investment Advisors

Unifimoney RIA will comply with the 2020 [SEC Marketing Rule 206\(4\)-1](#) that replaced the broadly drawn limitations and prescriptive or duplicative elements in the prior rules with more principles-based provisions for investment advisors.

Unifimoney will never ask your bank or your employees to market, advertise, or provide investment advice with regard to Unifimoney products or services, unless otherwise directed through a written contractual relationship that is in compliance with all applicable laws and regulation.



Information Security

Unifimoney maintains a documented Information Security Program with applicable policies and procedures that govern Unifimoney LLC, Unifimoney RIA, and Unifimoney Securities.

Unifimoney's data storage, security, and privacy is managed with [Very Good Security, LLC](#), and IT risk assessment and penetration testing is conducted by [Clear Gate Cyber Security & Research Ltd.](#)

Data Security

Below are some key mitigations designed to keep the Unifimoney platform and user data secure:

- Single Sign On (SSO) for customer login
- Multi-factor Authentication (MFA) for all customer transactions
- End-to-end data encryption
- Robust physical security
- No client data will be stored outside of reputable U.S. servers.
- All Unifimoney business and customer NPI/PII data is encrypted at rest and in-transit and never stored outside of the U.S.
- Unifimoney implemented information security and privacy awareness training requirements for all employees and contractors.

SOC 2 Examination

Unifimoney has begun their SOC 2 Certification process with [Wipfli](#), a reputable professional services firm, as key partner expected to conclude by the end of 2022. The [SOC 2 process](#) will cover performance and reporting requirements for an examination of controls related to information security controls, product code, performance, as well as enterprise policies, processes and access.

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Business Continuity

Unifimoney Inc. will maintain a Business Continuity Program at the corporate-wide level and Unifimoney RIA maintains a Business Continuity Program and Plan that aligns with FINRA's expectations.

To ensure network stability and to minimize data loss when isolated areas of our network fail, Unifimoney has established a disaster recovery plan and remediation strategies. Our disaster recovery exercises involve replicating Unifimoney services on backup networks with the expectation that it's done within an hour and data loss is contained to a five minute window.

Unifimoney's Partners are required to maintain Business Continuity & Disaster Recovery Plans that align with regulatory expectations within their respective regulatory regimes.

Incident Response

Incidents happen but we have built an efficient process that aligns with regulatory guidelines, including the 2021 interagency guidance that sets a 36 hour security incident notification period, to ensure that you are able to meet your obligations to regulators.⁶

What happens if there is an event?

1. We identify and investigate
2. We notify everyone (all users, partners, and financial institution clients)
3. We work to restore service
4. We notify everyone of the resolution
5. We digest and learn from the incident to improve everyone's experience and to prevent future attacks.

⁶ Computer-Security Incident Notification: Final Rule, OCC Bulletin 2021-55, November 23, 2021. Available at: <https://www.occ.gov/news-issuances/bulletins/2021/bulletin-2021-55.html>



Third-Party Risk Management

Unifimoney will operate a Third Party Risk Management Program that consists of processes for initial pre-contract due diligence and selection, as well as ongoing risk-based reviews.

Initial Due Diligence

Unifimoney performs an extensive evaluation on each vendor with whom we partner so we can review and validate their compliance, security, and business practices. Unifimoney's risk management team reviews their practices and provides a recommendation for approval or denial to proceed with the partnership.

Ongoing Monitoring

Unifimoney performs ongoing evaluations on all vendors based on their assigned risk ratings. Unifimoney conducts vendor oversight activities at least annually for all key or high risk providers and Partners. The reviews include an assessment of financial status, IT security and SOC reports, privacy and data sharing practices, regulatory and reputational events, among other items.

Assurances from our Partners

Outside vendors conduct risk assessment and compliance reviews over key compliance and operational areas.



Complaint Management

As the Unifimoney platform continues to evolve, product support remains a top priority. Unifimoney maintains customer support channels to assist customers with products, services, and technical issues, and to intake and manage consumer complaints that may arise through the use of the Unifimoney Platform and our partners.

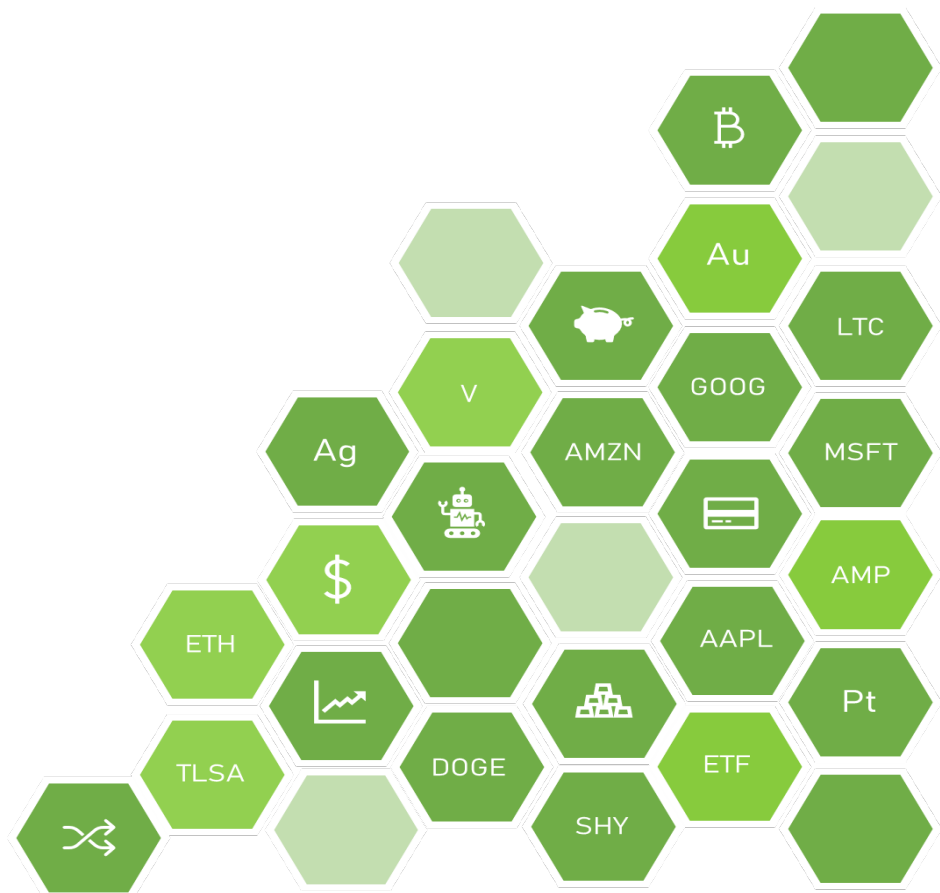
Unifimoney will maintain a Complaints Management Policy that governs the process of intaking and managing consumer complaints received directly from a consumer or from external sources such as regulatory bodies, consumer protection organizations or attorneys on behalf of customers. Customer support inquiries or complaints can be submitted directly to Unifimoney through our email, phone, chat/messenger, or web form channels provided to the customer in their initial terms and conditions and are prominently displayed on our Platform.

Customer complaints and related complaints trend analyses will be shared by Unifimoney to select individuals within your institution for oversight purposes and to provide evidence of an Institution's third party oversight program.

Accessibility Support

We're committed to following the tech industry's best practices for accessibility support for the persons with disabilities who require reasonable accommodations. Unifimoney ensures that our website & portal design are fully compliant with the American with Disabilities (ADA) digital content requirements, including the rigorous standards set forth by the [Website Content Accessibility Guidelines \(WCAG\) 2.1](#) (AA minimum) via our partnership with [AccessiBe](#).

Risk Self Assessment



Risk Self-Assessment

We are here to help make this as easy as possible.

Unifimoney provides this risk self-assessment for you to leverage in your review and diligence of us and our program. We've taken a thoughtful approach across all aspects of this partnership, including providing our partners with the resources needed to assess the partnership and fulfill their responsibilities to the financial institution.

The risk self-assessment methodology is based on industry best practices utilized to evaluate the enterprise risk of financial service providers. The risk self-assessment evaluates the inherent risks associated with the Unifimoney platform against the strength of the Unifimoney and partner controls in place to address those inherent risks to derive the residual risk associated with the Unifimoney platform.

Risk Appetite Statement

Unifimoney aims to achieve a low risk profile through prudent management, a diversified product offering, and reliance on only the most reputable, best-in-class third-parties. Regardless, Unifimoney must ensure that it adopts all regulatory, legal, and compliance requirements in a way that satisfies its financial institution partners' demand for low risk partnerships and the protection of its customer's assets.

The risk self-assessment evaluated risks associated with the following key risk areas:

1. Operational Risk
2. Regulatory Risk
3. Financial Crime (FinCrime) Risk
4. Information Technology (IT) Risk
5. Vendor Risk
6. Privacy Risk
7. Financial Risk
8. Insurance Risk
9. Legal Risk

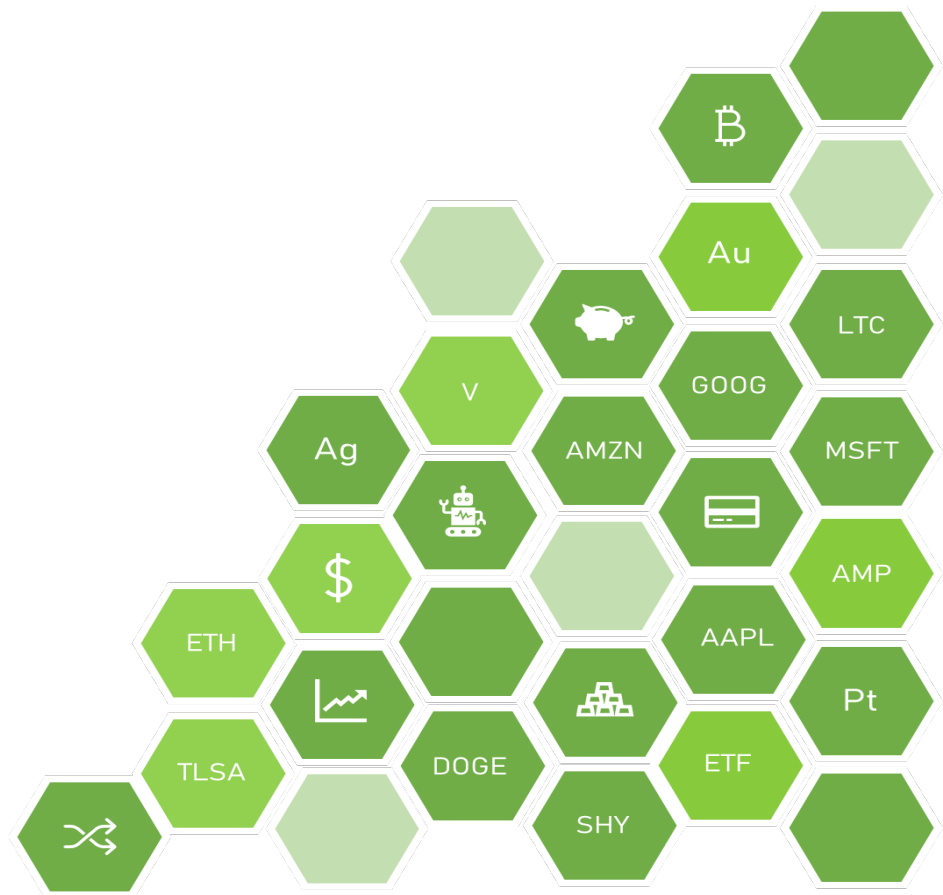


10. Reputational Risk

Overall, the inherent risk of the Unifimoney platform was found to be **Moderate** (on a scale of Low, Moderate, High, Very High), with strong and satisfactory controls mitigating the inherent risks to an overall residual risk level of **Low** (on a scale of Low, Moderate, High, Very High).

[Link to Secure Unifimoney Drive with Risk Assessment Excel]

FAQ and Next Steps





Is my FI permitted to engage in this type of activity?

Banks and credit unions are permitted to partner with digital wealth management providers to expand your product offerings. This is possible due to the [SEC's Reg R exemption](#) and the Non that allows Institutions to refer their customers to a securities broker-dealer under appropriate arrangements with broker-dealers (Unifimoney).

Also, check out the FDIC's [Pocket Guide for Financial Institutions on Uninsured Investment Products](#) for more information related to wealth management partnerships.

Can my FI offer cryptocurrencies via Unifimoney and Is it possible to compliantly offer more than Bitcoin?

Fortunately, Banks and credit unions are permitted to partner with digital wealth management and their regulated providers (Gemini) to offer various cryptocurrencies without providing direct cryptocurrency custody or similar services. This is possible due to the [SEC's Reg R exemption](#) and the [Nondeposit Investment Product \(NDIP\) guidance](#) that allows FIs to refer their customers to a securities broker-dealer (Unifimoney) under appropriate arrangements.

In the absence of regulatory clarity, community bankers and credit unions should take comfort in Gemini's strict cryptocurrency listing and custody criteria and the "greenlisting" process from the New York Department of Finance Services (NYDFS). NYDFS has been on the forefront of analyzing specific crypto projects for exchange listing/custody in NY State, and maintains the most rigorous standards in the country. Through our partnership with Gemini's highly secure and compliant platform, Unifimoney offers your customers the opportunity to directly own over 70 cryptocurrencies which differentiates us from our wealth management competitors who may offer limited cryptocurrencies or just Bitcoin.

How does Unifimoney differ from other digital wealth management platforms?

Unifimoney's platform is unmatched in its product offerings, and we're just getting started. Our competitors do not provide the same diversity in investment options, including both passive and active investing in stocks and ETFs, cryptocurrency and precious metals, in an all-in-one secure and compliant platform.

Unlike our competitors, Unifimoney offers your customers the opportunity to directly own over 70 cryptocurrencies, held in a highly secure and compliant platform with our partner Gemini. This differentiates us from our wealth management competitors who may offer limited cryptocurrencies or just Bitcoin.



My FI already works with LPL/Raymond James/Cetara - can we work with Unifimoney?

FIs that already offer a traditional RIA advisory service whether their own or via a partner such as LPL Financial have a great solution for customers who are generally older, more affluent and want a traditional advisory relationship. This excludes a strategic group of up and coming investors who embrace self directed investing and are typically younger, more digitally engaged and less affluent (HENRY's for example - High Earning Not Yet Rich). It also reduced their offering and opportunities to engage with their wealth management clients who may also like to self direct and or are interested in alternative assets like cryptocurrencies which are very rarely offered by traditional wealth advisors.

Unifimoney's services are, we believe, highly complementary to traditional wealth advisory business and enables an FI to offer a full stack wealth management solution for all customers.

Agreements with 3rd party traditional wealth management advisors and their FI clients will vary but it has been reported to us from a number of FI's that there is no prohibition in their agreements for working with other wealth management platforms such as Unifimoney. Clients should of course check and review any such agreement with their legal counsel.

Will this result in a reduction in my Institution's deposit base?

This is a major challenge faced by community banks and credit unions who are losing deposits to companies like Robinhood and Coinbase.

A key feature of Unifimoney is that we operate a closed-loop system that allows your customers to ONLY deposit and withdraw funds to and from your FI's DDA accounts.

They are your customers, let's keep it that way.

How does Unifimoney and our FI partners stay compliant under different bank and credit union regulatory regimes? Do they differ in their approach?

Unifimoney operates in accordance with each prudential regulator's respective regulations, rules, and official or interpretive guidance. While the various prudential regulators sometimes outline nuanced approaches for the respective FIs under their purview, the underlying regulatory framework principles do not substantially differ.

Unifimoney stays abreast of regulatory developments and aligns our operations with the applicable Interagency Guidance that promotes uniformity across the Federal Reserve, OCC, FDIC, and NCUA. To the extent that there are nuances in regulatory treatment

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across these regulators, Unifimoney will alert you to new requirements and partner with you to incorporate the appropriate changes to your policies, procedures, or processes.

We are committed to working with you and provide the appropriate guidance to get this right.

Where can I find more information or ask additional questions?

Please don't hesitate to reach out to us at compliance@unifi.money to obtain more information or for any specific questions!



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