

Legal Schedule



Q 1: Why is the company registered in Estonia?

A: The Estonian authorities have shown the readiness for infrastructure and legal framework, as well as loyalty towards blockchain projects.

Q 2: What is your company?

A: The joint-stock company incorporated in the European Union.

Q 3: Why are you changing ownership of the company from LLC to JSC?

A: According to the legislation of Estonia, for the issue of tokens which are non-depository securities the company needs to have the procedural and institutional structure of Joint-stock company.

Q 4: Now you have obtained the licenses. What opportunities do they give you?

A: We have acquired the right to render services for the exchange, turnover, transfer and storage of virtual currencies including, cryptocurrencies to our clients from around the world, both directly in representative office of the company, and remotely using digital channels of information, money and virtual currencies transfer.

Q 5: What actions does the FVR000110 license imply (providing services of exchanging a virtual currency against a fiat currency)?

A: The license allows you to exchange virtual currencies for cash funds (Fiat) and back.

Q 6: What actions does the FFA000254 license imply (operating as a financial institution)?

A: The license of the financial consultant grants us the right to carry out the activities of a non-bank financial institution, namely:

- lease deals
- payment services in the field of electronic currencies
- delivery and administration of non-cash means of payment, for example, electronic means
- payments, e-money, traveller's checks and accounts
- transactions on the issuance of guarantees and sureties, as well as other transactions related to obligations
- transactions and operations related to the issue and sale of securities
- financial consultation to clients concerning their economic activity
- brokerage activity in the monetary market
- real estate management, and consultations in the sphere of investments
- storage and management of securities

Q 7: What actions does the FRK000284 license imply (providing a virtual currency wallet service)?

A: It allows to create, administer cryptocurrency wallets and make transactions in favour of third parties in the cryptocurrency market.

Q 8: What actions does the license FSA imply (Estonian Financial Supervision Authority)?

A: This license grants the right to become a professional participant in the securities market with a possibility of issuing securities. It also guarantees transparency of the company's activities and requires that CINDX publish financial statements and data on beneficiaries. It also regulates the company's activities within the legislation of the EU.

Q 9: What does Exemption D (obtained by the SEC) provide?

A: The company incorporated in the European Union, which has received the Exemption D in SEC, has access to work with qualified investors from the United States of America. We can sell tokens to qualified American investors with their subsequent freezing for 12 months.

Q 10: Where will my personal data go? How will my data be protected?

A: Personal data are provided to the regulators of the Republic of Estonia. Non-disclosure is guaranteed in accordance with the legislation of the European Union Personal Data Officer who operates within the company.

Q 11: When will tokens be issued and distributed to participants?

A: Tokens will be produced according to regulation EU 809-2004 after claiming the license of FSA and registration of the prospectus (see legal roadmap on our website)

Q 12: What is an 'issue of tokens'?

A: From a legal point of view, the issue of a token is an issue of a non-depository security, registration of which takes place through the registration of the prospectus.

Q 13: What is a Prospectus?

A: Prospectus is a document that contains all the necessary information on the issue of securities, a subject to registration in accordance with the established procedure.

Q 14: Is your token a Utility token or a Security token?

A: It is a Security token.

1. The head of the United States SEC said in a statement that there is no utility, as utility does not provide profit, can not be traded on the exchange and provides utilitarian functions. For example, access to the platform;
2. To classify the token we contacted Estonian lawyers and received a legal opinion, in which our token was classified as a security token;
3. If we had followed the "simple" way, the American market would have been closed for us and the consequences for the company would have been unpredictable.

Q 15: How does security token CINDX protect the rights of the investor?

A: A Security token protects the rights of investors by:

- registration of tokens in Estonian FSA
- control of the company's activities by the tax inspection, FSA
- control of issue and distribution of tokens
- monitoring the correct KYC procedure
- control and protection of personal data of each Token sale participant
- control of expenditure of the raised funds
- transparency and openness of the company's structure and data on beneficiaries
- huge fines for violations and liability up to the criminal

Q 16: Why go through the KYC procedure to participate in the Token Sale?

A: The KYC procedure is necessary in order to comply with the legislation in the Republic of Estonia to protect investors against fraudulent actions of the third parties as well as to comply with AML procedures and avoid other criminal proceeds.

Q 17: Who is a qualified investor in the USA?

A: An investor who has a net worth or a joint net worth with their spouse, in the amount that is not worth less than one million dollars; or has over 200 thousand US dollars annually in the last two years or a joint income with their spouse in the amount over 300 thousand dollars for the same period.



Operating licence

Number

FVR000110

Area of activity

Providing services of exchanging a virtual currency against a fiat currency

Start of validity

12.04.2018

Valid until

Termless

Data of the entrepreneur

Name of entrepreneur

AS Cindx Investkapital

Registry code

14427370

Contact details

Number of licence

FVR000110

Area of activity

Providing services of exchanging a virtual currency against a fiat currency

Start of validity

12.04.2018

Valid until

Termless

Number of decision

20180412-156362

Date of decision

12.04.2018

Issuer of licence

Politsei- ja Piirivalveamet

Classification of Economic Activities code and name

Person who submitted the application

Aleksandr Bogdanov (tel: +7 903 003 04 69, email: zisin@mail.ru)

Accuracy confirmed

12.04.2018



Operating licence

Number

FFA000254

Area of activity

Operating as a financial institution

Start of validity

25.05.2018

Valid until

Termless

Data of the entrepreneur

Name of entrepreneur

AS Cindx Investkapital

Registry code

14427370

Contact details

Number of licence

FFA000254

Area of activity

Operating as a financial institution

Start of validity

25.05.2018

Valid until

Termless

Number of decision

20180525-168490

Date of decision

25.05.2018

Issuer of licence

Politsei- ja Piirivalveamet

Classification of Economic Activities code and name

64991 - Provision of other financial services, except insurance and pension
funding, not classified
elsewhere

Person who submitted the application

Sofja Pevzner-Belošitski (tel: 53745367, email: spbestonia@gmail.com)

Accuracy confirmed

25.05.2018

Crypto Wallet License

**Name of entrepreneur**

AS Cindx Investkapital

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Website

Operating licence

Subject field, area of activity Financial services, Providing a virtual currency wallet service

Number FRK000284

Start of validity 17.08.2018