

ReFi.Trading – ADGM Permitted Activities Mapping

Mapped Permitted Activities

1. Proprietary Trading - AI agents execute trades on behalf of users via self-custodied wallets.
2. Automated Portfolio Management - Agents continuously rebalance portfolios using average-reward RL I
3. Risk Management and Advisory - Zero-knowledge proofs enforce value-at-risk (VaR) constraints pre-tra
4. Trade Execution Technology Services - Orders are routed via FIX/REST to regulated brokers.
5. Tokenized Infrastructure Services - \$REFIN token powers GPU/data node rewards (DePIN model).
6. Regulatory Technology (RegTech) - Chainlink ACE enforces KYC, sanctions, and notional thresholds a

Key Compliance Highlights

- Non-custodial architecture: users retain control of funds at all times.
- zk-VaR proofs: mathematically verify that each order meets defined risk limits.
- Chainlink ACE: real-time compliance enforcement (KYC, AML, sanctions).
- ERC-4337 wallets: ensure agent actions are deterministic and policy-constrained.