



CoinMetro

INNOVATION POWERED BY CRYPTO

A one-of-a-kind, licensed, financial platform that will fuel the future of blockchain innovation.

Hong Kong
Tallinn
Tbilisi





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“continue”, “is/are likely to” or the negative of these terms, or other similar expressions intended to identify forward-looking statements.

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1. Abstract

The digital economy is maturing and blockchain technology is changing the way we do business. The financial sector is leading the way in blockchain and digital assets. While some potential uses of blockchain technology may be years away, the digital economy is already here. The industry needs a bridge between traditional and emerging asset classes. Experienced traders have teamed up with experienced developers to build this bridge.

Designed for mainstream adoption, the CoinMetro platform will be an all-in-one solution for crypto geared towards

maximizing client value. We will deliver a rock-solid, user-focused framework that offers unparalleled mobility between blockchain-based digital assets and traditional markets. The CoinMetro Ecosystem will include (i) a fast, intuitive exchange, (ii) a feature-rich trading platform offering unique digital asset investment opportunities, and (iii) a turnkey ICO Express solution. All services will be accessible via a streamlined web application with a stunning UI, fully integrated with industry-leading blockchain platforms. CoinMetro will price all services using our own digital ERC20 utility token, called COIN.

It is our vision that newcomers to the digital economy will be able to get started with buying their first Bitcoin instantly through our simple, supportive platform. Professional traders will enjoy a fast, secure, and highly flexible environment that integrates familiar features into our digital asset ecosystem. CoinMetro will also offer innovative investment models, such as our Tokenized Asset Management (TAM) platform and an Exchange-Traded Crypto Fund (ETCF) intended to give users access to one-click digital asset diversification options.

CoinMetro's partners and Token Buyback Program

Integral to CoinMetro is the relationship to our strategic partner, FXPIG, an established Forex ("FX") broker. FXPIG's proven track record and experience in providing financial services will help CoinMetro to deliver its planned "Token Buyback Program." The Token Buyback Program is one of the ways CoinMetro will look to initially stabilize the price of COIN and support market growth (See Section 4.0.4 for more information). Sharing of technology and human resources between CoinMetro and FXPIG will allow the CoinMetro Exchange to offer features, opportunities, and token sale bonuses above and beyond the scope of many current platforms



2. Background

2.1 Problems with existing exchange environment

Harvard Business Review published an article in 2017 analyzing the potential for blockchain technology to break into the mainstream. While noting that, “...financial services companies are already well down the road to blockchain adoption,” the study cites an overall lack of usability as the single largest barrier to widespread public adoption. Companies, it concludes, must “...focus on replacements that won't require end users to change their behavior much but present alternatives to expensive or unattractive solutions. To get traction, substitutes must deliver functionality as good as a traditional solution's and must be easy for the ecosystem to absorb and adopt.”

“Easy” is not the first word that comes to mind when considering the current exchange landscape surrounding digital assets. More often than not, users must use one service to exchange fiat for Bitcoin, go to another website to exchange Bitcoin for other cryptocurrencies, and then transfer

those currencies back into Bitcoin in order to transfer them out of the exchange and back to a fiat gateway in order to, finally, exchange them back into fiat.

CoinMetro intends to handle all of this and much more in one place: a fast, user-friendly, fully licensed and compliant platform. Our vision for the platform is to streamline the free flow of funds between platform users, traditional financial markets and the emerging digital asset economy. Bank-like security protocols, transparent third-party audits, and verifiable compliance with regulatory bodies will be established to support platform accountability and protection of client assets, data, and personal information. We believe that the technology to build our platform exists now, the demand for these services exists now, and the user base exists now.

2.2 Problems with existing ICO environment

A combination of hype, lack of regulation, and a “get-rich-quick” mentality has created a counterproductive ICO environment. A space of genuine opportunity has been flooded with an overabundance of ICO's based on immature projects, plagued by a lack of substance and a failure to deliver.

We continue to see ICO's making bold assertions about transforming entire industries, spearheaded by individuals with no tangible experience or background in the very industries they plan to revolutionize. We tend to see efforts led primarily by developers, engineers, or tech entrepreneurs who bring in a panel of “advisors” to assist with navigating whichever industry they aspire to “disrupt.”

CoinMetro takes the opposite approach. What we bring to the table is not experience in coding applications- we have hired great developers for that- but experience working with banks,



managing liquidity, analyzing markets, building relationships, and running companies. The potential we see for blockchain technology today is not to subvert existing industries, but rather to advance them through integration, accessibility, and mass adoption.

2.3 Team experience

Each core member of the CoinMetro team comes from an enterprise-level background in the financial sector and related fields. Our vision is based on the foundation of having already built a successful business in this space, and the desire to create a bridge between existing institutions and the digital asset ecosystem. While blockchain technology is undoubtedly going to change the way we do business across many industries, we believe that basic business principles still apply when developing consumer applications in the blockchain space.

Cambridge University's 2017 Global Cryptocurrency Benchmarking Study, by Dr. Garrick Hileman & Michel Rauchs, concludes that "...for cryptocurrencies to be useful to users they cannot live in a closed vacuum, but require interfaces and bridges to the broader economy." We agree, and our team is uniquely suited to create this bridge. Rather than starting from scratch, CoinMetro plans to build on the foundation of an established presence in the fintech space, to seamlessly integrate traditional brokerage services with proven blockchain platforms and the growing digital asset economy.

2.4 FXPIG: Our Strategic Partner

Since 2011, FXPIG has been a public and profitable Forex brokerage company with a focus on transparency, high volume traders, and customer service. From its inception, FXPIG has operated as a Straight-Through-Processing (STP) broker, sending all client trades for real execution on the market and earning a commission on volume. Additionally, FXPIG has developed a second revenue stream with its managed (PAMM) account options, which allow clients to work with vetted professional traders. The combination of STP and PAMM accounts has resulted in a low attrition rate of clients, high long-term revenue, and high user satisfaction. CoinMetro proposes to adapt proven aspects of FXPIG's unique PAMM account models to fit the contours of the digital economy through our innovative Tokenized Asset Management (TAM) features.

A crossover of team members and technology from FXPIG, as well as our Token Buyback Program (see section 4.0.5 for further details), will enable us to bring years of industry experience, existing ties, and established models into the development of the user-focused CoinMetro platform. Our team has experience building relationships with banks and payment gateways, establishing international partnerships, managing liquidity, working with regulators, analyzing markets, developing trading systems, and growing a dedicated user base.

FXPIG has over six years of experience dealing in both unregulated and regulated environments. This has made us very agile and aware of the global regulatory outlook. While regulation can take years to be finalized, adoption can happen quite quickly. If you take the FX space as an example, the retail FX industry was virtually unregulated in the early 2000's, or simply grouped under regulations that did not fit the underlying market. Today, there are essentially four main regulatory



bodies: the CTFC in the USA, the FCA in the UK, the ASIC in Australia, and CySEC in Cyprus. The latter houses more FX Brokers than the other three combined. We expect that regulation of cryptocurrencies will come in a similar wave. As recent research from one international consulting firm concluded, “Future controls on cryptocurrencies are generally trending towards tightened regulation that focuses on requiring exchange licensing and validation as well as AML, KYC, and other money transmission protections.” Companies that are unfamiliar or inexperienced with these processes will face challenges moving forward. CoinMetro intends to comply with laws and regulations applicable to it in the relevant jurisdictions.

For more information pertaining to FXPIG’s business model, its current relative financials, and a brief view at its predicted growth over the next five years, please see ‘FXPIG Appendix 1.’

2.5 Registration, Licensing, and Regulations (Multiple Jurisdictions)

Hileman & Rauchs emphasize that the biggest challenges faced by current cryptocurrency exchanges are maintaining relationships with payment gateways, banks, and traditional financial institutions. Based on an analysis of non-public data from over 150 companies in the cryptocurrency space, their study notes, “Small exchanges seem to have considerable difficulties with either obtaining or maintaining banking relationships...” Immediately upon launch of the CoinMetro Exchange, CoinMetro intends to operate as a registered eMoney Institution.

Running a multi-faceted fintech platform means that we will require multiple licenses in multiple jurisdictions to remain compliant with regards to the services we plan to provide. The CoinMetro Token Sale will be based in Hong Kong, and compliant with the regulatory environment there. Moving forward, CoinMetro intends to provide services in jurisdictions where it is licensed, or where no license is required. During 2018, CoinMetro intends to apply for licenses in several jurisdictions that cover the full range of planned services.

As of November 25th, 2017, CoinMetro is in the process of obtaining an eMoney license in

Georgia and an Alternative Payment (And Crypto Exchange) License in Estonia. Our intention for the eMoney license is that it will enable operation of the payment services side of our business, dealing in fiat transactions with countries outside the European Union, where applicable by law. The Estonia license will allow us to operate our exchange, dealing in both fiat and crypto, serving clients both within the EU and worldwide, subject to applicable law, and accept payments via multiple gateways, including SEPA transfers, SWIFT transfers, credit cards, and external wallet systems, from residents of the European Union.

We are also currently in talks to begin the process of acquiring an SIB Fund Management license in the Cayman Islands. This license would cover our ETCF and possibly our TAM platforms, and allow us to offer these services to a wide range of countries around the world, again subject to the laws of each applicable jurisdiction. We will look to acquire additional licenses in order to expand our regulatory footprint and remain compliant as CoinMetro grows, and as new regulations come to light around the world.



3. CoinMetro Ecosystem

3.1 Summary

Featuring a simple interface designed for mainstream adoption, the CoinMetro platform plans to serve as a conduit between traditional finance and the digital asset economy. CoinMetro's multifaceted ecosystem will streamline three major components of the digital economy, offering: (i) an exchange, (ii) a trading platform, and (iii) a complete ICO Express framework.

Working in tandem with FXPIG, CoinMetro plans to offer a wide range of services previously unavailable from a single entity. A scalable, user-focused environment will let new traders invest in cryptocurrencies with a few clicks on the exchange, while our trading platform will be equipped with a robust tool-set, designed to meet the needs of professional investors. Our vision for the CoinMetro ecosystem encourages growth and collaboration, intending to provide companies with a turnkey ICO Express solution to undergird project development.

By establishing stable banking relationships CoinMetro aspires to offer fast and secure payment processing in both cryptocurrencies and fiat. In addition to a full spectrum of familiar features, CoinMetro plans to implement a unique rewards program for COIN purchasers and custom trading solutions, carefully configured to fit the contours of the digital asset economy.

3.2 CoinMetro Exchange

3.2.1 Direct Payment Process - Cryptocurrency and Fiat Support

Direct payment processing in fiat and cryptocurrencies will be possible through CoinMetro's stable banking relationships fostered by its registered and licensed eMoney status in Georgia and Estonia, which it is currently pursuing. This feature will be available to both direct CoinMetro clients and to third-party clients, such as companies running their own ICO through our easy-to-use blockchain infrastructure.

3.2.2 Trading GUI

The Matching Engine will allow clients to send both standard and non-standard order types, including: Markets, Limits, Stops, Limit Stop Orders and OCO (One Cancels Other) orders, which are a combination of Stop and Limit orders on the same ticket. The system will also allow for several different TIF (Time in Force) options, such as FOK (Fill or Kill), IOC

(Immediate or Cancel), and GTC (Good till Cancelled).

Charting will be powered by a professional grade HTML5 library that allows users to customize their layout with a few clicks and add in multiple time and price studies or indicators with ease. Using a simple drag-and-drop interface, clients will be able place



stop and limit orders based on pre-calculated risk to reward settings. To reduce latency for higher frequency traders and to simplify the order enter process one click trading will be available right from the chart. Historical trades, both filled and pending orders, can be plotted on the chart, as well, so the client will be able to see a graphical representation of their account activity. The platform is

intended to be accessible from both a web browser and via our own CoinMetro-branded iOS and Android apps. API access and FIX 4.4 connectivity will be available. Following the approach of our strategic partner, FXPIC, API and FIX access will be open to anyone who requests it, with no minimum volume requirements or access fees.

3.2.3 Cryptocurrency Wallet - Supported Cryptocurrencies

CoinMetro's cryptocurrency wallet system will allow clients to hold, deposit and withdraw in the five largest digital currencies by market capitalization (~80%):

Bitcoin (BTC)

Bitcoin Cash (BCH)

Ethereum (ETH)

Ripple (XRP)

Litecoin (LTC)

By partnering with BitGo, the industry leader in multi-signature, multi-currency wallets, CoinMetro plans to offer clients convenient and secure services through BitGo's multi-signature technology.

Following our initial launch, CoinMetro plans to incorporate support for additional wallet platforms, adding more and more assets over time. Immediately after launch we will look to add support for the complete list of top ten cryptocurrencies mentioned on Coin Market Cap (<https://coinmarketcap.com>), including Monero (XMR), Dash (DASH), NEO (NEO), and BitCoin Gold (BTC). We will also look to add NEM (XEM) given that we will be developing tools based on the NEM blockchain. We plan to add additional assets over time, including ERC20 tokens, which will form the base for our EFTC platform (Section 3.3.2).

3.2.4 CoinMetro Debit Card

To provide clients with instant access to their CoinMetro wallet balances, we plan to offer a CoinMetro debit card. We envision that clients will be able use the CoinMetro debit card to access their cryptocurrency wallets or fiat wallet and withdraw cash instantly at certain ATM locations worldwide. Having already implemented a successful debit card

system for FXPIC, our team has a comprehensive understanding of the logistics of this space and we have developed a solution designed to provide maximum flexibility and utility to CoinMetro users.



Clients may choose a default account for use with the card as well as a list of secondary accounts that can be debited in case the balance of the default account is insufficient to cover the requested transaction. When using the card at an ATM, the system will check the balance in the default account

first. If a conversion is needed to the withdraw currency, an order will hit our matching engine to perform the conversion instantly, eliminating inconvenient delays in processing time. If the default account has insufficient funds, the secondary accounts will be debited.

3.2.5 Lending

CoinMetro's unique lending platform is intended to give passive investors an opportunity to earn interest on their cryptocurrency balances and create potential for under-capitalized traders to increase their profits. Our lending platform is envisaged to work by letting lenders state their daily rate on which they are prepared to lend; borrowers will be able to accept and immediately use the underlying assets as margin. CoinMetro plans to offer BTC, LTC, and ETH lending options.

3.2.6 Leverage

Liquidity provider relationships, fostered by our strategic partner, FXPIC, allows us to offer clients access to 1:50 leverage when trading non-deliverable OTC digital assets, either via our browser based platform or through an API or FIX connectivity. Leverage on our matching engine will

be capped at 1:10 initially when trading using borrowed margin by way of our give and take lending platform. Higher leverage will be made available to clients with a proven track record of low risk operations on a case by case basis. Via our partnership with FXPIC, CoinMetro intends to offer

FIX and API access to our exchange by way of a Prime of Prime model where FXPIC is the margin/credit provider. This will give individual and institutional traders access to exchange grade liquidity, spreads, and execution quality, paired with CFD like available leverage.

3.2.7 Risk Limitation

We propose that CoinMetro's underlying risk management strategy will use designated margin wallets to mitigate damages and prevent losses when trading using borrowed margin on our give and take lending platform. Position losses will be covered by funds in a trader's margin wallet, which serve solely as collateral. If the net value of a trader's account falls below the required maintenance margin, their position will be forced into liquidation.

To open a position, we propose that a trader will be initially required to allocate 30% margin based on the desired position size. Should the net value of the account fall below 15% of the value of the margin position, the account will be liquidated.



3.2.8 Exchange Fee Structure (Bonus)

Our proposal intends that takers on the exchange, or clients who place orders that are filled immediately, will pay a commission on all executed orders, starting from a MAXIMUM of 0.10%. Makers onto the exchange, clients who place limit orders below the ticker price on the buy side, and above the ticker price on the sell side, will receive rebates that account for up to 50% of any fee charged to the taker that eventually hits their resting orders. If two makers' orders are eventually matched (i.e. neither side is matched immediately) neither will be paid a rebate, but no commissions will be charged to either side.

3.2.9 Ecosystem growth

We believe that giving people additional opportunities to earn by engaging with the platform will incentivize client participation, retention, and enthusiasm. It also ensures more liquidity within the engine, which keeps spreads low and generates higher overall volumes. We intend for users to be rewarded for participation in COIN, and for the scope of rewarded activities to grow and

change as the platform develops. At release of the CoinMetro platform users will be rewarded for simply signing up to CoinMetro and creating a wallet, using the exchange for the first time, referring friends to the platform, and completing user feedback forms designed to help the team improve the platform.

3.2.10 Decentralization and Atomic Swaps

Generally, cryptocurrency exchanges are at least "semi-centralized," given that assets are often held by the exchange on behalf of its client base. The move toward fully decentralized exchange mechanisms has begun, and CoinMetro plans to take a proactive approach to this technology. The CoinMetro team sees technology like Polkadot, Cosmos, and Aion approaching, and understands that atomic swaps and cross chain communication will be extremely significant going forward.

CoinMetro intends to offer atomic swap-like 'peer-2-peer secure exchanges' using time locked smart contracts where no third party intervention is needed to complete the transaction. The smart contract will act as a form of timed escrow, ensuring

that both parties are protected in the event that one party defaults on the transaction. It is intended that this exchange mechanism will carry fees that will be almost zero from our side, as it will be considered an added service for clients who are trading smaller volumes and those that do not require immediate execution.



3.3 Innovative Investment Platform

3.3.1 Tokenized Asset Management (TAM)

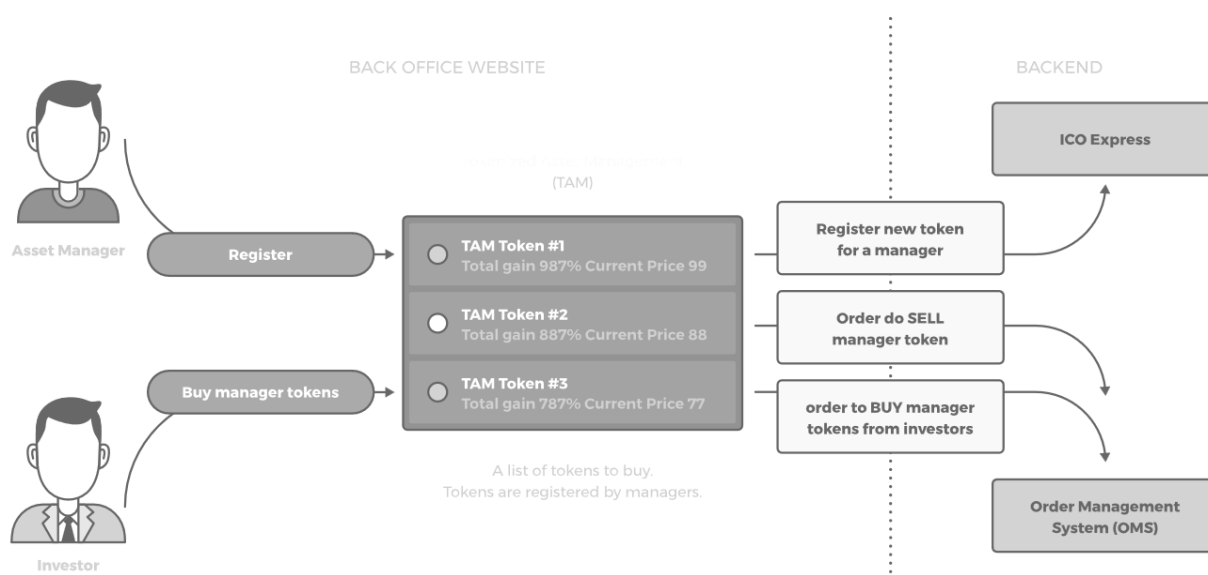


Image 4 - Tokenized Asset Management components

Tokenized Asset Management (TAM) is a unique concept developed by the CoinMetro team. TAM will allow professional asset managers to sell tokens in their trading performance to investors. Each pro trader (or “manager”) will be issued a unique personal token valued in and available for purchase priced in COIN, a fully minted ERC20 token that is used to price all CoinMetro products and services. COIN is our own

unique digital asset created to facilitate interaction with our infrastructure and provide transparency to our client base by way of the Ethereum blockchain.

Through TAM, clients will be able to work with a manager of their choice by investing in that manager’s token. Similar to earning a commission, managers will profit from fees based on the high-water mark principle (i.e. the highest peak in value for a given

account), and investors will benefit based on the growth of their investment. With a few clicks, investors will be able to quickly move funds between manager-specific tokens, COIN, and other crypto or fiat assets. Blockchain-based tokenization will facilitate a secure and transparent process, where each trade can be linked back to specific investors and managers, giving users a complete overview of their digital assets at all times.

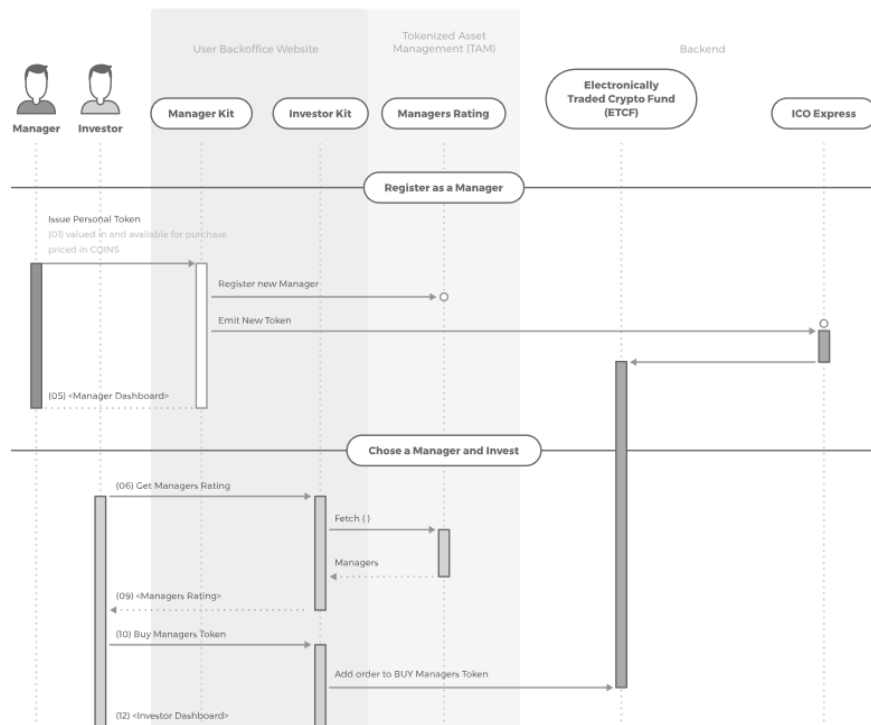


Image 4 - Tokenized Asset Management workflow

3.3.2 Curated Digital Asset Diversification: (ETCF - Electronically Traded Crypto Fund)

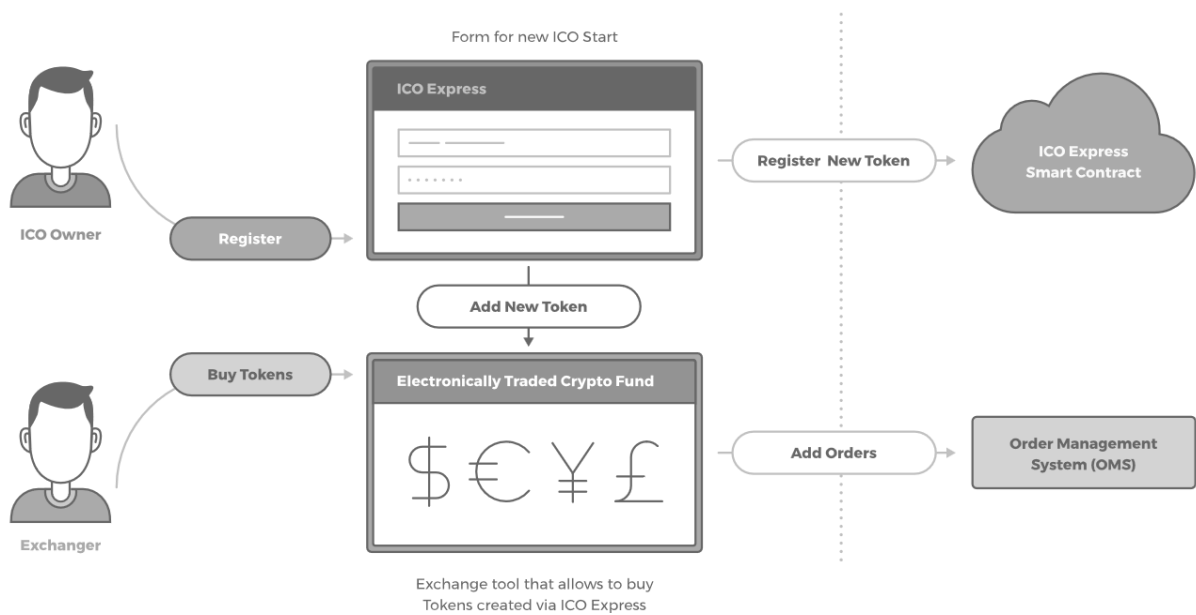


Image 4 - ICO Express and Electronically Traded Crypto Fund



Building on the concept of traditional ETFs, CoinMetro plans to offer unique opportunities for users to diversify their holdings into curated baskets of digital assets that can be traded in real-time on the exchange. With one click, users will be able to invest in multiple tokens, diversifying into a specific industry, such as healthcare, IoT, communication, or finance. Users will also be able to invest in a fund based on its risk profile, or even the social media influencer scores of tokens grouped inside the fund. The ETCF board is intended to give needed

liquidity to new tokens launched on our ICO Express platform. We believe that giving users the opportunity to buy multiple tokens at once will help stabilize prices of those tokens during initial sell swings as the token becomes tradable.

As with our TAM platform, all ETCF's will be priced in COIN. We believe that pricing these products in COIN will contribute to token price stability, and as usage of the platform accelerates we expect to see this positively affect the underlying price.

3.4 ICO Express Platform

3.4.1 Turnkey ICO Solution

CoinMetro aims to offer a powerful turnkey ICO Express Platform that will give vetted ICO's access to transparent and secure funding rounds. CoinMetro's team of senior engineers will formally review all aspects of token sale proposals, including project feasibility, idea novelty, financial justification, and legal compliance. It is our intention that approved projects will have access to CoinMetro's complete Token Express Platform and a dedicated support team.

Through our proposed interface, users will be able to issue tokens and ICO contracts using input parameters. Tokens issued through CoinMetro will be liquid and immediately tradable on the CoinMetro exchange following the token sale. The ICO Express platform will also offer an automatic smart contract mechanism capable of creating smart contracts and deploying them on the Ethereum, NEO and NEM blockchains. It is also proposed that the Token Express Platform will offer the option of including a client's token inside CoinMetro's ETCF board when launched (see paragraph 3.3.2).

3.4.2 Easy DAO Registration

CoinMetro's ecosystem aims to allow projects to register and deploy their business as a specialized smart contract or Mosaic on the Ethereum, NEO or NEM blockchain. This will allow users to formalize their business transactions without the explicit need of a 'paper corporation.'



3.4.3 Fiat and Cryptocurrency Deposits

We envisage that CoinMetro's planned infrastructure and banking relationships will enable fiat and cryptocurrency deposits on one platform. It is intended that users will be able to make deposits through a wide range of channels, including credit card, e-wallet, local bank deposit, SWIFT transfer, SEPA transfer, and multiple cryptocurrencies.

3.4.4 Smart Contracts

Smart contracts and digital tokens will be easily issuable on the ETH, NEO and NEM blockchains through the Coinmetro platform's planned interface. As new blockchain innovations emerge, there is potential to integrate new features and platforms into CoinMetro's ecosphere.

Smart contracts provide users with automated, low-fee transactions that provide a higher level of security than those that rely on standard localized databases. To reduce latency all smart contracts related to live trading will be created or written post-trade. As blockchain technology becomes faster, we will

explore the option to write all trade data in real time inside a distributed ledger. Smart contracts will manage approval workflows between counterparties and calculate trading settlement amounts with a level of accuracy not found in standard database technology.

3.4.5 Quick to Market

Through our vetting process and token interface, the CoinMetro ecosystem aspires to foster innovation by giving projects the infrastructure and tools they need to raise funds, gain support, and launch atop a stable platform. Tokens issued through CoinMetro will be liquid and immediately tradable on the exchange following the token sale.

3.4.5 White Labeling Opportunities

CoinMetro proposes creating unique white-labelling opportunities for enterprise clients through our token sale platform. Clients will be able to white label our digital wallet and portal setup, allowing them to offer crypto and fiat payments to their own user-base and token sale participants. CoinMetro plans to allow token issuers to create and customize their own branded interface and backend while taking advantage of the tools, such as easy token issuance, provided by our larger ecosystem architecture. When initial token sales end, tokens will be immediately tradable on the main exchange, with the option to add the token to one or more of our curated ETCF baskets for additional liquidity.



3.5 CoinMetro Platform Design

3.5.1 User Interface

Blockchain, as an underlying protocol, has the potential to radically transform the business landscape across many major industries. A developer-focused community is striving to advance the technology, while at the same time a lack of usability is widely recognized as a major barrier to entry into what is already possible within the blockchain space.

A 2017 article from Coin Telegraph honed in on the crucial role of user experience in relation to building sustainable businesses in the blockchain space: “Creating user interfaces that can enable the easy

application of Blockchain solutions without any special coding skills or extra computer language specialization appears to be an important aspect of industry development if Blockchain is to go mainstream.”

User experience is a core aspect of the vision for CoinMetro. We aim to provide a feature-rich platform that combines secure backend infrastructure with a highly intuitive front-end interface. Simple sign-up, instant access, direct payment processing, asset mobility, and unparalleled customer support are defining features of our vision for the platform.

3.5.2 Customer Support

CoinMetro intends to include a dedicated customer support center and thorough documentation for the purposes of ensuring that the platform is suited to users coming from all levels of experience. In addition to a 24/7 dedicated help desk, we plan to integrate a friendly, on-brand AI bot, “Frank”, designed to assist clients with troubleshooting, questions, and quick reference guides. CoinMetro’s customer support network plans to include a live-chat option via Intercom, an extended FAQ section, knowledge base, Slack channel, and supplemental videos to walk through important features.

3.5.3 Security

CoinMetro proposes using many of the security features and stringent protocols that have proven successful for FXPIC. Since its establishment in 2011, FXPIC has maintained a firm commitment to customer security. As of the date of this whitepaper, the company has never been hacked, never lost a client’s funds, and remained virtually incident-free.

CoinMetro plans to work with BitGo for payment processing. This will enable users take advantage of several strong security protocols in relation to login and payment approval, including:

Two-factor Authentication (via Authy)

Two-factor authentication (“2FA”) adds an additional security layer to user accounts. Login and account access will require both a password and a unique multi-digit code sent to a registered



physical device, such as a phone. Authy's multi-device 2FA feature gives users a convenient solution to securing their data.

Multi-signature transactions (via BitGo)

Multi-signature wallets require two signatures to confirm a transaction. One instance would be stored on BitGo's server, and another would be kept at the CoinMetro Backend. To compromise a multi-signature wallet, an attacker would have to compromise both BitGo's and CoinMetro highly secure servers.

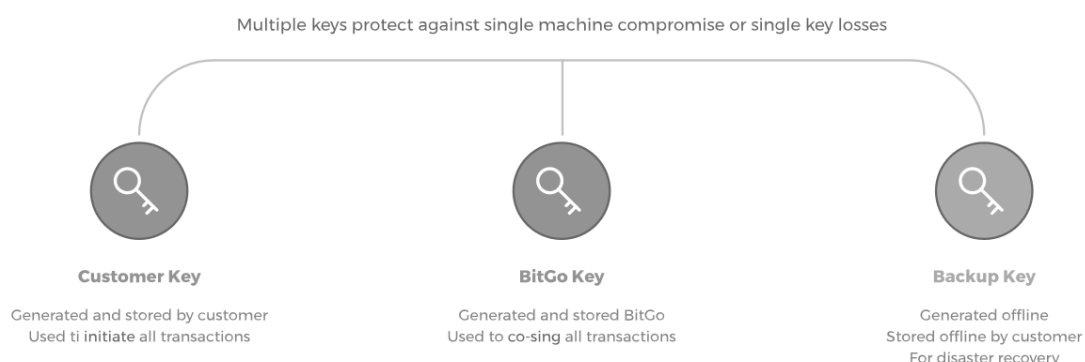


Image 1 - Multi-signature Wallet concept

Biometric authorization (via Voiceit)

Demonstrating much lower Equal Error Rates than fingerprint, iris, or facial recognition, voice biometrics offers a highly secure access mechanism for user accounts. Voice biometrics relies on text-dependent passphrases, making it possible for users to simply adopt a new voiceprint phrase to re-secure their account in the unlikely event of a biometric data leak.

Cold Storage (via BitGo)

CoinMetro will handle cryptocurrency deposits by generating temporary "receive

wallet" addresses. Behind the scenes, assets from these temporary wallets will move to "cold storage wallets" constantly. Cold storage wallets represent the most secure asset storage in the whole ecosystem, located on a physically secure, completely air-gapped device. In the event that a bad actor were to compromise the platform, they would only have access to the small amount of coins stored in the temporary receive wallets at any given time.

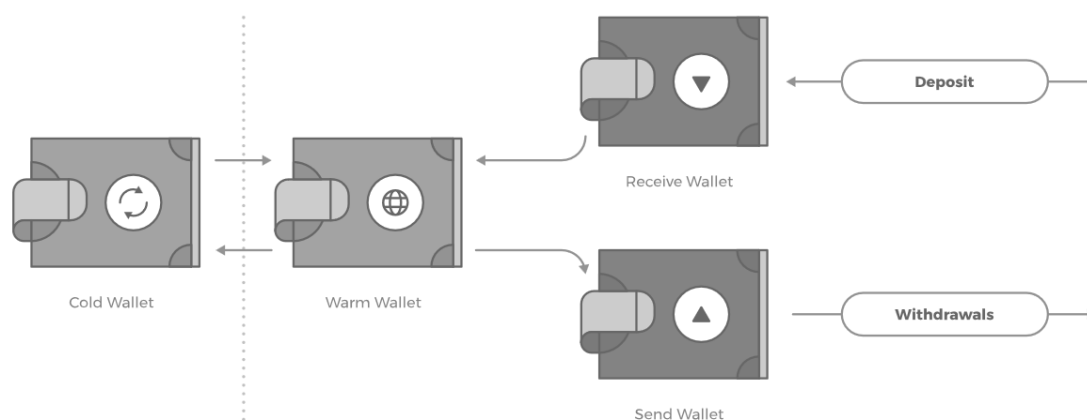


Image 2 - CoinMetro Wallets infrastructure

NEM Enterprise Blockchain

A private NEM blockchain is used for storing sensitive information, ensuring data immutability. Even in the event of a compromised database, a full NEM backup will exist containing a 100% in-tact blockchain record of all pertinent data and user verification statuses. In addition to

utilizing a PCI (payment card industry) compliant server, CoinMetro will employ partitions to avoid data centralization. To ensure that our security protocols continue to be consistent with industry standards, CoinMetro intends to perform third-party security audits on a regular basis.



3.6 Tech Stack

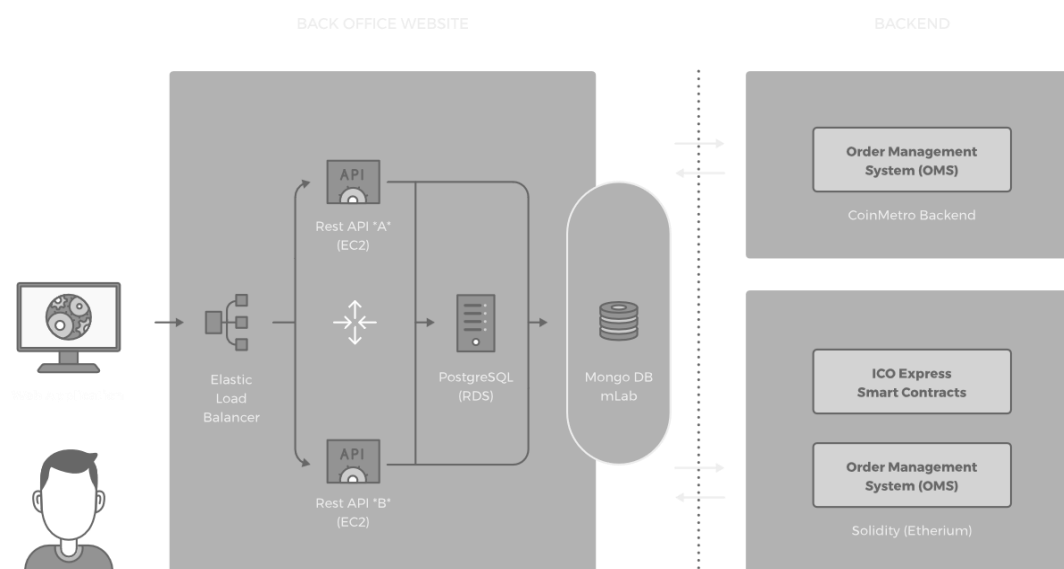


Image 3 - CoinMetro Backoffice components

3.6.1 Web Application

CoinMetro's core user interface will be built using ReactJS. React is flexible and scalable, making it perfect for designing interactive UIs. To build a fully functional dynamic application, we will supplement ReactJS with Gulp to automate tasks and manage content and template changes. The combination of the two offers a powerful alternative to existing task-runners, allowing us to streamline our development workflow and optimize existing code.

3.6.2 REST API

Our platform's REST API will be developed using NodeJS, TypeScript and Express. With a keen awareness of best practices, CoinMetro's REST architecture will emphasize performance, scalability and security while remaining highly flexible, simple, and stable. This layer is intended to provide a secure, reliable connection between the frontend interface and the CoinMetro database. The API will employ essential input validation to prevent cross-site request forgery attacks and cross-site scripition (XSS) or SQL breaches. We propose that main authorization will be performed using tokens in request headers with all the resource collections being processed in standalone units whenever possible. The API's internal functionalities are envisaged to be quite complex; however, the external layer is planned to be been kept open and remain simple to work with. Access permissions will be restricted and closely monitored, with end users only able to gain access to specific portions of the full API workflow. Frequent onsite security audits are intended to ensure that the API is constantly evolving based on real world production level risk analysis.



The CoinMetro API will be available to our partners, enabling them to build third-party services and applications that communicate with our core database.

3.6.3 Database

CoinMetro plans to use the open-source, document-oriented database program, MongoDB, to handle authentication, network isolation, and encryption. Fully elastic and natively “blockchain” structure supportive, Mongo is built to scale and is highly available by default. Role-based access controls enhance data security, while optimized dashboards highlight key historical metrics. MongoDB Atlas has been independently audited and confirmed to meet privacy and compliance standards.

In addition to Mongo, CoinMetro will deploy PostgreSQL, a powerful, open-source, fully ACID compliant object-relational database system. Backed by over 15 years of active development, PostgreSQL’s proven architecture has earned it a strong reputation for reliability, data integrity, and performance.

3.6.4 Order Management System

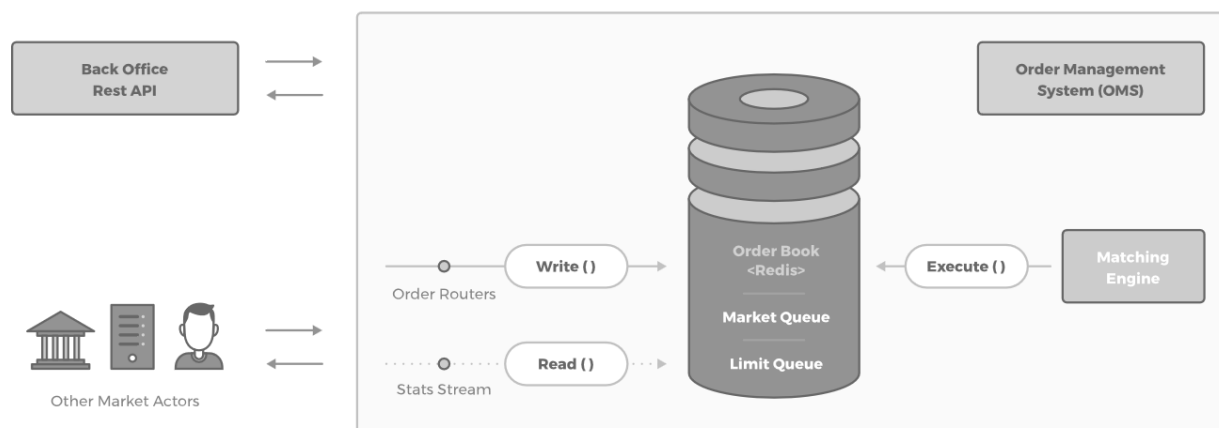


Image 3 - Order Management System components

CoinMetro’s Order Management System will be a basic, low-level component, that serves the exchange, the TAM, as well as the ETCF platform. It will be based on Redis, an in-memory database that supports a high speed of write/read operations. Submitted via a TCP/IP socket, order queues will be optimized for high-speed matching through our engine’s Redis implementation.



Integration of Redis with NodeJS/TypeScript will provide cache, lock and path-optional backends, as well as a placeholder module for easier integration of contributed modules.

3.6.5 NEM Blockchain

To ensure transparency, CoinMetro proposes using a public NEM blockchain to provide accessible and immutable storage for historic values, including:

- Order Matching Engine: execution times, volumes, slippage reports, and other information related to system wide transparency.
- Token Express: data on distributed tokens, token sale contribution data, smart contract timelines, and other data pertinent to the transparency of the platform as a whole.
- TAM: TAM managers trading statistics, amount of tokens sold and at what price, daily statement snapshots including profit and loss from previous days and the resulting token price.
- Using NEM's public blockchain, optional Mirror applications will let companies share their indicators, reinforcing data authority via unchangeable blockchain storage.

It is proposed that a CoinMetro private NEM blockchain be used for storing sensitive information, ensuring data immutability. Even in the event of a compromised database, a full NEM backup will exist containing a 100% in-tact blockchain record of all pertinent data and user verification statuses.



4.0 CoinMetro Token Sale

4.0.1 Token Sale - COIN

Total Supply of COIN

500,000,000 COIN

Total COIN Distribution Breakdown

- 50% through Token Sale
- 20% Liquidity
- 10% CoinMetro Team & Shareholders*
- 7.5% Community Rewards
- 2.5% Advisor Compensation
- 10% Public Pre-Sale

*This allotment of COIN is intended to be locked for the first 6 months after the date of distribution, and will be vested over a period of 24 months. CoinMetro team members will receive 25% of their tokens 6 month after the date of distribution, and subsequently receive 25% every 6 months. Pre-Token Sale & Token Sale Contributions Breakdown:

- 40% Platform Development, HR
- 30% Marketing
- 20% War chest; possible buyouts, takeovers, acquisitions, etc.
- 10% Legal, Compliance, Regulatory

A maximum of 7.5M will be paid to FXPIG for their support of CoinMetro, their inclusion in the Token Buyback Program, and to support the shared development of blockchain trading technologies between the CoinMetro and FXPIG.

4.0.2 Pre-Token Sale

Pre-Token Sale Start Date: December 21st, 2017 at 21:00:00 UTC, proceeded by a 10-day Whitelist campaign via telegram.

The price of COIN will be specified on the website.

During the period of the pre-Token Sale, the price of each COIN will start at 0.03 EUR. The price will increase by 0.02 after every 12,500,00th COIN is sold. The pre-Token Sale hardcap is set to 50 million COIN. Any COIN not sold during the pre-Token Sale will be carried over to the Token Sale. NOTE: Vesting rules will apply to the first two (2) softcaps listed below. For more information see section 4.0.4.1.

12,500,000 COIN Sold - 1.25% TBPR 1 +0.02 price increase (Vesting REQUIRED)

25,000,000 COIN Sold - 2.50% TBPR 1 +0.02 price increase (Vesting REQUIRED)



37,500,000 COIN Sold - 3.75% TBPR 1 +0.02 price increase

50,000,000 COIN Sold - 5.00% TBPR 1 +0.02 price increase

1“TBPR” stands for “Token Buyback Program Reserve” (See section 4.0.5 for more information); an account funded by a share of net profits from CoinMetro and FXPIG used to buy COIN on CoinMetro’s open exchange to promote a stable pricing environment. Purchasers have no rights in respect of the Token Buyback Program Reserve and the use of the profits is at all times subject to CoinMetro’s discretion and control. References to TBPR refer only to the allocation of proceeds to that Reserve.

4.0.3 Token Sale

Token Sale Start Date: February 21st 2018 at 21:00:00 UTC

During the period of the Token Sale, the price of each COIN will start where the pre-Token Sale left off up to a maximum initial price of EUR 0.11 per COIN if all 50 million COIN were sold out during the period of the pre-Token Sale.

If the number of COIN sold during the pre-Token Sale does not reach 50 million, the price of COIN during the Token Sale will begin at the price where the pre-Token Sale ended and it will follow the pre-Token Sale softcaps until the total 50 million COIN are sold. This price will increase by EUR 0.01 each time the Token Sale hits a 50 million softcap. The Token Sale hardcap is set to 300 million COIN, including the 50 million COIN allocated to the pre-Token Sale.

The pricing of COIN during the Token Sales is as follows:

- 100M COIN Sold - 8% TBPR 1 + lifetime CM discount 2 +0.01 price increase
- 150M COIN Sold - 11% TBPR 1 + 0.01 price increase
- 200M COIN Sold - 14% TBPR 1 + lifetime pre-pre-token sale invites +0.01 price increase
- 250M COIN Sold - 17% TBPR 1 + lifetime FXPIG discount 3 +0.01 price increase
- 300M COIN Sold - 20% TBPR 1

1 “TBPR” stands for “Token Buyback Program Reserve” (See section 4.0.5 for more information); which is an account funded by a share of net profits from CoinMetro and FXPIG used to buy COIN on CoinMetro’s open exchange to promote a stable pricing environment. Purchasers have no rights in respect of the Token Buyback Program Reserve and the use of the profits is at all times subject to CoinMetro’s discretion and control. References to TBPR refer only to the allocation of proceeds to that Reserve.

2 Commissions reduced to 0.075% maximum on all exchange volumes and equivalent discounts (25%) on all CoinMetro fees. The discount does not carry over on fees to external providers, TAM managers, or other services not directly priced by CoinMetro.

3 Commissions reduced to 19 per million maximum on all traded volumes across all available platforms. The discount does not carry over on fees to external providers, PAMM managers, or other services not directly priced by FXPIG.



Discounts listed above are personal to the purchaser of the COIN and do not attach to the COIN themselves.

4.0.4 Value of COIN after the Token Sale

There is no guarantee as to the price of COIN following sale, nor that CoinMetro's exchange or any secondary market will be available at that time. Any COIN price will depend on a number of factors. Prospective purchasers should not buy COIN for speculative purposes.

4.0.4.1 Vesting Rules for Certain Pre-Token Sale Participants

COIN purchased at 0.03 and 0.05 EUR will be subject to a special vesting schedule to support a stable pricing environment when the token is distributed and tradable in April, 2018.

Participants buying in at 0.03 EUR will have access to 20% of their total

purchase after an initial vesting period of 90 days following distribution. The other 80% will be vested for an additional 90 days. Participants buying in at 0.05 EUR will have access to 33% of their total purchase after an initial vesting period of 90 days following distribution. The other 67% will be vested for

an additional 90 days.

NOTE: the vesting period commences on the date of distribution not on the date of purchase. Distribution is scheduled for April of 2018.

Participants buying in at all other price points will see their purchases distributed in their entirety on the date of distribution.

4.0.5 Long Term Stability of COIN

Many ERC20 tokens focus on speculation rather than utility, which is not encouraged by CoinMetro. Long term value, for those tokens, starts at utility and their price also relies on supply and demand. In order to manage supply, help reduce volatility and enable persons who need COIN to obtain them, CoinMetro has created a three-pronged approach as outlined here:

(1) The creation of a Token Buyback Reserve, funded with up to 20% of CoinMetro's and FXPIG's net profits, CoinMetro intends to use the Token Buyback Reserve to support the stability of COIN on the CoinMetro exchange as needed. To facilitate liquidity on both buy and sell sides, COIN bought back by CoinMetro will be sold onto the exchange as needed depending on the underlying demand. NOTE: Net Profits here refers to net operating profits once CoinMetro is fully operational and does not in any way relate to the sums collected by way of the scheduled Pre-Token or Token Sales. Purchasers have no

rights in respect of the Token Buyback Reserve and the use of the profits is at CoinMetro's discretion and control. It is also subject to applicable legal and regulatory requirements.

Gauging the possible size of this reserve is difficult at the outset of the initial Token Sale. On the FXPIG side, the numbers are easier to discern given its verifiable track record. On the CoinMetro side, projections are generally based on market size and capitalization, as well as speculation based on published data from competitors and general market research. In this light we anticipate year one



focusing on establishing the brand and fostering its initial growth. Year two, we see gross margin somewhere in the area of 8 to 10 million EUR. Year three pushes this sum higher, to upwards of 18-22 million EUR.

These figures would mean a total market penetration equalling approximately 1.25% for year two and 2.5% for year three, based on the current total volumes traded, which will increase over time.

(2) It is planned that all fees payable to CoinMetro, either on our exchange, via our investment vehicles, such as the TAM and ETCF platforms, or for our ICO-related services via the ICO Express gateway, will be paid in COIN.

(a) We expect that demand for COIN will rise with usage of CoinMetro's service. Rising demand may result in higher prices over time. Each time a fee is paid, whether it is priced in BTC, ETH, USD, or any other currency, an equivalent amount of COIN will be purchased on the exchange to cover said fees. Thus, the buy side on our exchange platform will be very active. In the event that no sell orders are present to support the needed conversions, resting COIN sell orders from CoinMetro's liquidity reserve will be added to the book at a price equal to the indicative market value.

(b) In order to create a strong long term value proposition for COIN, we intend that 1%, 5%, 10% or 33% of each fee payment will be burned. As usage of the platform accelerates, the availability of the COIN token will diminish, thus decreasing supply and helping to maintain a competitive economic model for COIN.

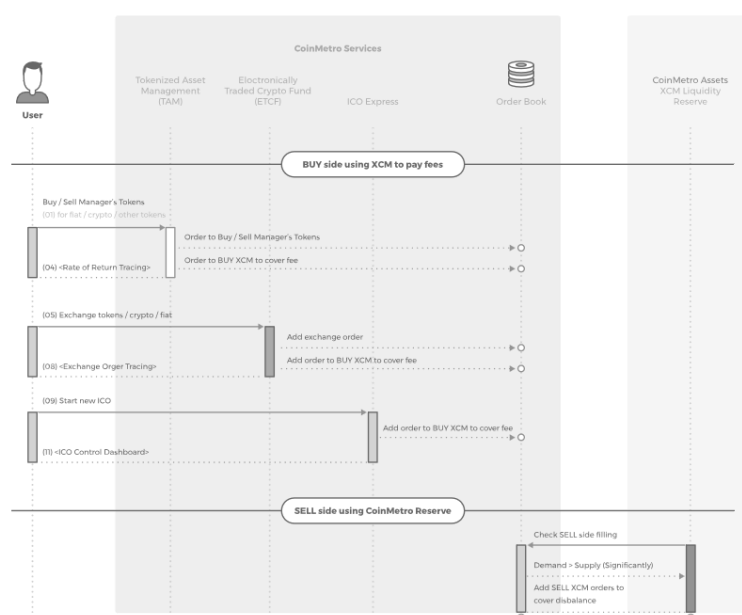


Image 3 - COIN tokens circulation

(3) We intend that holders of COIN tokens will be offered discounts on fees based on their overall COIN holdings. The more COIN they own, the higher the discount will be. This will likely incentivize clients to buy and hold COIN, further reducing the available supply. NOTE - This is part and partial to the LIFETIME discounts offered to our pre-Token Sale and Token Sale contributors which are not based on their total individual contribution.



4.1 Bonus Structure for Pre-Token Sale and Token Sale Participants

- Pre-Token Sale contributors will be eligible for a bonus of up to 500%, based on the final COIN value, should we reach our 300,000,000 COIN hardcap during the pre-Token Sale/Token Sale event. NOTE - Although this discount is sizeable this is only for the first 2.5% of tokens sold, with the discount diminishing as more tokens are sold. The reality is that most larger token sale events offer substantial discounts to private investors prior to their public pre-sale events, so while this may appear excessive it is in fact commonplace with the difference here being that CoinMetro has decided to offer these 'friends and family' discounts to the community at large rather than to a small select group of private investors.
- CoinMetro and FXPIG intend to create a Token Buyback Reserve funded with up to 20% of the net revenues of both companies used to support the COIN price by adding liquidity when needed to bolster the market.
See section 4.0.5 above for more information.
- Once 200 million COIN are sold during the Token Sale, participants will be granted lifetime discounts on applicable fees tied to services on both CoinMetro and FXPIG's platforms.
- It is intended that Token Sale participants will be privy to private invitations and exclusive opportunities concerning all future Token Sales offered by any of CoinMetro's founders, as well as special pricing on select Token Sales launched via our ICO Express Platform.

4.2 Risk Disclaimer

For the CoinMetro platform to move forward into the operational stage, the Token Sale must reach its minimum sale target of EUR 3 million. In the event that the CoinMetro Token Sale fails to reach this minimum, COIN purchasers will be provided with the opportunity for a refund on the COIN purchased.

In the event that the CoinMetro Token Sale reaches its goal without selling all available COIN, unsold COIN will be permanently eliminated and will not be circulated/sold.

Token Sale participants should be aware that, as with any developing industry, there are

risks involved (including the failure to build the intended platform). CoinMetro has worked hard to mitigate these risks by partnering with the industry-leading blockchain platforms, such as Ethereum, NEO and NEM, globally recognized payment processors such as BitGo. The potential for future regulation, security vulnerabilities in one of our third-party service providers, volatility in cryptocurrency markets, and other circumstances may present unforeseen challenges that may impact the CoinMetro platform and/or the value of COIN. Please refer to our Terms and Conditions for more details concerning official company policies.



5.0 Team

5.0.1 Core Team

Kevin Murcko

CEO

A Crypto Enthusiast before the term was even a 'thing', Kevin brought transparency to Forex via his unique FXPIG brand and he continually pushes to close the profit gap between institutional and retail traders. FXPIG is not the largest FX broker, but that is by design based on his vision. It was created to change the industry, and it did just that. FXPIG brought transparency to the forefront and it started a growing trend of client-centric shops that actually focus on their client's profitability rather than their losses. While FXPIG is still very unique in the FX space, it is proud to see the change it helped foster as it pushes through the industry. Kevin has always been a supporter of in-house tech development and FXPIG remains one of the few companies in FX to develop and trade on their own technology. This mantra is at the core of the CoinMetro philosophy as well. With his sights now set on blockchain, Kevin is ready to guide CoinMetro down a similar path; one that will eventually change the way this market operates. Competitors beware.

Sylvain Legay

CFO

Our by-the-book numbers guy, a corporate veteran turned startup aficionado, Sylvain helped shape FXPIG into the well-run FX brokerage company that it is today. With a background in corporate finance in one of the most highly-regulated industries- the pharmaceutical industry, he is a stickler for strict internal protocols, which is definitely something this industry needs to pay more attention to. Under his watch FXPIG was able to streamline its finances and push its

revenue to record levels while weeding out unnecessary expenditures. Sylvain's 12-year stint in pharma also showed him the need for compliance and how it plays an important role in a company's overall wellbeing. Jumping from the corporate world to running the books of a niche Forex broker was a bit of a culture shock, but Sylvain has proven to be an asset on many levels and we are happy to have him onboard this project.

Timur Khakimov

Lead Developer

If you can dream it up or sketch it out Timur can make it a reality. As one of four FXPIG allumns that have come onboard to help CoinMetro make its mark on the Crypto scene, Timur brings with him years of experience in the FX space, where he has lead our backend development team for over two years. Not being one to sit idle, Timur is always looking to learn about new frameworks



and techniques to hone his skillset. Currently he enjoys working with NodeJS, TypeScript, PHP frameworks, Angular, React, and Java. He has what it takes to help us transform this industry, after all it takes a genius to create simplicity.

Anton Corbijn

Senior Blockchain Developer

You would think his birth certificate was the original smart contract. Anton has been coding blockchain applications since the term was coined. An accomplished software engineer with a professional background in enterprise blockchain-based application development and consulting, Anton has contributed to projects that

span the available functionality of blockchain usage from automatic coin creator mechanisms to designing token sale infrastructures and crypto-based crowdfunding application development. He has a deep understanding of cryptography, not only from a university level but also from his experience in the field. His current focus is on

finding new ways to integrate blockchain technology into real-world situations, solving real world problems. Anton is ready to take on all the challenges we can throw at him. His key skill sets include: Cryptography, Algorithm & Data Structure, Golang, C/C++, Java, MERN stack, Laravel and Symfony.

Rory Baxter

Senior WebApp Developer

Rory is a proficient hands-on professional with a long record of accomplishments in the Computer Software industry. He has extensive object-oriented programming and design skills, and a creative mindset that helps him solve complex problems on the fly. Creating and navigating complex systems is just one of Rory's strong suits. An expert in

multiple frameworks and code bases, he is more than ready to tackle even the most ambitious development with ease. Rory enjoys focusing on innovative tech like Cloud Computing and Cryptocurrency. His core skills include NodeJS, TypeScript, PHP, Angular, React, Java and Swift.

DunHao Zhuang

Senior Front End Developer

Getting listed on Toptal is the developer equivalent of a michelin star rating. Difficult to achieve and even harder to maintain. DunHao brings with him over a decade of experience in creating amazing frontend applications. His ability to bring life to two dimensional design is a perfect fit inside our core development team as we focus on making the CoinMetro experience not only functional and simplistic but visually immersive. Creating a rich user experience entails much



more than simply linking a design to a set of APIs. Dunhao understands this better than most and is able to draw from his own portfolio of work ranging from ecommerce, to gaming, to full spec SaaS applications. Specializing in JavaScript, React.js, Vue.js, AngularJS, HTML5, and CSS3, he is well equipped to help us reach our goal.

Giovanni Ziccardi

Marketing Team Leader

A tireless researcher, Gio always looks ahead, implementing growth strategies that keep his projects on the forefront of innovation. After making his way into the mobile industry in 2011 he spearheaded the development of a social app platform that garnered nearly 13.5 million users worldwide in a little under three years. In 2012 Gio came on as the Marketing Team Leader at FXPIG, designing and

managing a social media centric marketing strategy, years before this type of campaign would be implemented by others in the FX industry. Thanks to his ample experience in mobile and social media marketing, backed by a newly forged interest in crypto and blockchain technologies, Giovanni is ready to help CoinMetro build a brand that will change an industry.

Biljana Kukeska

Social Media Guru

When Bily finds something she is passionate about she jumps in head first. With a background in political science, her analytical mind is always looking for the best way to push her brand further into the consciousness of her target audience.

Mikko Kauhanen

Senior Digital Growth Specialist

A seasoned marketing professional, Mikko has helped countless companies bring their visions to reality through a mix of customer-oriented content design and data-driven customer insights. With 14 years of experience under his belt he is ready to make CoinMetro a household name.

Frank

Customer eXperience AI

This guy only needs one name. That is how he rolls. He is open, honest, and well... Frank. If you need help, have questions, or just need someone to chat it up with, Frank is your man, err AI. This guy works morning noon and night, around the office we call him 'the machine'.



5.0.2 Advisors

Reuben Godfrey

Ruben ‘Satoshi’ Godfrey has been part of the cryptocurrency scene before there was even a scene. Having played advisory roles on countless blockchain tech startups, he is a known face in the industry and is a welcomed addition to our team. Ruben’s expertise has helped fortify CoinMetro’s place in the emerging crypto economy.

James Waugh

James has been involved in the Ethereum ecosystem since the initial whitepaper release, contributing to community building, business development and team expansion for multiple projects. A well connected member of the space James has a broad network of connections for CoinMetro to utilize and a deep understanding of ICO mechanics as well as token economics.

Timur Latypoff

Timur ‘Fintech’ Latypoff has been on the front lines of the trade tech space for the better part of a decade building solutions to complex problems. Director and co-founder of Takeprofit Technology, a software company creating liquidity and risk management solutions for retail brokerages. Blockchain enthusiast, sceptic, investor, and advisor, currently sitting on the advisory board of Genesis Vision, a B2B blockchain financial platform.

King & Wood Mallesons

Recognised as one of the world’s most innovative law firms, King & Wood Mallesons offers a different perspective to commercial thinking and the client experience. With access to a global platform, a team of over 2,000 lawyers in 27 locations around the world works with clients to help them understand local challenges, navigate through regional complexity, and to find commercial solutions that deliver a competitive advantage for its clients.

Myles Claffey

An early investor in both BTC and Ethereum, Myles comes on board with an impressive resume of accomplishments including his post as the CEO of Technical SEO, a fintech SEO consultation firm. His current role as contributing editor of TechMetro, a Crypto News Aggregator, means he has his ear to the ground and his finger on the pulse of the ever changing blockchain tech sector. Give this guy a Venti Latte and some space... miracles await.



Evan Griffin

Airline Pilot by day Crypto advocate by night. One of the first investors into Bitcoin ATMs, Evan is a founding member of the Bitcoin HK Group.

5.0.3 Strategic Partners

The CoinMetro Ecosystem is aligned with a select group of strategic partners, leveraging existing ties to develop a progressive vision for the future of the digital asset economy. Building national and international relationships with innovative companies enables resource-sharing, collaboration, and valuable opportunities to grow our company footprint. These strategic partners include:

- *FXPIG*
- *BITCO*
- *AmaZix*
- *BrightBee UK*
- *Takeprofit Technology*
- *BITCOIN GROUP HK*
- *Team2Soft*



6.0 Roadmap

The following are projected timing for the offering of COIN and the development of the CoinMetro ecosystem. The dates are projected only and may be affected by a number of factors both within and outside of our control.

1. *Initial eMoney Licensing - Oct '17*
2. *Georgia eMoney registration*
3. *Start of Development - Oct '17*
Initial REST API, modular code base for connecting blockchain infrastructure with redis and mongodb, integration of 2FA and biometric protocols onto the user and admin backends, integration of Bitgo protocols, as well as UI/UX work both on the front and backend systems.
4. *Pre-Token Sale - Dec 21 th '17*
Ending January 21 th, '18
5. *Token Sale - February 21st, 18*
Ending March 23rd, 18
6. *FXPIC Blockchain development starts - March '18*
Trade confirmation messages in the BC as well as integration of crypto deposits, wallets, and the shared development of the CoinMetro Matching Engine and the TAM and ETCF platforms.
7. *Exchange Beta Launch - March '18*
8. *COIN tradable at CoinMetro - April '18*
9. *Secondary Licensing - April '18*
Estonia (eMoney) as an initial step outside of Georgia to gain access to the EU market and fortify our banking footprint. Singapore (SVF) or Hong Kong (MSB) would be the next step to grab a stronger foothold in Asia on the eMoney side of the business. We will also pursue brokerage/exchange/money management licenses in Georgia, Estonia/Japan, and the Cayman Islands to comply with all applicable regulations based on our complete list of services.
10. *CoinMetro Liquidity at FXPIC - May '18*
Exchange liquidity tradable via MT4 and cTrader
11. *COIN accepted at FXPIC - June '18*
COIN accepted as a deposit method, as a way to pay fees, and as a tradable asset inside of FXPIC's platforms
12. *ICO Express Launch - July '18*
13. *CM Debit Card Launch - July '18*
14. *Virtual and physical cards available, possible inclusion of NFC virtual cards*
15. *Full PSP Services Launched - July '18*
Payments to third parties, IBAN accounts, and other banking services available under the PSP licensing guidelines
16. *TAM Platform Launch - Oct '18*
17. *Crypto ETF Launch - Oct '18*
18. *New Licenses Acquired - Early '19*
PSP, crypto, and/or brokerage licenses acquired in one of three key jurisdictions.
19. *CM & FXPIC Shared dev - ongoing*



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