

Outsourcing Statement

Updated: September 2024

This webpage contains a list of the Ceffu Affiliates and external vendors with whom Ceffu Custody FZE has entered into a written outsourcing agreement for the provision of specific functions relevant to the Services provided by Ceffu Custody FZE, together with a brief description of the outsourced service/function.

Ceffu Custody FZE regularly reviews and updates the list of outsourced functions contained in this web page to ensure it remains up to date. Any new outsourcing arrangements will be added to the list available on the webpage.

Intra-group outsourcings

Please note that where the outsourcing of a function is marked as 'internal', this indicates that it is an intra-group outsourcing to a Ceffu Affiliate.

External vendors

The external vendors displayed in the document below constitute those vendors with whom Ceffu Custody FZE has entered into a written outsourcing agreement for the provision of certain functions (as described below). All these external vendors have been screened and selected in accordance with the Ceffu Custody FZE Outsourcing Policy.

Ceffu Custody FZE - Table of outsourced functions

Function	Description	Internal or External	Service Provider
Wallet services	Technical service provision to facilitate the provision of custodial services by Ceffu Custody FZE as the custody provider.	Internal	Block Technologies Pte. Ltd.; Ceffu SG Pte. Ltd.
Platform operations and maintenance	Platform development, configuration changes, service requests and testing.	Internal	Block Technologies Pte. Ltd.
Internal Audit	To check and control functionality, regulatory compliance, security and efficiency of internal processes and procedures within Ceffu Custody FZE.	External	To be provided
Risk and Compliance Services	General risk management and compliance support, including for the outsourcing of functions to third parties, onboarding of customers (KYC and KYB), internal suspicious transaction monitoring and reporting, compliance investigations, adherence to local law and regulation.	External	Broadchain Fintech Pte. Ltd
IT Operations	This includes IT Operations for	Internal	Block Technologies

	cloud infrastructure, custody service infrastructure, and ID and access management.		Pte. Ltd.
Finance, Accounting and Tax Support Services	This function involves invoice processing and employee claims, exception handling/discrepancy resolution, payment processing, vendor issue resolution, global funding and group tax services.	External	Pioneer Pte. Ltd. (provided via Block Technologies Pte. Ltd.)
Information Security	Protection of sensitive information and the integrity of data maintained by Ceffu Custody FZE	Internal	Block Technologies Pte. Ltd.
Audit services	External auditing services to ensure Ceffu Custody FZE's internal controls, processes, guidelines and policies are adequate, effective and in compliance with VARA requirements, industry standards and company policies.	External	HLB HANT Chartered Accountants
Legal and Regulatory Services	Regulatory analysis and advice, litigation and dispute resolution, drafting and negotiating contracts with third parties and Ceffu Affiliates, general legal research and analysis, processing formations and dissolution of legal entities, company records, registrations and filings, instructing and managing external counsel.	External	Pioneer Pte. Ltd. (provided via Block Technologies Pte. Ltd.)
Human Resources	The Human Resources team is responsible for managing the employees of the company, including remuneration (employee benefits and compensation), recruiting, hiring and retaining talent, employee engagement, performance management and development and training.	External	Pioneer Pte. Ltd. (provided via Block Technologies Pte. Ltd.)