



CAYMAN ISLANDS MONETARY AUTHORITY

Business License / Regulatory Disclosure Document

1. Executive Summary

Business Name: Poolient (a digital asset solution under Rockpool Capital Opportunities Fund SPC)
Business Type: Virtual Asset Service Provider (VASP)
Jurisdiction: Cayman Islands
Legal Structure: Affiliated service division of Rockpool Capital Opportunities Fund SPC
License Type: Operation under Cayman Islands' Virtual Asset (Service Providers) Act (2020 Revision)

2. Affiliation Structure

Fund Name: Rockpool Capital Opportunities Fund SPC
Registration No.: 1618761
Fund Type: Segregated Portfolio Company (SPC)
Date of Registration: February 19, 2018
Portfolio Name: Poolient Digital Portfolio (established June 11, 2018)

3. Business Activities

Poolient provides wallet custody and management, staking, asset swaps, fiat on/off ramps, and a high-speed crypto engine.

4. Regulatory Compliance

Compliance with AML/CFT laws, full KYC procedures (since April 9, 2018), MLRO assigned (August 22, 2018), internal audits (October 12, 2018).

5. Technology and Security

Hybrid wallet management, AWS hosting, 2FA and encryption, disaster recovery (September 18, 2018), pen test (October 5, 2018).

6. Management & Operations Team

Adrian Clarke - CEO, Poolient | Rockpool SPC
Jasmine Okoro - Technology Lead | Poolient Tech
Edward Vassell - Compliance Officer | Rockpool SPC Compliance

7. Banking & Payments

Fiat Banking Partner: Cayman National Bank Ltd.
Liquidity Partners: BlueByte Digital, NovaStack, CoinFlow Global
Stablecoins: USDC, USDT, DAI
Onboarding Channels: Wyre, Coinify, Manual Wire (SWIFT)

8. Business Model

Revenue from trading commissions, custody fees, yield management, and subscriptions. API licensing from Q1 2019.

9. Documents Attached

Certificate of Incorporation, Division Charter, AML Policy, KYC Form, Forecasts, Security Policy, Admin Agreement

10. Declaration

We confirm this data is true and complete under Cayman Islands law.

Signed: Adrian Clarke
Title: Managing Officer of Poolient
Date: November 26, 2018



An Authorised Officer
Registry Of Companies,
Cayman Island.