

# REVERSE SOLICITATION & CLIENT-INITIATED TRANSACTIONS POLICY

## SO Digital Trade FZCO

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### 1. Company Information

**Company name:** SO Digital Trade FZCO

**Registered address:**

Unit No: UT-12-CO-362

DMCC Business Centre

Level No 12

Uptown Tower

Dubai

United Arab Emirates

**Business activity:** Proprietary P2P digital asset trading.

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### 2. Purpose of the Policy

The purpose of this Reverse Solicitation & Client-Initiated Transactions Policy (the “**Policy**”) is to establish and document that **SO Digital Trade FZCO** (the “**Company**”) conducts its business exclusively on the basis of **client-initiated contact**, and that the Company **does not engage in any form of active marketing, solicitation, or promotion** of its services toward clients, including persons located within the European Union.

This Policy is designed to ensure alignment with the principles of **reverse solicitation** under applicable regulatory frameworks, including the **Markets in Crypto-Assets Regulation (MiCA)**, where relevant, and to provide clear internal guidance for staff and counterparties.

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### 3. Regulatory Background

Under MiCA and related EU regulatory guidance, **reverse solicitation** refers to situations where a client independently and on their own initiative contacts a service provider, without any prior solicitation, advertising, or marketing activity conducted by that provider.

The Company relies on reverse solicitation to demonstrate that:

- any interest in entering into transactions is **solely initiated by the client**; and
  - the Company does not actively target, market to, or solicit European persons.
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## 4. No Marketing or Solicitation Statement

SO Digital Trade FZCO **does not conduct active marketing or solicitation**, including but not limited to:

- no cold calling, cold messaging, or unsolicited outreach;
- no targeted advertising campaigns;
- no affiliate, referral, or lead-generation programs;
- no promotion via social media, messaging apps, or external channels aimed at attracting clients;
- no direct invitations to trade or transact.

The Company does not position itself as offering services to the public and does not advertise trading services to EU or non-EU clients.

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## 5. Client-Initiated Contact (Reverse Solicitation)

A transaction or business relationship is considered **client-initiated** when:

- the client independently initiates contact with the Company;
- the initial approach originates from the client without any prior outreach by the Company;
- the interaction occurs through a recognised P2P platform or comparable marketplace where the client selects the Company's trading offer on their own initiative.

Typical examples include:

- an inbound message from a client via a P2P trading platform (e.g. Binance, Bybit, OKX);
  - a client selecting the Company's listing and initiating a trade request;
  - a client contacting the Company without any prior encouragement or solicitation.
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## 6. Operational Conduct

To ensure compliance with this Policy:

- the Company responds **only to inbound client requests**;
- staff are strictly prohibited from initiating contact with potential clients;
- all communications must originate from the client and be documented;

- transactions are executed strictly within the framework of the P2P platform or equivalent environment.

The Company does not migrate communications to external channels unless the client has clearly initiated contact and such communication is permitted by platform rules.

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## 7. Evidence and Record Keeping

For compliance and audit purposes, the Company retains evidence demonstrating client-initiated contact, which may include:

- screenshots or logs of the initial inbound message;
- P2P platform transaction IDs;
- chat histories confirming client initiation;
- internal transaction records marked as “*Client-Initiated (Reverse Solicitation)*”.

Such records form part of the Company’s onboarding or transaction documentation and are retained in accordance with internal record-keeping procedures.

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## 8. Staff Responsibilities

All directors, employees, and contractors of SO Digital Trade FZCO are required to:

- understand and comply with this Policy;
- avoid any conduct that could be interpreted as solicitation or marketing;
- immediately escalate any potential breach or uncertainty to management.

Failure to comply with this Policy may result in disciplinary action.

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## 9. Monitoring and Review

This Policy is subject to periodic review to ensure continued alignment with applicable regulatory expectations, business practices, and risk assessments.

Updates may be implemented as necessary to reflect changes in regulatory standards or operational activities.

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## 10. Effective Date

This Policy is effective as of the date of approval and applies to all activities conducted by SO Digital Trade FZCO.

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**Approved by:**  Signed by:  
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Director    STEFAN ROMANCHENKO

**Date:** 20/01/2026