Summary of the Custody and Administration Policy

28 May 2026

Bybit EU GmbH, Donau-City-Strasse 7, 1220 Vienna, Austria, Register Number (FN): 636180 i ("**Bybit EU**") publishes summary of its Custody and Administration Policy pursuant to Article 75(3) of Regulation (EU) 2023/1114 ("**MiCAR**").

1. Purpose and scope

Bybit EU is authorised as a crypto-asset service provider under MiCAR to provide, inter alia, **custody and administration of crypto-assets on behalf of clients** (Art. 3(1)(16)(a) MiCAR). This summary describes the services provided, how clients' crypto-assets are segregated and safeguarded, how the risk of loss due to fraud, cyber threats or negligence is minimised, and the main rights of clients in connection with the service.

2. Services provided

The service has two components. **Custody**: Bybit EU safekeeps clients' crypto-assets and the means of access to them; the client remains the legal and economic owner at all times. **Administration**: on the client's instruction, Bybit EU carries out actions such as deposits, withdrawals and transfers between clients on the platform. Custody is provided exclusively as **full third-party custody** (no self-custody by the client); Bybit EU acts only on the client's explicit instructions and does not move or use clients' crypto-assets at its own discretion.

3. Segregation of clients' crypto-assets

In accordance with Article 75(7) MiCAR, clients' crypto-assets are kept **segregated from Bybit EU's own crypto-assets**. Legally, the Custody Agreement is governed by Austrian civil law; clients remain the legal and beneficial owner of their crypto-assets and Bybit EU acts as mere factual holder, so that in an insolvency of Bybit EU clients' crypto-assets are intended to be protected from claims of Bybit EU's creditors. Operationally, clients' crypto-assets are held in dedicated client wallets that are kept on-chain separate from any wallets used for Bybit EU's own assets, and each client's share is recorded in real time on a separate internal ledger. Ongoing monitoring and regular reconciliations are performed between on-chain holdings and the internal ledger.

4. Measures to minimise the risk of loss

Bybit EU applies layered organisational, operational and technical measures to **minimise the risk of loss** of clients' crypto-assets, of the rights related to them, or of the means of access (Art. 75(3) MiCAR):

- **Wallet architecture:** a multi-layer custodial wallet system; assets not needed for ongoing client withdrawals are held in more strongly protected environments, and the wallet system and cryptographic keys are operated within a secure, automated technical environment.

- **ICT risk management:** an ICT Risk Management Framework consistent with EU rules on digital operational resilience (DORA), covering encryption, access controls, logging, incident management and business continuity.
- **Account-level safeguards:** access only via the client's account, protected by passwords, multi-factor authentication and biometric verification; sensitive actions such as withdrawals require additional verification.
- **Compliance and technical checks:** deposits and withdrawals are subject to anti-money-laundering and counter-terrorist-financing checks and to technical feasibility checks against the relevant DLT network on a best-effort basis.
- **Governance and oversight:** responsibility is assigned at management level; staff receive role-appropriate training and additional training where they operate custody systems; internal and external audit and compliance reviews cover the service; incidents are documented, investigated and used to improve controls.

5. Deposits, withdrawals and emergency returns

Clients can deposit crypto-assets at any time; a deposit is credited once the on-chain transaction is sufficiently irreversible and compliance checks are completed. Clients may request the withdrawal of their crypto-assets at any time up to the available balance; withdrawals are processed through automated systems, with higher-value or higher-risk withdrawals subject to additional manual review. Crypto-assets are returned in the **same type of crypto-asset** as held for the client; any conversion only occurs on the client's explicit instruction under a separate service. Bybit EU maintains **emergency return procedures** for situations where normal withdrawal functionalities are compromised or unavailable for a prolonged period, so that crypto-assets and the means of access can be returned to clients as soon as possible (Art. 75(6) MiCAR); short maintenance windows or brief downtime do not constitute an emergency.

6. Rights attached to clients' crypto-assets

Crypto-assets may carry rights or features such as governance/voting rights, staking-type rewards, airdrops, or new tokens created through a network upgrade ("**forks**"). For technical reasons, only Bybit EU as technical holder can directly exercise on-chain rights while assets are in custody. Bybit EU may, at its discretion, offer services through which clients can benefit from such rights, with the relevant conditions described in dedicated terms; it does not promise that every right attached to every crypto-asset will be accessible through the platform. Clients can always withdraw their crypto-assets and exercise rights through their own infrastructure. Where relevant, Bybit EU informs clients in advance of scheduled forks, expected suspensions of deposits or withdrawals and any actions clients may need to take; Bybit EU does not commit to supporting any specific fork.

7. No sub-custody; use of third-party providers

Bybit EU **does not delegate the custody and administration of clients' crypto-assets to another crypto-asset service provider**. Control of the custodial wallets and of the means of access remains with Bybit EU. Third-party providers may be used for technology and infrastructure components supporting the service; in such cases Bybit EU retains full responsibility and effective control over the means of access and ensures supervisory and audit rights for the competent authorities, in line with its Outsourcing Policy.

8. Information provided to clients

Clients receive (i) the **Custody Agreement** as part of the Terms and Conditions, setting out the contractual rules; (ii) **balance statements** in electronic form at least every three months and additionally on request, free of charge; (iii) information on the operation of the service,

fees, security and clients' rights via the platform, the Help Center, Bybit Learn and official announcement channels; and (iv) **this summary** in electronic format on request (Art. 75(3) MiCAR).

9. Availability, updates and records

This summary is made available to clients in **electronic format on request**. It is reviewed at least annually and updated when changes to Bybit EU's business, organisation, group structure or to applicable law so require. Bybit EU keeps records of the custody and administration of clients' crypto-assets and of related documentation in accordance with its record-keeping rules and applicable retention periods.

10. Contact

If you have any questions to this document, please use our CONTACT FORM. Registered users of Bybit EU GmbH can also use our HELP CENTER to contact us.