ETHEREUM CLASSIC COOPERATIVE, INC.

POLICIES WITH REGARDS TO FOREIGN GRANTMAKING

- Ethereum Classic Cooperative, Inc. shall operate in compliance with all statutes, Executive Orders, and regulations restricting or prohibiting U.S. persons from engaging in transactions and dealings with countries, entities, or individuals subject to economic sanctions administered by OFAC.
- Ethereum Classic Cooperative, Inc. will check the OFAC List of Specially Designated Nationals and Blocked Persons (the "SDN List") before dealing with persons (individuals, organizations, and entities) and specifically avoid dealing with any persons on the list.
- Ethereum Classic Cooperative, Inc. shall not enter into a relationship with a grantee where doubts exist about the grantee's ability to ensure safe deliver of charitable resources independent of influence by or association with any terrorist organization.
- Ethereum Classic Cooperative, Inc. shall not engage in trade or transaction activities that violate the regulations behind OFAC's country-based sanctions programs or engage in trade or transaction activities with sanctions targets named on OFAC's SDN List.
- Ethereum Classic Cooperative, Inc. will acquire from OFAC the appropriate license and registration where necessary.
- Ethereum Classic Cooperative, Inc. will conduct pre-grant inquiries and site visits prior to transfer of any assets.
- Ethereum Classic Cooperative, Inc. will require periodic reports demonstrating use of granted funds.
- Ethereum Classic Cooperative, Inc. will conduct semi-annual site visits to the foreign organization to investigate its activities and use of the funds and recheck the OFAC List periodically to ensure that recipients are not listed.

Adopted this   day of May, 2018

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Barry E. Silbert   Date

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James Wo   Date

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Cody Burns   Date