# EXHIBIT 10


# Binance.US Digital Asset & Custody Operations Policy

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**Version 1.0**

This document supersedes all previous versions.

insufficient, the US Clearing employee requests the cold wallet transfer to .COM employee in Wea, COM employee submits the transfer request in TSS and 4/7 private key owners will approve the transfer.

#### 5.2.10. Cold to Fee Address

When the fee address is insufficient to pay the on-chain gas fee, the US employee requests the cold wallet transfer to .COM employee in Wea, COM employee submits the transfer request in TSS and 4/7 private key owners will approve the transfer.

#### 5.2.11. Cold to staking wallet

When there is a staking request, the US employee requests the cold wallet transfer to .COM employee in Wea, COM employee submits the transfer request in TSS and 4/7 private key owners will approve the transfer. Then the token will be staked from the staking wallet to the node.

#### 5.2.12. Post-upgrade/hardfork/outage/ maintenance Test

Once the upgrade/hardfork/outage/maintenance are done, we need to test the withdrawal and deposit before the networks are resumed.

# 6. Digital Asset Management Framework & Policy

## 6.1. Allocation Framework for Hot vs. Cold Wallets

### 6.1.1. Thresholds & sizing methodology

Managing liquidity between the Firm's hot & cold wallets ensures that we strike the right balance between 'on demand' liquidity for daily customer withdrawals vs. the added security of storing incremental funds above daily needs in offline / cold wallets. Sizing of wallets is done on a coin & network combined basis (e.g. USDC on Ethereum, USDC on Polygon etc.) driven by the fact that we allow our users to deposit a coin on one network and withdraw it on a different network, effectively acting like a 'centralized bridge' for the customer.

*The current framework operates as follows:*

Withdrawals and deposits (on a coin & network basis as discussed above) are

# 7. Systems

## 7.1. Overview

### 7.1.1. Ceffu

We license wallet custody software and support services from Ceffu (previously Binance Holdings Limited). The primary venue for datacenters & hosting data for our users is in Virginia (specifically, Amazon Web Services ("AWS") facilities located in the US East region). The Ceffu solution makes up a majority of our wallet technology and utilizes a form of TSS (Threshold Signature Scheme) that is based on MPC (Multi-Party Computation) functionality.

### 7.1.2. BitGo

We currently utilize BitGo as a cold wallet and staking solution provider. BitGo hosts its primary data centers in South Dakota in addition to an offshore datacenter in place for disaster recovery purposes. BitGo uses a more traditional MPC solution that involves a physical device on their side to sign transactions.

### 7.1.3. Other Technology Solutions

We continuously monitor the wallet technology landscape for best in class products & services. We are currently researching the following wallet products/vendors for future implementations:

- Ledger Enterprise
- Aegis
- Anchorage

### 7.1.4. PNK

PNK is our internal system for managing our digital assets across the company and customers. PNK is a proprietary tool developed in-house that connects with the various aspects of our systems. Customer Service, Compliance, Risk, and Fraud teams interact with this platform as part of their day-to-day operations and it's supported by our internal development team.

## 7.2. Security Guidelines

The security and safety of our customers and their assets is a top priority, as such we strive to maintain the most stringent cybersecurity program across the organization. While this is not an exhaustive list of all security measures in place we implement the following principles when securing digital assets. Please note we do not get into specifics of how these are implemented for security reasons. If more information is needed please refer to the Binance.US Digital Asset & Custody Security Standard or contact the Security Operations team.

### 7.2.1. Segregation of Duties

No employee is given enough privileges to misuse any digital asset system on their own. This control splits processes among multiple people, with their own