

INSTITUTIONAL COMPLIANCE RESPONSE — FOR DISTRIBUTION TO COUNTERPARTIES, REGULATORS & INSTITUTIONAL PARTNERS

FORMAL INSTITUTIONAL RESPONSE · REF: NVC-RESPONSE-2026-001

RESPONSE TO UNSOLICITED FRAUD CHARACTERISATION

NVC Fund Holding Trust provides a direct, evidence-based rebuttal to a circulating document styled as a "Due Diligence Report: Critical Fraud Alert" concerning NVC Platform.

Issued: May 14, 2026 · Ref: NVC-RESPONSE-2026-001

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 Distribution: Institutional Counterparties, Regulatory Bodies, Compliance Officers, Due Diligence Professionals

Position of NVC Fund Holding Trust. A document has been circulated under the title "Due Diligence Report: Critical Fraud Alert" (hereafter "the Report"), purporting to assess NVC Platform. The Report carries **no author name, no issuing firm, no regulatory licence number, no methodology disclosure, and no contact information.** By the Report's own stated compliance standard — KYB failure defined as "no verifiable business identity" — the Report is itself unverifiable. This response addresses each substantive claim on its merits. NVC Fund Holding Trust invites any institution with genuine due diligence requirements to engage directly with the compliance office at compliance@nvcfund.com.

1. THE REPORT'S FOUNDATIONAL ERROR — WRONG ANALYTICAL FRAMEWORK

The Report applies institutional benchmarking criteria designed for **commercial banks, broker-dealers, and exchange-listed securities issuers** to an entity that is, by design and legal structure, a **Sovereign Estate Trust**. This is the equivalent of assessing a sovereign wealth fund by whether it holds a retail banking licence.

NVC Fund Holding Trust is not a commercial bank. It is not a broker-dealer. It does not solicit retail deposits or issue public securities. Sovereign Estate Trusts — the same structure used by the Rockefeller Trust, Gulf Cooperation Council sovereign vehicles, and the Government Pension Fund of Norway — **do not appear in commercial regulatory databases, Bloomberg counterparty records, or FINRA/FCA registrations.** This absence is definitional, not indicative of fraud. No analytical weight can be placed on the non-appearance of a sovereign trust in databases designed for a different class of institution.

Critical Methodological Note: The Federal Reserve System of the United States does not appear as a "Bloomberg counterparty" in the way a commercial bank does. The Bank for International Settlements (BIS) has no FINRA registration. The Kuwait Investment Authority files no SEC disclosures. Absence from these databases is the defining characteristic of sovereign and quasi-sovereign capital structures — not evidence of fraud.

2. POINT-BY-POINT REBUTTAL

| Report Section | Claim Made | Factual Position |
|---|--|---|
| §1 — Platform Claims vs. Institutional Reality | "No supporting evidence exists across institutional channels" | NVCT is deployed on Base Mainnet , a public blockchain. Contract address 0x36785Bb0396d3717aE3ddec61a4F562b7FcD9A37 is verifiable in real time on Basescan.org by any party, at any hour, without an institutional login. The pre-minted treasury supply is visible on-chain — a standard of transparency that exceeds the quarterly balance sheet disclosures of any commercial bank. |
| §2 — Regulatory & Legal Verification | "No evidence of registration, licensing, or oversight from" | Sovereign Estate Trusts are governed by private trust law , not commercial banking or securities law. Registration, licensing, and oversight are structure- |

| Report Section | Claim Made | Factual Position |
|--|--|--|
| | any recognized regulatory authority" | specific. NVC Fund's documented Nigerian regulatory engagement includes: (1) formal CBN Banking Supervision notification (January 2020); (2) NFIU AML compliance clearance (August 2022, Director Modibbo R. HammanTukur); (3) active sovereign-level engagement with the FGN, Ministry of Finance, and CBN in connection with the NDMPRC programme (April 2026, ongoing). These are Nigerian federal regulatory interactions — the highest level of sovereign engagement. |
| §3 — Institutional Footprint Analysis | "No Bloomberg / Reuters presence · No Tier 1 bank affiliation · No institutional counterparties" | Bloomberg and Reuters terminal records cover exchange-listed instruments and commercial bank counterparties. Sovereign private trusts do not appear in these databases — by design, not by absence of substance. NVC Fund's documented institutional relationships include: Central Bank of Nigeria (Bank Supervision), Nigeria Financial Intelligence Unit, Federal Government of Nigeria (Ministry of Finance), Access Bank (CBN-confirmed capital position on account), and FT Asset Management KB, Stockholm (documented escrow confirmed by bank comfort letter to counterparties). |
| §4 — Infrastructure Validation | "No evidence of operational infrastructure capable of supporting financial transactions" | NVC Fund operates: (1) on-chain settlement infrastructure on Base Mainnet — publicly verifiable, always live, no quarterly filing required; (2) ISO 20022 messaging compatibility ; (3) SWIFT-compatible correspondent banking ; (4) NVC Fund Bank as the institutional banking arm with CBN-acknowledged capital positions. On-chain infrastructure is provably more transparent than legacy correspondent banking rails, which settle T+2 with no public ledger. |
| §5 — Fraud Pattern Identification | "Pseudo-institutional positioning · Fabricated scale · Reliance on perception rather than proof" | The documented evidentiary record — CBN correspondence, NFIU AML clearance, FGN/MoF/CBN Joint Mandate, on-chain treasury contract, Access Bank CBN-confirmed capital — constitutes proof, not perception . These are sovereign regulatory actions, executed instruments, and publicly verifiable blockchain deployments. The characterisation of documented regulatory engagement as "fabricated" is itself without factual foundation. |
| §6 — Compliance Failure Matrix | KYB / KYC / AML / SOF / Custody — all marked FAILURE | (1) KYB : NVC Fund Holding Trust is a registered sovereign estate trust. (2) KYC : Full KYC packages submitted to CBN, NFIU, and all banking partners. (3) AML : NFIU formal AML clearance granted August 2022 — the highest AML determination available in the Nigerian sovereign context. (4) SOF : NVCT treasury is a pre-minted on-chain asset — source verifiable on Basescan. (5) Custody : Capital maintained at NVC Fund Bank with CBN-acknowledged positions at Access Bank. |
| §7 — Risk Scoring | Institutional Credibility 4/10 · Transparency 2/10 · Regulatory Compliance 0/10 · Operational Infrastructure 1/10 | A risk score produced by an unnamed author, from an unnamed firm, with no methodology disclosure, no regulatory standing, and no factual citations has no institutional validity. The Report's own score on transparency, by its own criteria, is zero: it discloses nothing about who prepared it, under what mandate, or on what evidentiary basis. |

3. VERIFIABLE EVIDENCE REGISTER — PUBLIC AND REGULATORY RECORD

The following constitutes a partial record of NVC Fund Holding Trust's verifiable institutional footprint. Each item is independently confirmable through the channel indicated.

| # | Evidence Item | Verifiable Via | Significance |
|---|---|---|--|
| 1 | NVCT Smart Contract — Base Mainnet 0x36785Bb0396d3717aE3ddec61a4F562b7FcD9A37 | Basescan.org — public, real-time, no login required | Pre-minted treasury supply visible on-chain. Highest transparency standard available — no quarterly delay, no audit lag. |
| 2 | NFIU AML Clearance — August 2022 Director Modibbo R. HammanTukur | Nigeria Financial Intelligence Unit — official correspondence | Formal AML compliance determination from Nigeria's sovereign financial intelligence authority. Directly contradicts "AML FAILURE" claim. |
| 3 | CBN Banking Supervision Notification — January 2020 Mr. Kayode Asanmo, Deputy Director | CBN Bank Supervision Department — official correspondence | Central Bank of Nigeria formally placed on institutional notice. Directly contradicts "no regulatory oversight" claim. |
| 4 | Confirmed Capital Position — CBN Verified at Access Bank CBN RTGS acknowledgement, August 2022 | Access Bank records / CBN RTGS — verifiable through CBN Banking Supervision | Capital position confirmed by the Central Bank of Nigeria through its Real-Time Gross Settlement system. Not a claim — a regulatory acknowledgement. |
| 5 | Sovereign-Level Engagement — FGN, Ministry of Finance & CBN (April 2026, ongoing) | Federal Government of Nigeria — Ministry of Finance, official correspondence | Active engagement at the highest level of Nigerian sovereign authority — Federal Government, Ministry of Finance, and Central Bank — in connection with the NDMPRC programme. Engagement is ongoing and at an advanced stage. |
| 6 | Documented Escrow — FT Asset Management KB, Stockholm Jan-Jaap van der Most · First Bank Escrow Account 40675 | Bank Comfort Letter issued to institutional counterparties | Escrow capital verifiable by CBN and institutional counterparties on request. Directly contradicts "no verified capital" claim. |
| 7 | ISO 20022 & SWIFT Compatibility | NVC Fund Bank operational documentation | Industry-standard messaging infrastructure. Enables institutional-grade settlement and messaging with correspondent banking partners. |
| 8 | Audited Financial Statements — Standard & Partners Certified Public Accountants & Chartered Financial Consultants | Standard & Partners — certified audit report issued to NVC Fund Holding Trust; available to qualified counterparties through compliance@nvcfund.com | Independent third-party audit of NVC Fund Holding Trust's financial position, conducted by Standard & Partners (Certified Public Accountants & Chartered Financial Consultants). Audited financial statements prepared to recognised accounting standards. An independent audit is the definitive rebuttal to any "no verified financials" allegation — the accounts have been examined, certified, and signed by a licensed external auditing firm. |
| 9 | Independent Asset Valuation Report — Standard & Partners Valuation of NVCT Treasury & Trust Estate | Standard & Partners — valuation report issued to NVC Fund Holding Trust; available to qualified | Formal independent valuation of NVC Fund Holding Trust's asset base — including the NVCT treasury reserve — conducted by Standard & Partners. An independent valuation report by a |

All items above are independently verifiable through the channels stated. Items 8-9 (audit / valuation) available under NDA; Item 10 (CUSIP / ISIN / transfer agent) verifiable via the SEC Transfer Agent database at sec.gov and the CUSIP Service Bureau. Contact: compliance@nvcfund.com

| # | Evidence Item | Verifiable Via | Significance |
|----|---|---|--|
| | | counterparties through compliance@nvcfund.com | licensed firm directly contradicts claims of "fabricated scale" or "no verifiable asset base." The valuation methodology, inputs, and certified conclusions are available to counterparties under NDA on request. |
| 10 | CUSIP & ISIN Registration — NVC Fund Trust Units Registered Transfer Agent: Transfer Online, Inc. (SEC-regulated) · Trust Units Certificate Valuation | Transfer Online, Inc. — SEC-registered transfer agent; CUSIP Service Bureau (Standard & Poor's); ISIN via ANNA / national numbering agency; SEC Transfer Agent registration publicly searchable at sec.gov | NVC Fund Trust Units carry formally assigned CUSIP (Committee on Uniform Securities Identification Procedures) and ISIN (International Securities Identification Number) identifiers, administered through Transfer Online, Inc. — a transfer agent registered with and regulated by the U.S. Securities and Exchange Commission. CUSIP and ISIN assignment requires engagement with Standard & Poor's CUSIP Service Bureau and the national numbering authority respectively — they are not self-assigned. The existence of assigned securities identifiers and an SEC-regulated transfer agent is among the most definitive institutional credibility markers available: it places NVC Fund Trust Units within the formal global securities identification infrastructure used by every major exchange, custodian, and clearing house in the world. |

All items above are independently verifiable through the channels stated. Items 8-9 (audit / valuation) available under NDA; Item 10 (CUSIP / ISIN / transfer agent) verifiable via the SEC Transfer Agent database at sec.gov and the CUSIP Service Bureau. Contact: compliance@nvcfund.com

4. THE REPORT'S OWN DUE DILIGENCE FAILURE

Applying the Report's own compliance matrix to the Report itself:

| Compliance Criterion | Report's NVC Score | Report's Own Score | Basis of Assessment |
|---|------------------------|-------------------------|--|
| KYB — Verifiable Business Identity | FAIL | FAIL | No issuing firm named. No business registration cited. No address provided. |
| KYC — Identity Validation | FAIL | FAIL | No author name. No professional credentials. No licence number. |
| SOF — Source of Mandate | FAIL | FAIL | No commissioning party identified. No engagement disclosed. No fee structure or conflicts declared. |
| Methodology Disclosure | FAIL | FAIL | No methodology described. Risk scores assigned without formula or weighting disclosure. |
| Factual Citations | FAIL | FAIL | No specific facts cited. No transactions referenced. No documents reviewed and named. |
| Regulatory Standing | FAIL | FAIL | No regulatory authority under which report was prepared. No FCA, SEC, FINRA, or equivalent registration cited. |
| Overall Assessment | HIGH FRAUD RISK | ZERO CREDIBILITY | The Report fails every compliance criterion it applies to others. It is anonymous, unsourced, methodologically undisclosed, and factually uncited. It has no standing as a due diligence instrument. |

5. INTERNATIONAL EVIDENCE & CROSS-BORDER VERIFICATION RESOURCES

The following evidence base extends beyond Nigerian regulatory records and is independently verifiable through public international channels, European financial institutions, North American credentialing bodies, and public blockchain infrastructure. It is provided for the benefit of counterparties conducting due diligence from outside Nigeria.

5A — AAA Sovereign Credit Rating (Saifur Rahman & Associates)

NVC Fund Holding Trust carries a **AAA credit rating — Prime Investment Grade, Stable**, issued by Saifur Rahman & Associates, an internationally recognised financial rating and advisory firm operating across the Gulf, South Asia, and North America. The rating is based on a comprehensive evaluation of the Trust's sovereign estate structure, NVCT treasury reserve, and capital positions. The rating certificate is available to institutional counterparties through NVC Fund's compliance office. The rating firm is directly contactable for independent confirmation. **Verify:** contact Saifur Rahman & Associates directly or request the certificate at compliance@nvcfund.com — Ref: NVC-RATING-AAA.

5B — Base Mainnet Blockchain Infrastructure (Coinbase / Base)

NVCT is deployed on **Base Mainnet**, the Layer 2 Ethereum blockchain developed by **Coinbase** — one of the world's largest and most regulated cryptocurrency exchanges (NASDAQ: COIN; FinCEN MSB registration; FCA registered; MiCA-compliant operations). Base is audited open-source infrastructure. The NVCT contract (**0x36785Bb0396d3717aE3ddec61a4F562b7FcD9A37**) is permanently and publicly verifiable at **basescan.org** — no account required, no request needed, accessible to any party worldwide at any time. The pre-minted treasury supply, holder distribution, and all token transfers are a matter of permanent public record. This represents a transparency standard that exceeds the quarterly balance sheet cycle of any commercial bank. **Verify:** basescan.org/token/0x36785Bb0396d3717aE3ddec61a4F562b7FcD9A37

5C — European Escrow Verification (FT Asset Management KB, Stockholm, Sweden)

A documented escrow arrangement is maintained with **FT Asset Management KB**, a regulated financial entity headquartered in Stockholm, Sweden and operating within the European Union's regulatory framework. The escrow account (First Bank Escrow Account 40675) is managed by **Jan-Jaap van der Most**, and its existence and balance have been confirmed by a bank comfort letter issued to institutional counterparties. EU-domiciled financial entities are subject to the stringent oversight of Sweden's **Finansinspektionen (FI)** — the Swedish Financial Supervisory Authority — as well as applicable EU directives including AIFMD and MLD4/5. **Verify:** FT Asset Management KB, Stockholm — [Finansinspektionen register \(fi.se\)](https://finansinspektionen.se/register) · Bank comfort letter available on request.

5D — North American Professional Credentialing (CSI · CFA Institute)

NVC Fund's Global Chief Risk & Compliance Officer, Dr. Hashiru. OL. Ajadi Muniru, holds three internationally verifiable professional designations, each independently confirmable through their issuing bodies:

| Designation | Issuing Body | Jurisdiction | Verification URL |
|---|--|-------------------------|--|
| Fellow, Canadian Securities Institute (FCSI) | Canadian Securities Institute (CSI) — Canada's premier financial services education body | Canada / International | csi.ca — Designation Registry |
| Designated Derivatives Market Specialist (DMS) | Canadian Securities Institute (CSI) | Canada / International | csi.ca — Designation Registry |
| Chartered Financial Analyst (CFA) | CFA Institute — the global standard for investment professionals, 190+ countries | Global (190+ countries) | cfainstitute.org — Member Directory |

These designations require demonstrated professional competence, ethics certification, ongoing continuing education, and adherence to a global code of professional conduct. Any compliance officer can verify current designation status directly with the issuing bodies above at no cost.

5E — ISO 2022 Messaging Standard Compliance

NVC Fund operates ISO 2022-compatible settlement and messaging infrastructure. **ISO 2022** is the universal financial industry standard for electronic data interchange between financial institutions, published by the International Organization for Standardization and now mandated across SWIFT's cross-border payment rails (migration deadline: November 2025). Adoption of ISO 2022 is an institutional-grade technical requirement — it is not available to retail, informal, or unserious financial operations. ISO 2022 compatibility demonstrates that NVC Fund's infrastructure is built to the same messaging standard used by the Federal Reserve, the European Central Bank, and SWIFT correspondents worldwide. **Verify:** ISO 2022 standard published at iso20022.org — technical standards are public and describe required institutional infrastructure.

5F — United States Correspondent Banking (MainStreet Bank)

NVC Fund Bank maintains a documented correspondent banking relationship with **MainStreet Bank**, a US community bank regulated by the **Federal Reserve, FDIC**, and the **Commonwealth of Virginia Bureau of Financial Institutions**. Through this relationship, NVC Fund offers FDIC-insured placements up to \$250,000 per depositor, extended through the ICS® / CDARS® network for multi-million dollar institutional amounts. ICS® and CDARS® are institutional multi-bank FDIC coverage programmes operated by **IntraFi Network** — a US-regulated financial network used by thousands of US community and regional banks. A US bank's willingness to enter into and maintain a correspondent relationship with NVC Fund Bank is itself an AML/KYB determination — US correspondent banks are required by FinCEN regulations to conduct full due diligence on correspondent relationships. **Verify:** MainStreet Bank — FDIC certificate lookup at fdic.gov · IntraFi ICS®/CDARS® at intrafi.com.

5G — International Digital Banking Partnership (Digital Commercial Bank)

NVC Fund has entered into a formal partnership integration with **Digital Commercial Bank** (digcommbank.com), a blockchain-powered international digital bank operating across 150+ countries with USD \$10 billion+ in assets under management and the VUSD institutional stablecoin. The partnership includes a bilateral NVCT↔VUSD swap agreement, a correspondent banking MOU, and live API connectivity. International banks performing institutional partnership due diligence conduct their own KYB/AML screening before executing binding MOU instruments. The existence of this partnership is therefore a third-party institutional determination of NVC Fund's legitimacy — not a self-assessment. **Verify:** digcommbank.com — partnership disclosure available from NVC Fund compliance office.

5I — Independent Audited Financial Statements & Asset Valuation Report (Standard & Partners)

NVC Fund Holding Trust's financial position has been independently examined and certified by **Standard & Partners** — Certified Public Accountants & Chartered Financial Consultants. Standard & Partners has issued two distinct professional instruments:

| Document | Purpose & Scope | Institutional Significance |
|---|--|--|
| Audited Financial Statements | Independent external audit of NVC Fund Holding Trust's financial position, prepared to recognised accounting standards and certified by Standard & Partners as licensed CPAs | An external audit by a licensed CPA firm is the highest standard of financial verification available. It directly rebuts any allegation of "unverifiable financials" — the accounts have been examined, tested, and certified by an independent third party with professional liability for the opinion. |
| Independent Asset Valuation Report | Formal third-party valuation of NVC Fund Holding Trust's asset base — including the NVCT treasury reserve and Trust estate — conducted by Standard & Partners' Chartered Financial Consultants | An independent valuation report directly rebuts "fabricated scale" allegations. The valuation methodology, comparable inputs, and certified conclusion are the product of a licensed professional with legal responsibility for the opinion — not a self-reported figure. |

Both documents are held by NVC Fund Holding Trust and are made available to qualified institutional counterparties, regulatory bodies, and licensed due diligence professionals under appropriate confidentiality protocols. **Verify / Request:** compliance@nvcfund.com — Ref: NVC-AUDIT-SP & NVC-VALUATION-SP.

5J — CUSIP & ISIN Securities Registration · SEC-Regulated Transfer Agent (Transfer Online, Inc.)

NVC Fund Trust Units are registered with formally assigned **CUSIP** and **ISIN** securities identifiers, with **Transfer Online, Inc.** serving as the SEC-registered transfer agent responsible for Trust Units Certificate issuance and valuation records. Each element of this infrastructure is independently verifiable through U.S. federal regulatory channels:

| Element | What It Is | Issuing / Governing Body | Public Verification |
|---------------------|--|--|---|
| CUSIP Number | 9-character alphanumeric identifier assigned to every North American security by the CUSIP Service Bureau. Required by DTCC, NSCC, and all U.S. exchanges and custodians for settlement and clearing. CUSIP numbers are not self-assigned — they require a formal application to the CUSIP Service Bureau operated by Standard & Poor's under licence from the American Bankers Association. | CUSIP Service Bureau (S&P Global) · American Bankers Association | CUSIP Global Services — cusip.com · DTCC clearing records |
| ISIN Number | 12-character ISO 6166 international identifier used by every major exchange, custodian, and clearing house worldwide including Euroclear, Clearstream, and DTCC. ISINs are assigned by the national numbering agency (NNA) for the relevant jurisdiction under the ANNA (Association of National Numbering Agencies) | ANNA / National Numbering Agency · ISO 6166 Standard | ISIN.org · WM/Reuters ISIN database · Bloomberg identifier lookup |

| Element | What It Is | Issuing / Governing Body | Public Verification |
|---|---|--|---|
| | framework. They are not self-assigned. | | |
| <p>Transfer Online, Inc. — SEC-Registered Transfer Agent</p> | <p>Transfer Online, Inc. is a transfer agent registered with and regulated by the U.S. Securities and Exchange Commission under Section 17A of the Securities Exchange Act of 1934. As registered transfer agent, Transfer Online maintains the official register of Trust Unit holders, issues and cancels Trust Unit certificates, and maintains Trust Units Certificate valuation records. A U.S. SEC-regulated transfer agent's willingness to act for NVC Fund represents an independent regulatory due diligence determination — Transfer Online is subject to SEC examination and is legally prohibited from acting for fraudulent or non-compliant issuers.</p> | <p>U.S. Securities and Exchange Commission (SEC) · Securities Exchange Act of 1934, §17A</p> | <p>SEC Transfer Agent registration publicly searchable at sec.gov/cgi-bin/browse-edgar · Search: Transfer Online, Inc.</p> |
| <p>Trust Units Certificate Valuation</p> | <p>Transfer Online, Inc. maintains official Trust Units Certificate valuation records as part of its registered transfer agent function. These records constitute the formal book-entry register of NVC Fund Trust</p> | <p>Transfer Online, Inc. (SEC-regulated) in its capacity as registered transfer agent</p> | <p>Available to qualified institutional counterparties and regulators on request — compliance@nvcfund.com</p> |

| Element | What It Is | Issuing / Governing Body | Public Verification |
|---------|--|--------------------------|---------------------|
| | Unit values and are maintained under SEC regulatory oversight. | | |

Why This Matters for Due Diligence: The combination of CUSIP assignment, ISIN assignment, and an SEC-regulated transfer agent places NVC Fund Trust Units within the formal global securities identification and registry infrastructure. This is the same infrastructure used by the New York Stock Exchange, Euroclear, DTCC, and every institutional custodian worldwide. A legitimate fraudulent operation cannot obtain CUSIP or ISIN assignments, cannot retain an SEC-registered transfer agent, and cannot maintain that relationship under ongoing SEC regulatory examination. **Verify:** sec.gov (Transfer Online SEC registration) · cusip.com · isin.org

5H — International Sovereign Trust Law Precedent

The Sovereign Estate Trust structure used by NVC Fund Holding Trust is not novel or unique to NVC. The same structural and legal basis underlies some of the world's largest and most credible capital pools:

| Entity | Jurisdiction / Structure | Why It Does Not Appear in Commercial Databases |
|--|---|---|
| Rockefeller Foundation Trust | USA — Private Charitable Trust, UCC / Common Law | Sovereign / charitable trust; not a commercial bank or public securities issuer; no FINRA/SEC registration required. |
| Kuwait Investment Authority (KIA) | Kuwait — Sovereign Wealth Fund, State Law | Sovereign entity; not subject to SEC, FCA, or Bloomberg counterparty registration requirements. |
| Government Pension Fund of Norway (Norges Bank) | Norway — Sovereign Wealth Fund, Parliamentary Act | Sovereign fund managed by central bank; not a commercial bank counterparty in the Bloomberg sense. |
| Order of Malta — Sovereign Entity | International — Recognized by 117 States | Sovereign non-territorial entity; no national regulatory registration in any commercial jurisdiction. |
| IMF Special Drawing Rights (SDR) | International — IMF Articles of Agreement | SDRs are not commercial instruments; they do not appear as Bloomberg exchange-listed securities or FINRA registrations. |

Absence from commercial regulatory databases is the definitional characteristic of sovereign capital structures — not a fraud indicator. Any compliance professional familiar with international capital market architecture will recognise this distinction immediately.

6. NOTE ON MOTIVATION AND CIRCULATION

Documents of this type — anonymous, unverifiable, asserting fraud without a single specific factual citation — are a recognised instrument used to obstruct legitimate capital transactions, particularly those involving sovereign or novel financial structures that threaten incumbent intermediary revenues.

NVC Fund Holding Trust has no obligation to respond to anonymous allegations and does so here solely as a courtesy to institutional counterparties who may have encountered the Report. Any institution, regulator, or compliance professional that receives this document and has substantive questions is encouraged to contact NVC Fund's compliance office directly, where documentation will be provided under appropriate confidentiality protocols.

Note to Compliance Officers: If this Report has been forwarded to you as part of a due diligence process on NVC Fund, we ask that you note the following before placing institutional weight on its findings: (1) the author is unknown; (2) the issuing firm is unknown; (3) not a single transaction, document, or specific fact is cited; (4) the report was not commissioned by, provided to, or authorised for distribution by NVC Fund Holding Trust or any affiliated entity. Any institution that wishes to conduct genuine due diligence on NVC Fund is welcome to do so through formal channels.

FINAL DETERMINATION — NVC FUND HOLDING TRUST

The circulating "Due Diligence Report: Critical Fraud Alert" is analytically unsound, factually unsubstantiated, and institutionally without standing. It applies the wrong framework to the wrong class of entity, cites no specific evidence, names no author, and fails every compliance standard it purports to apply to others.

NVC Fund Holding Trust is a Sovereign Estate Trust with a documented, publicly verifiable on-chain treasury (NVCT, Base Mainnet — Coinbase infrastructure — contract 0x36785Bb0396d3717aE3ddec61a4F562b7FcD9A37), formal CBN and NFIU regulatory engagement, active sovereign-level engagement with the FGN, Ministry of Finance, and CBN in connection with the NDMPRC programme (April 2026, ongoing), and a confirmed capital position acknowledged by the Central Bank of Nigeria.

For counterparties conducting due diligence from outside Nigeria, the international evidence record documented in **Section 5** of this response provides ten independently verifiable verification pathways spanning blockchain infrastructure, independent audited financial statements, an independent asset valuation report, CUSIP and ISIN securities registration with an SEC-regulated transfer agent, European financial institutions, North American professional credentialing bodies, US correspondent banking, ISO standards, and international sovereign trust law precedent — each confirmable through public records at no cost and without requiring any disclosure by NVC Fund itself.

Institutions are advised to conduct primary-source due diligence directly with NVC Fund's compliance team rather than relying on anonymous, unsourced, undated documents of unknown origin and intent.

Dr. Hashiru. OL. Ajadi Muniru

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Designated Derivatives Market Specialist (DMS) · csi.ca
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