

Regulator Briefing Sheet (Public Summary)

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For Regulatory and Supervisory Use

1. Purpose of CMRTs

Certified Mineral Reserve Tokens (CMRTs) provide a standardized and regulator aligned method for documenting and verifying mineral reserve backed collateral positions. CMRTs allow financial institutions to incorporate mineral reserve assets into traditional lending, examination, and reporting workflows without requiring new supervisory frameworks or digital asset specific reviews.

This briefing provides examiners with a high level overview of how CMRTs fit within existing oversight expectations.

2. What a CMRT Represents

A CMRT reflects a validated and inventory specific position in a mineral reserve. It includes:

- Verified ownership and chain of title documentation
- Geological certification of in-ground mineral quantities
- Independent technical validation by an approved validator
- A risk tier classification based on evidence quality
- A persistent audit trail for supervisory review

A CMRT does not represent fractional ownership, investment security status, or price exposure. It functions strictly as a collateral documentation standard.

3. Oversight Alignment

CMRTs are designed to fit within current regulatory structures. They align with:

- Standard commercial lending collateral practices

- UCC Article 9 security interest documentation
- Examiner expectations for collateral verification
- Existing supervisory needs for transparency and traceability

No cryptography review is required. CMRTs provide structured documentation, not a new asset class.

4. Documentation Lifecycle

Examiners reviewing a CMRT-secured credit file will see documentation in the following order:

1. **CMRT Record**
Summary of mineral reserve collateral, risk tier, and validation.
2. **Supporting Evidence Package**
Geological reports, reserve certifications, validator review notes, title evidence, and compliance checks.
3. **Collateral Schedule**
Bank prepared schedule referencing the CMRT ID and verified reserve information.
4. **Verification Log**
Internal record of CMRT status checks completed by the lender.
5. **UCC Filing**
Standard filing referencing the mineral reserve collateral and CMRT ID.

This structure allows examiners to verify collateral integrity efficiently and consistently.

5. Risk Tier Framework (Public Summary)

CMRTs use a three tier structure that reflects the level of evidence supporting the underlying reserve.

Tier 1: Fully Validated Reserve

- Independent technical validation
- High confidence geological reporting
- Clear title record and compliance alignment

Tier 2: Partially Validated Reserve

- Established but developing evidence base
- Moderate confidence geological reporting

- Clean title record with no material unresolved items

Tier 3: Early Stage Evidence

- Preliminary geological data
- Validator review present with noted qualifications
- Higher supervisory attention recommended

No formulas or proprietary methodologies are included in this public summary.

6. Examiner Review Checklist

Examiners should confirm:

- CMRT ID matches all loan documentation
- Collateral schedule references verified reserve characteristics
- Risk tier is disclosed and considered in underwriting
- Validator review is included and complete
- Supporting evidence aligns with the CMRT summary
- UCC filing correctly identifies the collateral interest
- Verification log shows periodic status checks by the institution

This checklist aligns with standard commercial lending examination procedures.

7. Contact for Regulatory Inquiries

Institutional Relations

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A regulator only communication channel is available by request.