GLOBAL LEDGER

Exchanges and Grinex

Compliance Investigation

Problem Statement

Since the seizure of **Garantex** on March 7, 2025, and the launch of its successor **Grinex** on March 10, their transaction volumes have surged rapidly.

According to our latest data, both incoming and outgoing transaction volumes are exceeding **\$1 billion** each in USDT (Tron) alone (<u>see Img. 1</u>).

This alarming pace of operational growth — achieved in under two months — is further underscored by Grinex's increasing engagement with major exchanges that enforce KYC protocols and adhere to international compliance standards.

Grinex. Trading volumes

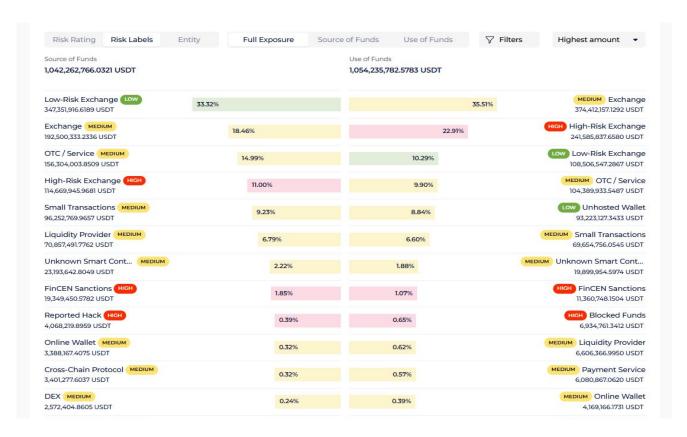
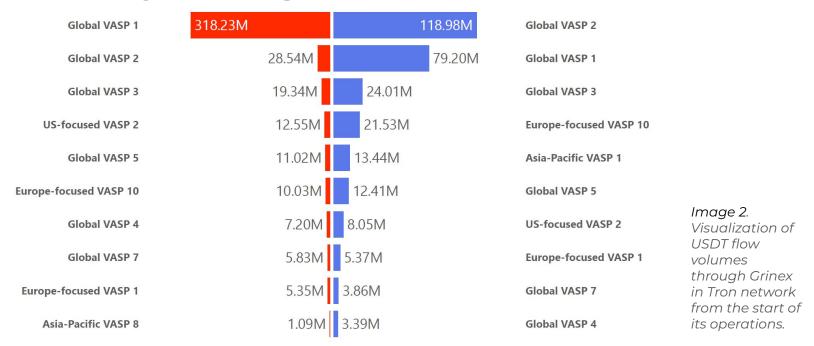


Image 1. Visualization of USDT flow volumes through Grinex in Tron network from the start of its operations.

To provide specific evidence of Grinex's operational volumes in connection with major, reputable global exchanges, we conducted an on-chain analysis to identify and highlight notable cases.

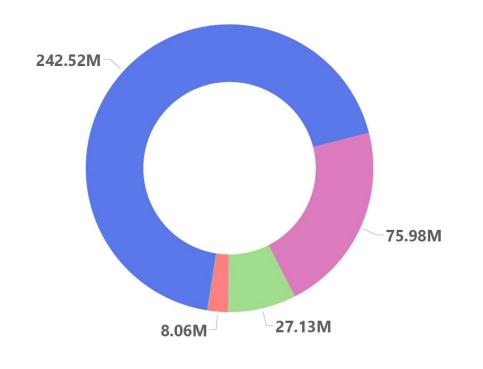
The following graph showcases volumes of transactions between Grinex and top 10 global licensed exchanges ranked numerically by their approximate daily trading volume (see Img. 2).

The **red** section represents **incoming** funds to Grinex, while the **blue** section shows **outgoing** amounts.



During our research, we identified **58 licensed exchanges** that have engaged in direct or indirect transactions with wallets associated with Grinex, totalling **\$788.2 million**. This figure includes both incoming and outgoing transactions.

The following graph (<u>see Img. 3</u>) illustrates the geographical distribution of the analysed entities that collectively received **\$353.9 million**, categorized by their primary regions of operation.



- Worldwide (68.53%)
- Asia-Pacific (21.47%)
- Europe (7.67%)
- North America (2.28%)
- Other (0.05%)

Image 3. Percentage distribution of licensed exchanges interacting with Grinex, categorized by primary operational regions. Total sums in millions.

Grinex. On-chain transactions

Below are several examples of on-chain transaction flows featuring **minimal depth** (i.e., fewest "hops" between Grinex and the receiving exchange) and with substantial amounts of USDT on the Tron network.

Here we can see a transaction with 1 hop between Grinex <u>wallet</u> and one of the Europe's biggest exchange (see Img. 4).



Image 4. Visualization of a one-hop deposit from Grinex to a European VASP 1

Grinex. On-chain transactions

The example below shows a **direct deposit** from another identified Grinex <u>wallet</u> to one of the world's largest exchanges, with no intermediate wallets involved, totaling over **\$191,000** (see Img. 5).



Image 5. Visualization of a direct deposit from Grinex to a Global VASP 1

Grinex. On-chain transactions

An example of **\$500,000** deposit with only one wallet in between — to another Europe-oriented VASP from the same Grinex <u>wallet</u> (see Img. 6).



Image 6. Visualization of a one-hop deposit from Grinex to a European VASP 10

Conclusions

Our findings reveal a significant blind spot in the compliance frameworks of even the most reputable licensed exchanges. Grinex, a successor to a sanctioned entity, has rapidly achieved substantial transaction volumes — with confirmed flows into and out of 58 licensed VASPs across major jurisdictions.

Key Takeaways:

- Over \$788 million in transactional exposure already identified.
- Multiple direct or minimal-hop flows to top-tier exchanges.
- This activity challenges the reliability of existing risk monitoring systems.