20.12.2024
Coinmotion Oy

SUMMARY OF THE CONFLICTS OF INTEREST POLICY

The Company has established a comprehensive **Conflict of Interests Policy** in compliance with Article 72 of MiCA and ESMA guidelines, to identify, prevent, manage, and disclose conflicts of interest that may arise among its shareholders, board members, senior management, employees, and customers. This ensures fair and transparent operations while prioritizing customer interests.

Key Circumstances of Conflicts of Interest

The policy identifies several situations where conflicts may arise, including:

1. **Financial Gain/Loss**: When decisions benefit the personal financial interests of individuals over customers or the Company.
2. **Different Interests in Transactions**: Favoring personal interests over customer needs in business outcomes.
3. **Favoritism**: Preferential treatment for certain customers, leading to unfair practices.
4. **Competition with Customers**: Activities or investments by stakeholders that conflict with customer interests.
5. **Receiving Gifts or Benefits**: External influences, such as gifts, that could bias decisions.
6. **Shareholder Influence**: Pressure from shareholders to prioritize their interests over other stakeholders.
7. **Personal/Professional Relationships**: Decisions influenced by external relationships of stakeholders.
8. **Conflicting Roles/Responsibilities**: Overlapping duties or supervision by conflicted individuals.
9. **Conflicts Between Connected Persons**: Prioritizing the interests of connected individuals, such as family members, over customers.
10. **Referral Fees**: Conflicts arising when customers earn incentives for referring others, which may not align with the new customer's best interests.

Measures to Handle Conflicts

The Company employs a structured approach to manage conflicts:

1. **Identification**:
   - Training personnel on the policy.
   - Reporting conflicts to the Compliance Team and maintaining a conflict log.
   - Conducting annual reviews of relationships and transactions.
2. **Prevention**:
   - Independent supervision of potentially conflicting activities.
   - Fair remuneration policies to avoid biased decisions.
   - Assigning separate roles to individuals with potentially conflicting responsibilities.
   - Monitoring and limiting Referral Fees to reduce potential conflicts.
3. **Management**:
   - Providing training on recognizing and handling conflicts.
   - Requiring conflicted individuals to step back from related decisions.
   - The Chief Compliance Officer (CCO) and CEO oversees handling conflicts.
4. **Disclosure**:
   - Transparent communication about identified conflicts to relevant stakeholders.
   - Informing customers about conflicts that may affect them.
   - Publishing a summary of the policy on the Company’s website in all relevant languages.

Remuneration Policy

- Remuneration policies avoid incentivizing decisions that favor personal or Company interests over customers.
- Pay structures balance fixed and variable components and consider compliance, customer fairness, and service quality alongside performance metrics.

Organizational Structure

The Company's organization and responsibilities are outlined in a separate document.

By implementing these measures, the Company ensures fairness, transparency, and customer trust in all operations.