SUMMARY OF THE CONFLICTS OF INTEREST POLICY

Coinmotion ("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.

Understanding that our clients possess varying levels of knowledge and experience, particularly private and corporate clients who may be less familiar with crypto services, it is sometimes challenging for these clients to independently identify potential conflicts of interest. Therefore, it is crucial for the Company to proactively detect and disclose such conflicts, ensuring that all clients, regardless of experience, are well informed and can make decisions in their best interests. Our commitment to transparency and the diligent identification of potential conflicts reinforces our dedication to serving all clients equitably.

Key Circumstances of Conflicts of Interest

It is Coinmotion's obligation under the regulation to identify possible conflicts of interest in order to be able to prevent or manage those. The policy identifies several circumstances related to our crypto-asset services, where conflicts of interest could possibly arise, including:

1. **Financial Gain/Loss**: When decisions benefit the personal financial interests of individuals over customers or the Company. When executing orders on behalf of clients through our OTC desk, there could be a potential for Coinmotion's own or Coinmotion's employees' personal financial gains that would not align with (private, corporate or institutional) clients' interests, particularly if confidential trading information would be misused. This potential conflict primarily concerns our institutional and corporate clients who engage in significant asset trades, where stakeholders' personal financial gains might misalign with client interests.

2. **Different Interests in Transactions**: Favoring personal interests over customer needs in business outcomes. In the execution of OTC orders, there might be situations where personal interests could take precedence over client needs, affecting transaction fairness and transparency. This could occur if the Company's employees, or the Company, would prioritize their own financial interests or those of related parties (private, corporate or institutional customers) when engaging in transactions.

3. **Favoritism**: Preferential treatment for certain customers, leading to unfair practices. There is a potential risk of favoritism in the execution of orders through the OTC desk. In

situations where certain clients, such as high-volume corporate customers or institutional customers, would receive expedited order execution or preferential treatment, this could affect the equitable treatment of other (private, corporate or institutional) clients. For example, if the order of execution would be influenced by the client's trading volume or other relationship with the company, that could potentially lead to less favorable conditions for other customers. In the event of favoritism, it would be more likely that large clients, such as institutional or corporate customers engaging in significant trades, would be favored over smaller corporate and private customers.

4. **Competition with Customers**: Activities or investments by stakeholders that conflict with customer interests. In delivering crypto-asset exchange services and execution services the Company's or its stakeholders own trading activities could potentially conflict with the interests of private, corporate and institutional clients who engage in trading. There could be a risk that the Company or the stakeholders might prioritize their own trading interests over those of its clients.

5. **Receiving Gifts or Benefits**: External influences, such as gifts, that could bias decisions. Accepting gifts or benefits by stakeholders could potentially bias decisions that are made inside the Company in relation to any crypto-asset services we offer, favoring for example high-value corporate clients or institutional customers. This risk could exist for example if external influences alter decision-making inside the Company to benefit someone else than the Company's (private, corporate or institutional) customers.

6. **Shareholder Influence**: Pressure from shareholders to prioritize their interests over other stakeholders. The Company's shareholders might potentially influence decisions for example on resource allocation across the different crypto-asset services, impacting our ability to maintain high standards in exchanges services, execution services, transfer services and custody. This could occur if shareholder interests would drive strategic decisions that would conflict with (private, corporate or institutional) client needs.

7. **Personal/Professional Relationships**: Decisions influenced by external relationships of stakeholders could potentially affect impartiality when providing any of our crypto-asset services provided to private, corporate and institutional customers. There's a risk of biased decision-making if relationships with third parties or personal connections are not adequately managed.

8. **Conflicting Roles/Responsibilities**: Overlapping duties or supervision, especially within the Company's management, might potentially impact private, corporate or institutional clients relying on our varied services. This could occur if role responsibilities would clash, leading to, for example, conflicts in prioritization and impartial service delivery.

9. **Conflicts Between Connected Persons**: There could be a risk that prioritization of interests of connected individuals over (private, corporate or institutional) customers could occur across all the services the Company offers. This could be a concern if

familial or external ties would affect objective decision-making and client service.

10. **Referral Fees**: In the context of our exchange services, the potential for conflicts of interest could arise between two (private, corporate or institutional) customers due to our referral incentive program. This program allows referring clients to earn incentives based on the trading activity of the new clients they introduce. The potential conflict occurs if the referring client, whether a private individual, corporate, or institutional entity, prioritizes their commission gains over the new client's trading interests. Such incentives might inadvertently encourage the referring client to influence the new client's trading behavior in a manner that might not align with the new client's best financial interests. Especially in situations where the new client is a private individual or corporate customer with less knowledge and experience in crypto assets and trading than the referring customer, the new customer might be particularly vulnerable to the inappropriate influencing attempts of the referring customer.

Measures to Handle Conflicts of Interest

The Company employs a structured approach to manage conflicts:

1. **Identification**:
    - Training personnel and stakeholders on the Conflict of Interest policy to ensure stakeholders recognize possible conflict situations.
    - Reporting possible conflicts to the Legal & 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 the handling of 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.