

CONFLICTS OF INTEREST DISCLOSURE

(In accordance with Regulation (EU) 2023/1114 – MiCA)

1. Introduction

Fintech SK s. r. o., ID No.: 54 500 923, a company incorporated under the laws of the Slovak Republic (the “Company”), as a licensed Crypto-Asset Service Provider (CASP), hereby publishes this Conflicts of Interest Disclosure.

This document has been prepared in accordance with Article 72 of Regulation (EU) 2023/1114 on Markets in Crypto-Assets (“MiCA”) and describes:

- the Company’s approach to identifying, preventing and managing conflicts of interest;
- the general nature and potential sources of conflicts of interest;
- the risks such conflicts may pose to clients;
- the measures adopted to protect clients’ interests.

A conflict of interest is a situation where the personal, financial or other interests of the Company, its management, employees or connected persons may adversely affect, or be perceived to affect, the impartial, fair and professional provision of services to clients.

2. Situations Where Conflicts of Interest May Arise

Conflicts of interest may arise in particular in the following situations:

2.1 Between the Company and its clients

A conflict may arise where the Company derives a direct or indirect financial benefit from a client transaction or performs multiple roles within the provision of crypto-asset services.

2.2 Between different clients

Conflicts may arise where multiple clients request comparable services or transactions under different market conditions, in particular in situations of limited liquidity or increased market volatility.

2.3 Between the Company and connected persons

Conflicts may arise due to personal, ownership or business relationships between the Company and

persons involved in its management or operations, including participation in crypto-asset projects or external business activities.

2.4 Internal conflicts

Conflicts may arise in connection with personal transactions, secondary employment or other external interests of persons acting on behalf of the Company.

3. Management of Conflicts of Interest

The Company has implemented appropriate and effective measures to manage conflicts of interest, including in particular:

3.1 Duty of disclosure

All relevant persons are required to promptly disclose any actual or potential conflict of interest.

3.2 Organisational and information measures

The Company applies proportionate organisational measures and information barriers to prevent the inappropriate flow of information that could give rise to conflicts of interest.

3.3 Rules of conduct

Persons acting on behalf of the Company must act honestly, fairly, professionally and always in the best interests of the client.

3.4 Personal transactions and external activities

Personal trading in crypto-assets and external professional or business activities are subject to the Company's internal rules and approval processes.

3.5 Remuneration

Remuneration is not linked to the recommendation of specific crypto-assets, projects or services to clients.

4. Disclosure of Conflicts of Interest

Where a conflict of interest cannot be effectively prevented, the Company shall:

- clearly and timely inform the affected clients of the nature of the conflict;
- provide clients with sufficient information to enable them to make an informed decision;
- publish this disclosure on its website.

5. Final Provisions

Fintech SK s. r. o. is committed to continuously identifying, preventing and managing conflicts of interest so as to avoid any detriment to clients' interests. This disclosure complements the Company's internal policies and does not replace its obligation to actively prevent conflicts of interest.