



Regulatory Notice

1 Purpose and Status of this Notice

This Regulatory Notice provides mandatory information about Bitcoin Suisse (Europe) AG (the “Company”) in its capacity as an authorized crypto-asset service provider, published in accordance with Regulation (EU) 2023/1114 (MiCAR) and its Liechtenstein implementing legislation. It is addressed to clients, prospective clients and the public.

2 Company Information

Legal name	Bitcoin Suisse (Europe) AG
Legal form	Aktiengesellschaft (stock corporation), Liechtenstein
Registered office	Aeulestrasse 74, 9490 Vaduz, Principality of Liechtenstein
Register / UID	FL-0002.600.023-9
LEI	5067009TZLDD94Q3W662
VAT number	61330
E-mail	contact.eu@bitcoinsuisse.com
Website	www.bitcoinsuisse.com/eu

3 Authorization and Regulatory Status

The Company is authorized as a Crypto-Asset Service Provider (CASP) under Article 63 MiCAR and is supervised by the Liechtenstein Financial Market Authority (“FMA”). MiCAR is directly applicable in Liechtenstein following its incorporation into the EEA Agreement on 24 June 2025; the accompanying national framework is the EWR-MiCA-Durchführungsgesetz (EWR-MiCA-DG), in force since 1 February 2025.

3.1 Authorisation details

Status	Authorized Crypto-Asset Service Provider (CASP)
Legal basis	Art. 59 et seq. MiCAR; Art. 63 MiCAR (authorization)
Competent authority	Financial Market Authority Liechtenstein (FMA)
Date of authorization	June 22, 2026



3.2 Authorized crypto-asset services

The Company is authorized to provide the following crypto-asset services within the meaning of Article 3(1)(16) MiCAR:

- Custody and administration of crypto-assets on behalf of clients
- Exchange of crypto-assets for funds
- Exchange of crypto-assets for other crypto-assets
- Execution of orders for crypto-assets on behalf of clients
- Reception and transmission of orders for crypto-assets on behalf of clients
- Transfer services for crypto-assets on behalf of clients

Only the services expressly listed in the FMA authorization are provided on a regulated basis. Any service not so listed is provided, if at all, outside the scope of MiCAR (see Section 5).

3.3 EEA passporting

On the basis of its Liechtenstein CASP authorization, the Company may provide its authorized crypto-asset services in other EEA Member States under the freedom to provide services / freedom of establishment, subject to the notification regime in Articles 65 et seq. MiCAR. The list of notified host Member States is available on request.

3.4 Public registers

- ESMA MiCA public register of authorized CASPs: [esma.europa.eu – MiCA register](https://esma.europa.eu/mica-register)
- FMA Liechtenstein register: register.fma-li.li

4 Competent Supervisory Authority

Authority	Financial Market Authority Liechtenstein (FMA)
Address	Landstrasse 109, P.O. Box 279, 9490 Vaduz, Principality of Liechtenstein
Website	www.fma-li.li/en
E-mail	info@fma-li.li

5 Applicable Legal and Regulatory Framework

The Company's activities are governed in particular by:

- Regulation (EU) 2023/1114 (MiCAR) and the delegated/implementing acts, RTS and ESMA/EBA guidelines adopted thereunder;
- EWR-MiCA-Durchführungsgesetz (EWR-MiCA-DG) and related Liechtenstein ordinances;
- Regulation (EU) 2022/2554 (Digital Operational Resilience Act, "DORA");



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- Liechtenstein AML/CFT legislation (Sorgfaltspflichtgesetz, SPG) and the applicable EU AML/CFT acquis;
- Act on the Implementation of International Sanctions of 10 December 2008 (ISG);
- Token and TT Service Provider Act (TVTG) for activities and tokens outside MiCAR's scope;
- GDPR (Regulation (EU) 2016/679) and the Liechtenstein Data Protection Act (DSG).

6 Regulated and Non-Regulated Services

Not all activities and crypto-assets are subject to MiCAR. The Company distinguishes clearly between services provided on a regulated basis under its CASP authorization and any ancillary activities outside MiCAR (e.g. crypto-assets qualifying as financial instruments under MiFID II, or assets/tokens governed by the TVTG). Where a service is not covered by the Company's MiCAR authorization, the MiCAR investor-protection regime does not apply to it.

7 Risk Warning

Crypto-assets are high-risk. You may lose all of the funds you invest. Before using any service, read the applicable crypto-asset white paper(s), product terms and risk disclosures.

In particular, you should be aware that:

- the value of crypto-assets can be highly volatile and may fall as well as rise; a total loss is possible;
- crypto-assets are not legal tender and are not backed by any central bank or government;
- crypto-assets held with the Company are not bank deposits and are not covered by any deposit guarantee or investor compensation scheme;
- transactions on distributed ledgers are typically irreversible; errors, lost access credentials or transfers to incorrect addresses may be permanent;
- crypto-assets are exposed to technological, cyber-security, operational, market, liquidity and legal/regulatory risks, including future regulatory change;
- past performance is not a reliable indicator of future results.

8 Conduct of Business and Client Communications

In accordance with Article 66 MiCAR, the Company acts honestly, fairly and professionally in the best interests of its clients. All information addressed to clients and prospective clients, including marketing communications, is fair, clear and not misleading, and marketing communications are clearly identifiable as such.

9 Pricing, Costs and Fees

The Company's policy on pricing, costs and fees is published in a prominent place on its website in accordance with Article 66 MiCAR.

10 Crypto-Asset White Papers



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Where required under Article 66(3) MiCAR, the Company makes available hyperlinks to existing and notified crypto-asset white papers relating to the crypto-assets in respect of which it provides services. Where no white paper exists or is required, this is indicated in the relevant product information.

11 Sustainability Disclosure

In accordance with Article 66(5) MiCAR and the related ESMA RTS, the Company publishes information on the principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanisms of the crypto-assets in respect of which it provides services, maintained on an ongoing basis.

12 Conflicts of Interest

The Company maintains effective arrangements to identify, prevent, manage and disclose conflicts of interest in accordance with Article 72 MiCAR.

13 Custody and ETP Eligible Custodian

Where the Company provides custody and administration of crypto-assets on behalf of clients, it does so in accordance with Article 75 MiCAR, including segregation of client crypto-assets and maintenance of appropriate records. The Company acts as an eligible custodian of crypto-assets used as underlying instruments in exchange-traded products (ETPs) listed on SIX Swiss Exchange.

14 Complaints Handling and Mediation

In accordance with Article 71 MiCAR, the Company operates effective and transparent procedures for the prompt, fair and consistent handling of client complaints, free of charge for clients.

14.1 How to complain

Please contact your Relationship Manager or submit your complaint via our [complaints contact form](#). You should first direct your complaint to the Company and request a written response.

14.2 Independent mediation (Conciliation Board)

If no response is received, or if the response is unsatisfactory, you may approach the independent, neutral and (generally) free conciliation body, verbally or in writing:

Mediation body	Conciliation Board of Liechtenstein (Schlichtungsstelle)
Address	Landstrasse 60, P.O. Box 343, 9490 Vaduz, Principality of Liechtenstein
Telephone	+423 220 20 00
E-mail	info@schlichtungsstelle.li
Website	www.schlichtungsstelle.li



15 Data Protection

The Company processes personal data in accordance with the GDPR and the Liechtenstein Data Protection Act. For details, please refer to our [\[● TO CONFIRM – insert live URL\]](#).

16 Value-Added Tax (VAT)

Certain services provided by the Company may be subject to VAT for individuals with tax residency in the Principality of Liechtenstein or in Switzerland. The applicable treatment is indicated in the relevant fee documentation.

17 Governing Law and Jurisdiction

This Notice and the Company's relationship with its clients are governed by the law of the Principality of Liechtenstein, without prejudice to any mandatory provisions of applicable EEA law or mandatory consumer-protection rules. The place of jurisdiction is Vaduz, Liechtenstein, subject to any mandatory statutory place of jurisdiction. The applicable General Terms and Conditions govern in case of conflict with this Notice.

18 Amendments and Updates

The Company keeps this Notice under review and may amend it to reflect changes in its authorization, services, applicable law or supervisory guidance. The version and date on the first page indicate the current version, which prevails.

This Notice is informational and does not constitute investment, legal, tax or financial advice, nor an offer or solicitation. It does not replace the Company's General Terms and Conditions, product-specific terms, fee schedules, risk disclosures or crypto-asset white papers, which prevail in the event of conflict.