I. General Nature and Sources of Conflicts of Interest Bitcoin Suisse (Europe) AG ("BTCS EU") operates in the cryptocurrency sector, providing services in trading (exchanging crypto-assets for funds and other crypto-assets, as well as executing client orders in crypto-assets) and custody/management of crypto-assets. Operating in a highly regulated and complex environment, BTCS EU strives to prevent unlawful and unethical behavior in all business relationships while ensuring transparent and fair business conditions for its clients.

Conflicts of interest may arise when the interests of one party adversely affect (or appear to affect) those of another, potentially impairing the ability to make fair and ethical decisions. This can influence objectivity in decision-making processes required by professional obligations. Relevant (potential) conflicts of interest involve BTCS EU itself, including its employees or individuals related to them by family ties, the corporate group to which it belongs, and its clients. Conflicts of interest may also arise between two or more clients whose interests conflict.

II. Sources of Conflicts of Interest The sources of conflicts of interest at BTCS EU are diverse and may include:

• **Group Structures:** As a sister company of Bitcoin Suisse AG ("BTCS CH"), a Swiss-based company, BTCS EU may encounter situations where the interests of the sister company and its affiliates conflict with those of BTCS EU or its clients.

• **Different Roles for Clients:** BTCS EU may act in various capacities for different clients, potentially leading to conflicts of interest, especially when providing services involving diverse or competing interests.

• **Activities of Employees and Related Persons:** Employees and affiliated persons of BTCS EU may have personal interests or engage in activities outside the company that conflict with their professional obligations or BTCS EU's and its clients' interests. For example, conflicts may arise if employees undertake side activities in areas competing with BTCS EU's objectives or services. Personal business relationships, investments, or financial ties that could affect decision-making objectivity also pose potential conflicts. Furthermore, close relationships with individuals or entities directly engaged with BTCS EU may create conflicts. Similarly, involvement in external advisory boards or supervisory roles may conflict with BTCS EU's or its clients' interests.

• **Business Strategies and New Ventures:** Developing new business strategies, products, or services may conflict with the interests of existing clients or market practices. Conflicts may arise if BTCS EU's new offerings compete with existing solutions or if strategic decisions inadvertently disadvantage clients. Additionally, partnerships or investments in new markets may conflict with the interests of current clients or competitors.

• **Access to Sensitive Information:** Employees with access to sensitive or compliance-relevant information may risk misuse of this information, potentially creating conflicts of interest.

III. Measures to Mitigate Conflicts of Interest To identify, assess, manage, mitigate, prevent, or disclose conflicts of interest effectively, BTCS EU has implemented a range of organizational and administrative measures, including:

• **Framework for Preventing Conflicts of Interest:** BTCS EU has developed a framework to identify and avoid conflicts of interest and, where necessary, manage potential conflicts through appropriate transparency and mitigation measures.

• **Transparency and Mitigation Measures:** BTCS EU has established transparency and mitigation measures to address conflicts of interest arising from its business activities.

• **Reporting Conflicts of Interest:** BTCS EU is committed to documenting all actual and potential conflicts of interest and reporting them to the relevant authorities as required by MiCAR.

• **Training and Awareness:** All BTCS EU employees receive training regarding their obligations and the applicable procedures for managing conflicts of interest.

• **Monitoring, Reporting, and Escalation:** BTCS EU has established monitoring, reporting, and escalation processes to evaluate potential breaches of the conflict-of-interest framework and initiate disciplinary actions if necessary.

• **Mitigation Measures:** BTCS EU has developed specific mitigation measures based on individual case-by-case assessments to avoid or reduce potential conflicts of interest.

• **Disclosure of Conflicts of Interest:** BTCS EU is obligated to publish general information on its website about the nature and sources of conflicts of interest and the measures taken to mitigate them.

We are committed to maintaining transparency and fairness in our business practices and to effectively managing all conflicts of interest that may arise from our activities.