

Legal document

Disclosure of conflicts of interest

Identification of potential conflicts of interest

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This document describes how Coinfinity GmbH handles potential conflicts of interest, as defined in Article 72 (2) of the MiCAR Regulation.

What are conflicts of interest?

A conflict of interest exists when business, financial, or personal interests of our company, our employees, or affiliated parties could compromise our objectivity in representing our customers' interests. Such conflicts may arise, in particular, when we gain an advantage while the customer simultaneously suffers or could suffer a disadvantage.

Potential conflicts of interest

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

- **Between customers and our company**, e.g. if our decisions regarding prices, terms of trade, or access to certain services could be influenced by our own economic interests.
- **Between shareholders, managing directors, and our company**, if the personal economic interests of individual decision-makers do not align with the interests of the company or its customers.
- **Between our company and our employees**, particularly when financial incentives could lead to certain products or services being offered preferentially.
- **Between our customers**, particularly when there are conflicting interests between different customer groups.

Measures to prevent and mitigate conflicts of interest

To reduce potential conflicts of interest, we have implemented various measures, including:

- **Internal guidelines and processes** to ensure that the interests of customers always come first.
- **Transparent pricing** that contains no hidden spreads and makes all costs transparent to the customer.
- **Separation of departments and functions** to ensure that no unilateral influence occurs.
- **A compensation policy** that does not create incentives for employees to favor certain products or services out of self-interest.
- **Training and awareness programs** for employees to ensure a consistent focus on the customer.
- **Regular review of conflicts of interest** by our compliance team to identify risks and take appropriate action.
- **No commissions from third parties:** We do not accept commissions or other payments from third parties for brokering or recommending products or services. Our recommendations are based solely on what is best for the customer and not on financial incentives.

Disclosure of conflicts of interest

In cases where conflicts of interest are unavoidable, we disclose them so that our customers can make an informed decision. Our disclosure is provided in an understandable format and includes an explanation of the nature of the conflict of interest as well as the measures we take to minimize any adverse effects on the customers.

Specific conflicts of interest in our business model

The following situations could constitute conflicts of interest:

- **Trading with own liquidity:** Since we buy and sell Bitcoin on our own account, there is a potential conflict of interest regarding pricing. We ensure that all prices are in line with market conditions and that there are no hidden fees or spread optimizations at the customer's expense.
- **Favoring certain liquidity sources:** We work with various external exchanges and liquidity providers. There may be a financial incentive to execute transactions through certain partners. However, our selection is always based on securing the best available price for our customers.
- **Additional services:** If we offer additional services or products (e.g., custody solutions, automated buying plans), a potential conflict of interest may arise if we favor our own offerings over alternative solutions. We always act in the best interest of our customers and ensure full transparency.

Ongoing review and adjustment

Our measures for handling conflicts of interest are reviewed regularly and adjusted as needed. Changes to this document will be communicated to our customers via our website or directly by email.