

Annex I: Pricing Policy

Please note: This Policy applies exclusively to the Conversion Service involving the purchase or sale of USDC or EURC against fiat currencies. It does not apply to transactions involving the conversion of other types of Cryptoassets, whether for funds or for other cryptoassets, nor does it govern any other services offered on the Platform. Such transactions may be subject to different rules and separate policies.

1. Purpose and Scope

This Pricing Policy describes the method applied by YouHodler Italy S.r.l. (“**YouHodler**” or the “**Company**”) to determine the applicable price to a sale or purchase of USDC or EURC, by using proprietary capital. This method is applicable to all the sale and purchase executed by the Clients and is designed to provide clarity, transparency, and fairness in accordance with Article 77.2 of Regulation (EU) 2023/1114¹ (MiCA).

2. Real-Time Pricing and Execution Model

When you initiate a transaction on our platform, whether to buy or sell EMTs using Fiat currencies, you will be presented with a real-time exchange rate. This rate reflects the current market conditions and is sourced directly from major cryptoasset exchanges, which act as our Liquidity Providers. These providers are securely integrated via APIs and ensure that prices reflect actual, executable market values at the time you place your order.

The rate shown on the interface represents the conversion value between one unit of fiat currency and the corresponding amount of the cryptoasset or EMT you are exchanging. The system always displays the best available market rate at the time of your request.

To ensure fairness and neutrality, YouHodler applies the same rate it receives from the Liquidity Provider when executing the transaction using its own proprietary capital. The Company does not apply any manual intervention, price manipulation, or client-based variation in pricing.

Please note: The amount you may exchange is subject to limits based on your economic profile, which is determined during the onboarding and KYC process. These limits are calibrated to ensure that your transaction activity aligns with the information you provided about your financial background, source of funds, and intended use of the platform. You may request a review of your limits by submitting updated information through the account verification section.

¹ REGULATION (EU) 2023/1114 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2023 on markets in crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937.

3. Fees and Commissions

Any fees or commissions applicable to your transaction are:

- Calculated and presented separately from the exchange rate,
- Shown in real-time as you set the parameters of your transaction (asset pair, amount, direction),
- Fees are charged only upon execution of the transaction and are directly deducted from the input amount involved in the exchange.

The total transaction amount, including fees, is always displayed before you confirm your order. For your convenience, a full and regularly updated list of fees and limits is available here: [YouHodler Commissions and Limits](#)

4. Price Confirmation and Slippage Protection

To protect you from price changes due to market volatility (commonly referred to as “Slippage”²), the system applies a brief confirmation window, typically lasting a few seconds. During this time, the exchange rate remains locked and valid, allowing you to review and confirm the transaction details with full transparency.

If the confirmation is not provided within the allotted time, the rate automatically expires, and a new rate reflecting the latest market conditions will be displayed should you wish to reinitiate the transaction.

This mechanism ensures that you always execute your transaction at a clearly disclosed and accepted rate, as well as to the most updated market price, helping to minimize the impact of sudden market fluctuations.

5. Execution and Transparency

Once the Client confirms the transaction, it is executed automatically and immediately at the confirmed exchange rate. The execution is considered final and irrevocable, and a timestamped confirmation is promptly generated and made available through the Platform interface. The entire process is managed by the Company’s automated execution engine, which ensures that all transactions are processed without manual intervention, discretionary pricing, or the possibility of modification at any stage.

² It refers to the variance between the exchange rate shown to the Client at the moment of initiating a conversion transaction and the price at which the conversion is ultimately executed. This may occur due to the price fluctuations in market conditions during the time between the Client’s confirmation and the actual settlement of the conversion.

Clients are able to view the confirmed exchange rate, applied fees, and the final transaction amount—net of all charges—both on the transaction confirmation screen and within their personal account history.

6. Fairness and Conflict-Free Pricing

YouHodler's pricing system is designed to ensure non-discriminatory access and equal treatment for all Clients. All users are presented with the same real-time market rate, regardless of account type, transaction volume, economic profile or user status. Prices are sourced directly from independent, reputable third-party Liquidity Providers, and transactions are executed without any internal markup, manipulation, or preferential pricing practices.

This transparent and neutral approach eliminates potential conflicts of interest, ensures that clients transact at clear and accepted rates, and fully aligns with the best execution obligations established under MiCA.

7. Policy Review and Updates

YouHodler regularly reviews its pricing methodology and Liquidity Provider arrangements to ensure continued compliance with regulatory requirements and market best practices. Clients will be informed in advance of any material changes to pricing presentation or fee structures.

If you have questions about this policy or how pricing works, please contact our Support Team via the platform or at: support@youhodler.com.