



Conflicts of Interest Disclosure

At **AKJNO**, we are committed to acting in the **best interests of our clients** and upholding the **highest standards of integrity and transparency** in the provision of our crypto-asset services.

In accordance with **Article 72(2) of Regulation (EU) 2023/1114 (MiCA)**, we disclose below the **general nature and sources of potential conflicts of interest** that may arise in the course of our business, along with the **measures we have implemented to manage and mitigate such risks**.

General Nature and Sources of Conflicts of Interest

Conflicts of interest may occur where:

- AKJNO provides multiple crypto-asset services to the same client or to different clients whose interests may diverge.
- AKJNO or its partners, affiliates, or employees may have financial or other incentives that could influence the fair treatment of clients.
- Employees engage in personal transactions or hold positions in crypto-assets that are also subject to client orders.

Measures to Mitigate Conflicts of Interest

We take a **risk-based and proportionate approach** to identifying, managing, and mitigating conflicts of interest. Our framework includes:

- Ongoing procedures to identify and assess potential conflicts.
- A culture of transparency, requiring employees to disclose any personal interests that may give rise to conflicts.
- Segregation of roles and responsibilities to reduce undue influence in decision-making.
- Policies preventing employees from participating in decisions where their impartiality may be compromised.
- Appropriate mitigation measures and, where necessary, disclosure of conflicts to affected clients.
- Guidance and training for employees.



We review our approach **annually and whenever necessary** to ensure it remains effective and aligned with legal and regulatory requirements, including **MiCA**.

Further details are available in our **Conflicts of Interest Policy**, which can be provided upon request.

If you have any questions or concerns about this disclosure, please contact us at **Compliance@akj.com**.