

Users Conflict of Interest Policy

Introduction

This Conflict of Interest Policy (hereinafter also “Policy”) is provided to users of YouHodler Italy s.r.l. (hereinafter also the “Company”) in accordance with Article 72 of the Regulation (EU) 2023/1114, of 31 May 2023 “Markets in Crypto-Assets Regulation” (“MiCAR”): its purpose is to help users understand what a conflict of interest is, how we manage such conflicts, and what this means for you as a client.

If you have questions, our support team is here to help.

What is a Conflict of Interest?

A conflict of interest happens when personal or financial interests could influence, or appear to influence, actions or decisions made by our company or its employees. This could affect the integrity and fairness of our services, or your experience as a user.

YouHodler Italy S.r.l. has divided the COI Clients in 2 categories:

1) First category

It includes the conflict of interests between the Company and the clients. An example of this category could be, for instance, when the Company is executing orders on behalf of clients, and at the same time is operating a trading platform for crypto-assets or an entity of the group is operating that platform.

2) Second category

It includes conflict of interest between individual clients and groups of clients of the Company. An example of this category is, for instance, when two clients seek separately to purchase a particular asset at the same time and the Company is obliged to sell that asset to either one of the clients after they have already agreed on all of the relevant terms and all of the relevant information relating to the transaction.

Other examples of Conflicts of Interest

Some situations that could create conflicts of interest include:

- When an employee of YouHodler Italy S.r.l. has a personal or financial interest in a transaction you make.

- When YouHodler Italy S.r.l. or its staff receive incentives from third parties that could affect the services or advice provided to users.
- When the company's own investments or positions could influence the execution or settlement of client transactions.

Our Approach to Conflicts of Interest

YouHodler Italy S.r.l. is committed to managing conflicts of interest honestly and fairly. Our approach includes:

- Identifying and assessing areas where conflicts may arise.
- Avoiding conflicts of interest when possible.
- Keeping records of identified conflicts and their management.
- Implementing internal controls and a strict code of ethics for staff.
- Training staff to recognize and manage conflicts.
- Disclosing material conflicts to users in a clear and timely manner.

Prevention of Conflicts of Interests

The Company has envisaged different systems to prevent COI situations. A non-exhaustive list of these measures includes the following:

- Clear client-order handling and allocation rules
 - Executes and allocates client orders according to transparent, pre-defined criteria (e.g. time/price priority)
 - Prohibits preferential treatment of some clients over others in the same situation.
- Segregation of roles and separation of functions

YouHodler Italy S.r.l. separates, where feasible, trading, execution, custody, and advisory/marketing functions so that one client cannot gain an unfair advantage over another (e.g. access to other clients' order flow or positions).

- Restriction on information sharing ("Chinese walls")

The Company implements controls to prevent sharing of non-public or sensitive information about one client (positions, orders, strategies) that could benefit another client.

- Fair pricing and non-discriminatory conditions

Applies the same pricing, fees, and execution conditions to comparable clients and comparable transactions, unless objectively justified and clearly documented.

- Controls on personal and proprietary trading

The Company sets rules for staff and related persons' personal transactions so they do not front-run or otherwise disadvantage any client, and ensure such trades are at arm's length.

- Prohibition or limitation of certain high-risk arrangements

Avoids, or tightly controls, arrangements that obviously create client-to-client conflicts (e.g. commingling client assets with group entities that are also clients; systematic internalisation without safeguards).

- Record-keeping and monitoring of conflict cases

Maintains a conflicts of interest register for all identified and handled conflicts between clients and periodically review controls and policies for effectiveness.

- Last resort – declining or stopping the service

Where a conflict between clients cannot be prevented or adequately mitigated, YouHodler Italy S.r.l. refrains from acting or providing the service to one or more of the clients concerned.

User Rights and Disclosures

- We will always inform you if a material conflict of interest arises that may affect you.
- You have the right to request more information about our management of conflicts at any time.
- This policy is available at all times and from any device.

Key Principles

- Integrity: We put fairness and transparency first in all our actions.
- Protection: We protect user interests and aim to prevent any harm from conflicts of interest.
- Transparency: We clearly disclose any conflict that could affect your decisions as a user.

Updates

This Conflict of Interest Policy may be updated from time to time to ensure compliance with legal requirements and to reflect best practices. The latest version is always available on our website.

Contact

If you have any questions or concerns about this policy, or if you believe a conflict of interest may exist, you can contact us to support@youhodler.com

Last updated: December 1st, 2025