

Conflict of Interest Management Rules
Bitcan Sp. z o.o.
dated 1 May 2025

1. General Information

Bitcan Sp. z o.o. (the “Company”) provides crypto-asset services, including the exchange of crypto-assets for funds or other crypto-assets, the transfer of crypto-assets on behalf of clients, as well as the custody and administration of crypto-assets on behalf of clients. The Company conducts its activities in a diligent, professional manner, in accordance with the principles of fair trading, and with the overarching objective of acting in the best interests of its clients.

One of the fundamental means of achieving this objective is the prevention of conflicts of interest that may arise between Bitcan Sp. z o.o., its employees, contractors, and clients. These efforts are carried out through the implementation and application of internal organisational regulations and control mechanisms that comply with applicable legal requirements, in particular Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on Markets in Crypto-Assets (MiCA).

In order to appropriately manage actual and potential conflicts of interest, Bitcan Sp. z o.o. has developed this Conflict of Interest Management Policy (the “Policy”), which constitutes an internal document setting out the rules for identifying, mitigating, and disclosing such conflicts.

2. Key Principles

Bitcan Sp. z o.o. applies, among others, the following mechanisms aimed at preventing the occurrence of conflicts of interest:

- **Information barriers:** The Company has implemented so-called “Chinese walls” between the sales department and teams directly cooperating with Clients. Employees are granted access only to the information necessary for the proper performance of their professional duties.
- **Appropriate organisational structure:** Individuals and departments that may potentially be in conflict of interest are not in a direct reporting line and do not remain in a relationship of hierarchical dependence.
- **Internal regulations:** The Company has developed and implemented internal procedures and documents governing the identification and management of conflicts of interest.
- **Mandatory disclosure obligation:** Every employee is obliged to promptly report any actual or potential conflicts of interest. Such disclosures are recorded in a dedicated **Conflict of Interest Register**.
- **Prohibition on accepting gifts:** Employees are not permitted to accept gifts or non-monetary benefits from Clients, except for customary business courtesies generally accepted in the relevant industry.
- **Operational neutrality:** Employees are not aware of the Client’s intentions regarding planned transactions. Clients receive full information on the purchase and sale prices of the relevant crypto-assets, including applicable costs as specified in the fee schedule. The decision to execute the transaction rests solely with the Client.
- **Training and education:** The Company organises regular training sessions for its employees on legal regulations, professional ethics, and internal policies, fostering a culture of compliance and accountability.

3. Categories of Potential Conflicts of Interest

Bitcan Sp. z o.o. may identify potential conflicts of interest arising from relationships between:

- the Company and its shareholders,
- the Company and individuals or entities directly or indirectly affiliated with it,
- members of the management body,
- the Company's employees,
- the Company and its Clients,
- two or more Clients whose interests are mutually conflicting.

As of the date of publication of these rules, the Company has not identified any conflicts of interest that have not been adequately mitigated or reported in accordance with the applicable procedure.

4. Review and Update of the Policy

The Conflict of Interest Management Policy, together with these Rules, shall be reviewed at least once a year, as well as each time any of the following circumstances occur:

- significant changes in the legal or regulatory environment,
- changes in the scope of services provided by the Company,
- changes in the organisational structure of the Company or entities personally or financially affiliated with it, which may affect areas exposed to conflict of interest risk,
- identification of a new category of conflict of interest not previously addressed by the Policy.

5. Contact and Access to Information

Individuals interested in obtaining detailed information regarding the procedures applied by Bitcan Sp. z o.o. in the area of conflict of interest management may contact the Company via the contact details provided on Website. Upon request, the Company will provide comprehensive explanations using a durable medium.

6. Responsibility for Implementation and Supervision

Responsibility for the implementation and supervision of the Conflict of Interest Management Policy and these Rules lies with the Compliance Officer, in cooperation with the Management Board of the Company. The review is carried out in accordance with the schedule outlined in Section 4, and the results of the review are documented in the form of an internal report.

These Rules shall enter into force on 1 May 2025. The next review of this document is scheduled for May 2026, or earlier if any of the circumstances indicated in Section 4 occur.