# INTERNAL REGULATION ON MEASURES TO PREVENT AND MANAGE CONFLICTS OF INTEREST

**CRYPTOASSETS SERVICE PROVIDER**
**Okazio s.r.o.**

1 **INTRODUCTORY PROVISIONS**

1.1 This internal regulation on measures to prevent and manage conflicts of interest has been drawn up in accordance with

(a) Article 72 of the MiCA Regulation;

(b) Article 1142 et seq. of DN 2025/1142; and

(c) Article 4(2) of DN 2025/305.

2 **DEFINITIONS**

2.1 Capitalized terms used in these internal regulations have the following meanings:

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| **CEO** | is a member of the management body and CEO of the Company |
| **COO** | is a member of the management body and the Chief Operating Officer of the Company |
| **Compliance Officer** | is the person responsible for internal control within the Company |
| **DN 2025/305** | is Commission Delegated Regulation (EU) 2025/305 of 31 October 2024 supplementing Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to regulatory technical standards specifying the information to be included in an application for authorisation as a crypto-asset service provider |
| **DN 2025/1142** | is Commission Delegated Regulation (EU) 2025/1142 of 27 February 2025 supplementing Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to regulatory technical standards specifying requirements for policies and procedures on conflicts of interest for crypto-asset service providers and details and methodology regarding the content of conflict of interest notifications |
| **MiCA Regulation** | is 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 |
| **NBS** | is the National Bank of Slovakia |
| **Authorized persons** | are any of the following persons:<br>a) members of the Company's bodies;<br>b) employees of the Company or other natural persons whose services are placed at the disposal of the Company and under its control and who are involved in the provision of cryptoasset services by the Company;<br>c) third parties providing services to the Company on an outsourcing basis pursuant to Article 73 of the MiCA Regulation |
| **Personal transaction** | a transaction in a crypto-asset or leading to a position in or exposure to a crypto-asset is carried out by or on behalf of a Connected Person if at least one of the following criteria is met:<br>a) the person acts outside the scope of activities carried out within the scope of their professional competence;<br>b) the transaction is carried out on behalf of any of the following persons: |

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| | 1. Connected person;<br>2. any person with whom a Connected Person has a family relationship or close ties;<br>3. a person in relation to whom the Related Person has a direct or indirect material interest in the outcome of a transaction, other than receiving a fee or commission for executing the transaction. |
| **Connected people** | are any of the following persons:<br>a) partners of the Company;<br>b) persons who directly or indirectly control the Company or its associates;<br>c) members of the Company's management body;<br>d) Company employees. |
| **Company** | is the company Okazio s.r.o., with its registered office at Bottova 2A, Bratislava - Staré Mesto district 811 09, Company ID: 54 724 732, registered in the Commercial Register of the Municipal Court Bratislava III, section Sro, entry no. 163835/B |

## 3 SUBJECT OF THE MODIFICATION OF THE INTERNAL REGULATION

3.1 The purpose of this internal regulation is to identify, prevent, manage and report conflicts of interest between and

3.1.1 The Company and any Affiliated Person;

3.1.2 The Company and its clients;

3.1.3 clients of the Company to each other.

## 4 SITUATIONS LEADING TO CONFLICTS OF INTEREST

4.1 The Company has identified the following situations or circumstances that could lead to a potential conflict of interest:

(a) **Conflicts of interest based on personal definition**can be identified as conflicts of interest arising between:

(i) The Company and its associates;

(ii) The Company and any person who directly or indirectly controls the Company or its affiliates;

(iii) The company and the members of its management body;

(iv) The Company and its employees;

(v) The Company and its clients; or

(vi) two or more clients of the Company to each other.

(b) **Conflicts of interest based on substantive definition**can be identified as conflicts arising from:

(i) from conflicting interests of individual clients;

(ii) between the Company and clients, arising mainly as a result of the remuneration structure or other revenues and profits dependent on the performance of the managed crypto assets;

(iii) between the legitimate interests of the Company, or Authorized Persons, and the legitimate interests of the Company's clients;

(iv) in creating the Company's business strategy;

(v) when selecting crypto-assets for the Company's managed portfolio;

(vi) when remunerating Authorized Persons;

(vii) in the event of misuse of confidential information by Authorized Persons or Connected Persons;

(viii) when conducting personal transactions of Connected Persons at the expense of the Company's clients;

(ix) when providing advice to clients;

(x) in prioritizing the interests of the Company over the interests of clients or in prioritizing the interests of specific clients to the detriment of the majority of clients;

(xi) when accepting any incentives from clients in connection with services provided by the Company;

(xii) arising from personal, political or professional relationships between Connected Persons;

(xiii) in situations where the Company or its Affiliates may, at its sole discretion, decide to take a decision that is clearly adverse to the legitimate interests of clients; or

(xiv) in situations where a Related Person has an economic interest in another entity, body or person with interests that conflict with the interests of the Company, whereby an economic interest is considered to be if the Related Person:

(I) owns a share, tokens, other ownership rights or membership in that person, body or entity;

(II) holds debt instruments or has other debt arrangements with that person, body or entity; or

(III) has any form of contractual arrangement with that person, body or entity, such as a management contract, a service contract, a delegation or entrustment contract, or a license for intellectual property rights.

4.2 The above list of existing or potential conflicts of interest is not exhaustive and is continuously supplemented and updated by the Compliance Officer. In the event that any Authorized Person identifies a situation that, in their opinion, leads to or may potentially lead to a conflict of interest, they are obliged to inform the Compliance Officer immediately.

4.3 In the event that a situation that, in the opinion of the Authorized Person, leads to or could potentially lead to a conflict of interest relates to a specific transaction with crypto assets carried out within the Company or any other transaction within the Company, the Authorized Person is obliged to inform the CEO of this fact in addition to the Compliance Officer.

4.4 The Compliance Officer shall issue an opinion on the information received pursuant to Articles 4.2 and 4.3 of these internal regulations no later than 24 hours after receipt. This opinion must contain at least the following particulars:

(a) an assessment of whether this is a conflict of interest that has already materialized or whether it is only a potential conflict of interest; and

(b) assessing whether or not a materialized or potential conflict of interest can be eliminated and proposing appropriate measures.

4.5 In order to identify, monitor and prevent conflicts of interest, the Compliance Officer maintains and regularly updates the following registers:

(a) a list of close persons of the Company's managers and employees according to the template set out in Annex No. 2 to these internal regulations, whereby for this purpose the term "close person" is interpreted in accordance with Section 116 of Act No. 40/1964 Coll. Civil Code, as amended; and

(b) a list of identified conflicts of interest according to the template provided in Annex No. 3.

## 5 PROCEDURES AND MEASURES TO PREVENT OR MANAGE CONFLICTS OF INTEREST

5.1 The Company applies and complies with effective measures to prevent conflicts of interest as defined in Article 4 of these internal regulations. Measures to prevent conflicts of interest are designed taking into account the size and organization of the Company and the nature, scope and complexity of its business.

5.2 Authorized persons are required to act with an appropriate degree of independence when carrying out the Company's business activities.

5.3 Where necessary and appropriate to ensure the required level of independence, the Company takes appropriate measures to manage conflicts of interest, including the following:

(a) effective procedures for restricting information flows between Authorized Persons, if so decided by the CEO in accordance with Article 6 of this internal regulation;

(b) independent supervision of Authorized Persons who have decisive influence over the provision of crypto-asset services by the Company, whose interests may conflict, or who otherwise represent different interests that may conflict, including the interests of the Company;

(c) the elimination of any direct link between the remuneration of Authorized Persons who primarily perform a certain activity and the remuneration of other Authorized Persons, or income generated by other Authorized Persons who primarily perform another activity, if the relationship between these activities may give rise to a conflict of interest;

(d) measures that prevent or restrict any Authorized Person from unduly influencing the manner in which another Authorized Person carries out activities related to the provision of cryptoasset services by the Company;

(e) measures to prevent or control the concurrent or sequential involvement of the Authorized Person in activities related to the provision of crypto-asset services, if such involvement may impair the proper management of conflicts of interest;

(f) entrusting activities that may be in potential conflict of interest to different Authorized Persons in the Company.

5.4 In the event of any potential conflict of interest, the Company will assess whether:

(a) it is likely that, as a result of the conflict of interest, the Related Person or the Authorized Person will gain a financial benefit, avoid a financial loss or obtain some other type of advantage at the expense of the Company's client;

(b) The Related Person or Authorized Person has an interest in the outcome of the crypto asset service provided to the client that is different from that client's interest;

(c) The authorized person has a financial or other incentive to prioritize the interests of one or more clients over the interests of another client;

(d) The Related Person or Authorized Person carries out the same business activities as the client; and

(e) The authorized person receives or receives from a person other than the client an incentive in connection with a service provided to the client, in the form of monetary or non-monetary benefits or services.

5.5 In the event that the organizational or administrative measures adopted by the Company are not sufficient to ensure with reasonable certainty that a conflict of interest under this internal regulation will be prevented, the Company's managers must be informed immediately, in order to take the necessary decision or measure to ensure that the Company acts in the best interests of its clients.

5.6 In the event that the organizational or administrative measures adopted by the Company to identify, prevent, manage and monitor conflicts of interest are not sufficient to ensure that risks of damage to the interests of the Company's clients are prevented with reasonable certainty, the Company shall provide clients with clear information on the general nature or sources of conflicts of interest before carrying out any transaction and shall develop appropriate strategies and procedures.

## 6 RESTRICTION OF INFORMATION FLOWS

6.1 If required to effectively prevent the emergence of conflicts of interest or minimize existing conflicts of interest, the Company may, by decision of the Company's directors, limit the flow of information or access to information between individual employees of the Company or between the Company and third parties providing its services.

6.2 In a decision pursuant to Article 6.1 of these internal regulations, the Company's directors must adjust the conditions of the flow of information or access to it between the Company's employees or between the Company and third parties providing its services, which are affected by the restriction pursuant to Article 6.1, in such a way that the provision of services by the Company in the appropriate quality or the necessary provision of services by a third party is not prevented or fundamentally limited.

## 7 ENSURING APPROPRIATE INDEPENDENCE IN THE PERFORMANCE OF ACTIVITIES

7.1 The Company is interested in each Authorized Person performing their activities independently and in accordance with professional care. In this regard, the Company ensures the independence of all Authorized Persons who may be affected by the threat of the existence or emergence of a conflict of interest in the performance of their activities, primarily in the following ways:

(a) The Company's executives do not unreasonably interfere with the performance of the Compliance Officer's activities;

(b) Authorized persons are obliged, in connection with their private business affairs existing outside their activities for the Company, to assess whether a conflict of interest exists in a given case that could entail a material risk of harm to the interests of the Company's clients and, if such a conflict exists, to notify the Compliance Officer and obtain his opinion. The Compliance Officer is obliged to make a decision in the relevant matter and act in the interests of the Company's clients.

(c) The Company's directors are required to ensure that when third parties provide services to the Company, such services are not provided in a manner that would prevent the monitoring and effective management of potential conflicts of interest. Payments made to third parties for their services must not be provided in a manner that would in any way affect the integrity and independence of the provision of these services.

(d) Each member of the body or employee of the Company is obliged to notify and submit to the Compliance Officer a list of all functions he performs as a member of the statutory, supervisory or other body of any commercial company or any other legal entity authorized to conduct business.

## 8 PERFORMING PERSONAL TRANSACTIONS

8.1 Linked persons are required to:

(a) request the approval of the Compliance Officer before carrying out a Personal Transaction;

(b) keep records of all Personal Transactions they have made;

(c) to alert the Compliance Officer to any, even potential, risk of conflict of interest.

8.2 Before granting consent pursuant to Article 8.1, the Compliance Officer shall assess whether the execution of a Personal Transaction will result in:

(a) to violate the prohibition of market abuse;

(b) to misuse confidential information;

(c) to endanger the interests of the Company's clients;

(d) to a conflict of interest or potential conflict of interest with the Company; or

(e) whether the execution of the Personal Transaction does not jeopardize the fulfillment of the Company's obligations and the provision of services by the Company of the appropriate quality.

## 9 GIFTS AND CONSIDERATIONS FROM CLIENTS

9.1 The Company and Authorized Persons may not accept gifts and favors or other payments from the Company's clients or from the Company's business partners that could impair their independence in the performance of their functions at the Company.

9.2 Any gift, attention or other consideration received by the Company or any Authorized Person and valued at more than EUR 50 must be immediately reported to the Compliance Officer, who shall assess the compliance of the acceptance of such consideration with this internal regulation. In the event that the recipient is the Compliance Officer, the assessment pursuant to the preceding sentence shall be carried out by the CEO.

## 10 LOANS OR OTHER PERFORMANCES FOR THE BENEFIT OF MEMBERS OF THE BODIES OR EMPLOYEES OF THE COMPANY

10.1 The Company does not generally provide loans or other benefits from its assets to members of its bodies and other employees. Similarly, providing loans or other benefits to third parties working for the Company is possible only exceptionally and under standard market conditions, such as those common between unrelated parties (on the so-called*arm's lenght basis*). The possible provision of such loans or benefits requires the prior consent of the Company's executives. In the event that a Company executive requests the provision of a loan or other benefit, the consent within the meaning of the previous sentence shall be granted by the other Company executive together with the Compliance Officer.

## 11 INTERESTS OUTSIDE THE COMPANY AND THE GROUP

11.1 Authorized persons who have financial or other interests in companies that participate in transactions with the Company and whose interests could be or are in conflict with the interests of the Company's clients are obliged to notify the Compliance Officer of these interests before carrying out any action or transaction related to these interests. The Compliance Officer is obliged to evaluate such conflict of interest.

## 12 PRODUCTS AND SERVICES FROM EXTERNAL PROVIDERS

12.1 When procuring products and services from third parties, the Company ensures the prevention and management of conflicts of interest as follows:

(a) The Company, through the Compliance Officer, identifies existing or potential conflicts of interest arising from new business relationships or, to the extent possible given the information available to the Company, with a third party.

(b) If the Company assesses that the relevant relationship with a third party or service provider poses a material risk of harm to interests, the Company is obliged to take measures to prevent or minimize the risk of a conflict of interest.

12.2 If the adoption or application of one or more of the above measures and procedures does not guarantee the required degree of independence and quality of prevention and management of conflicts of interest, the CEO, in cooperation with the Compliance Officer, shall adopt such alternative or additional measures and procedures as are necessary and appropriate for these purposes.

## 13 CONFLICT OF INTEREST MANAGEMENT

13.1 In the event that the organizational or administrative measures taken by the Company are not sufficient to ensure with reasonable certainty that risks of harm to the interests of the Company's clients are prevented, the Company's directors must be promptly informed (by any Authorized Person) so that they can take a timely and necessary decision or action to ensure that the Company acts in the best interests of its clients.

13.2 Such a conflict of interest must be clearly addressed and the relevant decision or action must be documented and duly complied with.

## 14 MONITORING AND EVALUATION OF CONFLICT OF INTEREST

14.1 The assessment of conflicts of interest known to the Company and reflected in this internal regulation is a mandatory part of the agenda of each meeting of the Company's directors. If there are no relevant developments in the mentioned area, the directors may decide that the point of assessment of conflicts of interest will not be discussed.

14.2 The Compliance Officer, in accordance with Article 4 of these internal regulations, shall maintain and regularly, at least once a year, update a list of all circumstances and activities carried out by the Company or Authorized Persons that constitute or could potentially constitute a conflict of interest. This list shall include, in particular, but not exclusively, the activities defined in Article 4 of these internal regulations.

14.3 Regularly, at least once a year, the Compliance Officer is required to prepare a written report on all activities that constitute or may potentially constitute a conflict of interest and that could harm the interests of one or more clients of the Company and submit it to the Company's executives.

## 15 PUBLICATION OF INFORMATION

15.1 The Company shall notify its clients and potential clients of the general nature and sources of conflicts of interest through its website in a prominent place on that website. The information pursuant to the preceding sentence must be accessible to the Company's clients and potential clients at all times.

15.2 The Company shall ensure that the notification pursuant to Article 15.1 contains at least information on:

(a) cryptoasset services provided, activities and circumstances that have led or may lead to conflicts of interest, including the status and position of the Company in which it acts when providing cryptoasset services to clients;

(b) the nature of identified conflicts of interest;

(c) the associated risks identified in connection with the identified conflicts of interest; and

(d) steps and measures taken to prevent or mitigate identified conflicts of interest.

15.3 The Company shall ensure the publication of the notice pursuant to Article 15.1 in the Slovak language and any other language that is an official language of the EU Member State in which the Company provides cross-border crypto-asset services. The Company shall update the published information regularly, but at least once a year.

## 16 NOTIFICATION OBLIGATIONS OF AUTHORIZED PERSONS

16.1 If any Authorized Person, in the performance of his/her duties, discovers that, due to any circumstances, including circumstances not directly related to his/her activities within or in connection with the Company, he/she is threatened with or has encountered a conflict of interest, he/she is obliged to inform the person or body that is his/her immediate superior in the organizational structure of the Company. Third parties providing services to the Company on a contractual basis directly and immediately related to the performance of the Company's business and/or a natural or legal person who is directly involved in providing services to the Company under an agreement on delegation to third parties pursuant to the Company's internal regulation on outsourcing or the Company's internal regulation on risk management of external suppliers of ICT services are obliged to inform the Company's representative specified in the relevant contract with the Company or the Compliance Officer about the threatened or existing conflict of interest.

16.2 The Company's executives shall notify each other of any potential conflict of interest and shall also notify the Compliance Officer. The Compliance Officer shall notify the Company's executives of any potential conflict of interest.

## 17 ASSESSMENT OF POTENTIAL CONFLICT OF INTEREST IN OUTSOURCING

17.1 Before concluding any agreement on delegation to third parties within the meaning of the Company's internal regulation on outsourcing or the Company's internal regulation on risk management of external ICT service providers, the Company's executives shall request the prior opinion of the Compliance Officer regarding:

(a) potential conflicts of interest that could arise if delegated to a particular third party; and

(b) proposed solutions, in order to eliminate conflicts of interest, or at least reduce them, as a result of delegation.

17.2 Executives are obliged to take into account the opinion of the Compliance Officer and reflect his recommendations in the delegation agreement.

17.3 The Compliance Officer shall ensure that the entity to which the functions are delegated takes all appropriate steps to identify, manage and monitor potential conflicts of interest that may arise between it and the Company, or between it and the Company's clients.

## 18 REWARDING

18.1 The Company applies the following remuneration principles in relation to employees and members of the Company's bodies:

(a) remuneration must always be documented and appropriate to the size, internal organization and nature, scope and complexity of the Company's activities;

(b) discrimination in the remuneration of men and women for equal work or work of equal value is prohibited;

(c) remuneration is consistent with and supports the Company's sound and effective risk management;

(d) remuneration is in line with the business strategy and objectives of the Company;

(e) Remuneration also includes measures to prevent conflicts of interest and supports responsible business conduct and the promotion of risk awareness and prudent risk-taking.

18.2 The company applies the following remuneration principles:

(a) a guaranteed fixed component of the total remuneration as

(i) the basic wage component, if it is an employee;

(ii) a fixed component of remuneration, if it concerns an executive; and possibly also

(b) the variable component of the total remuneration.

18.3 If a variable remuneration component is applied, it shall never exceed the guaranteed fixed component of the total remuneration. The guaranteed fixed component of the total remuneration represents a sufficiently high proportion of the remuneration to allow for a flexible policy in the area of variable remuneration components, including the option of not paying any variable components of the total remuneration. The guaranteed fixed component of the total remuneration takes into account the professional competence and responsibility of the persons being remunerated.

18.4 The employee is entitled to a basic salary component for the work performed. The basic salary component is proposed to the employee based on an assessment of professional competence, ability, level of responsibility related to performance, quantity and quality of work performed. The assessment is within the competence of the Company's executives. The determination of the specific amount of the employee's basic salary component is within the competence of the Company's executives and is contained in the employment contract.

18.5 The remuneration of executives and the Compliance Officer is approved by the Company's general meeting.

18.6 The Compliance Officer is remunerated exclusively with a fixed amount of remuneration.

18.7 The amount of the variable component of the total employee remuneration, its type, frequency and method of payment are approved by the Company's managers, who are also authorized to decide not to grant the claim to the variable component of the salary.

18.8 The method of calculating the variable component of the total remuneration of the Company's executives, its type, frequency and method of payment are approved by the Company's general meeting, which is also authorized to decide not to grant the right to the variable component of the salary.

18.9 The variable component of the total remuneration does not depend on the performance of a specific employee or executive of the Company, but is based solely on the achieved economic results of the Company. When determining the variable component of the total remuneration, the Company is obliged to monitor the status of its own resources and not grant the variable component of the total remuneration if its payment would have a negative impact on the Company's own resources.

18.10 Notwithstanding Article 18.9, the variable component of the total remuneration shall not be granted if the relevant employee or executive has committed a serious breach of the Company's internal regulations or multiple breaches of the Company's internal regulations. A serious breach of the Company's internal regulations shall also be considered an action that is intended to improve the Company's economic results to the detriment of the client's best interests.

## 19 NOTIFICATION AND COMPLIANCE

19.1 All Authorized Persons are required to demonstrably familiarize themselves with this internal regulation, as well as all related internal regulations issued by the Company, before starting to perform any activities for the Company, and to express their consent to comply with them (if applicable). The Compliance Officer shall ensure that the Authorized Persons, upon entering into a contractual relationship with the Company, on the basis of which they will act for the Company, complete and sign a declaration in accordance with Annex No. 1, pursuant to which, among other things, they confirm in writing their familiarization with this and other related internal regulations of the Company and their consent to them. The Compliance Officer shall also ensure that any change in the facts stated in the already signed declaration in accordance with the previous sentence shall be recorded in writing and signed by the Authorized Person to whom this change applies.

19.2 Article 19.1 of this internal regulation shall not apply to third parties providing the Company with services directly and immediately related to the performance of the Company's business on a contractual basis, if the contractual or other documents on the basis of which the Company is provided with services directly and immediately related to the performance of the Company's business by third parties contain provisions (i) obliging these third parties to comply with and apply measures to prevent conflicts of interest in substantially the same respects as these internal regulations, (ii) enabling the Company, through the Compliance Officer, to monitor compliance with measures to prevent conflicts of interest by these third parties and (iii) enabling the Company to effectively sanction any failure to comply with obligations in relation to the prevention of conflicts of interest by third parties, including termination of the contractual relationship with the third party.

19.3 Notification pursuant to this Article 19 is notification pursuant to Article 10.4 of the Company's organizational rules.

## 20 EVALUATION OF THE EFFECTIVENESS OF THE MEASURES TAKEN

20.1 The Compliance Officer is responsible for assessing the effectiveness of the measures taken under this internal regulation to identify, prevent and manage conflicts of interest. The Compliance Officer will assess:

20.1.1 at least once a year, if no conflict of interest has been identified in the last year; or

20.1.2 always no later than one month after the identification of the conflict of interest and its effective resolution.

20.2 The Compliance Officer shall prepare a written report on the assessment of the effectiveness of the measures taken, which shall be submitted to the Company's executives for discussion. The Company's executives may decide that the Compliance Officer's report shall be discussed at the next general meeting of the Company, especially in cases where the Compliance Officer assesses the measures taken as insufficient or ineffective.

20.3 In the evaluation report, the Compliance Officer will assess in particular:

20.3.1 the number and frequency of occurrence of conflicts of interest;

20.3.2 what measures have been taken to manage conflicts of interest, and in the event of the existence of multiple conflicts of interest in the period under review, the number of measures taken will also be assessed and compared;

20.3.3 the areas of the Company's activities from which the conflict of interest arose;

20.3.4 the time required to manage conflicts of interest, both for each identified conflict of interest individually and on average for all conflicts of interest;

20.3.5 whether and how the identified conflict of interest affected the Company's activities;

20.3.6 whether and how the identified conflict of interest affected the Company's clients;

20.4 The Compliance Officer's evaluation report, following the assessment, contains a conclusion according to which:

20.4.1 the measures currently taken are sufficiently effective and no adjustment is necessary;

20.4.2 the currently adopted measures are partially effective and therefore measures need to be taken to make them more effective and/or further measures need to be taken; or

20.4.3 The current measures are not effective and new measures need to be taken.

## 21 PROCEDURE FOR ELIMINATING DEFICIENCIES

21.1 If the Compliance Officer's report contains a conclusion that the currently adopted measures are not effective and new measures need to be taken, the Company is obliged to proceed without undue delay to revise this internal regulation and propose new effective and efficient measures for managing conflicts of interest.

21.2 The CEO is responsible for proposing new measures to manage conflicts of interest. In such cases, the CEO will request a recommendation from the Compliance Officer with a proposal for adopting new measures. If the CEO deems it necessary, he may also request recommendations from external advisors to the Company.

21.3 The CEO proceeds as follows to eliminate the identified deficiencies:

21.3.1 will review the Compliance Officer's proposal to adopt new measures;

21.3.2 shall familiarize himself with the proposal of the external advisor for the adoption of new measures, if he has requested such proposals from the external advisor;

21.3.3 compares the proposals of the Compliance Officer and the proposals of the external advisor, if requested, and determines whether they are the same or different proposals;

21.3.4 evaluates whether the proposed measures have already been applied by the Company in the past and whether these have been assessed as insufficient;

21.3.5 assess whether the proposed measures are in compliance with applicable legal regulations; and

21.3.6 decides on the adoption of new measures.

21.4 When deciding whether to adopt new measures, the CEO will consider the following criteria:

21.4.1 the complexity (technical and administrative) associated with the implementation of new measures;

21.4.2 costs associated with adopting new measures;

21.4.3 the expected effectiveness of the new measures; and

21.4.4 the effectiveness of monitoring the proposed measures.

## 22 RECORDING THE REMEDY FOR AN IDENTIFIED CONFLICT OF INTEREST AND INFORMING THE CLIENT

22.1 In the event of a conflict of interest being identified, the Compliance Officer shall record the method of its correction according to the template specified in Annex No. 4 to this internal regulation.

22.2 If the identified conflict of interest has had any material impact on the Company's client, the Compliance Officer shall inform the client of the identified conflict of interest without undue delay by e-mail sent to the client's e-mail address. The Compliance Officer shall subsequently inform the client in the same manner of the measures taken to remedy the identified conflict of interest.

## 23 SPECIAL PROVISIONS

23.1 Violation of the provisions of this internal regulation by the Company's employees is a serious violation of work discipline. The Company will strongly punish such violations, with the proviso that violation of this internal regulation may lead to immediate termination of employment by the Company pursuant to the provisions of Section 68, paragraph 1, letter b) of Act No. 311/2001 Coll., the Labor Code, as amended.

## 24 RECORD KEEPING

24.1 The Company is obliged to keep records of all activities, events and activities under this internal regulation, in accordance with the Company's internal regulation on record keeping.

## 25 CONTROL

25.1 The Compliance Officer monitors compliance with the obligations set out in this internal regulation.

25.2 The COO shall monitor compliance with the obligations set out in this internal regulation, which are fulfilled by the Compliance Officer.

25.3 If the Compliance Officer, within the scope of his/her competence, discovers any violation of this internal regulation, he/she shall inform the Company's executives without undue delay.

## 26 RESPONSIBILITY

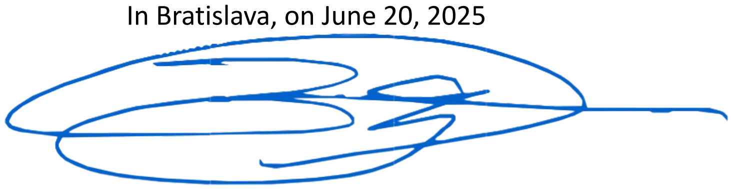
26.1 The Compliance Officer is responsible for fulfilling the obligations under this internal regulation. This is without prejudice to any provisions of this internal regulation that specifically assign a specific responsibility to another function within the Company.

## 27 FINAL PROVISIONS

27.1 This internal regulation was approved by the decision of the directors on June 20, 2025, and it enters into force on that date.

27.2 This internal regulation shall enter into force on the date of the decision of the National Bank of Slovakia granting the Company a license to provide crypto-asset services.

In Bratislava, on June 20, 2025



**Okazio s.r.o.**
Martin Bittara, Managing Director

**ANNEX No. 1**
**DECLARATION OF THE AUTHORIZED PERSON**

[identification of the Authorized Person](hereinafter referred to as "**Authorized person**"), having the following relationship to the company Okazio s.r.o., with its registered office at Bottova 2A, Bratislava - Staré Mesto district 811 09, Company ID 54 724 732, registered in the Commercial Register of the Municipal Court Bratislava III, Section Sro, Insert No. 163835/B (hereinafter referred to as "**Company**“): [identification of the contractual relationship between the Company and the Authorized Person and, where applicable, the function or job position performed by the Authorized Person on the basis of this contractual relationship](hereinafter referred to as "**Mandate**“)

**hereby solemnly declares that:**

**(1) in relation to conflicts of interest:**

☐ is not aware of any conflict of interest between her and the Company or related to the performance of the Mandate for the Company;

☐ records the following conflicts of interest between itself and the Company, or related to the performance of the Mandate for the Company:

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The Authorized Person makes the above declaration after familiarizing himself with the Company's internal regulations on measures to prevent and manage conflicts of interest.

**(2) in relation to the Company's internal regulations:**

- has become familiar with all internal regulations of the Company, including the Company's internal regulation on measures to prevent and manage conflicts of interest and the Company's organizational rules, and is aware of the obligations arising from these internal regulations and undertakes to comply with them; and
- acknowledges that a violation of the provisions of the internal regulation on measures to prevent and manage conflicts of interest by the Company's employees is a serious violation of work discipline, which may lead to immediate termination of employment by the Company pursuant to the provisions of Section 68, paragraph 1, letter b) of Act No. 311/2001 Coll., the Labor Code, as amended.

**(3) in relation to your other employment or commercial obligations:**

- is in an employment relationship or performs an agreement on work outside of an employment relationship with the following entities (*full identification data is provided, including ID number*):

- acts as a statutory body or a member of a statutory body or as a member of the supervisory body in the following entities (*full identification data is provided, including ID number*):

- carries out the following business activities:

**(4) in relation to any changes to the statement set out herein:**

- In the event of changes to any of the facts set forth in this declaration, the Authorized Person undertakes to inform the Company's compliance department in writing of such changes without undue delay and to confirm such changes in writing.

In ___________________ on ___________________

_______________________

*(Signature of Authorized Person)*

**ANNEX No. 2**

**LIST OF CLOSE PERSONS OF MEMBERS OF THE BOARD OF DIRECTORS, SUPERVISORY BOARD AND EMPLOYEES OF THE COMPANY**

| Identification of a specific member of the body or employee of the Company | Position held in the Company | Identification of his loved one | Notes (relevant to potential conflicts of interest, e.g. employment of a close person) |
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**ANNEX No. 3**

**REGISTER OF IDENTIFIED CONFLICT OF INTEREST**

| Definition of conflict of interest | Detection from | Identification of the Authorized Person, Connected Person and/or client to whom the conflict relates | Notes (relevant to potential conflict of interest) | Measures taken, including the date of their adoption |
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**ANNEX No. 4**

**REGISTER OF REMEDIES IMPLEMENTED FOR DETECTED CONFLICTS OF INTEREST**

| Definition of a conflict of interest, including identification of the Authorized Person, Connected Person and/or client to whom the conflict relates | Detection from | Measures taken, including the date of their adoption | Person responsible for correction | Date of implementation of the correction | Verification of the effectiveness of the measures taken (ex post) |
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