

Information on Conflicts of Interest

This document provides a detailed disclosure of the general nature and sources of conflicts of interest as specified in Article 72 of MiCAR, together with the specific measures AMINA (Austria) AG (“AMINA EU”) has implemented to identify, prevent, manage, and mitigate such conflicts.

Conflicts of interest exist as soon as personal, professional, political, economic, or other interests of AMINA EU and its connected persons (including clients, shareholders, employees, members of the management body, group members or other (affiliated) companies) could impair or appear to impair the impartial, objective, and fair execution of responsibilities of AMINA EU, resulting in a potential benefit for AMINA EU or its connected persons at the expense of AMINA EU itself, its clients, or its business partners.

AMINA EU is committed to proactively identifying, avoiding, and - where unavoidable - minimizing any potential conflicts of interest across all aspects of its business.

1. Potential Conflicts of Interests in general

Potential Conflicts of Interest could arise between AMINA EU and their clients, between AMINA EU and its shareholders, between AMINA EU and the management board, between AMINA EU and its employees, between the client and an AMINA group member and between the clients themselves.

For a detailed description: see section 3.

2. Information on the measures to prevent conflicts of interests

In alignment with applicable legal and regulatory requirements, AMINA EU — including its management board and all employees — commits to conduct all business activities lawfully, diligently, and with integrity, prioritizing the best interests of its clients. The purpose of these provisions is to systematically identify potential or actual conflicts of interest at the earliest possible stage, prevent their occurrence wherever feasible, and to provide clear and timely disclosure to affected clients and partners if avoidance is not possible.

AMINA EU has implemented preventive and mitigating measures tailored to its organizational structure, business profile, and operational complexity. These measures are under-pinned by robust internal guidelines and detailed procedures that are consistently monitored and reviewed by the Compliance Department — at minimum once per year and additionally on an ad hoc basis as circumstances demand.

The above measures include, but are not limited to:

- Immediate identification and reporting: Employees are obliged to promptly report any actual or potential conflict of interest through established internal communication channels to their line manager and the Compliance Department.

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- Regular training: All employees undergo annual training to raise awareness about conflicts of interest and updates to internal procedures.
- Information barriers ("Chinese Walls"): Sensitive/confidential information is strictly separated and shared only on a need-to-know basis between teams and functions to prevent misuse or insider dealing.

For this purpose AMINA EU maintains at all times proper and adequate "Chinese Walls" in order to avoid any actual, apparent and potential conflicts of interest, including and not limited to:

- Segregation of accounts: Customer funds and accounts - even discretionary accounts - are strictly kept separate from the proprietary accounts and employees' personal accounts.
- Sensitive information controls: Access to price-sensitive information related to corporate finance matters (such as initial coin offerings or takeovers, mergers and other M&A activity) is restricted to employees in relevant departments; it is only shared beyond those teams on a need-to-know basis.
- Managing multiple regulated activities: AMINA EU (and its group companies) implements procedures to address conflicts that may arise from conducting more than one type of regulated activity or business concurrently.
- Internal Arrangements preventing Misuse of Information including the principle of client order priority and the prohibition to misuse the position, company assets and classified information for personal gain.
- Division of roles/tasks and separate oversight: Dual roles that could cause conflicts are avoided; and activities or transactions that could conflict are assigned to different people to maintain objectivity, e.g. request the withdrawal of cryptos from a cold wallet and executing the request. Connected persons serving clients with potentially conflicting interests are supervised separately by the Compliance Department.
- Remuneration policy with clear guidelines for employee compensation, ensuring that there are no direct links between the pay of employees, delegatees, or out-sources or members of the management body in different roles where a conflict could arise.
- Separate regulations for personal transactions by employees, including for example
 - Strict Controls: All personal and related-account transactions require pre-clearance and active monitoring. Insider dealing, front-running, and trades creating unfair advantage are prohibited. Trades must only occur at equivalent, market-standard terms.

- Mandatory Disclosure & Monitoring: Employees must disclose their personal and related accounts to the Compliance Department. Any personal transaction must be promptly reported.
- Trading Restrictions: Employees should generally execute trades in digital assets via AMINA EU; consent is required for external accounts, with confirmation records provided. Trading around client transactions or recommendations is restricted.
- Independent remuneration: Compensation structures are designed to avoid influencing decisions improperly.
- Independence in Asset Distribution: When AMINA EU presents itself as independent in the distribution of digital assets, it does not accept any fees, commissions, or monetary/non-monetary benefits from issuers or third parties that could impair independence or favour specific digital assets or issuers.
- Rebates, Soft Dollars, and Related Practices: Any rebates or soft dollar benefits are only accepted with prior written client consent, clear disclosure, and provided such products/services demonstrably benefit the client. Brokerage rates must be market standard, not excessive, and all practices are documented and disclosed to the client at least annually, including the quantification of the value of rebates received in relation to the client's account.
- Conduct with Counterparties: For gifts and entertainment there are strict limits in value. Employees are not allowed to accept loans or are not advised to engage in frequent gambling with business counterparts.
- Management body responsibilities: Board members must immediately disclose actual or potential conflicts and refrain from related decisions; leadership roles in competing companies are prohibited.

3. Disclosure of Conflicts of Interests

In some cases, conflicts of interest may be unavoidable. In such cases, AMINA EU will inform clients about the conflict of interest and disclose it accordingly. It is then at the discretion of the clients whether they wish to proceed with the transaction despite the conflict. The disclosure of conflicts of interest is to be understood as a last resort and should not serve as an alternative to conflict of interest management measures. Possible conflicts of interest are disclosed below.

The following potential conflicts of interest are disclosed by AMINA EU.

3.1 Potential conflict of interest in connection with trading suspension

This potential conflict of interest arises between the client and AMINA EU as AMINA EU has the authority to suspend trading of certain crypto assets. Given its financial interest in these assets, there is a risk that trading suspensions may be influenced by AMINA EU's own exposure, rather than solely by market conditions or the best interests of clients. This could allow AMINA EU to minimize risks while clients are unable to trade, potentially leading to less favourable outcomes for them once trading resumes. A further conflict may arise if AMINA EU suspends trading for a longer period of time in order to avoid a financial loss, which could result in a financial loss for the client

3.2 Potential conflict of interest situation in connection with own products

This potential conflict of interest situation may arise between the client and AMINA EU in relation to AMINA EU issuing, promoting, or trading in crypto assets for which it also provides services, such as custody, execution of orders. This creates a situation where AMINA EU may have a financial interest that conflicts with its duty to act in the best interests of the client. In such cases, there is a risk that AMINA EU may prioritize its own products or those of affiliated entities over others, potentially leading to biased promotion of its own products.

3.3 Potential conflict of interest situation in connection with remuneration

This potential conflict of interest situation arises between the client and AMINA EU in relation to the remuneration of employees. Specifically, employees of certain departments may receive remuneration, such as bonuses or commissions, that are linked to the promotion, sale, or recommendation of certain products or services, including those issued or affiliated with AMINA EU. This may create a conflict where AMINA EU or its employees are financially incentivized to promote specific products, even when they may not align fully with the client's best interests.

3.4 Potential conflict of interest situation in relation to financial incentives of token projects.

This potential conflict of interest arises between the client and AMINA EU in relation to all forms of financial incentives that AMINA EU may receive from third parties. Specifically, AMINA EU may receive payments, cost sharings, rebates, or other financial benefits from third-party service providers, partners, or affiliates in exchange for listing specific crypto assets or related services. This may create a conflict where AMINA EU is incentivized to promote products or services based on financial gain, rather than the best interests of the client.

3.5 Potential conflict of interest situation in relation to trading incentives

This potential conflict of interest arises between the client and AMINA EU in relation to trading incentives provided to AMINA EU. Specifically, AMINA EU may earn money based on the volume or frequency of trades of clients. The final decision to trade therefore always lies with the client and AMINA EU gives no investment advice and takes no investment decisions on behalf of a client, a fact which significantly reduces this conflict. In addition, there is a strict coin selection process that AMINA EU adheres to in its selection of relevant coins to list and trade and this reduces the risk that AMINA EU may be motivated by highly volatile or 'trending' assets (e.g. those 'hyped by the market', meme coins) to further reduce this potential conflict.

3.6 Potential conflict of interest situation in connection with AMINA EU operating as a member of a group

This potential conflict of interest arises between the client and AMINA EU due to AMINA EU operating as a member of a corporate group. Conflict of interests are primarily driven by the complex interrelationships and overlapping business activities within the group, which may lead to biased decision-making, preferential treatment of group entities, and a potential lack of transparency in service provision, e.g. with which entity the contract is signed. Although AMINA EU tries to ensure clarity, such a situation can't completely be ruled out. Such conflicts may lead to recommendations or decisions that prioritize the interests of related entities within the group over the best interests of the client. This could result in less favorable outcomes for the client, such as suboptimal pricing, higher costs, or limited access to alternative products and services.

3.7 Potential conflict of interest situations in connection with AMINA EU acting as the counterparty to client trades

This potential conflict of interest arises from the fact that clients are trading directly against AMINA EU, which acts as the counterparty in these transactions. In such situations, AMINA EU is not only facilitating the trades but also taking an opposing position to its clients for a certain time by holding or acquiring crypto assets for its own account until it is hedged. Although this is within the nature of the "exchange service" it might create a conflict where AMINA EU may have financial incentives that could influence its behavior in a manner that is not aligned with the best interests of the client.

3.8 Potential conflicts of interest related to AMINA EU's exercisable rights

This potential conflict of interest exists between the client and AMINA EU. The conflict is that AMINA EU can choose to some extent to exercise the exercisable rights regarding crypto assets (e.g. forks, airdrops, changes etc). Although AMINA EU tries to ensure to cover all such cases in the best interest of clients it can't be ruled out that a situation occurs, where one or - based on an ex-post view - even all clients are worse off due to the decision made within this process.

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