Conflict of Interest Management Information

MP Developers s.r.o.

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1 Introduction and Purpose of the Document

In this document, MP Developers s.r.o. (hereinafter referred to as the "**Provider**") informs Clients about the general nature of the sources of conflicts of interest and the steps taken to mitigate them, in accordance with Article 72(2) of the Regulation.

The terms used in this Conflict of Interest Management Information have the meanings defined in the Anycoin Platform Terms and Conditions (hereinafter referred to as the "**Terms and Conditions**") and the Platform Services Agreement (hereinafter referred to as the "**Platform Services Agreement**").

The Provider has adopted comprehensive policies and procedures to address conflicts of interest in the course of its activities, particularly in connection with the provision of Exchange and Execution of Orders, including their identification, prevention, management, and disclosure.

The Provider shall review the measures adopted in connection with conflict of interest management at least once a year and, where appropriate, shall take suitable and proportionate organisational or control measures and update this document.

2 Definition of Conflict of Interest

Conflicts of interest are situations that arise or may arise between the Provider and a connected person, in particular its:

a) employees and any other person involved in the provision of Services by the Provider, including persons involved in the provision of services by the Provider on the basis of an outsourcing agreement, or persons who are directly or indirectly connected with the Provider or with these persons by means of control,
b) members of the governing body and shareholders,
c) between Clients, if their interests differ (hereinafter collectively referred to as "**Connected Persons**")

and which may affect the personal or professional interest of Connected Persons, the interest of the Provider, or which represent or may represent a risk of harm to the interests of Clients.

3 Basic requirements for identifying, preventing and managing conflicts of interest

To prevent or reduce the risk of conflicts of interest, the Provider has implemented and applies, in particular, the following measures:

a) an organisational structure has been established to ensure proper separation of employee competences between roles that are incompatible with each other,
b) an information barrier policy between individual organisational units is applied,
c) internal channels have been established through which employees and persons involved in the provision of services by the Provider based on an outsourcing agreement are informed about the principles of conflict of interest management, and through which these persons inform the Provider of any fact that leads or could lead to a conflict of interest,
d) the "four eyes" principle is complied with,
e) multi-level decision-making mechanisms have been established, with selected matters being discussed at the level of a collective body,
f) the general preventive duty is applied, consisting of preventing, identifying and managing conflicts of interest rather than complying with the requirement to disclose them,
g) independent control is ensured through continuous supervision by the compliance department, the risk management department and independent control by internal audit,

h) rules for personal trades with crypto-assets by employees and persons involved in the provision of services by the Provider based on an outsourcing agreement have been established,
i) Client Orders are executed and/or settled based on the time priority of individual Orders,
j) the Client's crypto-assets and funds are stored, recorded and managed separately from the Provider's own crypto-assets and funds, ensuring the protection of Client's ownership rights and preventing the use of crypto assets and funds for the Provider's own account through a combination of appropriate measures,
k) organisational and technical measures have been implemented to prevent possible misuse of information related to Orders and Client Transactions,
l) before entering into a contractual relationship with a third-party Provider and during the course of the contractual relationship, the risks associated with a potential conflict of interest are assessed.

In cases where a conflict of interest between the Provider and the Client cannot be avoided, the Provider shall always prioritise the interests of the Client over its own interests. If a conflict of interest arises between Clients, the Provider shall ensure that these Clients are treated fairly. In such cases, the Provider will act in accordance with internal regulations governing the rules for conflict of interest management and in line with the recommendations of the compliance department. The Provider shall inform the affected Clients of any such conflict of interest and indicate what measures have been taken to ensure fair treatment.

Should a conflict of interest be identified between Clients prior to the provision of Services, the Provider reserves the right to refuse to provide the Services.

4 Description of situations that lead or may lead to a conflict of interest

Execution of Orders on the trading platform operated by the Provider

When providing Execution of Orders, the Provider carries out Client Orders on the trading platform that it operates, which creates a potential conflict of interest in that the Provider may favour its own trading platform over others, which could potentially better meet the criteria relevant for executing the Order under better conditions.

To properly manage this conflict of interest, the Provider has established criteria for selecting trading platforms on which it executes Client Orders, as well as criteria for selecting a trading platform as the venue for executing a specific Client Order, and informs Clients of these rules through the information document Summary of Rules for Executing Orders under the Best Conditions.

Trading on the trading platform operated by the Provider within the provision of Exchange

The Provider operates a trading platform and also provides Exchange, whereby a conflict of interest may arise due to the Provider trading on its own platform for its own account.

In order to manage any potential conflicts of interest, when providing the Exchange, the Provider acquires crypto-assets, which are used to execute the Order and conclude the transaction with the Client, beyond its own reserves, by purchasing the relevant crypto-asset on a third-party trading platform, or, where appropriate, through purchases and sales carried out outside regulated trading platforms.

The Provider does not acquire crypto-assets for its own account on the platform operated by it when providing the Exchange.