

Summary of Conflict of Interest Policy

Axiology

1 MANAGEMENT OF CONFLICT OF INTERESTS

For the management of conflicts of interest, Axiology DLT, UAB (“the Company”; “Axiology”) applies the principle of external information disclosure, i.e. discloses information to the Client about a possible conflict of interest. The decision that there is a basis for disclosing information about a conflict of interest to existing or potential Clients is made by the Company’s CCO.

In managing situations where there is a conflict of interest, the Company prioritizes the interests of the Client in all cases. In the provision of the services the Company ensures impartial treatment of the clients.

Conflict of interest cases must be handled by employees who are impartial, and where there is no family relationship with the clients or service provider, and where there is no other direct or indirect interest in the assignment.

2 GENERAL INFORMATION

Axiology is authorised to provide investment services in accordance with the regulatory requirements of the Republic of Lithuania and relevant EU legislation. Axiology is licensed as investment firm under Directive 2014/65/EU (MIFID II) by the Bank of Lithuania (License No. B, issued on 9 of July 2025) with a special permission to operate DLT trading and settlement system (DLT TSS) under Regulation (EU) 2022/858 (DLTR).

In addition, Axiology can provide investment services under MiFID II () for which it applied. Therefore with the license Axiology can provide all of the following services:

- Operation of trading venue MTF for the trading of DLT financial instruments
- Placing of financial instruments (both DLT and traditional)
- Safekeeping of financial instruments (both DLT and traditional)

Given the range of services and the structure of the Company and its potential business relationships, the provision of these services may give rise to conflicts of interest. Conflicts of interest may arise between different units, functions, or business lines within the Company; between the Company and its Clients; between employees, Management Board members, or their related parties; and between Axiology DLT and third parties connected directly or indirectly through ownership or contractual relationships.

To address and manage such situations, the Company has established and enforces a Conflict of Interest Policy (this “Policy”), which outlines the procedures for identifying, recording, managing, mitigating, and disclosing potential and actual conflicts of interest in accordance with the Law on Markets of Financial Instruments of the Republic of Lithuania and other applicable EU regulations.

This Policy ensures that all employees, including members of the Management Board, act with integrity and in the best interests of clients, and that any actual or potential conflicts are dealt with transparently and effectively, consistent with the Company's core principles and regulatory obligations.

3 SCOPE OF APPLICATION

The purpose of this Policy is to define and document Axiology arrangements for the identification, management, recording, monitoring, and disclosure of conflicts of interest in accordance with its regulatory obligations. The Company is committed to treating all Clients in a fair, transparent, and equitable manner.

This Policy applies to all employees, contract agents, senior management, and members of the Management Board, as well as any persons directly or indirectly connected to the Company through control or close association.

In order to manage conflict of interest, the Company has implemented the following measures:

- Identification of potential and actual conflicts of interest;
- Effective management and mitigation of such conflicts;
- Maintenance of internal records through the conflict of interest register;
- Ongoing monitoring and periodic review of identified risks and internal processes;
- Disclosure to Clients, where appropriate, of the nature, source, and potential impact of conflicts that have arisen in connection with the services provided.

Conflicts of interest may arise in various scenarios, including but not limited to:

- Between the Company (including its directors, senior management, employees, or any person directly

or indirectly linked to them by control) and a Client;

- Between two or more Clients of the Company;
- Between Axiology DLT and other entities within the same corporate group, where applicable.

The following situation may be an example of conflict of interest cases where the Company and connected person:

- is likely to make a financial gain, or avoid a financial loss, at the expense of the Client;
- has an interest in the outcome of a Service provided to the Client or of a transaction carried out on behalf of the Client, which is distinct from the Client's interest in that outcome;
- has a financial or other incentive to favour the interest of another Client or group of Clients over the interests of the Client;
- carries on the same business as the Client;
- receives or will receive from a person other than the Client an inducement in relation to a Service provided to the Client, in the form of monetary or non-monetary benefits or services.
- has an economic interest in a person that does business with the Company and (or) whose with interests conflicting with those of the Company. For the purpose of this economic interest is considered where a connected persons holds shares, tokens (including governance tokens), other ownership rights or membership in that person, body or entity; holds debt instruments of or has other debt arrangements with that person, body or entity; has any form of contractual arrangements
- management contracts, service contracts, delegation or outsourcing contract or intellectual property licenses, with that person, body or entity.
- has or has had within at least the last 3 years a personal relationship with a person, body or entity that does business with the Company, and / or whose interests conflict with those of the Company;
- has or has had within at least the last 3 years a professional relationship with a person, body or entity that does business with the Company, and / or whose interests conflict with those of the Company;
- has or has had during at least the last 3 years a political relationship with a person, body or entity that does business with the Company, and / or whose interests conflict with those of the Company;
- carries out conflicting tasks or activities, is entrusted with conflicting responsibilities or is hierarchically supervised by a person in charge of conflicting functions or tasks.

The nature of a conflict of interest shall be assessed on a case-by-case basis. Below is a non-exhaustive list of situations that could give rise to a conflict of interest:

- providing a wide range of investment and ancillary services. The Company provides a wide range of services to the clients, that may give rise to a conflict of interest between each other;
- investments of own funds in financial instruments related to the services provided. The Company may invest its own funds in financial instruments for which it offers services;
- remuneration. Conflicts of interest may arise if there is a direct link between the remuneration of employees in one area and the revenues of those in another. For example, when the salaries or payments for control and oversight functions is tied to the revenues generated by persons who take investment decisions, or if employees' pay is entirely performance-based thus encouraging excessive risk-taking;
- employee's conflict of interest. Where an employee is considering an employment with other entities that the Company has business relationships;
- employee's external roles. A conflict of interest may arise if an employee is considering taking up an external role, either through employment or by being a member of another organization;
- gifts and hospitality. Gifts, inducements, or other forms of hospitality may introduce bias, potentially causing the Company's employees or directors to favor one service provider over another, to the detriment or disadvantage of the client's interests;
- personal trading. Employees, or members of the Management Board may face a conflict of interest if they invest/hold in the same financial instruments for which the company provides services;

- capital participation or personal interest of interested party in entity which externally supplies services to the Company, including any entity which was entrusted by the Company to provide services or activities,
- case when the interested party is a member of governing body or other bodies or committees of entity, which externally supplies services used by the Company, or is using services provided by the Company.
- case where an employee economic interest in any entity that pays fees to the Company as a client, e.g. a broker. An employee may show preferential treatment to a Client in which they have an economic interest.
- the Company is owned by its shareholders, some of which may be important Business Partners, such as members of its market centers and issuers admitted to listing/trading on its markets
- the Company is required to operate its markets, regulated or not, in a fair and orderly manner and, to achieve this objective, is obligated in various countries in which it operates markets to perform regulatory functions and take disciplinary measures against its Business Partners, members or issuers;
- there may be sharing between business units of customer information, trade data or other knowledge that should remain segregated.

In addition to requirements set out in this Policy a member of Management Board shall abstain from voting where the member may have a conflict of interest or where the member's objectivity or ability to properly fulfil duties to the Company may be otherwise compromised.

This Policy ensures that any such conflicts are managed in accordance with applicable laws and regulations, with the objective of preserving the integrity of the Company's operations and safeguarding the interests of its Clients.

4 IDENTIFICATION OF CONFLICT OF INTEREST

All employees, including members of senior management and the Management Board of are required to ensure that actual, potential, or perceived conflicts of interest are promptly identified in the course of conducting business activities.

Conflicts of interest may arise during the normal course of operations, and not only as a result of significant events such as:

- the onboarding of new Clients;
- the launch of new services;
- or the engagement of new service providers.

As part of the Client onboarding process, the assessment of potential conflicts of interest must be carried out before entering into a service agreement or signing any contractual documentation. If such an assessment identifies a conflict that cannot be adequately mitigated, the Company must decline to provide services to that Client.

Employees and members of senior management are required to exercise ongoing vigilance and professional judgment in proactively identifying conflicts of interest that may arise in the course of day-to-day business activities. In line with applicable regulatory requirements, the Company must assess whether it, a relevant person, or any individual directly or indirectly connected through control.

All newly identified conflicts of interest must be immediately reported to the employee's line manager and the Chief Compliance Officer (CCO). Identified conflicts must also be recorded in accordance with the procedures outlined in the Record Keeping section of this Policy.

5 MANAGING

When a conflict of interest is identified, the Company shall implement appropriate measures to ensure a sufficient degree of independence between relevant persons and business units, taking into account the size and complexity of the Company's operations and the potential risk of harm to Client interests.

To effectively manage conflicts of interest, the Company has implemented a clear corporate governance framework with well-defined roles, responsibilities, and reporting lines designed to reduce potential conflicts and restrict unnecessary information flow between business units. Senior Management and the Management Board are responsible for regularly reviewing the Company's organisational structure, particularly when launching new

business lines or activities, to ensure that conflict risks remain minimized.

The Company also enforces strict information barriers to safeguard confidentiality in business partner relationships. Employees performing business or compliance functions must preserve the confidentiality of sensitive information, using measures such as restrictions on electronic communications, access controls, information security protocols, inter-departmental communication restrictions, and contractual confidentiality obligations.

Where potential conflicts may be inherent in the operation of the Company's Multilateral Trading Facility (MTF), the Company may establish rules - subject to regulatory approval - that transparently address and mitigate such conflicts (e.g., rebate structures for qualifying liquidity providers). Furthermore, the Company's remuneration and incentive system is designed to prevent financial incentives that could give rise to conflicts of interest, and is governed by a separate Remuneration Policy approved by the Management Board. In complex or exceptional situations - such as a conflict involving the Chief Compliance Officer (CCO) - the Company may seek external advice (e.g., legal or audit opinions) to determine the appropriate course of action, with the final decision made by the Risk Committee.

The Company manages conflicts of interest by implementing effective information barriers (such as Chinese Walls), ensuring separate supervision of individuals with potentially conflicting responsibilities, maintaining remuneration policies that eliminate direct links between pay and conflicting activities, preventing undue influence over decision-making, and enforcing functional separation to avoid simultaneous or sequential involvement in roles where such overlap could impair conflict management.

These measures are assessed and reviewed periodically to ensure their continued effectiveness in safeguarding the interests of the Company's Clients and maintaining regulatory compliance.

6 RECORD KEEPING

All newly identified or modified actual or potential conflicts of interest must be immediately reported by the employee or relevant person to their line manager and the Chief Compliance Officer (CCO). Upon review and assessment by the CCO and, where necessary, the Management Board or Risk Committee, the conflict must be formally recorded in the Company's Conflict of Interest Register of Axiology.

Each entry in the register must include:

- A clear and concise summary of the actual or potential conflict identified;
- A description of the mitigating measures and internal controls applied to address or manage the conflict;

An assessment by the CCO and/or Senior Management indicating whether the conflict is:

- Adequately mitigated by the controls in place, or
- Not effectively manageable, in which case a record of the disclosure made to affected Clients must be included.

7 ONGOING REVIEW AND INTERNAL REPORTING

A formal review of the Conflict of Interest Register is conducted annually by the Chief Compliance Officer (CCO). This review includes a comprehensive evaluation of all previously recorded actual and potential conflicts of interest to:

- Assess the continued relevance of each entry;
- Verify the effectiveness of applied mitigation measures;
- Amend entries where necessary based on changes in services, business relationships, regulatory guidance, or internal risk assessments.

Documentation and supporting evidence of the review process shall be retained in accordance with internal record-keeping procedures.

Following the annual review, the updated Conflict of Interest Register shall be submitted to the Management Board for review and formal approval.

In addition to the annual review, conflict-related Management Information (MI), including all updates to the Conflict of Interest Register (i.e. new entries, amendments, or removals), shall be tabled at each regular meeting

of the Management Board. This ensures the Board remains informed of all relevant developments in the Company's conflict of interest landscape.

The CCO may consult with relevant control functions - including Risk, Internal Audit - as needed to support the assessment and ongoing monitoring of conflicts. Group Compliance will provide support as required in both the annual review process and ongoing updates to the Register.

8 REPORTING OF CONFLICTS TO CLIENTS

In addition to internal reporting requirements, the Company is obligated to disclose to Clients any situations where the organisational and administrative arrangements implemented are not sufficient to ensure, with reasonable confidence, that the risk of damage to the Client's interests can be prevented.

In such cases, the Company shall provide the Client with a clear and detailed disclosure in a durable medium before delivering any services. This disclosure will describe the specific nature and source of the conflict of interest, explain the associated risks to the Client, outline the measures taken to mitigate those risks, and clearly state that the Company's current arrangements may not be sufficient to fully safeguard the Client's interests.

The level of detail included in the disclosure must be sufficient to enable the Client to make an informed decision regarding whether to proceed with the service under the identified conflict.

The Chief Compliance Officer (CCO) is responsible for ensuring that:

- The conflict is properly recorded in the Conflict of Interest Register;
- Affected Clients are notified in a timely and transparent manner; and
- Re-disclosure is conducted, where applicable, following the annual conflict review process.

If a conflict of interest cannot be appropriately managed, and poses material risk to the Client, the Company may decide to decline or cease the provision of services to that Client, in line with the provisions of this Policy.

9 CONFLICT OF INTEREST IN PLACING SERVICES

This section applies when the Company provides placing services - for example, helping issuers to offer financial instruments to investors. It also covers cases where the Company is involved in pricing the offer, executing orders, or placing financial instruments that are issued by the Company itself or by another entity within the same group.

To manage and prevent conflicts of interest in these situations, the Company ensures that:

- The pricing of the offer is fair and does not favour the interests of the Company, its other clients, or any related parties over those of the issuer client;
- At the same time, pricing must not unfairly favour the issuer client at the expense of the Company's other clients;
- Individuals responsible for providing investment services or making product recommendations are not involved in pricing decisions for the issuer client;
- There are no direct or indirect links between the success of a placing activity and the remuneration of employees in other departments or business lines;
- Recommendations given to clients, whether initiated by the client or the Company, are free from improper influence from existing or potential business relationships;
- Employees providing services to investment clients are not involved in making allocation recommendations to issuer clients.

To maintain transparency and oversight, the Company keeps a placing operations register, which logs the date when potential placing activities are first identified. The Chief Compliance Officer (CCO) is responsible for maintaining this register. All employees involved in placing services must inform the CCO of any actual or potential placing activities as soon as they arise.

10 FINAL PROVISIONS

This Policy shall be reviewed by Axiology DLT, UAB on an annual basis, or more frequently if required due to changes in regulatory requirements, internal organisational structure, or business operations.

For more information, please contact Axiology by email info@axiology.xyz or Compliance Team by an email compliance@axiology.xyz.