Conflict of Interest Policy Statement

Introduction

At CoinCorner, we are committed to upholding the highest standards of integrity. The objective of the Policy is to ensure that conflicts of interest within CoinCorner are identified, managed appropriately and disclosed where necessary.

Periodic Review

This policy will be reviewed by the board annually.

Policy Statement

This policy governs situations where the firm or its personnel may have actual or potential interests that could influence the objective performance of their obligations to clients or the company. A conflict of interest is a situation in which a firm finds itself in a position where commercial or personal interests conflict with the duty owed to its clients, or one in which the firm's duty to one client conflicts with its duty to another.

Disclosure

All employees must disclose potential conflicts in writing, including outside business activities, financial relationships, or personal interests affecting their ability to act in the best interests of clients or the company. Disclosures are recorded in the firm's conflicts register.

Where CoinCorner considers that the arrangements in place to manage potential and/or actual conflicts of interest are not sufficient to avoid material risk of damage to a client's interest, CoinCorner will disclose the general nature and/or sources of the conflict of interest to the client before undertaking any business for the client.

<u>Actual & Potential Conflicts</u>

CoinCorner Virtual Assets Broker & Dealer Services L.L.C has not identified any actual or potential conflicts of interest arising out of the activities it carries out.

Managing Conflicts of Interest

CoinCorner has established procedures which are designed to identify and manage conflicts of interests. CoinCorner adopts several approaches to manage conflicts of interest including, but not limited to:

- Segregation of duties for persons engaged in different business activities.
- Personal account dealing restrictions applicable to all staff.
- Gifts and personal benefits processes including a gift register recording the solicitation, offer or receipt of certain benefits.
- Board disclosure and reporting obligations and controls.
- External directorship & outside business interests' processes, including the requirement for all external directorships and outside business interests to be declared.
- Training employees of CoinCorner on conflicts of interest management.

Training

All employees receive training on identifying and managing conflicts of interest.

Implementation

Implementation is the responsibility of the board of directors.

CoinCorner Virtual Assets Broker & Dealer Services LLC Conflict of Interest Policy statement 1st August 2024.