

## CONFLICT OF INTEREST POLICY

**FUMBI, s. r. o.** is a limited liability company, Company Identification Number (IČO): 55 651 232, having its registered office at Suché Mýto 6, Bratislava – Staré Mesto District, 811 03, Slovak Republic, entered in the Commercial Register maintained by the City Court Bratislava III, Section: Sro, File No.: 177108/B, LEI Code: 097900CAKA0000269926, which was established, incorporated and conducts its business in accordance with the legal regulations in force in the Slovak Republic (hereinafter referred to as “**FUMBI**”).

Contact details for obtaining information:

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**FUMBI** provides crypto-asset services on the basis of a decision of the National Bank of Slovakia dated 17 December 2025, which became final and effective on 17 December 2025, and which was issued pursuant to 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. The National Bank of Slovakia, having its registered office at Imricha Karvaša 1, Bratislava – Staré Mesto District, 813 25, exercises supervision over **FUMBI** in connection with the provision of crypto-asset services.

### 1. DEFINITION OF CONFLICTS OF INTEREST. IDENTIFICATION OF SITUATIONS WITH A POTENTIAL CONFLICT OF INTEREST.

**FUMBI** has adopted all reasonable measures in the form of work procedures, procedures in management activities, control activities and other activities necessary to identify a conflict of interest, to prevent it or to manage it, in cases:

- where **the interest** of **FUMBI**, of persons who directly or indirectly control **FUMBI**, of members of the management body of **FUMBI**, or of **FUMBI** employees (relevant persons), **may come / comes into conflict with FUMBI’s obligations towards clients** (where such obligations may arise from a contractual relationship or from legal regulations);
  - where a **conflict of interest arises between several clients towards each other**, towards whom **FUMBI** has contractual obligations or statutory obligations;
- and which arise in the provision of crypto-asset services.

If, in the provision of crypto-asset services, a conflict of interest cannot be avoided, the nature and source of the conflict of interest must be disclosed to the client prior to the provision of the service and, when providing the service, the client’s interests must be prioritised over **FUMBI**’s own interests and, in the case of conflicts of interest between clients, equal and fair treatment of all clients must be ensured. Disclosure of a conflict of interest is a measure of last resort, which is used only when organisational and administrative measures to prevent conflicts of interest or to address them are not sufficient to ensure, with a reasonable level of confidence, that the risks of damage to the client’s interests will be prevented.

For the purpose of identifying conflicts of interest that arise in the course of the provision of crypto-asset services and the existence of which may harm the client’s interests, **FUMBI**, using the minimum criteria, takes into account whether **FUMBI** or the relevant persons are in any of the situations listed below, whether as a result of the provision of crypto-asset services or otherwise:

- **FUMBI** or a relevant person could achieve a gain or avoid a loss at the expense of the client;
- **FUMBI** or a relevant person has an interest in the outcome of the crypto-asset service provided and that interest is different from the client’s interest in that outcome;

- FUMBI or a relevant person has any incentive to favour the interest of one client or group of clients over the interests of other clients;
- FUMBI or a relevant person receives or will receive, in connection with the provision of crypto-asset services, a benefit in any form from a person who is not a client, which is not a customary commission or fee for that service.

FUMBI has established, implements and maintains an effective conflict of interest policy in written form, which includes, inter alia:

- defined circumstances which constitute a conflict of interest or may give rise to a conflict of interest which entails a risk of harm to the interests of one or more clients;
- defined procedures to be followed and measures adopted in order to prevent conflicts of interest or to address them.

## **2. MEASURES TO PREVENT / MANAGE CONFLICTS OF INTEREST.**

The procedures and measures in the conflict of interest policy are designed so as to ensure that relevant persons carrying out various business activities that constitute a conflict of interest carry out those activities independently.

In order to achieve the required degree of independence, FUMBI has also adopted the following measures in order to manage conflicts of interest:

- measures to prevent or control the flow and exchange of information between persons engaged in activities which involve a risk of a conflict of interest (where the exchange of such information could harm the interests of one or more clients);
- measures aimed at specific supervision of employees who provide advice on crypto-assets to clients and communicate with clients, and whose interests may conflict with the interests of clients or who represent other interests, including the interests of FUMBI, which may conflict with the interests of the client;
- measures aimed at eliminating any direct link between the remuneration of employees who mainly carry out one activity and the remuneration or income of other employees who mainly carry out another activity, where a conflict of interest may arise from the relationship between those activities;
- measures to ensure that remuneration of employees is not applied in a manner that is contrary to the obligation to act in the best interests;
- measures that prevent any person from unduly influencing the manner in which an employee performs their job duties in the provision of crypto-asset services, or that restrict such influence;
- measures to prevent or control an employee's simultaneous or sequential involvement in the provision of services, where such involvement could harm the proper management of conflicts of interest.

## **3. DISCLOSURE OF CONFLICTS OF INTEREST.**

If the measures adopted by FUMBI are not sufficient to prevent the risk of harm to clients' interests, FUMBI shall disclose, in a prominent place on its website, the general nature and sources of conflicts of interest and the steps taken to mitigate them. The disclosure will be recorded in an electronic format and must be sufficiently detailed, taking into account the nature of each client, to enable each client to make an informed decision on the crypto-asset service in connection with which the conflicts of interest arise.

## **4. FINAL INFORMATION.**

FUMBI assesses and, at least once a year, regularly reviews the conflict of interest policy and adopts appropriate measures to address any deficiencies.

FUMBI shall provide the client, upon request, with further detailed information on the conflict of interest policy.