

GENERAL DISCLOSURE AND SOURCES OF CONFLICTS OF INTEREST

1 INTRODUCTORY PROVISIONS

- 1.1 Madison Six j. s. a., with its registered office at Slávičie údolie 106, 811 02 Bratislava - Staré Mesto district, Company ID No.: 56 856 229, registered in the Commercial Register of the Bratislava III Municipal Court, Section Sja, insert no. 381/B (hereinafter referred to as "**Madison Six**" or "the company") is a provider of crypto-asset services supervised by the National Bank of Slovakia (hereinafter referred to as "NBS") on the basis of a licence to provide crypto-asset services granted by NBS no. 100-001-025-213 on 17 December 2025 pursuant to Regulation (EU) (EU) 2023/1114 of 31 May 2023 on markets in crypto-assets (hereinafter referred to as **the "MiCA Regulation"**), which entered into force on 18 December 2025. At the same time, based on the above authorisation, the company is authorised to provide crypto-asset services cross-border throughout the European Union, including the European Economic Area.
- 1.2 Madison Six provides the following crypto-asset services within the meaning of the MiCA Regulation:
- custody and management of crypto-assets on behalf of clients;
 - exchange of crypto-assets for funds;
 - exchange of crypto-assets for other crypto-assets;
 - execution of orders relating to crypto assets on behalf of clients;
 - receiving and transmitting orders relating to crypto assets on behalf of clients;
 - provision of cryptoasset transfer services on behalf of clients (hereinafter collectively referred to as "services").
- 1.3 Madison Six does not belong to a group within the meaning of Article 2(11) of Directive 2013/34/EU of the European Parliament and of the Council.
- 1.4 The notice on the general nature and sources of conflicts of interest (hereinafter referred to as the "notice" or "document") provides information to clients and potential clients in accordance with the MiCA Regulation on the general nature and sources of conflicts of interest that may arise in the provision of crypto-asset services by the company, as well as on the measures taken to prevent, manage and mitigate them.
- 1.5 This document does not replace Madison Six's internal policy on measures to prevent and manage conflicts of interest , but aims to summarise for clients and potential clients the most important aspects of the general nature and sources of conflicts of interest and the steps taken to mitigate them.
- 1.6 The notice is available on the Madison Six website: [here](#).

2 BASIC TERMS

Terms with a capital or small initial letter used in this document have the following meanings:

Conflict of interest	means a situation where there may be a conflict between the company's own interests and the interests of its related parties or the interests of its clients, or a conflict between the common interests of two or more clients, as a result of which the impartiality or quality of the service provided may be affected and the crypto-asset service provider or client may be harmed.
Related parties	are any of the following persons: a) shareholders of the company; b) persons who directly or indirectly control the company or its shareholders; c) members of the company's management body; d) employees of the company
Authorised persons	are any of the following persons: a) members of the company's bodies; b) company employees; c) third parties providing services to the company on an outsourcing basis pursuant to Article 73 of the MiCA Regulation
Personal transaction	is a transaction with a crypto-asset or leading to a position or exposure to a crypto-asset carried out by or on behalf of a Related Person, if at least one of the following criteria is met: a) the person is acting outside the scope of activities carried out in the course of their professional competence; b) the transaction is carried out on behalf of any of the following persons: 1. the Related Person; 2. any person with whom the Related Person has a family relationship or close ties; 3. a person in relation to whom the Related Person has a direct or indirect material interest in the outcome of the transaction, other than the receipt of a fee or commission for executing the transaction
Remuneration	is any form of payment or other financial or non-financial benefits provided directly or indirectly by the company in connection with the provision of crypto-asset services to clients

3 GENERAL NATURE AND SOURCES OF CONFLICTS OF INTEREST

- 3.1 The company ensures that its policies and procedures regarding conflicts of interest are in its best interests as a crypto asset service provider and those of its clients, covering situations that may affect or appear to affect both the ability of the company or persons connected with the company to perform their duties or responsibilities objectively and independently, in the interests of clients, and on the performance of the company.

- 3.2 The potential and actual conflicts of interest that the company takes into account are conflicts that affect or could affect the interests of clients, as well as conflicts that affect or could affect the performance and situation of the crypto asset service provider as such, and thus indirectly affect the interests of clients.
- 3.3 The basis of the conflict of interest management system is Madison Six's internal regulation on measures to prevent and manage conflicts of interest, which defines specific types of situations in which a conflict may arise and sets out clear responsibilities and procedures for all persons involved. Responsibility for the entire process lies with a designated responsible person who is authorised to decide on measures, carry out checks, investigate reported cases, eliminate any conflicts of interest and propose appropriate measures.
- 3.4 The company has identified the following situations or circumstances that could lead to a potential conflict of interest (clash of interests):
- 3.4.1 **Conflicts of interest based on personal definitions** can be identified as conflicts of interest arising between:
- (i) the company and its shareholders;
 - (ii) the company and any person who directly or indirectly controls the company or its shareholders;
 - (iii) the company and members of its management body;
 - (iv) the company and its employees;
 - (v) the company and its clients; or
 - (vi) two or more clients of the company with each other.
- 3.4.2 **Conflicts of interest based on factual definitions** can be identified as conflicts arising:
- (i) from the conflicting interests of individual clients;
 - (ii) between the company and its clients, arising mainly as a result of the structure of remuneration or other revenues and profits dependent on the performance of managed crypto assets;
 - (iii) between the legitimate interests of the company or Authorised Persons and the legitimate interests of the company's clients;
 - (iv) in the creation of the company's business strategy;
 - (v) when remunerating Authorised Persons;
 - (vi) in the misuse of confidential information by Authorised Persons or Related Persons;
 - (vii) when conducting personal transactions of Related Persons to the detriment of the company's clients;

- (viii) when prioritising the interests of the company over the interests of clients or when prioritising the interests of specific clients to the detriment of the majority of clients;
- (ix) when accepting any incentives from clients in connection with the services provided by the company;
- (x) arising from personal, political or professional relationships between Related Parties;
- (xi) in situations where the company or Related Persons may, at their own discretion, decide to take a decision that is clearly likely to have an adverse effect on the legitimate interests of clients; or
- (xii) in situations where a Related Person has an economic interest in another entity, body or person with interests that conflict with the interests of the company, whereby an economic interest is considered to exist if the Related Person:
 - (a) owns shares, tokens, other ownership rights or membership in that person, body or entity (including where the Related Person is a member of the body of another entity);
 - (b) holds debt instruments or has other debt agreements with this person, body or entity; or
 - (c) has any form of contractual arrangement with that person, body or entity, such as a management contract, service contract, delegation or entrustment contract, or intellectual property licence.

4 MEASURES TO MITIGATE CONFLICTS OF INTEREST

- 4.1 The Company applies and complies with effective measures to prevent and mitigate conflicts of interest, which are designed taking into account the size, organisation of the Company, as well as the nature, scope and complexity of its activities.
- 4.2 The company takes appropriate measures to manage and mitigate conflicts of interest, including the following:
 - (a) **RESTRICTION OF INFORMATION FLOWS:** the company may, by decision of the members of the board of directors, restrict the flow of information or access to information between individual employees of the company or between the company and third parties providing services to it ;
 - (b) **INDEPENDENT SUPERVISION** of Authorised Persons who have a decisive influence on the provision of crypto-asset services by the company, whose interests may be in conflict, or who otherwise represent different interests that may be in conflict, including the interests of the company;
 - (c) **DELEGATION OF ACTIVITIES** that may be in potential conflict of interest to different Authorised Persons within the Company;

- (d) ENSURING APPROPRIATE INDEPENDENCE IN THE PERFORMANCE OF ACTIVITIES: the Company has an interest in ensuring that each Authorised Person performs their activities independently and with professional care, while ensuring the independence of all Authorised Persons who may be affected by the threat of the existence or emergence of a conflict of interest;
- (e) PERFORMING PERSONAL TRANSACTIONS: Related parties are required to obtain the consent of the responsible person before performing a Personal Transaction, keep records of all Personal Transactions they have performed, and notify the responsible person of any potential risk of a conflict of interest;
- (f) GIFTS AND ATTENTIONS FROM CLIENTS: The Company and Authorised Persons may not accept gifts and attentions or other benefits from the Company's clients or business partners that could compromise their independence in the performance of their duties at the Company;
- (g) LOANS OR OTHER BENEFITS TO MEMBERS OF THE COMPANY'S BODIES OR EMPLOYEES: As a matter of principle, the Company does not grant loans or other benefits from its assets to members of its bodies or other employees;
- (h) INTERESTS OUTSIDE THE COMPANY: Authorised persons who have financial or other interests in companies that participate in transactions with Madison Six and whose interests could be or are in conflict with the interests of the company's clients are required to disclose these interests in advance to the responsible person;
- (i) PRODUCTS AND SERVICES FROM EXTERNAL PROVIDERS: When procuring products and services from third parties, the company ensures the prevention and management of conflicts of interest by identifying existing or potential conflicts of interest arising from new business relationships through a responsible person.
- (j) REMUNERATION: An important part of the company's system for preventing conflicts of interest is its remuneration policy, which is designed to ensure that employees are not motivated to act contrary to the interests of clients. The company applies the following remuneration principles:
 - (i) a guaranteed fixed component of total remuneration as
 - a basic salary component for employees;
 - a fixed component of remuneration in the case of members of the board of directors; and, where applicable,
 - (ii) a variable component of total remuneration; where a variable component of remuneration is applied, it shall never exceed the guaranteed fixed component of total remuneration.

- 4.3 If a conflict of interest is identified that has any material impact on the company's client, the responsible person shall inform the client of the identified conflict of interest without undue delay by sending an email to the client's email address. The responsible person shall then inform the client in the same manner of the measures taken to remedy the identified conflict of interest.
- 4.4 The responsible person shall assess the effectiveness of the measures taken in accordance with the internal regulations for the identification, prevention and management of conflicts of interest at least once a year, if no conflict of interest has been identified in the last year, or more frequently depending on the conflict of interest that has arisen.

This Notice on the general nature and sources of conflicts of interest was prepared on 5 January 2026.