

INTERNAL REGULATION ON ORDER EXECUTION POLICY

1 INTRODUCTORY PROVISIONS

1.1 This internal regulation on order execution policy (also referred to as the "order execution policy") has been drawn up in accordance with:

1.1.1 Article 78 of the MiCA Regulation; and

1.1.2 Article 15 of DN 2025/305.

1.2 The Company also applies this order execution policy to the provision of services for the receipt and transmission of orders relating to crypto-assets on behalf of clients and, for this reason, it has also been drawn up in accordance with:

1.2.1 Article 80 of the MiCA Regulation; and

1.2.2 Article 3(2) of DN 2025/305.

2 DEFINITIONS

2.1 Capitalised terms used in this internal regulation have the following meanings:

Compliance Officer	is the person responsible for compliance within the Company
DN 2025/305	is Commission Delegated Regulation 2025/305 of 31 October 2024 supplementing Regulation (EU) 2023/1114 of the European Parliament and of the Council (EU) 2023/1114 as regards regulatory technical standards specifying the information to be included in an application for authorisation as a crypto-asset service provider
Client Zone	is a section of the Company's website that is only accessible to the Company's clients after registration and login, and where clients can, among other things, submit requests to the Company for the provision of crypto-asset services
MiCA Regulation	is Regulation (EU) 2023/1114 of the European Parliament and of the Council (EU) 2023/1114 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
NBS	is the National Bank of Slovakia
Authorised persons	are any of the following persons: a) members of the Company's bodies; b) employees of the Company; c) third parties providing services to the Company on an outsourcing basis pursuant to Article 73 of the MiCA Regulation.
The Company	is Madison Six j. s. a., with its registered office at Slávičie údolie 106, Bratislava - Staré Mesto 811 02, Company ID No.: 56 856 229, registered in the Commercial Register of the Municipal Court Bratislava III, Section Sja, File No. 381/B
The internal auditor	is the person responsible for performing internal control functions within the Company

3 SUBJECT OF THE INTERNAL REGULATION

3.1 The purpose of this internal regulation is to clearly and comprehensively define the policy for executing orders to buy or sell crypto assets, taking into account factors such as price, cost, speed, likelihood of execution and settlement, size, nature, custody conditions of crypto assets or any

other aspects related to the execution of the order, so as to obtain the best possible result for the Company's clients.

- 3.2 The purpose of this internal regulation is also to establish procedures and measures for the provision of services for the receipt and transmission of orders relating to crypto-assets on behalf of clients by the Company, in accordance with the requirements set out in Article 80 of the MiCA Regulation.

4 SCOPE OF THE ORDER EXECUTION POLICY

- 4.1 This order execution policy applies to all clients of the Company, unless otherwise specified in Article 4.2 .

- 4.2 The Company does not apply this order execution policy if it has received a specific order from a client. A specific order is considered to be an order that includes, for example:

4.2.1 selection of a specific place of execution (e.g. a specific trading platform for crypto assets);

4.2.2 specifying the time of execution; or

4.2.3 other similar specifications for the execution of the order by the Company on behalf of the client.

- 4.3 If the Company receives a specific instruction from a client in accordance with Article 4.2 , it shall notify the client that this order execution policy will not apply to the elements covered by that specific instruction. After such notification, the client is obliged to express their unambiguous and unconditional consent that this order execution policy will not apply to them and to confirm the submission of their order. The Company will only execute the client's order if the client bindingly confirms their order in accordance with the previous sentence. In the absence of the client's consent, the Company will not execute the order.

- 4.4 The non-application of the order execution policy under Article 4.2 is not absolute and only applies to those elements of a specific order to which that specific order relates, and the Company shall make every effort to comply with this order execution policy to the extent that it does not conflict with the client's specific order.

- 4.5 Articles 4.2 to 4.4 are applied by the Company only when providing the service of executing orders relating to crypto-assets on behalf of clients, not when providing the service of receiving and transmitting orders relating to crypto-assets on behalf of clients.

5 CLIENT ORDERS WHEN PROVIDING SERVICES FOR EXECUTING ORDERS RELATING TO CRYPTO ASSETS ON BEHALF OF CLIENTS

- 5.1 The Company executes client orders only for the purchase of the crypto assets listed in Annex 1 to this order execution policy. The sale price of these crypto assets is exclusively in the currencies listed in Annex 2 to this internal regulation.

- 5.2 If the consideration for an order to sell or purchase crypto assets is to be an official currency, it may only be an official currency listed in Appendix 2 to this internal regulation.
- 5.3 The Company shall execute client orders only if it has obtained prior consent to this order execution policy. The client must (if interested in the crypto-asset service under this policy) grant this consent via the Client Zone before the first provision of the service of executing an order relating to crypto-assets on behalf of the client to a specific client, whereby the client places an order for this service in accordance with Article 5.5. At the same time, before providing the service of executing an order relating to crypto assets on behalf of the client to a specific client for the first time, the Company shall inform that specific client that its orders may also be executed outside the crypto asset trading platform (OTC) and shall request the client's express consent to such a procedure. The client's consent to this order execution policy under this article 5.3 is considered, for the purposes of Article 78(5) of the MiCA Regulation, to be the client's explicit consent given in the form of a general agreement with the possibility of executing the client's orders outside the crypto-asset trading platform.
- 5.4 The client is required to state in the order:
- 5.4.1 whether they are interested in buying or selling crypto-assets;
- 5.4.2 the address of the wallet to which the client wishes to credit the crypto assets;
- 5.4.3 in the case of a purchase of cryptoassets:
- (i) the type and name or designation of the crypto asset to be purchased;
 - (ii) the number of crypto assets to be purchased;
 - (iii) whether the consideration for the purchase of this crypto asset will be crypto assets in their wallet, and if so, the type and name or designation of these crypto assets;
- 5.4.4 in the case of the sale of cryptoassets:
- (i) the type and name or designation of the crypto asset to be sold;
 - (ii) the number of crypto assets to be sold.
- 5.5 The Company accepts orders from clients exclusively through the Client Zone. The Company validates orders in real time, which includes checking the formal correctness of the order (verifying that it contains all the mandatory information according to Article 5.4) and checking that the client has sufficient funds to execute the order.
- 5.6 Upon receipt of a client order, the Company shall confirm to the client that it will execute the order.
- 5.7 The Company may refuse to execute the client's order, in which case it shall notify the client of this fact.

5.8 If the client has specified a time limit for the execution of the order, the Company shall proceed in accordance with Article 5.7 if it is unable to meet this requirement.

5.9 In the case referred to in Article 5.4.2, the Company does not provide transfers of electronic money tokens to external wallets of clients not managed by the Company.

6 CLIENT ORDERS WHEN PROVIDING THE SERVICE RECEIPT AND TRANSFER OF ORDERS RELATING TO CRYPTO ASSETS ON BEHALF OF CLIENTS

6.1 In the case of the purchase of crypto assets other than those listed in Appendix 1 to this order execution policy, the Company may accept and forward a client order. The range of crypto assets and currencies that may constitute the countervalue of these crypto assets, for which the Company provides the service of accepting and forwarding orders relating to crypto assets on behalf of clients, is determined by the offer of execution venues according to Annex 3 to this order execution policy. The Company regularly, at least once every two weeks, monitors the offer at the execution venues and, accordingly, allows clients to place an order in the Client Zone, which may be accepted by the Company and subsequently forwarded for execution to the execution venue specified in Annex 3 to this order execution policy.

6.2 When providing the service of receiving and forwarding orders relating to crypto-assets on behalf of clients, the Company shall proceed in accordance with Articles 5.3 to 5.8, with the variations specified in Article 6.

6.3 The Company individually adapts the scope of data under Article 5.4 within the Client Zone, which the client must provide so that the Company can properly receive and forward their order. The Crypto Asset Services Department adapts this data according to the requirements of the execution venues listed in Annex 3 to this Order Execution Policy so that they can accept and subsequently execute orders from the Company.

6.4 The Company allows clients to select a specific execution venue from the list in Appendix 3 to this order execution policy within the Client Zone, with the range of selection depending on the parameters of the specific order and its compliance with the individual execution venues.

6.5 In order to ensure the proper and prompt transmission of client orders to execution venues, the Company has adopted the following procedures and measures:

6.5.1 Orders are accepted in accordance with Article 5.5.

6.5.2 After receiving orders, the Company processes them, i.e. forwards them to the selected execution venue for execution. Orders are prioritised primarily on the basis of time priority (*FIFO - First In, First Out*), which means that orders are processed in the order in which they were received. This principle ensures fair treatment of all clients regardless of the volume of the order. If several orders arrive at the same time, the secondary priority for order processing is the size of the order, i.e. orders are processed from the lowest nominal value in EUR to the highest.

- 6.5.3 The Company shall forward the order immediately after its receipt, at the latest within 1 hour of its receipt.
- 6.5.4 If it was not possible to forward the order within the time limit specified in Article 6.5.3, the Company shall immediately inform the client thereof in the Client Zone, including the reason for the failure to meet the deadline.
- 6.5.5 If the order could not be forwarded at all, for example, if the designated place of execution rejected it, the Company shall immediately inform the client thereof in the Client Zone, including the reason for the impossibility of forwarding the order.
- 6.5.6 If the order has been successfully forwarded and accepted by the place of execution, the Company shall immediately inform the client thereof in the Client Zone.

7 EXECUTION VENUES

- 7.1 A list of execution venues used by the Company is provided in Appendix 3 to this Order Execution Policy. The Company is entitled to add or remove specific execution venues from the list of execution venues, in which case it shall update Appendix 3 to this Order Execution Policy.
- 7.2 The Company does not charge or account for any fees or commissions associated with the execution of orders in a manner that would discriminate against certain execution venues. At the same time, the Company does not charge, bill or receive any fees, discounts, commissions or other forms of remuneration associated with the execution of orders at a specific execution venue, i.e. with the selection of a specific execution venue and with the routing of orders received from clients to a specific execution venue. The Company also does not collect, charge or receive any fees, discounts, commissions or other forms of remuneration (monetary or non-monetary) in exchange for directing orders received from clients to a specific execution venue.
- 7.3 The CEO is responsible for compiling the execution venues and also reviews and updates the list of execution venues in accordance with Articles 9.4 and 9.5, in particular after considering whether the current execution venues guarantee the best possible results for the Company's clients. When selecting execution venues, the CEO proceeds according to the following criteria:
- 7.3.1 Best available price for the client:
- (i) Favourable exchange rates for crypto assets;
 - (ii) Transparency and reasonableness of fees;
 - (iii) Minimisation of *price slippage* when executing orders;
- 7.3.2 Speed and reliability of order execution (measurement of order processing efficiency):
- (i) Average time required to execute an order;
 - (ii) Order execution success rate;

- (iii) Reliability of API connection and communication channels;
- 7.3.3 Liquidity and availability of requested crypto assets (assessment of sufficient liquidity for requested crypto asset pairs):
- (i) Market depth for individual crypto assets;
 - (ii) Ability to execute larger volume orders without significant impact on price;
 - (iii) Availability of the required crypto assets and trading pairs;
 - (iv) Continuous operation of the trading venue (24/7);
- 7.3.4 Security standards and technical reliability of the execution venue (assessment of the level of security):
- (i) Implementation of advanced security protocols
 - (ii) History of security incidents;
 - (iii) Existence of cyber risk insurance;
 - (iv) Regular security audits and penetration tests;
- 7.3.5 Regulatory status and compliance with legal regulations (assessment of legal compliance):
- (i) Registration and licensing in relevant jurisdictions;
 - (ii) Compliance with AML/CFT requirements;
 - (iii) History of regulatory measures or sanctions;
- 7.3.6 Technical infrastructure (technical maturity assessment):
- (i) System stability and scalability;
 - (ii) Quality and documentation of API interfaces;
 - (iii) Availability of testing environment;
 - (iv) Level of technical support;
- 7.3.7 Reputation and market position (consideration of market position):
- (i) Length of time on the market;
 - (ii) Volume of transactions;
 - (iii) Number of users; and

(iv) Transparency of business practices.

- 7.4 The company uses places of performance on an independent basis, meaning that it does not receive any remuneration, commission, discount or other monetary or non-monetary benefit for using a particular execution venue, and the determination of a particular execution venue is solely at the discretion of the Company after taking into account the factors specified in this order execution policy in order to achieve the best interests of the client.
- 7.5 The Internal Auditor monitors on a quarterly basis the Company's compliance with its obligations under Article 7.4, including any financial flows between execution venues and the Company. For this purpose, the Compliance Officer provides the Internal Auditor with all information on any gifts or attentions from execution venues to Authorised Persons that have been reported to the Compliance Officer in accordance with the Company's internal regulations on measures to prevent and manage conflicts of interest, so that the Internal Auditor can assess their compliance with Article 7.4. Any violations of Article 7.4 shall be reported by the Internal Auditor to the Company's Board of Directors, which, after assessment, shall impose the appropriate labour law or commercial law sanctions on the Authorised Person concerned.
- 7.6 The Company shall not execute orders or forward orders to places of execution other than those listed in Annex 3, unless this is a specific request of the client pursuant to Article 4.2 (in the case of order execution).
- 7.7 The criteria for selecting execution venues are set out in Article 9.

8 RULES FOR EXECUTING ORDERS

- 8.1 The Company shall take all reasonable steps to achieve the best possible result for the Client, taking into account the price, costs, speed, likelihood of execution and settlement, size, nature of the order, conditions of custody of crypto assets or any other relevant factors (hereinafter referred to as **the "Execution Factors"**). The relative importance of these factors may vary depending on the specific case.
- 8.2 However, if the Client provides the Company with a specific order in accordance with Article 4.2, the Company shall comply with it, applying the Execution Factors in accordance with Article 4.4 only to the extent that they do not prevent or impede the fulfilment of the Client's specific order.
- 8.3 The Company shall exercise due professional care in executing orders and shall take into account the experience and expertise of the Authorised Persons responsible for executing orders, taking into account available market information and market conditions in order to achieve a balance between the following Execution Factors:
- 8.3.1 Total consideration (i.e. price and costs combined) – the total cost of the transaction for the client, including the Company's fees and any third-party fees.
- 8.3.2 Speed – the importance of completing the transaction quickly (especially given the volatility of the crypto asset market).

- 8.3.3 Probability of execution and settlement – risks of the transaction not being executed due to low liquidity or other factors.
 - 8.3.4 Size – consideration of the size of the transaction, especially for large orders.
 - 8.3.5 Other relevant factors – e.g. low liquidity or high volatility for a particular type of crypto asset.
- 8.4 The Company considers the Execution Factors set out in Articles 8.3.1 and 8.3.2 to be the main Execution Factors to which it attaches the highest weight when executing orders (with exceptions as permitted by the fixed weight ranges set out in this Article 8.4 in conjunction with Article 8.5). The Company assigns weight to the Execution Factors in the following amounts and under the following conditions:
- 8.4.1 Total consideration (price + costs): 50–70% of the total weight of the decision;
 - 8.4.2 Speed of execution: 20–30% weighting, with increased priority in cases of high volatility where delays can lead to significant price deviations;
 - 8.4.3 Probability of execution and settlement: 10–20% weighting, especially for larger orders or crypto assets with low liquidity;
 - 8.4.4 Order size: considered on a case-by-case basis; for large orders, this may carry a weighting of up to (maximum) 30%, as ensuring gradual execution without undue impact on price is key;
 - 8.4.5 Crypto asset custody conditions: in cases where it is relevant to consider the availability and security of the custody infrastructure, this factor is weighted at 10–20%;
 - 8.4.6 Other factors (e.g. nature of the order, time limitation, specifics of a particular crypto asset): these are taken into account on an ad hoc basis with a weighting of 0–10%.
- 8.5 In accordance with Article 8.4 , the Company follows the following decision tree when assigning weights:
- 8.5.1 If volatility is low and liquidity is sufficient, priority is given to the execution factor "total consideration (price + costs)" (i.e. it can account for up to 70% of the total weighting, primarily at the expense of the execution factor "speed of execution");
 - 8.5.2 If volatility is high, priority is shifted to the execution factor "speed of execution" (i.e. it can account for up to 30% of the total weight, primarily at the expense of the execution factor "total consideration (price + costs)");
 - 8.5.3 If liquidity is low or the order is large, priority is given to the execution factors "probability of execution and settlement" (i.e. it can account for up to 20% of the total weight) and "order size" (i.e. it can account for up to 30% of the total weight);

8.5.4 The execution factor "Crypto Asset Custody Conditions" is only taken into account if there are special custody conditions (e.g. security or technical restrictions);

8.5.5 The Company only takes into account other execution factors if they contribute to achieving the best possible result for the client, and such other execution factors may have a maximum weight of 10%.

8.6 For the purposes of assessing the best possible result for the client, the Company will not compare the results achieved through the application of this order execution policy with the results that could be achieved for the client by another crypto-asset service provider based on the application of that provider's order execution policy or based on a different fee structure.

9 CHOICE OF EXECUTION VENUE

9.1 When executing orders, the Company analyses the execution venues available under Article 7 in order to identify those execution venues that enable orders to be executed with the best possible result for clients.

9.2 When selecting a specific execution venue, the Company takes into account all previous positive and negative experiences with the execution of orders and the achievement of the best possible results through that execution venue, whereby, in the event of repeated negative experiences, the CEO will reconsider the inclusion of that particular execution venue in the list of execution venues.

9.3 When initially selecting a specific place of performance and any time it is selected again, the Company will assess:

specific factors of the specific place of performance;

the specific factors of the specific crypto asset;

whether the specific crypto asset is traded in multiple execution venues;

the total costs associated with executing the order at the specific place of execution;

the likelihood of achieving the best result for the client at a specific place of execution;

the likelihood of execution and settlement and the risks of non-execution due to low liquidity or other factors; and

the speed of order execution.

9.4 The CEO, or an Authorised Person designated by him, maintains an evaluation card for each place of execution, applying the following weights and thresholds:

9.4.1 Price and costs

(i) **weighting:** 40%;

- (ii) **threshold:** target deviation of the executed price from the volume-weighted average price of trades executed at the relevant execution venues over the last two hours () ≤ 30 basis points for liquid assets, ≤ 60 basis points for less liquid assets;

9.4.2 Liquidity

- (i) **weighting:** 40%:
- (ii) **threshold:** target *fill rate* $\geq 97\%$ for liquid assets, $\geq 95\%$ for less liquid assets;

9.4.3 Reliability

- (i) **Weighting:** 20%:
- (ii) **Threshold:** API/performance location availability $\geq 99.0\%$ per month.

9.5 The CEO updates the evaluation card in accordance with Article 9.4 on a monthly basis. If the place of execution fails to meet the threshold values for two consecutive months, the CEO shall decide on its temporary suspension or removal from the list of places of execution in accordance with Annex No. 3.

9.6 The company is obliged to inform the client about the execution venue where the transaction was executed, including details of the price and speed of execution of the order.

10 ORDER EXECUTION POLICY

10.1 Client orders received for processing are automatically entered into a central order database, where they are processed in accordance with the principles set out in this article 10. Each order is assigned a time stamp, which serves as an identifier for the purposes of order sequencing.

10.2 When executing orders, the Company shall proceed in such a way as to ensure:

prompt, fair and expeditious execution of the order;

the execution of client orders in the order in which they are received and without delay, except where the nature of the order or prevailing market conditions do not allow this, or where it is not in the best interests of the client, whereby:

in the case of two or more orders received with the same priority, the Company shall first execute the order for crypto assets with greater liquidity; and

orders with the same priority under the previous point shall be ranked from the lowest nominal value in EUR to the highest (with those with a lower nominal value taking precedence);

immediate notification of the client of any serious obstacles to the proper execution of the order of which the Company is aware;

prompt and correct transfer of all client crypto-assets or funds.

10.3 The Company undertakes not to misuse information about unexecuted orders and to take sufficient appropriate measures to prevent the misuse of such information by any Authorised Person involved in the execution of orders under this order execution policy. To this end, the Company:

has established an effective mechanism for reporting suspicious behaviour in accordance with the Company's separate internal whistleblowing policy;

ensures that all Authorised Persons comply with ethical principles, whereby any Authorised Person (in addition to complying with the obligations relating to the prevention of market abuse under the Company's organisational rules) who has information about unexecuted orders:

is prohibited from trading on the basis of this information;

is bound by confidentiality regarding this information, unless the provision of this information to another Authorised Person is necessary for the performance of their work tasks;

is not allowed to keep this information (whether in physical or electronic form) in a way that makes it available to other people

monitors the activities of Authorised Persons, whose activities it can also track retrospectively; and

performs regular checks on the activities of Authorised Persons to ensure compliance with this internal regulation.

10.4 The Compliance Officer is responsible for adopting and implementing measures under Article 10.3 .

10.5 If the Compliance Officer finds that any Authorised Person has misused or is likely to have misused information about unexecuted orders, he shall immediately report this to the members of the Company's Board of Directors, and if the misuse or potential misuse was committed by a member of the Company's Board of Directors or Internal Auditor, also to the Company's General Meeting. Such misuse shall be considered a breach of work discipline or a breach of the duty to act with professional care, for which the competent bodies of the Company shall, in accordance with the previous sentence, impose the relevant labour law or commercial law liability.

10.6 When executing orders within the meaning of this internal regulation, it is possible to combine a client's orders with the orders of other clients if it is a priori unlikely that such a combination would disadvantage any of the clients whose orders are to be combined with the orders of other clients.

10.7 In the event of extraordinary and unforeseeable events, the Company may proceed differently from the procedures set out in this internal regulation, but always in the best interests of the client.

10.8 The Company shall proceed in accordance with Articles 10.3 to 10.7 when accepting and forwarding orders relating to crypto-assets on behalf of clients.

10.9 In the event of any conflicts arising in the execution of orders, the Company shall be guided by the following principles:

the execution of a client's order always takes precedence over the execution of an Authorised Person's order or the execution of a transaction by the Company on its own account;

if a client order is placed to buy or sell a crypto asset for which there is already an active (i.e. accepted but not executed) order from another client, the Authorised Person receiving the client's order is obliged to notify the client that there is an active order from another client of the Company to buy or sell this crypto asset; if the client insists on placing the order, the Company shall notify the client that it will accept the order but will only execute it after the order of the client whose order was accepted by the Company earlier has been fully satisfied or after its expiry.

11 SPECIAL PROVISIONS

11.1 The Company publishes its order execution policy on its website in simplified and non-technical language that is understandable to all of the Company's clients.

11.2 The Company monitors the effectiveness of the order execution policies adopted in accordance with this internal regulation, in particular for the purpose of identifying any shortcomings and taking appropriate corrective measures.

11.3 The crypto asset services department monitors and verifies on a biweekly basis whether the best possible results have been achieved for clients. For each order, it evaluates:

11.3.1 the price deviation from the reference average price of trades executed at the relevant execution venues over the last 24 hours, with an acceptable (target) deviation limit of a maximum of 0.3% for liquid crypto assets and a maximum of 0.6% for less liquid crypto assets;

11.3.2 the execution time, with an acceptable (target) execution time of a maximum of 10 seconds for liquid crypto assets and a maximum of 60 seconds for less liquid crypto assets;

11.3.3 fill rate, where the acceptable (target) fill rate limit is a minimum of 97% for liquid crypto assets and a minimum of 95% for less liquid crypto assets, measured as the ratio of fully executed orders to the total number of orders for the period under review.

11.4 In the event of repeated non-compliance with the limits set out in Article 11.3, the CEO shall take corrective measures, such as (i) initiating a change in the places of performance; (ii) initiating a change in the manner in which orders are executed; or (iii) initiating a change to this internal regulation.

- 11.5 The CEO, in cooperation with the Internal Auditor, shall regularly, at least once a year, evaluate the effectiveness of this order execution policy in accordance with Article 11.2, in particular by assessing:
- whether the execution venues included in it allow the best possible result to be obtained for the client;
 - whether it is necessary to make changes to its order execution arrangements.
- 11.6 The assessment pursuant to Article 11.5 shall be carried out in addition to the assessments specifically carried out pursuant to this internal regulation.
- 11.7 The CEO, in cooperation with the Internal Auditor, is required to review and update this order execution policy regularly, at least once a year, and also in the event of significant changes that affect the Company's ability to obtain the best possible result for its clients when executing orders.
- 11.8 The Company shall notify clients of any material changes to its order execution arrangements or changes to this order execution policy by publishing an updated version in the Client Zone and sending it by email to those clients to whom it has already provided order execution services relating to crypto-assets on behalf of clients at least once.
- 11.9 The client is entitled to request the Company to prove that it has executed their order in accordance with this order execution policy. The Company shall provide the client with such proof as soon as possible, in particular by making available all relevant information and documents relating to the specific order, with any costs associated therewith being borne by the Company.
- 11.10 The NBS has the same rights as the client under Article 11.9. The Company shall treat the NBS in the same way as it treats the client in accordance with Article 11.9.

12 RECORDING AND CONTROL OF ORDERS

- 12.1 In order to ensure auditability and transparency, the Company (through its IT department) automatically records received orders using order management systems (OMS), which assign a unique identifier and time stamp to each order. The Company stores such records in an unalterable form, which allows for retrospective control of the entire order processing process.
- 12.2 In order to protect against manipulation and abuse of the Company's crypto-asset services, the Company implements advanced anomaly detection algorithms that can identify suspicious trading patterns, such as high-frequency trading or sudden changes in volume. In such cases, the Company is able to automatically suspend suspicious orders and alert the need for review.

13 CONTROL

- 13.1 Compliance with the obligations set out in this internal regulation is monitored by the Compliance Officer.

13.2 If the Compliance Officer discovers any violation of this internal regulation within the scope of his or her authority, he or she shall inform the members of the Company's Board of Directors without undue delay.

14 RESPONSIBILITY

14.1 The crypto-asset services department is responsible for fulfilling the obligations under this internal regulation. This shall not affect any provisions of this internal regulation that specifically assign specific responsibilities to another function within the Company.

15 FINAL PROVISIONS

15.1 This internal regulation was approved by a decision of the Board of Directors on 28 November 2025 and shall enter into force on that date.

15.2 This internal regulation shall take effect on the date of legal validity of the decision of the National Bank of Slovakia to grant the Company a licence to provide crypto-asset services.

APPENDIX NO. 1

LIST OF CRYPTO ASSETS FOR WHICH THE COMPANY EXECUTES ORDERS

- Bitcoin
- Ethereum,
- Ripple,
- Solana,
- Cardano,
- USDC.

APPENDIX NO. 2

LIST OF OFFICIAL CURRENCIES THAT MAY BE USED AS COUNTERCURRENCIES WHEN
EXECUTING ORDERS

- EUR

ANNEX NO. 3

LIST OF PLACES OF EXECUTION

Place of execution	Type of place of execution
OKX	Trading platform for crypto assets
Binance	Trading platform for crypto assets
Bybit	Trading platform for crypto assets