

# Disclosure on Conflicts of Interest

Last Update: 9th January 2025

## Evergon's policy on preventing conflicts of interest

Evergon has adopted a policy on preventing conflicts of interest (the **Conflict of Interest Policy**). This Conflict of Interest Policy applies to Evergon's shareholders, board members and employees. The purpose of Evergon's Conflict of Interest Policy is to identify, prevent, manage and disclose conflicts of interest.

Evergon ensures that all its shareholders, board members and employees are able to identify all possible conflicts of interest in time. Evergon's shareholders, board members and employees are obliged to immediately report any situation in which there is a (potential) conflict of interest. Evergon's Head of Legal and Regulatory and management board takes appropriate measures to avoid the (potential) conflict of interest.

Through this disclosure, Evergon aims to inform you on the general nature and sources of conflicts of interest that have arisen or might arise, and the steps that Evergon has taken to mitigate these conflicts of interest.

## General identification of conflicts of interest

The Company recognises that conflicts of interest may arise in the course of providing our token market infrastructure and related services. These conflicts can stem from various sources, including but not limited to:

- **Personal Relationships:** Interpersonal connections between employees and clients or third parties that may affect decision-making.
- **Financial Interests:** Direct or indirect financial interests in third parties, such as equity stakes, partnerships, or directorships, particularly in relation to projects listed on the Company's Platform.
- **Business Relationships:** Existing business relationships that may compromise impartiality, especially those related to blockchain technology providers or financial service partners.
- **Gifts and Hospitality:** Any gifts or hospitality received from clients, vendors, or partners, which could influence business decisions or create perceived obligations.

## General measures to prevent conflicts of interest

To effectively address and mitigate potential conflicts of interest, the Company has implemented the following measures:

- **Regular Training:** Comprehensive training for all staff on recognising and managing conflicts of interest, with an emphasis on scenarios specific to the blockchain and tokenization sectors.
- **Clear Policies and Procedures:** Establishment of clear internal policies for reporting and handling conflicts, tailored to our operational context.
- **Ongoing Monitoring:** Continuous monitoring of activities and relationships that may lead to conflicts, especially given the dynamic nature of blockchain and financial markets.
- **Disclosure Requirements:** Mandatory disclosure by employees of any potential conflicts to management, ensuring transparency and accountability.
- **Conflict Records:** Maintaining thorough records of identified conflicts and the mitigation measures employed, aligned with best practices in compliance and governance.

## **Remuneration**

Evergon's remuneration policy is designed to avoid creating any conflicts of interest (COIs) or incentives that may lead personnel to favour their own interests or the Company's interests to the potential detriment of any client. This policy ensures that individuals perform their duties and responsibilities in an objective and independent manner.

## **Personal Transactions**

Personal transactions of Connected Persons and other natural persons involved in the provision of services may entail a conflict of interests of those Connected Persons with Evergon or Evergon's clients. Therefore, Evergon has established policies and procedures regarding personal transactions, which outlines rules for its Connected Persons who trade crypto-assets. The policies and procedures emphasise compliance with market regulations to avoid conflicts of interest.

## **Evaluation and Updates**

Evergon maintains up-to-date records of all situations giving rise to actual and potential conflicts of interest, including the relevant crypto-asset services and activities, and of the measures taken to mitigate such conflicts in the relevant situations. This disclosure is regularly updated on the basis of those records, and evaluated annually by the Head of Legal and Regulatory for its accuracy, effectiveness and compliance with applicable regulations, addressing any deficiencies in that respect.