

## **Commercial Policy**

The Commercial Policy of Decentralized, UAB (the Company), established in line with the MiCA Regulation and ESMA standards, ensures that the Company's operations related to crypto-asset exchange are transparent, secure, and compliant. It applies to all services and transactions involving crypto-assets and covers aspects like pricing, Client eligibility, transaction limits, and order execution. The policy outlines pricing principles such as market-based pricing, liquidity, volatility management, transparency, equal access for all Clients, and record-keeping of pricing decisions and supporting data. These measures aim to maintain Client trust and market integrity.

### **Sources of price information**

The Company determines cryptocurrency prices by aggregating data from trusted market data aggregators, industry-standard exchanges, and real-time price feeds from liquidity providers and financial institutions. The exchange rates are published on the Company's website for Clients and potential Clients.

### **Pricing algorithms and models**

The Company's pricing model for cryptocurrency is based on rates from trusted exchanges, which are adjusted with margins for product and currency risks. The product margin accounts for risk in trading or payment processing, while the currency margin reflects risks related to market conditions and currency volatility. Merchant fees are applied to payment processing transactions and can be reduced for specific Clients based on criteria like transaction volume or partnership potential. Pricing algorithms adjust based on bid/ask quotes, market liquidity, and risk premiums for certain currencies. Market volatility significantly influences pricing, with real-time checks and volatility alerts in place to manage risks. Trading volume also impacts pricing, with higher volumes leading to tighter spreads and better liquidity.

### **Client eligibility requirements**

The Company has set criteria for both individual and corporate Clients. Individuals must be at least 18 years old or the legal age in their jurisdiction. Corporate Clients must be legally registered and active. Both types must be based in jurisdictions where the Company operates and where crypto services are allowed.

Clients must complete identity verification through KYC, with enhanced checks for corporate Clients. They must pass AML screening and acknowledge the risks of crypto trading. Clients must also have a valid bank account and comply with ongoing KYC updates. The Company will only engage with Clients who meet these criteria and may refuse transactions if Clients do not meet legal or risk standards.

### **Transaction limits policy**

The Company sets transaction limits through a process involving risk assessment, regulatory compliance, Client verification levels, and Client risk classifications. These factors determine the appropriate limits, with higher-risk Clients facing stricter thresholds. Limits are also influenced by market conditions and liquidity. The Company applies these limits to manage exposure, with merchant orders limited to 100,000 EUR and converter transactions capped at 200,000 EUR.

### **Order execution**

The Company ensures transparency and accuracy in transaction information, providing details in line with regulations while reserving the right to update or withhold data for security, privacy, or compliance reasons. To maintain price accuracy, prices are refreshed every minute, and orders are locked at the price when placed. Orders are finalized once the Client acknowledges the terms, verifies sufficient funds, and optionally uses two-factor authentication. The Company processes orders on a time priority basis, relying on partner exchanges to execute the trades.

### **Information disclosure to the clients**

The Company will publish aggregated information on a monthly basis regarding the ten most popular crypto-asset exchange pairs from the previous month. The published data will include the total transaction volume, the total number of transactions, and specific exchange pairs with a monthly volume exceeding EUR 100,000. For each of these pairs, the monthly transaction volume and the average exchange rate for the month will be provided. This information will be made publicly available on the Company's official website and updated once per month.