

Conflict of Interest Management Policy

The Conflict of Interest Management Policy of Decentralized, UAB (the Company), established in line with the MiCA Regulation, ensures that the Company, as a crypto-asset service provider, identifies, prevents, manages, and discloses conflicts of interest. It aims to protect Clients, uphold the Company's reputation, and ensure regulatory compliance. The Policy applies to all employees, management, and anyone connected to the Company by control, covering all crypto-asset services.

General principles

The Company prioritizes Clients' interests, ensuring transparency by disclosing unavoidable conflicts and treating all Clients fairly, regardless of their relationship with the Company. Connected Persons are independently supervised and separated from conflicting tasks to maintain objectivity. Serious conflicts are escalated to senior management or regulators, with the Compliance Officer overseeing their resolution. Transactions by employees and related parties are monitored in real time to promptly identify and manage potential conflicts.

Identification of conflicts of interest

Conflicts of interest in the Company's operations can affect both Clients and the Company itself. For Clients, risks include preferential treatment for certain users, manipulation of exchange rates or asset promotions based on internal holdings, and delays in transactions that benefit the Company or Connected Persons. These situations may arise in custody, administration, exchanges, and transfer processes. For the Company, conflicts can stem from financial interests, personal relationships, or dual roles held by Connected Persons that may lead to biased decisions favouring external entities, competitors, or specific Clients. Effective conflict management is essential to ensure fair, transparent, and impartial service.

Measures to identify, prevent, manage and disclose conflicts of interest

The Company has established a comprehensive framework to identify, prevent, manage, and disclose conflicts of interest. Key measures include mandatory reporting to the Compliance Officer, segregation of roles and information access, transaction monitoring, and a COI Questionnaire completed during onboarding and updated annually. Employees and Connected Persons are restricted from participating in conflicting or competing activities, and fair, transparent treatment of all Clients is enforced. Unresolved or serious conflicts are escalated to senior management, and if necessary, to regulatory authorities. Independent oversight, clear governance guidelines, and restrictions on external influence further ensure impartial decision-making and regulatory compliance.

Disclosure of conflicts of interest

The Company ensures that all conflict of interest disclosures to Clients are clear, specific, and understandable, provided in both Lithuanian and English, and published in an accessible section of its website. When conflicts cannot be avoided or adequately managed, they are promptly disclosed with detailed information to help Clients make informed decisions. Clients must acknowledge receipt and understanding of these disclosures, which are documented. The Company regularly reviews and updates its disclosures to reflect new conflicts or regulatory changes, maintaining transparency and client trust.

Reporting to the management board

The Management Board is responsible for overseeing the Conflict of Interest Management Policy, ensuring its effectiveness, and addressing any deficiencies. It reviews the policy at least annually or more often if needed. While the Regulatory Committee handles specific conflict cases, the Management Board monitors overall policy compliance and implementation. Staff must submit an annual report detailing conflict cases, mitigation actions, and any policy weaknesses, with ad hoc

reports required for significant issues. The Compliance Officer or designated staff prepare these reports, which are reviewed by senior management before submission to the Board.

The Company will keep an up-to-date register of all actual and potential conflicts of interest, including management measures and Client disclosures, regularly reviewed by the Compliance Officer. All employees, board members, and Connected Persons must acknowledge and commit to the Policy, with records maintained for compliance purposes.