

## **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 crypto-asset operations are transparent, secure, non-discriminatory, and compliant. It applies to all clients and transactions involving crypto-asset exchange, transfer, and management through the Company's platform. The Policy outlines principles for pricing, client eligibility, transaction limits, and order execution. Key pricing principles include market-based pricing, liquidity considerations, volatility management, transparency, equal access to pricing information, and thorough record-keeping of pricing decisions and data.

### **Use of firm prices**

The Company uses a firm price model under MiCA Article 77, acting as the counterparty in all crypto exchanges. It means that the Company does not transmit client orders to third-party platforms, but rather acts as the counterparty to the client for each exchange transaction, utilizing the Company's own funds and crypto-assets to facilitate client exchanges, bearing the risk for each exchange transaction, including price volatility and liquidity risk. Prices are updated every 60 seconds using data from major crypto and funds sources. Regular exchange prices are valid for 60 seconds while payment processing prices are valid for 20 minutes with a risk margin added. Prices are shared via the website interface and APIs and become binding once the client proceeds with the transaction. Clients can cancel a transaction before its execution ensuring informed consent. This process is part of the Company's contract terms.

### **Pricing model**

The Company earns revenue through different models depending on the product used. It charges a 1 percent fee on regular crypto exchanges. For payment processing it adds a risk margin and a 1 percent merchant fee. For crypto payouts it charges a fixed fee of 0.50 EUR and 0.5 percent of the transfer amount. Fees are clearly shown on the website in terms and during service use. Discounts may be offered based on client volume, use of multiple services, existing competitor deals, partnership opportunities, market entry incentives or brand value.

### **Transaction execution**

The Company executes transactions at the firm price confirmed by the client. For payment processing, the price is locked once the crypto is received in the Company's wallet. A transaction is considered final after the client accepts the price and the Company completes required checks, including quote validity, account permissions, balance or blockchain confirmations, and compliance verification. Detailed transaction information, including volumes, prices, fees, and timestamps, is provided through the client portal, downloadable reports, and API.

### **Referrals**

The Company may run a referral program to attract new users to its crypto platform. Both the referrer and the referred must complete actions like identity verification to qualify. The referred must be a new user, and duplicate or fraudulent accounts are not eligible. Referrers can earn a bonus based on the gross margin from qualified referrals. Fees are paid monthly if they exceed 100 EUR and are issued in the same currency as the referral. Fraudulent or unethical behaviour is strictly prohibited. The program may be limited to specific regions based on local regulations.

### **Client eligibility requirements**

To be eligible, clients must meet specific requirements set by the Company. Individual clients must be at least 18 years old, and corporate clients must be legally registered and active. All clients must be based in jurisdictions where the Company operates legally. Identity verification is mandatory through KYC procedures—real-time ID checks for individuals and enhanced documentation for businesses. Clients must pass AML checks, acknowledge trading risks, and not have had past accounts terminated for violations. A valid bank account is required for funds transactions. Clients must comply with ongoing policies, including updating KYC data. The Company reserves the right to reject or terminate relationships with clients who do not meet internal compliance or risk standards.

### **Transaction limits**

The Company applies transaction limits to manage risk, with standard limits of 100,000 EUR for payment processing and 200,000 EUR for regular exchanges. These limits are shown to clients and can be reviewed periodically or upon request. Limit reviews involve risk assessments considering market conditions, client behaviour, and financial stability, as well as ensuring regulatory compliance with AML and CTF rules. Limits vary based on client risk profiles, industry, and location, with higher-risk clients facing stricter limits. The Company customizes limits to each client's risk level and factors in market liquidity and asset stability to maintain orderly trading conditions.

### **Information disclosures**

The Company will make a summary of this Policy easily accessible on its website in all client communication languages, including Lithuanian and English. Additionally, it will publish monthly aggregated data on the ten most popular crypto exchange pairs, showing total transaction volume, number of transactions, and average exchange rates for pairs exceeding 100,000 EUR. This information will be updated monthly and publicly available on the Company's website.

The Policy will be reviewed and updated at least annually to ensure compliance with MiCA and reflect business changes.