Disclosure on conflicts of interest

Bitblock d.o.o. provides services for the purchase and sale of crypto-assets for its own account through crypto ATMs and may act as the other contracting party in a transaction with the client.

This disclosure is for information purposes and does not constitute a standalone measure for resolving conflicts of interest. The Company primarily identifies, prevents, manages and mitigates conflicts of interest through internal policies, procedures, organisational measures and controls.

1. A conflict of interest may arise, or may appear to arise, especially in the following circumstances:

- the Company determines the exchange price, including the margin and fixed fee, whereby the Company earns revenue from the difference between the market reference price and the price displayed to the client;
- the Company acts as the other contracting party in the transaction, which creates a potential interest of the Company in earning its own revenue through the applied margin;
- the Company uses external liquidity providers and trading venues to execute transactions for its own account;
- related persons, including management board members, employees or persons involved in the Company's business processes, may have a personal interest in a particular crypto-asset;
- due to the proportional and simple organisational structure, certain persons in the Company may perform several functions, which may require additional controls to preserve objectivity;
- the Company uses external service providers, including ICT, KYC/AML and other technology providers, where it is necessary to ensure that their interests do not affect the interests of clients;
- business, personal or professional relationships with external partners or service providers may exist.

2. Nature of conflicts of interest

In the situations described above, a conflict of interest may arise between:

- the interests of the Company and the interests of clients, especially with regard to pricing, margin and transaction terms;
- the interests of employees and the interests of clients, for example where a related person has a personal interest in a particular crypto-asset;
- a conflict between the interests of the Company and the interests of an external service provider, for example a liquidity provider, ICT service provider or provider of other technological solutions;
- a conflict between operational and control functions, where the same person participates in several processes due to the size and proportional organisational structure of the Company;
- a conflict that may arise due to personal, business or professional relationships of related persons with third parties.

3. Risks for clients

Potential risks include:

- less favourable transaction terms for the client
- risk of non-objective pricing

- risk of unequal treatment of clients
- reputational and operational risks

3. Risks related to conflicts of interest

If conflicts of interest were not properly identified, prevented or mitigated, the following risks could arise:

- the risk that the client does not receive sufficiently clear and complete information about the price, margin and transaction terms;
- the risk that the price or transaction terms are determined in a way that favours the Company's interest to the detriment of the client;
- the risk of unequal treatment of clients;
- the risk that personal interests of related persons affect the objectivity of business decisions;
- the risk that external service providers or liquidity providers affect the execution of transactions in a way that is not in the client's best interest;
- regulatory, operational and reputational risk for the Company.

4. Measures for preventing and mitigating conflicts of interest

The Company applies organisational, technical and control measures to identify, prevent, manage and mitigate conflicts of interest.

Measures include in particular:

- a clearly defined methodology for determining the price of crypto-assets;
- display of the price, margin, fixed fee and other essential transaction terms to the client before transaction confirmation;
- separation of operational, control and management responsibilities in accordance with the size and complexity of the Company;
- oversight by the compliance and risk management functions over relevant business processes;
- keeping records of actual and potential conflicts of interest;
- the obligation to report an actual or potential conflict of interest;
- control of personal transactions of related persons;
- rules for handling personal, business and professional relationships that may affect objectivity;
- oversight over external service providers and liquidity providers;
- regular review of the policy and procedures for managing conflicts of interest;
- training of employees and related persons;
- taking corrective measures when a conflict of interest is identified.

5. Disclosure and availability of information

Where a conflict of interest cannot be fully avoided, the Company will inform the client in a timely manner before the execution of the transaction.

This disclosure is available to clients and potential clients in a prominent place on the Company's website.

Information on the availability of this disclosure is also available through crypto ATMs, with reference to the Company's website where the disclosure is permanently available.

This disclosure is published in Croatian and English, which the Company uses for communication with clients and for marketing its services in the Republic of Croatia.

6. Updating and records

The Company regularly updates this disclosure, especially in the event of a change in the business model, organisational structure, types of services, external service providers or the identification of new circumstances that may give rise to conflicts of interest.

The Company maintains an up-to-date record of all actual and potential conflicts of interest, including relevant services or activities related to crypto-assets and the measures taken to prevent, manage or mitigate such conflicts.

Records are kept for at least five years.

Date of last update: 01.07.2026