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COMMERCIAL POLICY

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1. Purpose and regulatory framework

This Annex regulates the Commercial Policy of the Company in accordance with Article 77(1) of Regulation (EU) 2023/1114 (MiCA). The Commercial Policy sets out the principles according to which the Company provides the service of exchanging crypto-assets for funds, while ensuring transparency, equal treatment of users and compliance with applicable regulatory requirements.

The Company provides the service exclusively on its own account, applying an OTC (over-the-counter) business model.

2. Principles of the Commercial Policy

The Company's Commercial Policy is based on the following principles:

- legality and regulatory compliance,
- transparency of business terms,
- equal and non-discriminatory treatment of users,
- protection of users and integrity of business operations,
- prevention of money laundering and terrorist financing.

The Company's Commercial Policy does not include the provision of recommendations, investment advice or encouraging users to make individual investment decisions.

3. Types of users and limits

The Company provides the service of exchanging crypto-assets for funds **exclusively to natural persons** who meet all of the following conditions:

- being at least 18 years of age,
- physically accessing the service in the territory of the Republic of Croatia
- successfully completed identification and identity verification in accordance with regulations on the prevention of money laundering and terrorist financing,
- an acceptable level of risk in accordance with the Company's internal rules,
- residence in jurisdictions that the Company considers acceptable.

The Company applies transaction limits in accordance with internal rules and applicable regulations.

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Level	Limit	User obligation
I	up to EUR 995.00 within 30 days	Mobile phone number, entry of SMS code and crypto-wallet address, politically exposed person declaration, acceptance of general terms and conditions
II	up to EUR 9,995.00 within 24 hours	Level I, identification, due diligence questionnaire, additional documentation at the Company's assessment (source of funds)

The transaction limit for a single transaction is EUR 9,995.00.

The Company may refuse or temporarily suspend the execution of a transaction if this is necessary for compliance with regulatory obligations, prevention of abuse or protection of the system.

If the User reaches or exceeds thresholds that require additional identification, due diligence or submission of additional data and documentation, the Company may temporarily restrict or refuse the execution of transactions until the required checks have been completed.

In such cases, the Company shall act proportionately and in accordance with the law.

4. Users with whom the Company does not do business

The Company shall not provide services to the following categories of persons:

- legal persons,
- minors,
- politically exposed persons (PEP),
- persons on international and national sanctions lists,
- persons from high-risk or unreliable jurisdictions,
- persons who refuse or are unable to fulfil identification and verification requirements.

Fulfilment of the conditions set out in this point is determined through the identification and identity verification procedure carried out through the crypto ATM, including:

- reading and verification of the identification document

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- automatic verification of document authenticity
- biometric verification of the match between the person and the document
- checking relevant databases (sanctions lists, PEP lists)
- assessment of the client's risk in accordance with internal rules

If the user does not meet the stated conditions, the transaction shall not be enabled.

5. Method of providing the service (OTC model)

The Company provides the service of exchanging crypto-assets for funds on an OTC basis, whereby:

- the Company acts as the contractual party in the transaction,
- the Company does not execute user orders and does not act as an intermediary,
- the Company does not connect third parties and does not operate a market or order book,
- the user is offered a pre-defined final exchange price.

The User may accept or reject the offered price, without any further obligations.

6. Transparency of price and terms

Before confirmation of each transaction, the following are clearly and unambiguously displayed to the user:

- the amount of funds or crypto-assets,
- the final exchange price,
- the quantity of crypto-assets being bought or sold,
- other relevant transaction terms.

The Company does not charge users a commission, but earns revenue exclusively through the margin (spread) built into the offered exchange price.

Before execution of the transaction, all key elements of the transaction are displayed to the user on the screen of the Kriptomat device, including:

- the amount of funds that the user invests or withdraws
- the final exchange price
- the quantity of crypto-assets being bought or sold

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- the applicable exchange rate of the crypto-asset
- the total margin included in the price
- the fixed fee

The User must actively confirm the offered transaction terms in order for the transaction to be executed.

By confirming the offer, the user accepts the offered exchange price and the order is considered finally agreed.

In the case of the sale of crypto-assets, the offered price is valid for 20 minutes from the moment the offer is displayed; after its expiry, the user is notified by SMS that the offer is no longer valid.

In the case of the purchase of crypto-assets, the price is considered final at the moment the user confirms the offer. The user confirms the offer when the user inserts into the Kriptomat device the total amount of funds for which the user wishes to buy crypto-assets.

During the process of inserting banknotes, all relevant transaction data, including the quantity of crypto-assets, the applicable exchange rate and the total transaction price, are continuously updated and displayed on the device screen.

After the user confirms the final transaction amount, the exchange price becomes final and can no longer be changed.

Before the final confirmation of the transaction, the user is enabled to review all relevant information about the transaction and, if desired, to cancel the transaction.

In the event of cancellation of the transaction before its final confirmation, the funds previously inserted are returned to the user through the Kriptomat device.

The method of forming the exchange price is regulated in detail by a separate internal document - the Pricing Methodology, which is applied consistently and in accordance with this Commercial Policy.

6.1. Publication of information on executed transactions

The Company ensures the transparency of transaction execution by publishing relevant information on executed transactions through its website.

The publication includes at least:

- the type of crypto-asset
- the quantity of the executed transaction
- the price at which the transaction was executed

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- the date and time of execution

The data are published at an aggregated level, in a manner that does not enable the identification of an individual user.

The Company regularly updates the published information in accordance with regulatory requirements and ensures its availability to the public.

7. Right to refuse or interrupt a transaction

The Company reserves the right to refuse or interrupt a transaction in the event of:

- failure to meet regulatory or legal requirements,
- suspicion of money laundering or terrorist financing,
- technical or operational reasons,
- security or reputational risks.

The right to refuse or interrupt a transaction constitutes a measure to protect regulatory compliance, business security and the integrity of the Company, and is applied proportionately and in accordance with applicable regulations and internal acts.

8. Non-discrimination and equal treatment

The Company applies equal commercial terms to all users who meet the prescribed conditions, without discrimination on the basis of personal or other characteristics, in accordance with applicable regulations.

9. Final provisions

This Commercial Policy applies to all users and transactions of the Company and forms an integral part of the Company's documentation within the MiCA regulatory regime.

Responsible person/Director

Denis Košćić
