

VALUE BRIDGE SINGLE MEMBER INVESTMENT SERVICES S.A.

CONFLICTS OF INTEREST POLICY SUMMARY

Last updated: 30th of June 2026

Important notice. This public summary explains Value Bridge's approach to identifying, preventing, managing, and disclosing conflicts of interest in connection with the Crypto-Asset Services. It is a summary and does not replace the full internal Conflicts of Interest Policy and procedures of Value Bridge.

1. Introduction and Scope

1.1. Value Bridge Single Member Investment Services S.A. is a Greek investment services firm authorised and regulated by the Hellenic Capital Market Commission (HCMC) under the Markets in Financial Instruments framework and Law 4514/2018, which transposed Directive 2014/65/EU on markets in financial instruments into Greek law.

1.2. Value Bridge's HCMC license number is 6/927/31-8-2021. Value Bridge is registered in Greece under GEMI with register number 161690660000. Its registered office is at 43 Aioulou Street, 3rd floor, 10551 Athens, Greece.

1.3. Value Bridge has submitted a notification to HCMC under Article 60 of Regulation (EU) 2023/1114 on Markets in Crypto-assets (MiCA), Protocol No. 8101. The relevant crypto-asset service is the reception and transmission of orders for crypto-assets on behalf of clients.

1.4. Value Bridge is committed to acting honestly, fairly, professionally, and in the best interests of its clients when providing services within its regulatory permissions.

1.5. This Summary applies to conflicts of interest that may arise in connection with the Crypto-Asset Services, including interactions between Value Bridge, clients, prospective clients, directors, employees, associates, affiliates, outsourcing providers, Third-Party Venues, and other related persons.

2. What is a Conflict of Interest

2.1. A conflict of interest may arise where Value Bridge, a related person, an affiliate, a service provider, or a Third-Party Venue has an interest, relationship, incentive, or arrangement that may conflict with the interests of a client or group of clients.

2.2. A conflict of interest does not necessarily mean that a client will suffer harm, but it requires appropriate identification, prevention, management, and, where necessary, disclosure.

3. Potential Conflicts in Crypto-Asset Services

- Value Bridge may receive fees, commissions, mark-ups, spreads, rebates, or other remuneration in connection with the Services.
- Value Bridge may have commercial arrangements with Third-Party Venues, payment providers, banks, liquidity providers, blockchain infrastructure providers, or other service providers.
- Different Third-Party Venues may offer different pricing, fees, liquidity, speed, reliability, supported networks, compliance requirements, and settlement arrangements.
- Value Bridge may have an interest in selecting or continuing to use a particular Third-Party Venue or provider.
- Value Bridge may have an incentive to increase transaction volumes or service revenue.
- Employees or related persons may have personal, financial, or business interests that could conflict with client interests.
- Affiliates, outsourcing providers, or group entities may be involved in technology, support, infrastructure, onboarding, payment, or other operational arrangements.
- Conflicts may arise between the interests of different clients or groups of clients.

4. Criteria for Identifying Conflicts

- 4.1. Value Bridge considers whether it, a related person, or a person directly or indirectly linked to it may have an interest in the outcome of a service or transaction that is distinct from the client's interest.
- 4.2. Value Bridge considers whether it or a related person may have a financial or other incentive to favour one client, group of clients, Third-Party Venue, provider, or business relationship over another.
- 4.3. Value Bridge considers whether it or a related person receives or may receive an inducement, fee, commission, rebate, non-monetary benefit, or other advantage from a person other than the client in relation to a service provided to the client.
- 4.4. Value Bridge considers whether the same person, department, affiliate, or provider performs functions that should be separated to protect client interests.

5. Measures for Managing Conflicts

- policies and procedures to identify, prevent, manage, monitor, and record conflicts of interest;
- segregation of duties where activities may give rise to conflicts if performed by the same person;
- controls over the exchange and use of confidential information;
- separate supervision of persons whose functions may involve conflicting interests;
- controls over remuneration structures and incentives;
- controls over gifts, benefits, inducements, and external business interests;
- internal compliance oversight and reporting to senior management where appropriate;
- procedures governing access to electronic data and confidential information;
- review and approval of outsourcing, Third-Party Venue, and provider arrangements;
- monitoring of order transmission arrangements and service provider relationships;
- disclosure to clients where organisational and administrative arrangements are not sufficient to prevent the risk of harm to client interests;
- refusal to proceed with a transaction or service where a conflict cannot be adequately managed.

6. Third-Party Venues and Remuneration

- 6.1. Value Bridge may use Third-Party Venues and providers in connection with the Crypto-Asset Services. These arrangements may involve fees, commissions, spreads, mark-ups, rebates, or other remuneration.
- 6.2. Value Bridge seeks to ensure that such arrangements do not prevent it from acting honestly, fairly, professionally, and in the best interests of clients within the scope of its role.
- 6.3. Where required, Value Bridge will disclose relevant information concerning fees, costs, charges, or potential conflicts in the applicable disclosure, order flow, or client communication.

7. Disclosure of Conflicts

- 7.1. Where Value Bridge's organisational or administrative arrangements are not sufficient to ensure, with reasonable confidence, that risks of damage to client interests will be prevented, Value Bridge will disclose the general nature and/or sources of the conflict before undertaking further business with the client where required by Applicable Law.
- 7.2. Disclosure is used as a measure of last resort and does not replace the duty to maintain effective organisational and administrative arrangements to manage conflicts.

8. Review and Contact

- 8.1. Value Bridge may review and amend its Conflicts of Interest arrangements and this Summary from time to time.
- 8.2. Questions regarding conflicts of interest may be sent to compliance@valuebridge.global.