

# KRIPTOMAT CODE OF CONDUCT

28 February 2022  
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## KRIPTOMAT

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## Introduction

We are on a mission to make virtual currency available to everyone and to support the worldwide adoption of digital assets. We strongly believe that we are facing a new economic digital era and we are happy to be a proactive player in the field. However, we respect the lessons learned and the market experience of the seasoned financial industry. For this reason, we implemented processes and guidelines that serve as our fenced path toward long-term success. Our business strategy, that puts the satisfaction of the clients in the central point of our business as well as our Guiding Principles - Trust & Security, Accessibility, and the Team give us direction on how to achieve our business goals. The guiding principles are incorporated into our everyday business and reflect how we do business.

For us, it matters what we do and how we do it. We want the public to know how we conduct our business, and this is why transparency is one of our pillars. We are a dedicated team playing by the rules, written and unwritten, as we all know that not all situations can be covered with written guidelines. For this reason, in such cases especially, we follow the ethical principles we advocate and nourish our fairness and integrity. Integrity was something we all followed even before we gave it form in our written policies. The “crypto” environment is new and developing and needs help of us all to model it to ideas of integrity, fairness, transparency and safety, in order for it to become the (r)evolution of finance and bring about new levels of decentralization, certainty and prosperity, that we all aim for!

Our Code of Conduct applies to all our employees and all other contractors and service providers (hereinafter also Kriptomat’s collaborators). We also expect our business partners to be proponents of ethical principles and shared values. All our suppliers are obliged to undergo our supplier questionnaire through which we also assess the integrity of our business partners.

We are committed to fair business practices and professional corporate governance. Our management team consists of experienced international experts with a high sense for integrity and who are fully aware that they are the role model for the rest of

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the company. By confirming this Code of Conduct we publicly present our dedication to integrity. We also vouch to be ever vigilant and strive for a constant improvement of our practices.

Aleksander Ottokar, Managing Director

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# Everybody Deserves Kriptomat - Supporting Crypto Adoption

We wish to enable our services to everyone. We are on a mission to enable crypto to anyone at any time. The industry is challenging, and we need to work very hard to reach our goals. We also need to do things differently to remain successful and also to separate from other competitive players. We are motivated by the success of our clients and growing number of successful use cases of adoption of virtual currencies in the industry. We have welcomed the AMLD5 adoption as within the AML regulation application we fully consider ourselves a company operating in the financial industry. We employ state of the art technological and organizational measures to ensure a high level of protection for our clients' assets. Safety and security of those assets and client satisfaction is what drives and sustains us. It makes us happy and proud to see our customers remain our active customers for years, as this indicates they recognize us as a reliable partner when entrusting us with their assets. It also pushes us forward to work as hard as possible to provide only the best to our clients, as they deserve nothing less.

## Trust & Security

### Building long-term meaningful business relationship in a safe environment

Trust & Security are prerequisites for curiosity to win. Our services are adjusted for various client types - professionals, advanced users and occasional users as well as the beginners who are just getting to know the crypto world and may be contemplating purchasing virtual currencies. For all of them Trust & Security are the key. Trust & Security are also the common denominators of all our clients, and they materialize in various forms - in our overall attitude toward business conduct, decision-making processes and also in the technical security of our platform and organization. For this reason, we are proud to say that we were one of the first providers of virtual currency

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services to obtain ISO / IEC 27001:2013 certification, which represents the best practice in the field of information security.

We deliver what we promise and are responsible and accountable for what we do. We understand that decision-making is hard, but we require all of us to make decisions and take the responsibility for decisions made. We believe in knowledge and constant learning and also in the measurement of the results.

We want to be seen as a reliable and long-term partner where clients feel safe and sound.

## Accessibility

### Making virtual currencies accessible to everyone at any time

If we are on a mission to spread the adoption of virtual currencies. We want our clients to have an excellent, easy to use customer experience. The accessibility of our services is the key to our mission. We strive to adapt to new situations and to constantly improve our services. We understand that the benefits of virtual currencies bring about new levels of scrutiny and strict regulations, as it should be, and also we declare full understanding and abidance by the rigorous AML & CFT requirements. In that regard, we take care that our communication with clients is transparent, fair, and honest.

At the same time, we work hard in developing B2B solutions as we want to follow the industry development.

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## Team

**Everyone who is helping us become one of the top crypto exchange as a service and more**

We work together to provide the best services possible; we face challenges together which gives us the strength and expertise to face and overcome them. We work strongly as a team, and we firmly believe that we all together are responsible for the satisfaction of our clients and success of our company. We cherish and nourish our corporate culture; we interact directly with each other, respectfully and openly. We care for each other and our families. It matters what each of us says. We are also proud of each other and help each other to learn and grow. We all build a most pleasant place to work.

## Customer happiness

We enable our clients to buy virtual currency in the most user-friendly way possible.

We simply genuinely care for our clients. Our focus is on client experience and their satisfaction with the services. We monitor the number of support tickets and try to improve the average response and resolution time. Our help desk is driven by our customers' smile - we talk about customer happiness as we all know that good service makes you smile, and a smile makes you feel good.

When it comes to our services portfolio we are always on the lookout for improvements and new opportunities.

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## Ethical principles

### Legality

In carrying out our business activities and in relationships of any kind and nature and especially when providing virtual currency exchange service, we act in accordance with the applicable laws and regulations in force and with a set of compliance rules.

Kriptomat regards the observance of all national and international standards as a binding and essential condition.

During the execution of their activities, Kriptomat collaborators are expected to comply with the principles of lawfulness.

Under no circumstances can the alleged pursuit of the Kriptomat's interest or benefit justify actions, which would not be in line with policy of honest and lawful conduct.

### Impartiality & Equal opportunity

We avoid any form of discrimination based on sex, race, class, nationality, language, religion, political and philosophical opinions, state of health, age, or any other property.

### Honesty

While carrying out their tasks and during all types of interactions, the Kriptomat's team - employees and collaborators are expected to diligently comply with current laws, the provisions and guiding principles of this Code of Conduct, and all other internal procedures. In all cases, Kriptomat undertakes to carry out its business with honesty, showing at all times full respect for all parties.

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## Correctness and transparency

During the execution of all types of activities, the team is expected to avoid situations in which transactions are or may appear doubtful or lead to a conflict of interest. and must follow internal rules as set in internal Risk Appetite

The team is required to provide complete, transparent, understandable and accurate information.

## Confidentiality

Kriptomat guarantees the confidentiality of all the information that comes into its possession and commits to using it in compliance with current laws. Employees are expected not to use nor distribute confidential information for purposes that are not directly connected with their work.

## Value of collaborators and employees & Diversity

Employees and collaborators are a vital factor in securing the success of Kriptomat. Therefore, Kriptomat carefully protects all its human resources and ensures that their professional needs are met.

We promote a culture of diversity and inclusion of all people and give our utmost to create and preserve an environment of not only tolerance, but genuine acceptance and respect for the uniqueness of us all.

## Personal Integrity and Health & Safety

Kriptomat guarantees the physical and moral integrity of its employees and collaborators as well as working conditions that are respectful of individual dignity and enable them to execute their duties diligently. Special attention is paid to all

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employees and collaborators that are involved in the compliance process and Kriptomat wishes to ensure that their work is always conducted prudently and diligently. To that end, Kriptomat will not tolerate any demands or threats aimed at encouraging colleagues to act in a manner contrary to the law and the internal rules or to behave in a way that is harmful to the moral and personal beliefs and preferences of each person.

Any kind of sexual harassment, mobbing or any other behavior which is detrimental to members of the team, is by no means acceptable nor justifiable and will be prosecuted with highest priority and followed by strict consequences.

Kriptomat is committed to its responsibility for the safety and health of its employees. We provide occupational safety and healthcare according to the provisions of national regulations. We do what is necessary to preserve and promote the health and safety of our employees and we continually strive to improve our working environment. Our team is instructed on how to take all appropriate precautions to ensure that their workplace provides safe and optimal working conditions.

## Rules of Conduct

### I EXTERNAL

### Conflict of interest & Gifts and hospitality

Building the Kriptomat's network is of utmost importance to the work we do. We set out to reach the best possible relationships with our partners and clients. However we always need to take into account possible conflicts of interests and limitations regarding hospitality and exchange of gratitude gifts. Such benefits (in the form of gifts, invitations) are prevalent in business relationships and they are acceptable as long as they are within reasonable values and do not contravene any internal rules or

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national regulations. On the contrary, if such benefits exceed what is reasonable and are misused to influence decisions of third parties, such actions will be investigated and the involved Team members will be held accountable. For more detailed guidance, please refer to Kriptomat's Conflict of Interest policy.

## Anti-bribery and corruption

This subject is inherently connected with the previous hospitality but reaches much further. Bribery is illegal. Corruption is a serious problem of the society and should be fought against with the highest priority, as it clearly impairs innovation, progress and overall development of society. Kriptomat does not condone nor tolerate corruption.

We need to understand the ramifications and consequences of offering or accepting a bribe. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law. We must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor).

The employees and/or collaborators are prohibited from bribing a foreign public official, or anyone else for that matter, anywhere in the world. We never partake in such illicit activities, and we offer hospitality only within the applicable legal frameworks - national regulations and our internal procedures. For more detailed guidance, please refer to Kriptomat's Anti-bribery and Corruption Policy.

## Relationship with authorities

Kriptomat fully and scrupulously observes the regulations established by market regulatory authorities, neither denying, hiding nor delaying any information requested by the bodies responsible for their application and actively collaborating

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during preliminary operations. To guarantee the utmost transparency, Kriptomat undertakes to avoid conflict of interest with Authorities' employees or their relatives.

## Money laundering and Terrorist Financing Prevention

Kriptomat and its employees and collaborators must strictly observe and follow the laws against money-laundering and terrorist financing prevention in any competent jurisdiction.

All Kriptomat employees and collaborators are prohibited from carrying out or from being in any way involved in activities involving the laundering, recycling, or use of money, goods or profits from an illicit source, in any way or form or for any purpose that has or could have elements of terrorist financing. The responsible person within Kriptomat organization must make prior checks on commercial partners, clients, and suppliers, based on the information available and based on the requirements as set in the applicable law, including financial information, in order to verify their respectability and the legitimacy of their activities before entering into any business relationship with the latter.

## Transactions & Financial Statements

All transactions and operations carried out must be duly and appropriately posted to allow the competent bodies to check the decisional, authorization, and implementation processes. All operations must be supported by adequate documentation to allow the competent bodies to verify characteristics and reasons of each transaction and to identify the person that has authorized, carried out, posted, and assessed each transaction. All transactions and operations must be conducted in a transparent manner and with a full audit trail of execution of actions and supervision thereof.

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We are transparent with our figures and we conduct our accounting and financial reporting according to applicable regulations and highest professional standards.

## Fair competition

Fair and free competition is protected by the applicable competition and antitrust legislation. Anti-competitive conduct has not only the potential to cause severe detriment to the market health, but also to damage the Kriptomat's goodwill and induce high monetary fines, damages and even criminal liability.

Kriptomat upholds conducting business solely on principles of fair and free competition. We do not enter into any competition hindering agreements with competitors, business partners or customers. Whenever we are in contact with our competitors, we avoid discussions with competitors about issues that could influence free and fair competition. Such issues include fees and pricing policy, business and product development, business strategies and anything else that feels it may be hindering free and fair competition.

If we come to hold a dominant market position, we do not abuse it, but abide by applicable national and transnational regulation. Abuse can manifest itself in various forms - e.g. refusal to provide services not based on objective criteria, treating our users differently for no objective reason (discrimination) - such as imposing unreasonably high or low fees and conditions for certain customers based solely on our discretion, or unjustified tie-in arrangements linking unsolicited additional services. The Employees guide themselves here as well with their inner integrity, and should in case of doubt, always consult our Compliance and/or Legal team.

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## Inside information & Prohibition of Insider Trading

National legislations and EU law prohibit insider trading as a general principle in financial markets. The same applies to inciting a third party to engage in insider trading and to the unlawful disclosure of inside information. Although such rules are traditionally linked with financial markets and financial instruments, some legislations go as far as explicitly prohibiting insider trading with crypto currencies, even when they are not considered financial instruments. We will therefore consider insider trading rules to be applicable to our business and act accordingly.

Inside information is each information about specific facts that are non-public and relate directly or indirectly to one or more issuers or one or more types of crypto currencies, which, if made public, would be likely to have a significant effect on the price of crypto currencies.

We do not condone nor tolerate insider trading or any involvement in insider trading, nor inciting insider trading or disclosure of inside information).

We may use knowledge relating to our business processes and projects only internally and in accordance with the general legal framework and internal rules and we may not disclose such knowledge to any outside party, be that even friends or close family members.

## Marketing & Social Media

Aiming to be recognized as the most trusted and safest exchange platform, we have a responsibility to market our products accurately and transparently. We are expected to always represent our products truthfully, responsibly, and in adherence to all relevant laws and regulations in the countries where we operate.

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Fair marketing practices are rules set in stone for us. So when an employee's work involves marketing, we must abide by certain rules.

We will never misrepresent the quality of our services, nor succumb to misleading or untruthful practices in advertising. We do not make unsupported claims. Marketing practices will always be properly legally vetted and approved by the management before their roll-out.

We engage in social media with care, responsibility and accountability. When we are online, we are expected to always have Kriptomat's best interest in the back of our mind and to adhere to Kriptomat's key social principles of being understanding, responsible, and respectful.

Guidelines for social media behavior are the same as they are for our everyday conduct. The values, ethics and principles that we are expected to live by everyday, apply when we are online as well. Whether we are Tweeting, supporting customers or chatting with our neighbors, we always act with integrity and respect and strive to be the better versions of ourselves. Bear in mind that what you post, share or like online may be read at any time by anyone – our customers, colleagues, potential or existing investors, journalists or even regulators. This policy applies to both company sponsored social media and personal profiles, as it relates to Kriptomat.

## II INTERNAL

### Infosec

Kriptomat recognizes the fundamental importance of information security in our business and in the digital environment. Being one of the pillars of our business, we have created state of the art information security policies, procedures and processes which are there to establish and maintain the stability of our services and the trust of all our stakeholders.

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Since we see Infosec as one of the most critical business areas within our organization, we saw it as a necessity to implement best practices within the industry to assure the highest level of security and safety. We are proud to say that we are ISO 27001:2013 certified, which is by no means the goal, but just a milestone in the never ending quest for achieving and maintaining the best possible security system. For more details on our sophisticated information security measures, please refer to our set of Information Security policies and procedures.

## Data Protection

We adhere to strict EU data protection regulation and recognize the intricate and inherent connection between information security and data protection.

Collecting, storing, structuring, using, disclosing and other use of personal data is performed on legal basis, be that performance of our services to customers (execution of contractual obligations), our legitimate interest, consent of the person concerned, or some other legal basis.

We protect the personal data of customers, employees, business partners and all other stakeholders and affected parties at all times. Unauthorized internal or external access is strictly prohibited.

We act with proper diligence and care when processing personal data and observe at all times principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, storage limitation, accuracy, integrity and confidentiality and accountability. For more details please refer to Kriptomat's Privacy Policy. In case of doubt, employees can always contact their superior or our Data Protection Officer.

## Confidential information, IP & Know-how

We are committed to safeguarding all relevant company information, but we put additional emphasis on the importance of protection of confidential information, be

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that information about our own organization or about our business partners, (joint) projects, customers or any other third parties, entrusted to us. Confidentiality lies as a responsibility with all members of the Team, even after leaving Kriptomat.

All business partners, employees and collaborators are introduced with the set of mutual rights and obligations regarding confidentiality of information by means of a Non-Disclosure Agreement (“NDA”).

Intellectual property (“IP”) and know-how are invaluable assets created in the course of our meticulous and hard work and need to be protected at all times. Intellectual property includes our trademark, brand, logos, copyrights, domain name, social media accounts and products, registered or not.

Know-how represents our expertise and knowledge, the organization of our business which allows us to provide excellence to our customers. It is invaluable and needs to be protected with the highest degree of care and integrity.

We do not allow third parties to use our trademark or other intellectual property without proper authorization. Our brand, logo and other IP must not be used as part of illicit actions, in a degrading or otherwise offensive manner.

Our intellectual property also includes products of our employees’ work, subject to certain exceptions. As a Kriptomat’s employee, any work you create, in whole or in part, in or outside working hours, in connection with your duties by using company resources, belongs to Kriptomat. This is elaborated and agreed upon in detail not later than at the moment of commencement of employment and/or cooperation with Kriptomat.

## Company assets

Kriptomat’s tangible and intangible assets are there to help us provide the best service and user experience and achieve our business objectives and may be used for

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business purposes only. We all share a common responsibility to our assets and exercise proper diligence and care when putting Kriptomat's assets to use. The assets are used in the optimal way - efficiently and fairly. We protect them from damage, mistreatment, loss or theft, without forgetting that our own physical health & integrity come first. We never use the assets for private or other non-business related purposes.

## Kriptomat code of conduct in daily operations

We work together as one team and with passion and dedication and commitment to be the best. We form a culture of cooperation where we work together and learn from each other as well as support and challenge each other. We are fair, direct, and honest.

We strive to work efficiently and interact with each other to maintain the communication flow. We constantly build our knowledge base and lessons learned. When needed we work together to overcome any and all obstacles. We are genuinely concentrated on improvement of business processes and our service..

## Business Relationship Management

We strive to build meaningful long-term business relationships that are based on trust and fairness. Our business decisions must not be influenced by private interest and personal advantage and for this reason, we avoid situations of conflict of interest.

Customer care is the goal of our business and our focal point of interest. We respond to inquiries quickly and comprehensively. The roles and responsibilities for communication with interested stakeholders are clearly defined and managed by responsible managers.

We care about who we work with. So prior to entering into a business relationship we perform detailed due diligence to assure our cooperation is formed with entities,

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which business is based on the same principles. Relationships are monitored and evaluated on a regular basis in order to implement possible improvements and to assure smooth cooperation.

## Assuring Internal Compliance

We, the Kriptomat - each and every team member - act in accordance with the law, internal procedures and rules and with integrity. Any deviation from this automatically represents a serious violation of conduct standards and needs to be internally investigated. Misconduct cannot be tolerated and to assure these special obligations are given to managers who are responsible for implementing the culture of compliance. We care for honesty and integrity and have built an environment that includes these principles in its very basis.

We all represent the company; one's misconduct can negatively impact the company's reputation. For this reason, we always act with integrity with Kriptomat's best interest in mind. We build and protect the goodwill of Kriptomat at all times. The employees must interact with each other openly and honestly and with respect, concentrating on the business needs. One of the main manager's responsibilities is to assure an environment where employees feel safe and are enabled to share their opinion and disclose information without fearing negative consequences. By providing such an environment we detect possible deviancies at an early stage.

Together we build good practice standards and we look forward to the further development of the company and the industry in general.

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