

1. Purpose and Scope

Finnova's Conflict of Interest Policy aims to identify in advance the risks of conflicts of interest that may arise during the services and activities provided by the Company, to prevent or effectively manage these risks, and to define the methods and procedures to be followed in cases where conflicts of interest cannot be completely avoided.

Finnova commits to act fairly, honestly, and transparently toward all its customers while conducting its operations. The Company has structured its internal control mechanisms and organizational framework within this policy to minimize the possibility of conflicts of interest and has defined the necessary administrative and operational measures. In the event of a conflict of interest, the Company adopts the principle of managing the process fairly and exercising maximum care to resolve the issue.

This policy covers potential conflicts of interest that may arise between one or more customers and Finnova, or between Finnova's managers, employees, customers, or third parties directly or indirectly connected to these individuals.

In preparing this policy, Finnova considered its transaction volume, number and diversity of listed crypto assets, the technical and operational complexity of its activities, organizational structure, and authorized services. Although Finnova is not a member of a corporate group within the scope of Article 195 of the Turkish Commercial Code No. 6102, if it joins such a structure in the future, the conflict of interest policy will be updated considering the structure of the corporate group and the activities of related parties.

2. Definitions

Policy: Refers to the Conflict of Interest Policy.

Company / Finnova: Refers to Finnova Kripto Varlık Alım Satım Platformu A.Ş.

Personnel / Employee: Refers to individuals employed by Finnova Kripto Varlık Alım Satım Platformu A.Ş.

Conflict of Interest: Refers to any financial or non-financial interest or personal gain that may affect or influence the impartial performance of the personnel's duties.

Information: Refers to any data that could influence customers' investment decisions.

Customer: Refers to users who trade on Finnova and utilize Finnova's services.

3. Basis

This Policy is prepared based on the Communiqué on the Establishment and Operating Principles of Crypto Asset Service Providers (III-35/B.1), published in the Official Gazette No. 32840 dated 13.03.2025. For matters outside the scope of the Policy or where there is ambiguity, other relevant capital market legislation provisions will apply. Finnova will carry out all processes related to the prevention, management, and customer notification of conflicts of interest in compliance with the applicable legislation.

4. General Principles

- This policy is prepared within the scope of Finnova's obligation to act honestly and fairly towards its customers.
- Finnova reserves the right to make changes to the Conflict of Interest Policy at any time.
- Managers of different units within the company are responsible for identifying, preventing, and managing conflicts of interest within their units.
- The company takes the necessary steps to professionally manage potential conflicts of

interest.

- This policy is not prepared to establish rights and obligations between Finnova and the Customer. The Conflict of Interest Policy is not part of any contract signed between Finnova and the Customer.

5. Customer Complaints

The customer may report any actions contrary to this Policy encountered during the receipt of services provided by Finnova to the Company via phone, email, fax, or in writing. If the customer has submitted a verbal complaint, they will be requested to submit the complaint in writing. The customer's complaint is forwarded to the audit unit. Finnova's Customer Complaint Procedures are applied regarding the customer's complaint.

6. Resolution of Conflict of Interest

All Finnova personnel are obliged to avoid situations that could give rise to conflicts of interest, detect potential conflict of interest cases, and manage them in accordance with this policy. Personnel must inform their manager immediately in case of any conflict of interest or if they suspect one and cannot decide. Personnel must disclose to their manager all personal or professional relationships and financial transactions that may cause a conflict of interest. If a conflict of interest is identified, personnel and managers will be subject to an investigation by the relevant unit to evaluate the adequacy of internal control systems and measures taken. The results of the investigation are recorded, and if necessary, additional measures are communicated to the personnel and management. If the conflict of interest cannot be resolved despite all measures, the audit unit will take reasonable precautions within a reasonable time and inform the Board of Directors.

7. Notification of Conflict of Interest

In cases where a conflict of interest cannot be prevented due to reasonable reasons arising from the normal course of the market and life, the company officials will provide the customer with an explanation regarding the content, causes, and effects of the conflict of interest. In some cases, the customer may be informed about the conflict of interest before starting to use Finnova's services, and the customer's consent may be obtained. This explanation must be informative and legally compliant, informing the customer about the conflict of interest risk related to the service they will receive.

8. Management of Conflict of Interest

- When Finnova encounters a conflict of interest case, it professionally manages the process in accordance with internal company procedures.
- All company personnel are required to comply with procedures. Necessary measures are taken to prevent internal information flow.
- Finnova takes the necessary precautions and measures to ensure that its units and personnel act diligently in cases of conflict of interest.
- Research specialists are aware of their responsibility regarding conflicts of interest and that they will not create any material benefit for themselves.
- Research unit bulletins are simultaneously accessible to all, including company employees and customers.
- Finnova personnel treat all customers equally.

- All personnel are responsible for information security and must comply with the rules and procedures established within their units.
- Finnova may share information related to the services provided with regulatory authorities if deemed appropriate by managers or requested by public authorities.

9. Potential Conflict of Interest Cases

The following listed behaviors are strictly prohibited. Individuals who engage in or attempt these behaviors will be subject to disciplinary actions and relevant sanctions under Finnova's disciplinary regulations and procedures.

9.1. Customer-Finnova

- Discriminating between customers,
- Overlooking losses of some customers for the benefit of others,
- Steering customers to the detriment of themselves and benefit of the company through research reports or customer support teams,
- Failing to apply customer identification procedures for certain customers,
- Advising customers on crypto assets known to be unsuitable, thereby causing the asset to remain unsellable within the exchange,
- Providing written or verbal guarantees that any crypto asset will yield a certain return,
- Forcing transactions inconsistent with the normal flow of the customer's accounts, portfolio size, and profits and gaining continuous material benefits from this,
- The customer or company acting as both buyer and seller in a transaction.

9.2. Customer-Staff

- Staff members providing guiding behavior regarding crypto assets in which they or related parties have invested,
- Research experts taking guiding attitudes in newsletters or customer communication channels,
- Customer representatives engaging in guiding actions under any name,
- Staff conducting transactions from customer accounts for any reason,
- Staff copying customer transactions for personal or related third-party benefits,
- Staff or related third parties benefiting by copying transactions of customers who achieve extraordinary profits,
- Engaging in debt-credit relationships with customers,
- Acting on behalf of customers with notarized power of attorney,
- Obtaining benefits beyond standard fees and commissions for themselves or related third parties,
- Staff receiving personal benefits from third parties due to customer services,
- Leaking or trading confidential customer information obtained through duties,
- Discriminating among customers,

- Using investments of customers with high volume that cause price fluctuations to manipulate the market,
- Using company or customer information for personal or third-party benefits,
- Acting in favor of personal or related parties' interests by disregarding time and price priority during order transmission,
- Using confidential information for material gain,
- Accepting gifts over 100 USD or encouraging gift acceptance,
- Directing customers to inappropriate crypto purchases to gain profit,
- Staff communicating with customers outside the company and engaging in insider trading.

9.3. Staff-to-Staff

- Research experts and treasury personnel benefiting themselves or related parties through exchange transactions and market movements,
- Research experts and treasury personnel directing other company employees in any manner based on market and exchange transactions,
- Relevant personnel sharing insider information with others, leading those others to invest for their own and third parties' benefit.

9.4. Company-to-Staff

- Using research results that are to be communicated to customers in written, printed, or verbal form, which may influence investment decisions, for the benefit of personnel or third parties before notifying customers,
- Making purchasing or hiring decisions for the company in favor of employees or their related parties.

9.5. General Operating Condition

- Personnel cannot use their personal accounts on the exchange for trading purposes on their own behalf; they may only use them for investment purposes. Personnel can only invest in accounts opened under their own or a third party's name, under any name, and cannot perform continuous buy-sell trades. Personnel's family members or acquaintances may open accounts under their own name and use them according to their purposes.
- The tracking of the personal accounts used exclusively for investment purposes by personnel permitted to open accounts is the responsibility of the respective personnel's manager.
- Treasury personnel are prohibited from opening personal accounts at our company, except for test accounts. This prohibition cannot be circumvented by using accounts opened under different names by the personnel concerned.
- Treasury personnel cannot share the information obtained due to their duty with anyone inside or outside the company, except for the Head of the Treasury Department, CEO, and Board of Directors.
- All behaviors listed above are deemed inappropriate under this Policy.

10. Detection of Potential Conflicts of Interest

Finnova defines the following situations as primary scenarios that may pose a risk of conflict of interest, aiming to identify and effectively manage potential conflicts arising during its operations:

a) Gaining Financial Benefit at the Expense of the Customer or Avoiding Financial Loss

Situations where Finnova or its employees gain financial benefit at the expense of customers' losses or avoid their own financial losses are considered conflicts of interest.

Examples include:

- Finnova providing customers with delayed or incomplete information to protect its own position,
- The company or its employees conducting crypto asset transactions that cause losses to the customer,
- Creating information asymmetry to place the customer at a disadvantage, constitutes a conflict of interest.

10. b) Gaining Benefits from Services and Activities That Do Not Serve the Customer's Interest

Services and activities that create no benefit for the customer but solely generate profit for Finnova or its affiliates can pose a conflict of interest risk.

- Marketing services to the customer that are not needed,
- Investment advice or recommendations that are not tailored to the customer but serve only the company's interest,
- Redirecting transaction risks that do not belong to the customer onto the customer; these are examples of such practices.

10. c) Granting Privileges to Certain Customers or Customer Groups

A conflict of interest may arise if Finnova unfairly prioritizes one customer or group of customers over others. This includes:

- Directing liquidity or special pricing to specific customers,
- Offering different trading conditions to customers holding the same position,
- Providing advantages to certain customers based on insider information.

10. d) Obtaining Additional Gains from Third Parties

If Finnova obtains earnings beyond standard fees and commissions from third parties, institutions, or applications as a result of services provided on behalf of customers, this may cause a conflict of interest.

- Hidden fees received for listings,
- Indirect benefits obtained for order routing,
- Special agreements with third-party wallets or platforms are examples of this situation.

10. e) Incentives for Listing Networks Owned by Itself or Its Affiliates

A conflict of interest arises if Finnova prefers to list only crypto assets with distributed ledger technology owned by itself or its affiliates, and performs this listing without offering any alternative to the user.

In this case;

- Users' choice of technical infrastructure is restricted,
 - Users are forced to use a particular network, generating income from transaction fees or network gains,
- which falls within the scope of conflict of interest.

11. Minimum Measures Implemented to Prevent Conflicts of Interest

Finnova implements the following minimum structural and operational measures to prevent and manage conflicts of interest:

a) Management of Information Flow

The “Chinese Wall” principle is applied within Finnova and its group companies (if any) to prevent unauthorized access to information that may give rise to conflicts of interest.

Accordingly:

- Only employees who require access to sensitive information as part of their job description can access it,
- Access roles to information within internal systems are limited,
- Information barriers are applied between listing process, market analysis, trading, and operations teams.

11. b) Supervision Measures

Units and personnel that may be subject to conflicts of interest are periodically monitored by internal control and compliance units.

For this purpose:

- The principle of segregation of duties is applied for employees in critical positions,
- Transaction records and decision-making processes are regularly audited,
- Senior management reviews reports containing conflict of interest risks.

11. c) Compensation Measures

Finnova's employee compensation policy is free from performance targets that could create conflicts of interest. In this context:

- Personal bonus systems linked to listings or trading volumes are limited,
- Structures where managers or teams could indirectly benefit from customer losses are prohibited,
- Compensation criteria are linked to transparency, objectivity, and customer-interest-focused performance.

12. Procedures to Follow When Conflicts of Interest Cannot Be Prevented

If the risk of conflict of interest cannot be completely eliminated despite all preventive measures taken, Finnova commits to managing this situation transparently. In this context, upon identification of a conflict of interest, relevant units and the Compliance Officer are notified first. The nature of the situation is assessed, the impact of the conflict of interest on customer transactions is analyzed, and additional control mechanisms that eliminate or minimize the impact are implemented.

In cases where the conflict of interest cannot be fully prevented and may affect customer interests, the situation is clearly, accurately, and timely communicated to the customer. The customer is given the opportunity to decide whether to continue receiving the service despite the existing conflict of interest. This notification is made in writing and prior to the transaction whenever possible. If necessary, explicit consent is obtained from the customer before providing the related service. However, Finnova reserves the right to suspend or refuse the provision of the service if the conflict of interest cannot be managed or poses a risk of harm to the customer.

13. Record Keeping

Finnova keeps and preserves records of the services provided to customers. In the event of a potential conflict of interest or when a risk of conflict arises, these service records will be used and preserved to prevent the conflict of interest from occurring or to address it as soon as possible.

14. Compliance with Personal Data Protection Law

Finnova commits to full compliance with the Personal Data Protection Law No. 6698 (“KVKK”) in the detection, prevention, and management of conflict of interest situations. Accordingly, personal data belonging to customers, employees, and related parties are processed only for specific, explicit, and legitimate purposes; these data are used for assessing, preventing, and reporting conflict of interest risks when necessary. Personal data is kept limited, relevant, and proportionate to the purpose of processing, and all necessary technical and administrative measures are taken to ensure data security.

Finnova has established internal policies and infrastructures to ensure the protection of personal data used in conflict of interest processes from unauthorized access and sharing, to respect the rights of data subjects under KVKK, and to conduct data processing activities in compliance with regulations.

15. Responsibility

All units within Finnova are responsible for acting in accordance with the principles set forth in this policy. The control and supervision of compliance with this policy is the responsibility of the Audit Unit.

16. Effective Date

The Conflict of Interest Policy consists of 16 articles and enters into force with the approval of the Board of Directors. Any amendments made will take effect immediately upon implementation.