

CONFLICT OF INTEREST INFORMATION

Introduction

1. Invity operates in the crypto asset sector and is aware of the potential conflicts of interest that may arise in the provision of Services between Invity and you or within Invity. In this document, we will familiarize you with the general nature and sources of conflicts of interest, including the measures we take to minimize the impact of conflicts of interest.
2. A conflict of interest may arise when the interests of one party adversely affect (or appear to affect) the interests of another party, which may impair the ability to make objective and ethical decisions.
3. Potential conflicts of interest may arise:
 - within Invity (for example, between Invity and its partners, its employees, or members of its governing body),
 - between Invity and Users, for example if Invity could benefit financially or otherwise at the expense of a User,
 - and also between multiple Users, if the interests of different User Groups differ, in particular if they could give one of the Users an unfair advantage.
4. In the event of a conflict between the Czech, English, or other language versions of this document, the Czech version shall prevail.

Sources of conflicts of interest

5. Sources of conflicts of interest vary and may include:
 - a. possible misuse of confidential information within Invity's organizational structure;
 - b. influencing the provision of Services to Users;
 - c. unjustified sharing of information across Invity's organization;
 - d. diversity of Users and inappropriate categorization of Users into groups;
 - e. inappropriate internal organization of Invity;
 - f. development of new products that are not in line with the interests of a particular group of Users.

Identifying and minimizing the impact of conflicts of interest

6. Invity has procedures in place to identify conflicts of interest within Invity, between Invity and Users, and between Users themselves. Conflicts of interest are identified on an ongoing basis and apply to all Services provided.
7. The impact of conflicts of interest is minimized in particular by the following measures:

- a. introducing measures to identify and report conflicts of interest or potential conflicts of interest;
- b. ensuring an organizational structure that separates control functions from executive functions;
- c. recording all conflicts of interest that arise and implementing plans to minimize their impact;
- d. ensuring the incompatibility and independence of key control functions;
- e. preventing a direct link between the remuneration of persons within Invity and the remuneration or income of other persons within Invity;
- f. ensuring that persons within Invity refrain from voting on matters where there may be a conflict of interest or a breach of that person's objectivity;
- g. assessing new products to determine whether they are developed in accordance with the interests of all User groups;
- h. introducing procedures for resolving conflicts of interest between Users, in particular by:
 - ensuring equal and fair treatment of all Users concerned;
 - limiting the sharing of information that could give any User an unfair advantage;
 - separating activities or teams where necessary to ensure impartiality;
 - transparently informing affected Users about the nature of the conflict of interest, where appropriate and proportionate.

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