

Information on Conflicts of Interest

Tangany maintains effective internal strategies and procedures to prevent, manage, and disclose conflicts of interest between the company's shareholders, business partners, members of the management, employees, Customers, or between two or more Customers.

1. Business Activities

Tangany provides crypto custody services (custody, administration, and safeguarding of Crypto Assets, cryptographic instruments, and associated Private Keys), as well as crypto asset transfer services.

No other regulated crypto asset services are provided, such as investment advice or trading in Crypto Assets. As such, no conflicts of interest exist in relation to those activities.

2. Conflicts of Interest between Tangany and Customers

Tangany is compensated by the Platform for its services. The remuneration is typically based on the transaction volume processed via the Platform and the volume of Crypto Assets held in custody. Therefore, Tangany has a commercial interest in a high number of crypto transactions being conducted via the Platform. However, Tangany has no influence over how or when transactions are executed by the operator of the trading Platform.

3. Conflicts of Interest between Tangany, Customers, and the Platform

Tangany receives remuneration from the Platform under the Cooperation Agreement. This compensation covers the provision of the technical infrastructure for crypto custody services. The creation of a Customer Account is initiated by the Customer through the conclusion of a custody agreement directly with Tangany.

Tangany has no interest in maintaining a Customer Account without a valid Platform agreement. If the Cooperation Agreement with the Platform ends and the Customer still holds Crypto Assets with Tangany, Tangany becomes the customer's sole contractual partner. The Customer Account may only be closed once all of the customer's Crypto Assets and cryptographic instruments have been withdrawn from custody. In such cases, Tangany will contact the Customer and request the transfer of all Crypto Assets and/or cryptographic instruments to an External Wallet in order to close the account.

Tangany is dependent on the delivery of Crypto Assets by the Platform's broker. If the broker fails to deliver the purchased Crypto Assets to the Customer on time (e.g., due to technical issues or internal processing delays), Tangany will request the broker to complete delivery of the outstanding crypto asset position.

4. Conflicts of Interest between Tangany and Business Partners

Any benefits provided by business partners to Tangany employees or to Tangany itself must be reported to the Compliance Department if they exceed a certain value. The compliance team assesses whether accepting such a benefit could result in a conflict of interest. In cases of doubt, the benefit may not be accepted.

5. Conflicts of Interest Between Customers

Customers may issue instructions to Tangany regarding transfers to External Wallets. If multiple transfer instructions from different Customers are received, the execution of these orders may be delayed. Transfer instructions are collected upon receipt, reviewed, and processed in the order in which they are received. If delays occur during the review process, the affected instructions will be postponed and executed at a later time.

6. Internal Conflicts of Interest

Tangany employees receive virtual company shares as part of their compensation package (Virtual Stock Option Plan, “VSOP”). This creates a heightened interest in Tangany’s business performance.

Tangany serves a wide range of Customer groups and has insight into their crypto asset holdings and transactional behavior. This includes access to potentially non-public information (insider information). Tangany or employees with access to such insider information could, in theory, exploit it unlawfully for personal trading advantages (“front running”). To prevent such conflicts, Tangany has implemented measures to ensure compliance with the prohibition of insider trading.

7. Internal Measures to Identify and Prevent Conflicts of Interest

Tangany ensures that all personnel meet the required level of professional qualification to reliably perform their duties. Each employee undergoes a reliability assessment upon hiring, followed by annual re-assessments. Employees in relevant roles receive regular training on conflicts of interest.

Employees who may be exposed to conflicts of interest are required to disclose their personal transactions involving Crypto Assets or cryptographic instruments held in custody by Tangany. These employees must inform Tangany promptly and without being asked. The Compliance Department collects an annual declaration of completeness from such employees.

Tangany has implemented internal information barriers (“Chinese Walls”) to prevent the dissemination of insider information within the company. In line with the “need-to-know” principle, information is shared only with employees who require it. Tangany has also implemented internal procedures and controls to ensure compliance.

The Compliance Department has introduced controls to ensure ongoing adherence to conflict-of-interest management rules. These include:

- a. Regular employee reliability checks
- b. Monitoring the fulfillment of customer transactions
- c. Periodic updates to the risk analysis to assess new risks arising from conflicts of interest and to define appropriate mitigation measures

Customers may file complaints regarding any dissatisfaction related to the provision of crypto custody or transfer services. Further information is available at <https://tangany.com/complaints>.

Customers may also report violations of conflict-of-interest measures confidentially via Tangany’s whistleblower system. Details are available at <https://tangany.com/whistleblower-policy>.

8. Remuneration System

Tangany maintains a transparent remuneration system that does not incentivize employees to take disproportionate risks or promote conflicts of interest.

9. Internal Control System and External Audits

Tangany operates an Internal Control System based on the four-eyes principle. This system serves to identify, assess, manage, and monitor risks and internal controls. The Compliance Department performs regular audits to ensure adherence to internal policies. The effectiveness of the compliance controls is assessed and reviewed by the internal audit team. Regular external audits of the Internal Control System are conducted by an independent auditing firm.

10. Handling of Unavoidable Conflicts of Interest

In cases where individual and unavoidable conflicts of interest arise between involved parties, the Compliance department will work with the relevant business unit to develop a mitigation strategy. If necessary, the affected parties will be contacted in an effort to find a mutually acceptable resolution.