



Client Information on Crypto Asset Services

Information on Handling of Conflict of Interest

As a financial services provider with global activities and a tremendously diverse range of businesses, Commerzbank AG ("Bank") encounters both actual and potential conflicts of interest on a regular basis. These conflicts can also arise in the course of providing crypto-asset services. The Bank offers its clients services related to custody and administration of crypto-assets as well as transfer services for crypto-assets. In this context, conflicts of interest may arise between clients, as well as between the Bank and its clients, staff, members of the management body, shareholders, and other group companies.

As a matter of principle, the Bank conducts its business in a manner designed to avoid conflicts of interest. This principle is firmly established in the Bank's Code of Conduct, which is binding upon senior management and all of the Bank's employees.

The majority of conflicts can be mitigated at an early stage through appropriate organisational measures. These measures include establishing areas of confidentiality, segregating functions, disclosing conflicts to the client, and obtaining consent from the parties involved.

Whenever a conflict of interest is unavoidable, it is addressed fairly. This applies to conflicts between the Bank and its clients and such among clients, as well as between the Bank and its connected persons, as mentioned above.

The Compliance Department is one of those tasked with ensuring that the bank handles conflicts of interest fairly. Compliance is an independent unit and reports directly to senior management.

Specifically, conflicts of interest may arise:

- when providing crypto-asset services, based on the Bank's own interest in generating revenue and profit;
- through performance-related remuneration of employees;
- out of the Bank's other business activities as well as the activities of other companies of the group;
- when information that is not publicly known is obtained;
- from current or past personal or political relationships of the Bank's employees, its senior management, or other connected persons;
- from the engagement of, e.g., staff or members of the management body in supervisory or advisory boards of other companies with differing interests;
- from an increased number of transfer requests of clients.

The Bank has taken organisational measures to avoid or adequately manage conflicts of interest:

- The Bank's departments and subsidiaries operate with appropriate independence from one another.
- The flow of information between different areas of the Bank which may give rise to conflicts of interest is regulated.

- In certain cases, the Bank deals with potential conflicts of interest by prohibiting specific business activities.
- The Bank's sales guidelines and remuneration systems have been designed with Compliance involvement to prevent client interests from being compromised.
- Before any new products are launched or products are selected for sales activities, they are examined for potential conflicts of interest.
- The Bank qualifies its staff through regular training activities.
- A gift acceptance scheme governs the acceptance and granting of personal gifts.
- Transfer requests of clients are processed in the order they are received.

If, despite all these measures, there are conflicts of interest which cannot be avoided, the Bank will disclose such conflicts of interest to affected clients before concluding any business transaction. Such a disclosure is considered "Ultima Ratio" and is not considered as an alternative to the conflict-of-interest management measures mentioned above.