

Conflicts of Interest Disclosure

1. Introduction

Cash Friday B.V. (Monflo) is a crypto-asset service provider (CASP) currently in the process of obtaining a license from the AFM on the basis of the Markets in Crypto-Assets Regulation (MiCA). As a CASP, Monflo is obliged to implement and maintain effective policies and procedures to identify, prevent, manage, and disclose conflicts of interest.

2. Monflo's policy on preventing conflicts of interest

Monflo has adopted a policy on preventing conflicts of interest (the Conflict of Interest Policy). This Conflict of Interest Policy applies to Monflo's shareholders or members, any person directly or indirectly linked to Monflo or Monflo's shareholders or members by control, Monflo's board members and Monflo's employees including contractors (the Connected Persons). The purpose of Monflo's Conflict of Interest Policy is to identify, prevent, manage and disclose conflicts of interest.

Monflo ensures that all Connected Persons are able to identify all possible conflicts of interest in time. Monflo's shareholders, board members and employees are obliged to immediately report any situation in which there is a (potential) conflict of interest. Monflo's Compliance Officer and management board takes appropriate measures to avoid the (potential) conflict of interest.

Through this disclosure, Monflo aims to inform you on the general nature and sources of conflicts of interest that have arisen or might arise, and the steps that Monflo has taken to mitigate these conflicts of interest.

3. General identification of conflicts of interest

Monflo has identified two categories of potential conflicts of interest:

- Conflicts of interest potentially detrimental to clients of Monflo; and
- Conflicts of interest potentially detrimental to Monflo.

Conflicts of interest that are potentially detrimental to clients may arise when Connected Persons are in any of the following situations:

- Monflo or the Connected Person is likely to make a financial gain, avoid a financial loss, or receive another kind of benefit, at the expense of the client;
- Monflo or the Connected Person has an interest in the outcome of a crypto-asset service provided to a client of Monflo or of a transaction carried out on behalf of that client, which is distinct from that client's interest in that outcome;
- Monflo or the Connected Person has a financial or other incentive to favour the interest of one or more clients of Monflo over the interest of another client of Monflo;
- Monflo or the Connected Person carries on the same business as the client of Monflo; or

- Monflo or the Connected Person receives or will receive from a person other than the client of Monflo an inducement in relation to a service provided to that client, in the form of monetary or non-monetary benefits or services.

Conflicts of interest that are potentially detrimental to Monflo may arise when a Connected Person:

- has an economic interest in a person, body or entity with interests conflicting with those of Monflo;
- has a personal relationship with a person, body or entity with interests conflicting with those of Monflo;
- has or has had a professional relationship with a person, body or entity with interests conflicting with those of Monflo;
- has a political relationship with a person, body or entity with interests conflicting with those of Monflo; or
- carries out conflicting tasks, is entrusted with conflicting responsibilities or is hierarchically supervised by someone who is in charge of conflicting functions or tasks.

4. General measures to prevent conflicts of interest

Conflicting activities

Certain activities of Monflo may lead to conflicts of interest with other activities of Monflo. For that reason, Monflo has adopted measures to prevent conflicts of interest arising from:

- Connected Persons being involved in conflicting activities;
- Connected Persons involved in conflicting activities sharing information;
- Connected Persons supervising another Connected Person that is involved in activities conflicting with those of the supervising Connected Person;
- Connected Persons supervising two or more conflicting activities.

Remuneration

Remuneration for employees, board members and other natural persons involved in the provision of Monflo's services may create a conflict of interest that encourages those persons to act against the interests of any of Monflo's clients or impair their abilities to fulfil their duties and responsibilities in an objective and independent manner.

Therefore, Monflo has adopted a remuneration structure that is balanced between fixed and variable components, so that the remuneration structure does not favour the interests of Monflo or its Connected Persons against the interests of any client, in both the short, medium and long term. This remuneration structure is based on both quantitative commercial criteria and qualitative criteria, reflecting compliance with applicable regulations, the fair treatment of Monflo's clients and the quality of services provided to Monflo's clients.

Personal transactions

Personal transactions of Connected Person may entail a conflict of interests of that Connected Person with Monflo or Monflo's clients. Therefore, every intention by a Connected Person to enter into a personal transaction above a certain threshold is

notified to the Compliance Officer. The Compliance Officer will determine in consultation with the CRO whether the personal transaction can be made.

Gifts

The acceptance of gifts from clients or third parties can lead to (the appearance of) a conflict of interest. For this reason, Monflo has adopted a strict policy on accepting gifts, which entails:

- a prohibition on accepting gifts in money or crypto-assets;
- a maximised value of physical gifts; and
- the obligation to report gifts to the Compliance Officer.

Promotion campaigns

Carrying out promotion campaigns may lead to conflicts of interest between a Connected Person and Monflo. For this reason, Monflo has adopted a strict policy on carrying out promotion campaigns, which entails:

- ensuring that the independence of the Connected Person entrusted with the promotion campaigns is beyond doubt;
- a prohibition to have any kind of relationship with participants in the promotion campaign; and
- the obligation to report (doubts regarding) relationship with participants to the Compliance Officer.

Commission

Commissions (also known as referral fees) paid to a third party for bringing in new clients may involve a risk of a conflict of interest. Monflo pays referral fees to referral agents for referring clients that are onboarded by Monflo. These fees are taken into account by Monflo when determining potential conflicts of interest. Monflo does not accept and retain fees, commissions or any monetary or non-monetary benefits paid or provided by any third-party, or a person acting on behalf of a third party, in relation to the provision of its services.

Ancillary activities

Ancillary activities of Connected Persons may lead to conflicts of interest between the Connected Person and Monflo or Monflo's clients. Therefore, ancillary activities are not allowed to be conducted by Connected Persons unless the Compliance Officer has provided permission for a specific activity, irrespective of whether the position is paid or unpaid.

5. Evaluation and updates

Monflo maintains up-to-date records of all situations giving rise to actual and potential conflicts of interest, including the relevant crypto-asset services and activities, and of the measures taken to mitigate such conflicts in the relevant situations. This disclosure is regularly updated on the basis of those records, and evaluated annually by the Compliance Officer for its accuracy, effectiveness and compliance with applicable regulations, addressing any deficiencies in that respect.