

Conflict of Interest Disclosure

CoinMENA FZE is committed to maintaining the highest standards of integrity, fairness and transparency in all aspects of its virtual asset activities. We recognise that actual, potential or perceived conflicts of interest may arise in the course of conducting our business and have established policies, procedures and governance arrangements to identify, manage, mitigate and monitor such conflicts.

Our Commitment

CoinMENA seeks to ensure that the interests of clients are treated fairly and that business decisions are made objectively, independently and in accordance with applicable regulatory requirements. Our Conflict of Interest framework is designed to support compliance with the Dubai Virtual Assets Regulatory Authority ("VARA") Regulations and Rulebooks, including requirements relating to corporate governance, market conduct, related-party transactions, insider dealings and conflicts of interest.

Types of Conflicts We Monitor

Conflicts may arise between:

- CoinMENA and its clients;
- Different clients of CoinMENA;
- CoinMENA and its shareholders or affiliated entities;
- Board members, Responsible Individuals, Senior Management or employees and CoinMENA;
- CoinMENA and its service providers, including custodians, liquidity providers, payment service providers and outsourced service providers;
- Related parties involved in transactions with CoinMENA.

Conflicts may also arise in connection with:

- Token listing, monitoring and delisting decisions;
- Product approvals and business initiatives;
- Vendor and outsourcing arrangements;
- Marketing and promotional activities;
- Personal account dealing by employees;
- Access to confidential or non-public information;
- Gifts, hospitality and other inducements.

How We Manage Conflicts

CoinMENA maintains a Conflict of Interest Policy supported by internal procedures and governance controls. These measures include:

- Mandatory conflict disclosures by Board members, Senior Management and employees;
- Maintenance of a Conflict of Interest Register;
- Segregation of duties and independent oversight arrangements;

- Board and management review of material conflicts;
- Recusal from discussions, decisions and voting where conflicts exist;
- Information barriers and access controls where appropriate;
- Independent review of related-party transactions;
- Ongoing monitoring by Compliance, Risk Management and Internal Audit functions;
- Periodic training and awareness programmes for employees and management.

Related-Party Transactions

CoinMENA assesses transactions involving related parties to identify potential conflicts and ensure that such arrangements are conducted on fair, reasonable and arm's-length terms where applicable. Material related-party matters are subject to appropriate governance review and approval processes.

Personal Account Dealing and Insider Information

Employees, Board members and other relevant personnel are prohibited from using confidential or non-public information obtained through their position for personal gain. CoinMENA maintains controls designed to prevent insider dealing, misuse of information and other conduct that may create conflicts of interest.

Client Protection

Where a conflict cannot be effectively prevented or mitigated through internal controls, CoinMENA will consider whether disclosure to affected clients is appropriate and may decline to proceed with the relevant activity, transaction or relationship where necessary to protect client interests and maintain regulatory compliance.

Governance and Review

CoinMENA's Conflict of Interest Policy is reviewed periodically to ensure continued effectiveness and alignment with applicable laws, regulations and industry best practices. Material conflicts are escalated to Senior Management and, where appropriate, the Board of Directors for oversight and resolution.

Clients may contact CoinMENA through the published contact channels on this website should they require further information regarding our conflict management arrangements.