

Summary of Risks and Safeguards (Public Disclosure)

Disclosing conflicts of interest that could adversely affect our clients' interests.

1. Ventures Participation in Token Offerings

Conflict Risk: Decubate Ventures, an affiliated investment entity, may invest in token projects onboarded through the Decubate Launchpad.

Safeguards:

- Ventures may invest only between €10,000 and €25,000 per project, and never more than the lower of €50,000 or 1% of total funds raised.
- Ventures is subject to longer vesting periods than retail investors.
- Ventures is prohibited from trading based on non-public information.
- All Ventures trading must avoid market orders and use delta-neutral execution strategies.

2. Referral Arrangements with Service Providers

Conflict Risk: Decubate may receive referral fees from third-party service providers recommended to projects or clients.

Safeguards:

- Referral fees are capped at 20% of first-year revenue generated through the referral.
- Decubate does not enter into exclusive partnerships with any service provider, ensuring referrals are based on objective project needs, not financial incentives.

3. Board-Level Decision-Making and Compliance Oversight

Conflict Risk: Day-to-day managers are also shareholders, which could lead to prioritisation of internal or commercial interests over regulatory obligations.

Safeguards:

- The Chief Risk Officer (CRO) holds a formal veto right over all matters involving compliance with applicable laws.
- An escalation procedure is in place for all conflict-related decisions, with mandatory documentation and review.

- The Compliance Officer is structurally separated from commercial teams and reviews all personal transactions and related party decisions.
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4. Token Listing and Allocation Conflicts

Conflict Risk: Decubate may have influence over how projects are listed or how allocation is distributed among different participant groups.

Safeguards:

- All Launchpad listings are subject to structured due diligence and must meet objective onboarding criteria.
 - Allocation mechanisms (including Ventures participation) are predefined and published.
 - No privileged access is granted to internal teams beyond what is transparently disclosed.
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Disclosure and Transparency Commitment

If a specific conflict arises that cannot be effectively mitigated, Decubate will disclose it clearly and in advance to the affected parties, as required by MiCAR. We are committed to maintaining transparency and fairness in all client-facing activities.

For questions about our conflict management framework or to request a more detailed copy of our Conflicts of Interest Policy, please contact: **compliance@decubate.com**