

Conflicts of Interest Policy

1. Introduction

This Conflicts of Interest Policy ("Policy") is established by CrowdX ("CrowdX"), a European crowdfunding platform, to ensure transparency, fairness, and integrity in its operations. This Policy outlines the procedures and guidelines to identify, prevent, and manage conflicts of interest that may arise within CrowdX. CrowdX is subject to Commission Delegated Regulation supplementing the EU Crowdfunding Regulation regarding regulatory technical standards (RTS) specifying conflicts of interest requirements for crowdfunding service providers.

2. Scope

While ensuring by means of relevant policies and procedures the equal treatment among Investors and Project Owners respectively, the Company is obliged as a Crowdfunding Service Provider to operate as a neutral intermediary between the inherently opposing interests of its clients, i.e. those of the Project Owners on the one hand and of the Investors on the other, as these are displayed on the Crowdfunding Platform. The conflicts of interest policies and procedures laid down herein apply to the Company, its shareholders, managers and employees, and any natural or legal person closely linked to them by way of control. In particular, the Company is not allowed to have any participation in the Crowdfunding Offers on the Crowdfunding Platform. Major shareholders, managers and employees, and any natural or legal person closely linked to them by way of control, will not act as Project Owners in relation to the Crowdfunding Services offered by the Company on the Crowdfunding Platform. However, those major shareholders, managers, employees, and natural or legal persons should not be prohibited from acting as Investors in the Crowdfunding Projects offered on the Crowdfunding Platform, subject to observance of the safeguards against conflicts of interest laid down below herein.

3. Definition of Conflicts of Interest

A conflict of interest arises when the personal interests or activities of an individual or entity interfere or have the potential to interfere with their responsibilities and obligations to CrowdX. Conflicts of interest can manifest in various forms, including financial, personal, or professional interests.

4. Identification of Conflicts of Interest

CrowdX shall implement procedures to identify and assess potential conflicts of interest, including but not limited to:

- Regular training and education for employees to recognize and report conflicts of interest.
- Disclosure of personal, financial, or other interests that may create conflicts.
- Monitoring of employee activities and transactions to detect potential conflicts.

5. Prevention and Management

CrowdX shall take appropriate measures to prevent and manage conflicts of interest, including:

- Any staff member who may have a conflict of interest in relation to a Crowdfunding Project will not participate in the discussion and voting process on the corresponding project.
- The division and allocation of duties to different employees and the prevention and control of the simultaneous or sequential involvement of a relevant person in separate Crowdfunding Services where such involvement may impair the proper management of conflicts of interest.
- The adoption of specific procedures ("Chinese Walls") to prevent or control the exchange of information between relevant persons engaged in activities involving a risk of conflict of interest or exchange of information which may harm the interests of one or more clients.
- The establishment of a remuneration policy and procedures which set out appropriate governance to prevent remuneration structures which may incentivize an employee to act contrary to their responsibilities. To this end, the Company's remuneration policy applies to the Crowdfunding Services offered by the Company as well. The remuneration structures with the Company's employees do not include any clauses that may incentivize them to act in a manner that may give rise to potential conflicts of interest between the Company and its Clients (e.g., commission on a successful crowdfunding campaign).
- The education and training and the provision of clear instructions to the staff of the Company and the introduction of rules of conduct for the prevention of, insofar as possible, the creation of any conflicts of interests.
- The prohibition of the Staff from offering, giving, soliciting or accepting an inducement, gift or benefit, if it is likely to materially conflict with the Employees' duties to the Client.
- The establishment of independent committees, including the Crowdfunding Investment Committee (CIC), for the overview of the operations of the Company and evaluation of crowdfunding projects.
- Oversight of the Company's operations by the Internal Audit function and reporting directly to the Board of Directors which may launch internal investigations in suspicion of a potential conflict of interest.
- The Company will receive from Project Owners a percentage commission on the total amount raised of a successful crowdfunding campaign. The percentage is variable and depends on the type and size of the campaign and is agreed with the Project Owner prior to the launch of the crowdfunding campaign on the Crowdfunding Platform. The Company also charges a small upfront fee to cover any transaction costs incurred. The Company may pay an Introducer Fee to persons that recommend a potential fundraising company that results in a successful crowdfunding campaign. The introducer fee will be a percentage of the amount that the Company charges the fundraising company for a successful

crowdfunding campaign. The exact nature of the relationship and payment of the Introducer will be clearly stated in the agreement between the Company and the Introducer. If a crowdfunding campaign is launched on the Crowdfunding Platform that resulted from an Introducer, the Introducer's interests will be aligned with those of the Company as well as with the fundraising company (Project Owner).

- The Company will decline from acting in situations where there is no other practicable way of ensuring that the Client would be treated fairly.
- The Company and any or all of its managers, employees and persons linked to them by means of ownership or control will ensure that the Investor orders and any other information concerning Investor transactions or holdings or other info will not be disclosed to non-relevant staff members or third parties (e.g. Project Owners) but forwarded to the responsible persons for completing the normal internal processes of the Company. In order to ensure confidentiality of information known by staff members belonging to a different department, the Company's staff concerned will not disclose information they possess as a result of their business activities to any other departments which they are not relevant, or have no procedural function to perform in using this information. If, in any case, this information is made known, they should by no means use it for the specific duties of the other unit. The Company's staff should not use the confidential information of the Investors, and in particular, the shares they hold, companies that they may control or are involved in the management of transactions, and any information they know and may use to get benefits either personally or for the Company.
- Similarly, the use of information for the benefit of a third party (such as another customer or company) is strictly prohibited. Disclosing confidential information is only allowed after the written authorisation of the involved client.
- With regard to potential conflicts of interest arising between Investors and Project Owners, the Company takes the following measures to safeguard against those conflicts:
 1. The valuations of the Project Owners and/or of the Crowdfunding Project are performed by the Risk Manager, preventing Project Owners from inflating share prices at the expense of (potentially) Non-sophisticated Investors.
 2. The structure of any TS or Admitted Instruments to be offered by the Project Owner is agreed upon between the Project Owner and the CIC prior to the launch of the campaign on the Crowdfunding Platform. The Committee will ensure that the structure and terms are fair and reasonable for investors prior to accepting the crowdfunding project on the platform.
 3. The Company performs extensive due diligence on all Crowdfunding Projects and KYB/KYC for the Project Owners and relevant personnel. Through its processes, the Company verifies all information to be displayed on the Crowdfunding Platform and KIIS before publishing to ensure the accuracy of the information and avoid misrepresentation.

6. Disclosure Requirements

Employees of CrowdX are required to disclose any actual or potential conflicts of interest promptly and fully. Disclosure should be made to the designated compliance officer or relevant authority within CrowdX. Failure to disclose conflicts of interest may result in disciplinary action.

The Company shall also disclose to its clients the general nature and sources of conflicts of interest and the steps taken to mitigate them. Such disclosure shall be made on the website of the Company on a place that is easily accessible for Clients, and include sufficient detail, taking into account the nature of the Client, to enable that client to make an informed decision with respect to the service in the context of which the conflict of interest arises. The Company shall disclose that information to clients on a durable medium, unless no conflict of interest has been identified between the Company, its shareholders, its managers or employees, or any natural or legal person linked to them by control, and its Clients, or between one Client and another Client, and shall update that information where relevant. The disclosure shall contain a specific and clear description of the conflicts of interest and associated risks identified in the context of a given service, taking into account the nature of the clients to whom the disclosure is being made, in particular their qualification as sophisticated or non-sophisticated prospective investors. The Company will assess and review its internal rules to prevent conflicts of interest at least annually and take all appropriate measures to address any deficiencies identified. For the avoidance of doubt, disclosures are made by the Company in order to provide the Client with general information as to the Company's approach to managing conflicts of interest. It is noted that if a Conflict arises which cannot be sufficiently mitigated through disclosures or other controls the Company will not process any such transaction or relationship.

7. Confidentiality and Non-Disclosure

CrowdX shall ensure the confidentiality of information related to conflicts of interest and shall not disclose such information except as required by law or regulatory authorities. Employees involved in managing conflicts of interest must adhere to strict confidentiality and non-disclosure obligations.

8. Forbidden Transaction Practices

In order to prevent potential conflicts of interest, the following transaction practices are strictly forbidden and all employees are aware of the forbidden transaction practices. It is their responsibility to inform the Compliance Officer immediately in case any of these appear:

- a. The provision of services to a Client for the benefit of the Company or related persons, particularly with respect to transactions that the Company or related persons are about to effect before or after the provision of the said crowdfunding services.
- b. The use of Client transaction information by the Company for own benefit or the announcement to third persons of such information.
- c. The preferential treatment of Company members of staff at the expense of its Clients, during the provision of services of a crowdfunding campaign.

- d. The investment at preferential terms and/or valuation for a project staff at the expense of Investors.
- e. Participation of the Company in any Crowdfunding Offer on the Crowdfunding Platform.

9. Training and Education

CrowdX shall provide regular training and education to employees on conflicts of interest, including awareness of potential scenarios, ethical considerations, and compliance with this Policy. Training sessions shall be conducted periodically and documented for record-keeping purposes.

10. Reporting and Monitoring

CrowdX has established mechanisms for reporting and monitoring conflicts of interest, including:

- a. Regular review of conflict of interest disclosures and related documentation.
- b. Investigation of reported conflicts and implementation of appropriate corrective actions.
- c. Continuous monitoring of internal controls and procedures to identify and address emerging conflicts.

11. Review and Updates

This Policy shall be reviewed periodically to ensure its effectiveness and relevance. Updates may be made as necessary to reflect changes in regulations, industry standards, or business practices. CrowdX shall communicate any updates to the policy through its website, as appropriate.

12. Compliance and Enforcement

Compliance with this Policy is mandatory for all individuals and entities associated with CrowdX. Violations of this Policy may result in disciplinary action, including termination of employment or contractual relationship, as well as legal consequences if warranted.

In certain cases, following an internal assessment of the situation, the Chief Executive Officer may suspend or cancel an individual's or a legal entity's authority to act on behalf of the Company.

13. Governing Law

This Policy shall be governed by and construed in accordance with European laws. Any disputes arising under this Policy shall be subject to the exclusive jurisdiction of the courts of the European Union.

14. Contact Information

For inquiries or assistance regarding conflicts of interest, please contact the Compliance Officer at info@eurivex.com.

15. Acknowledgment and Acceptance

By accepting employment or engaging in business with CrowdX, individuals and entities acknowledge that they have read, understood, and agreed to abide by this Conflicts of Interest Policy.