

Summary of conflicts of interests management policy

In accordance with French and European regulations and as part of the Société Générale Group, SG-Forge has established and maintains a policy for the identification, prevention, and management of conflicts of interests. This policy aims to ensure that SG-Forge conducts its activities honestly, fairly, and professionally, respecting the primacy of its clients' interests.

Definition and Identification of Conflicts of Interests

A conflict of interests situation arises when a company or one of its employees finds itself, during its activities, at the center of multiple, opposing, or simply differing interests. In this situation, acting in favor of one of these interests (personal interests, employer's interests, client's interests, interests of multiple different clients, etc.) may harm the interests of others. Generally, to identify whether a conflict of interests is likely to occur, SG-Forge (or a person directly or indirectly connected) ensures that it is not in one of the following situations:

- SG-Forge or the employee is likely to gain financially or avoid a loss at the expense of the client;
- SG-Forge or the employee has an interest in the outcome of a service provided to the client or a transaction carried out on their behalf that differs from the client's interest in that outcome;
- SG-Forge or the employee is incited for financial or other reasons to prioritize the interests of another client (or a group of clients) over the interests of the client to whom the service is provided;
- SG-Forge is engaged in the same activity as the client;
- SG-Forge or the employee receives an advantage from someone other than the client in relation to the service provided to the client in any form other than the commission or fee normally charged for that service.

Conflicts of interests may arise between a client and SG-Forge, for example (non-exhaustive list) when the crypto-asset service provider:

- does not adhere to its transfer policy and prioritizes certain clients to the detriment of others;
- does not comply with its Order execution policy on crypto-assets at the expense of clients;
- does not apply its market abuse prevention policy to the detriment of clients;
- favors transactions of Société Générale Group entities to the detriment of external clients;

Conflicts of interests may also arise between the interests of a client and those of a third party/supplier/partner of SG-Forge.

Conflicts of interests may also involve an employee, an executive, or a shareholder of SG-Forge when they conduct outside activities privately or due to personal or professional relationships that could conflict with their professional activities.

Prevention and Management of Conflicts of Interests

To prevent and manage the risk of conflicts of interests and to strengthen client trust, the conflict of interests policy implemented at SG-Forge includes a mechanism aimed at:

- identifying the types of conflicts of interests that may occur in the conduct of activities (criteria, examples, mappings, registers, etc.);
- preventing the occurrence of conflicts of interests, including, where applicable, those that may lead to renouncing an activity, transaction, or mandate;
- conducting its activities in a manner that ensures the bank always acts in the best interests of its clients and that strict confidentiality of information is maintained regarding the various activities that could potentially generate conflicts of interests.

This mechanism includes:

- the establishment of information barriers and adherence to the "Need to Know" principle, especially between SG-Forge and the Société Générale Group entities potentially involved in similar transactions. These measures ensure a physical separation between departments, prohibit the undue circulation of confidential information, and prevent its use to the detriment of the interests of its clients;
- employee compensation policies that specifically prohibit any direct interest of the employee in the success of a specific transaction;
- provisions concerning commissions, remuneration, non-monetary benefits;
- specific procedures designed to identify and prevent conflicts of interests in the issuance of natively tokenized assets or refinancing activities (e.g., repurchasing agreements, etc.);
- procedures implementing the principles of fairness in executing clients' orders and transaction records;
- provisions concerning hospitalities;
- rules of conduct in the event of outside activities conducted privately by employees and executives or shareholders in case of personal or professional relationships that may conflict with their professional responsibilities.

This mechanism does not guarantee, with reasonable certainty, the absence of conflict of interests risks, and in accordance with local regulations, SG-Forge will either refrain from carrying out the transaction or, if confidentiality allows, inform the client or prospect of the general nature or source of the conflict of interests so that they can make an informed decision.

Employee Awareness and Role of the Compliance Department

Training is provided to employees and executives to remind them of the applicable rules and procedures. The mechanism in place is determined and monitored by the compliance department of the Société Générale Group in coordination with SG-Forge's compliance. The

conflict of interests policy is reviewed at least annually and considers regulatory changes and changes in activities. For any questions regarding this mechanism, please use the Contact form at the bottom of the SG-Forge homepage, which is also accessible [here](#).