



Galaxy Digital UK Limited (“GDUK”) Conflicts of Interest Policy Summary

Requirement

GDUK (the “**Firm**”) takes all appropriate steps to identify conflicts of interest arising during the normal course of business which pose a material risk of damage to the interests of our clients.

Defining and Identifying Conflicts of Interest

We maintain arrangements to identify, mitigate and manage actual, potential or perceived conflicts of interest, which generally fall into one or more of the following categories:

- Firm vs. client;
- Client vs. client;
- Employee vs. client;
- Employee vs. employee;
- Employee vs. Firm.

Situations where conflicts of interest may arise include instances where the Firm or its employees may:

- profit (or avoid loss) at the expense of a counterparty;
- hold trading positions or have financial interests whose performance may contrast with the best interests of a counterparty; and/or
- maintain relationships which may risk favouring the interests of one counterparty over the interests another.

Managing Conflicts of Interest

The Firm’s employees are responsible for taking appropriate action after identifying actual, potential or perceived conflicts arising in the normal course of business.

In order to ensure that conflicts of interest are escalated, managed and, if possible, prevented, we implement measures such as:

- written policies and procedures to which staff must adhere, including Galaxy’s Code of Ethics and Business Conduct and an internal escalation process to notify senior management of relevant conflicts;
- monitoring of employee communications and trading activity;
- training to raise awareness of policies and procedures regarding conflicts and our expectations of employees; and
- information barriers to restrict the flow of information between the Firm, its own business units and external parties.

Disclosure of Conflicts

Where a conflict of interest arises and the implemented policies and procedures are deemed insufficient to prevent the risk of damage to the interests of a client, we clearly disclose, in a durable medium, the general nature and sources of the conflict to the client before undertaking business for them. Such disclosure should contain sufficient detail to enable the client to make an informed decision about the service giving rise to the conflict.

Recordkeeping and Retention

Conflicts of interest are documented in a Conflicts of Interest Register, which is maintained by Compliance. The Register sets out all identified circumstances which have caused, or may give rise to, a conflict of interest and the controls and mitigants in place to manage them.

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Governance

All employees are responsible for identifying and managing conflicts in accordance with applicable regulatory requirements and the Firm's policies.

The Firm's Board oversees and is accountable for governance arrangements that ensure the effective and prudent management of the Firm, including the prevention of conflicts of interest. Designated senior management receives on a frequent basis (and at least annually) written reports of situations related to conflicts of interest.