

# **Ceffu Custody FZE's Conflict of Interest Policy**

*Updated: August 2025*

Ceffu Custody FZE (“**Ceffu**”) will take reasonable steps to ensure that conflict of interest and/or any potential conflict of interest are identified and then prevented or managed in accordance with the Virtual Assets Regulatory Authority (“**VARA**”) Rulebooks. Ceffu has a Conflict of Interest Policy that provides the guidelines to identify, prevent and manage conflict of interest that may arise.

## **Conflict Identification**

Ceffu maintains and periodically reviews a conflicts inventory which will set out material conflicts identified or that may be encountered during the day-to-day business. The inventory is made available to all Employees to provide information regarding the proper identification and handling of conflicts.

## **Actual and Potential Conflicts of Interest**

Ceffu may have actual and potential conflicts during the course of its activities. These may arise from any one or a combination of the following:

- Ceffu and customer relationships;
- Ceffu and other third party service providers duties;
- Employee interests which potentially compete with Ceffu products or services; and
- Potentially competing interests between two or more customers.

## **Conflict Prevention**

Where Ceffu has identified a conflict, it will seek to organise business activities in a manner which prevents such a conflict. This may include considering the appropriateness of external relationships.

## **Conflict Management**

Where Ceffu identifies conflicts that are unavoidable, it will seek to identify them in advance and provide for their mitigation and management. These management arrangements will be designed to ensure Ceffu does not benefit to the detriment of a customer and no customer is disadvantaged.

Measures in handling conflicts include:

- Internal guidelines are developed and shared with employees in raising and managing all actual and potential areas of conflicts. The definitions, steps and processes ensure that employees follow and meet the standards of conduct.
- Regular updates to the Conflict of Interest Policy with detailed descriptions and mitigation measures to actual and potential conflict of interest situations.
- Trained employees who handle Compliance and Risk Management functions to effectively manage conflict of interest situations.

- Comprehensive compliance training program for employees to create awareness and foster a culture of integrity.
- The monitoring of the measures taken by the Compliance Officer to avoid conflicts of interest.
- Within the group of companies, an information wall is created to ensure that the disclosure of information does not exceed what is necessary for conducting regular business proceedings (need-to-know principle).
- Remuneration policy with clear rules for employee remuneration.

Ceffu does not have accounts, funds or Virtual Assets maintained by a third party.