CUSTODY POLICY SUMMARY

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The Czech version of this document is binding; the English version is for information only.
Závazná je česká verze tohoto dokumentu; anglická verze je pouze informativní.

1. INTRODUCTION

1.1. MipSoftware s.r.o., Company ID No.: 24667021, with its registered office at Na příkopě 848/6, Nové Město, 110 00 Prague 1, Czech Republic, a company registered in the Commercial Register kept by the Municipal Court in Prague under File No. C 164643 (the “Company”), is a crypto-asset service provider, in particular providing custody and administration of crypto-assets on behalf of clients. The provision of crypto-asset services is subject to Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937 (the “MiCA Regulation”).

1.2. In accordance with the MiCA Regulation, the Company has adopted an internal policy and operational procedures for carrying out custody and administration of crypto-assets on behalf of clients. The custody policy summary is publicly available on the website www.coinero.cz and, at a client’s request, the Company will provide it in electronic form.

2. SCOPE

2.1. This summary is intended for all existing and prospective clients of the Company who use or wish to use the service of custody and administration of crypto-assets on behalf of clients. It is intended to make clients aware of the essential information on the policy governing the manner in which clients’ crypto-assets are held in custody. The policy is designed so as to minimise the risk of loss of clients’ crypto-assets or of the rights attached to them and of the means of access to them. The relationship between the Company and its clients is governed by Czech law.

3. CUSTODY POLICY

3.1. Segregated accounts and wallets. The Company uses segregated accounts and wallets in order to distinguish between clients’ crypto-assets and its own crypto-assets. Clients’ crypto-assets are held only in wallets designated exclusively for this purpose. The Company’s own crypto-assets are held in different wallets. Wallets containing clients’ crypto-assets may under no circumstances be commingled with wallets containing the Company’s crypto-assets.

3.2. Prohibition of use. Clients’ crypto-assets are the exclusive property of the clients and may never be used for the Company’s own account.

3.3. Orders. Clients’ crypto-assets are used exclusively for the purpose of executing clients’ orders. Clients’ crypto-assets may under no circumstances be used for any other purpose unrelated to the execution of clients’ orders, in particular, but not limited to, for the purpose of trading on the Company’s own account.

3.4. Register of positions. The Company keeps detailed internal records, which include a register of all client crypto-assets (the register of positions). Every transaction carried out in connection with clients’ crypto-assets is recorded in this register. The register of positions allocates specific crypto-assets to

individual clients, records changes and shows the current balance of individual clients.

3.5. Omnibus wallets. Custody and administration take place, as a rule, through the Company's technical infrastructure in the form of omnibus wallets, which means that the Company holds crypto-assets of several clients at the same time within a single wallet. The crypto-assets of individual clients in the omnibus wallets are separated by means of virtual sub-accounts, which ensure logical segregation. The crypto-assets of individual clients are identifiable through the records kept in the register of positions.

3.6. Clients' crypto-assets are generally kept in a combination of hot wallets and cold wallets ("hot and cold wallets") so as to ensure their protection and liquidity. The information below provides a basic overview of the wallet system used by the Company:

(a) Hot wallets. Hot wallets are omnibus wallets intended primarily for deposits and withdrawals and for the execution of clients' orders. These wallets are separated from the cold wallets described below. Once a hot wallet reaches a certain threshold of crypto-assets, the crypto-assets are transferred to a cold wallet. A wallet held with a trading platform is also considered a hot wallet.

A smaller portion of client crypto-assets may be held in wallets with trading platforms, in particular for the purpose of settling trades, ensuring short-term liquidity and, in the case of the client's express order, also for the purpose of staking. Crypto-assets committed to staking are tracked separately for record-keeping purposes.

(b) Cold wallets. Cold wallets are omnibus wallets intended primarily for the long-term custody of crypto-assets. Cold wallets are also referred to as "offline wallets", as the emphasis with them is on the maximum level of security.

3.7. Display of crypto-assets. All crypto-assets recorded in the register of positions for the benefit and for the account of individual clients are displayed to clients in a uniform manner in the application.

3.8. Statement. At least once every three months and at the Client's request, the Company shall provide the Client with a statement of account of the crypto-assets held in custody for the benefit of the Client. This statement is in electronic form and contains a list of the relevant crypto-assets, their current quantity, their current value (in the selected official currency) and the transfers of crypto-assets (including deposits, withdrawals and transactions within the application) carried out during the given period.

3.9. Monitoring. All transactions carried out in connection with clients' crypto-assets (in particular deposits and withdrawals) are recorded in real time in the register of positions and, once completed, subsequently also in the omnibus wallets. All transactions are always recorded in a manner that makes it possible to identify retrospectively their purpose, their relationship to the individual client and the confirmation of their compliance with the client's order.

3.10. Staking. Where the Company enables a client to use staking, this takes place exclusively on the basis of the client's order and only in relation to crypto-assets for which this option is supported. A client's crypto-assets committed to staking remain recorded in the register of positions for the benefit of the relevant client throughout. Staking may be provided through a third party. In such a case, the Company ensures that the records of client positions are maintained and that client crypto-assets are segregated from the Company's own crypto-assets.

3.11. Security measures. The security measures are designed to minimise the risk of loss of clients' crypto-assets, of the rights related to those crypto-assets and of the means of access to them. Hardware security modules are kept in a secure environment, protected by strong encryption, and access to them is restricted to authorised persons. Private keys and other means of access are never stored in unencrypted form or shared between different functional roles. Critical operations require the cooperation of two

authorised persons (the four-eyes principle). All access operations are logged and regularly reviewed. The technical infrastructure is continuously tested against known vulnerabilities, and there is an incident response plan including recovery of operations.

3.12. Review and updates. The custody and administration policy is regularly reviewed and revised in response to changes in the legal environment, internal processes and changes in the technical infrastructure. Changes to the policy and their implementation are continuously assessed within the compliance system.

4. ENTRUSTMENT TO A TRADING PLATFORM

4.1. The Company hereby informs clients that clients' crypto-assets may be entrusted to a third party in connection with the provision of the order execution service and in connection with staking. This third party may only be an operator of a trading platform that has been granted authorisation under Article 59 of the MiCA Regulation.

5. LIABILITY FOR LOSS

5.1. The Company is liable for the loss of any crypto-assets or means of access to crypto-assets as a result of an incident attributable to the Company. The Company's liability is limited to the market value of the lost crypto-asset at the time the loss occurred.

5.2. Incidents attributable to the Company are only incidents that arose as a result of the provision of the relevant service, in particular, but not limited to, as a result of a breach of internal procedures or a security failure. Incidents not attributable to the Company, on the other hand, include any event in respect of which the Company proves that it occurred independently of the provision of the relevant service or independently of the Company's transactions, such as a problem inherent in the operation of the distributed ledger that the Company does not control.

5.3. The amount of any compensation corresponding to the market value of the lost crypto-asset at the time the loss occurred is determined as the product of the lost quantity of the crypto-asset according to the register of positions and the market value of the crypto-asset at the moment of the loss, i.e. as at the last moment at which, according to the register of positions, the crypto-asset had not been lost. To determine the market value, the average of two independent and publicly available price sources (in particular data from trading platforms) that best reflect the market price of the crypto-asset concerned at the relevant moment is used.

6. CHANGES TO THE SUMMARY

6.1. In the event of material changes affecting this summary, an updated version together with an explanation of those changes will be published on the websites www.coinero.cz and www.trader.coinero.cz. The previous version will remain available on the website for 3 months from the publication of the new version.