GB **ENGLISH VERSION**

# CONFLICT OF INTEREST STATEMENT

DealerBox Technologies S.A.S. · Version 2.0 · May 2026

This statement is published in accordance with Article 23 of Directive 2014/65/EU (MiFID II) and Articles 34–35 of Commission Delegated Regulation (EU) 2017/565.
It describes how DealerBox Technologies identifies, prevents, and manages conflicts of interest.

## 1. Introduction and Scope

DealerBox Technologies S.A.S. (hereinafter "DealerBox") is committed to upholding the highest standards of integrity and transparency in all its activities.

In accordance with EU Directive 2014/65 of 15 May 2014 on Markets in Financial Instruments ("MiFID II"), EU Regulation No. 596/2014 of 16 April 2014 on market abuse ("MAR"), and related regulations, DealerBox has established comprehensive policies and procedures to identify, prevent, and manage conflicts of interest relating to the provision of services to its clients.

This statement applies to DealerBox Technologies S.A.S., its affiliates, and all its employees. It covers all investment services provided by DealerBox, including operating a multilateral trading facility (MTF) and providing investment advice. It applies regardless of client category (professional client or eligible counterparty) and also covers service providers and subcontractors engaged by DealerBox.

Regulatory basis:

| Regulatory text | Provision |
|---|---|
| Directive 2014/65/EU — MiFID II | Article 23 — Conflicts of interest |
| Commission Delegated Regulation (EU) 2017/565 | Articles 34 and 35 — Identification & management |
| Regulation (EU) 596/2014 — MAR | Market abuse — Integrity obligations |
| Règlement général AMF | Articles 313-18 to 313-21 |

## 2. What Is a Conflict of Interest?

A conflict of interest arises when DealerBox, its affiliates, or its employees could derive a benefit at a client's expense, or when the interests of one client may conflict with those of another.

Conflicts may be:

- **Actual —** a concrete situation where a client's interests are compromised
- **Potential —** circumstances that could lead to a conflict in the future
- **Perceived —** when a third party reasonably believes a conflict exists, even if it does not

## 3. Examples of Conflicts of Interest

Conflicts may arise in various situations, including:

- **Personal conflicts —** an employee's personal investments or relationships influencing decisions made for a client
- **Between clients —** two clients competing for the same asset or service, where one could be favoured over the other
- **DealerBox vs. client —** DealerBox deriving a financial benefit from a transaction not in the client's best interest
- **Operational conflicts —** different DealerBox divisions having diverging interests in the same transaction
- **Third-party inducements —** receipt of benefits or remuneration from a third party in connection with services provided to a client

Specific to DealerBox's activities as an MTF operator:

- Access to order flow: as an MTF operator, DealerBox has access to information on clients' interests prior to execution.
- Outsourcing relationships: service agreements with third-party providers may create conflicts when resources or priorities diverge to the detriment of clients.
- Remote work: an employee sharing a workspace with a person employed by a competitor, participant, or DealerBox client may expose DealerBox to a conflict-of-interest risk.

## 4. Our Approach to Managing Conflicts

DealerBox Technologies implements a framework designed to identify, prevent, and manage conflicts of interest in order to protect clients' interests and ensure fair treatment. This framework notably includes:

| Measure | Description |
|---|---|
| **Identification & monitoring** | Regular review of activities and business relationships to detect current or potential conflicts. |
| **Information barriers** | Chinese walls, access controls, and organisational separations to limit inappropriate information flows. |
| **Independent supervision** | Oversight and controls performed by functions separate from relevant operational teams. |
| **Segregation of duties** | Allocation of roles to avoid incompatible functions being held by a single individual. |
| **Gifts & benefits policy** | Prohibition on accepting or granting benefits likely to influence performance of duties, except in authorised cases. |
| **Remuneration policy** | A framework preventing remuneration or targets from creating incentives contrary to clients' interests. |
| **Personal transactions policy** | Rules governing employees' personal dealings to prevent conflicts and misuse of confidential information. |
| **External mandates declaration** | Obligation to declare and obtain prior approval for any external corporate mandate. |

| Measure | Description |
|---|---|
| **Training & awareness** | Regular training and awareness-raising actions to promote a culture of integrity and compliance. |

## 5. Disclosure as a Last Resort

If DealerBox cannot ensure with reasonable certainty that a conflict will not affect your interests, we will clearly inform you of:

- the nature and source of the conflict
- the risks involved
- the measures taken to mitigate those risks

This disclosure will be made in writing (email or postal mail) before any transaction, in sufficient detail to enable the client to make an informed decision. It applies regardless of client category. Disclosure constitutes a measure of last resort — prevention is our primary objective.

## 6. Refusal to Act

In rare cases where a conflict of interest cannot be effectively managed or mitigated, DealerBox may refuse to act on behalf of the client in order to protect their interests. The client will be informed accordingly.

## 7. Monitoring and Review

Our Compliance Department and Senior Management provide regular oversight of conflict-management arrangements and conduct periodic reviews to ensure their effectiveness and compliance with regulatory standards.

In accordance with Article 35 of Delegated Regulation (EU) 2017/565, DealerBox maintains a register of situations in which a conflict of interest resulting in a risk of harm to one or more clients has arisen or may arise. This register is regularly updated by the Compliance Department. An annual report on identified conflicts is prepared and submitted to Senior Management.

This statement is reviewed at least annually, or upon any significant change likely to affect DealerBox's sources of conflicts of interest.

**Date of last review:**
January 2026

**Contact:**
compliance@dealerbox.com

**Version:**
2.0 — May 2026

**Issuer:**
DealerBox Technologies S.A.S.
28 Cours Albert 1er, 75008 Paris, France

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