

Commercial Policy

The Commercial Policy of Decentralized, UAB (the Company), established in line with the MiCA Regulation and ESMA standards, ensures that the Company's operations related to crypto-asset exchange are transparent, secure, and compliant. It applies to all services and transactions involving crypto-assets and covers aspects like pricing, Client eligibility, transaction limits, and order execution. The policy outlines pricing principles such as market-based pricing, liquidity, volatility management, transparency, equal access for all Clients, and record-keeping of pricing decisions and supporting data. These measures aim to maintain Client trust and market integrity.

Sources of price information

The Company determines cryptocurrency prices by aggregating data from trusted market data aggregators, industry-standard exchanges, and real-time price feeds from liquidity providers and financial institutions. The exchange rates are published on the Company's website for Clients and potential Clients.

Pricing algorithms and models

The Company's pricing model for cryptocurrency is based on rates from trusted exchanges, which are adjusted with margins for product and currency risks. The product margin accounts for risk in trading or payment processing, while the currency margin reflects risks related to market conditions and currency volatility. Merchant fees are applied to payment processing transactions and can be reduced for specific Clients based on criteria like transaction volume or partnership potential. Pricing algorithms adjust based on bid/ask quotes, market liquidity, and risk premiums for certain currencies. Market volatility significantly influences pricing, with real-time checks and volatility alerts in place to manage risks. Trading volume also impacts pricing, with higher volumes leading to tighter spreads and better liquidity.

Referrals

The Company might offer a referral program where both the referrer and referred must complete specific actions, like identity verification, to be eligible. The referred must be a new user, and duplicate or fraudulent accounts will be disqualified. Referrers earn a bonus based on the gross margin from fees collected from successful referrals. Referral fees are paid monthly, once they exceed 100 EUR, and are calculated in the same crypto/fiat currency used by the referred. Fees are converted between crypto and fiat based on exchange rates at the time of payout. Fraudulent practices, such as self-referring or fake accounts, are prohibited, and the program may only be available in certain regions due to regulatory constraints.

Client eligibility requirements

The Company has set criteria for both individual and corporate Clients. Individuals must be at least 18 years old or the legal age in their jurisdiction. Corporate Clients must be legally registered and active. Both types must be based in jurisdictions where the Company operates and where crypto services are allowed.

Clients must complete identity verification through KYC, with enhanced checks for corporate Clients. They must pass AML screening and acknowledge the risks of crypto trading. Clients must also have a valid bank account and comply with ongoing KYC updates. The Company will only engage with Clients who meet these criteria and may refuse transactions if Clients do not meet legal or risk standards.

Transaction limits policy

The Company sets transaction limits through a process involving risk assessment, regulatory compliance, Client verification levels, and Client risk classifications. These factors determine the appropriate limits, with higher-risk Clients facing stricter thresholds. Limits are also influenced by

market conditions and liquidity. The Company applies these limits to manage exposure, with merchant orders limited to 100,000 EUR and converter transactions capped at 200,000 EUR.

Order execution

The Company ensures transparency and accuracy in transaction information, providing details in line with regulations while reserving the right to update or withhold data for security, privacy, or compliance reasons. To maintain price accuracy, prices are refreshed every minute, and orders are locked at the price when placed. Orders are finalized once the Client acknowledges the terms, verifies sufficient funds, and optionally uses two-factor authentication. The Company processes orders on a time priority basis, relying on partner exchanges to execute the trades.