

Disclosure on Execution Venues

SmartAtlas Ltd. S.r.o. (“the Company”) is authorised as a crypto-asset service provider under Regulation (EU) 2023/1114 on Markets in Crypto-Assets (MiCA). In the course of providing the service of reception and transmission of orders for crypto-assets on behalf of Clients, the Company is required to act honestly, fairly, and in the best interests of its Clients.

As part of its transparency obligations, and in accordance with Section 6.3 of the Reception and Transmission of Orders for Crypto-Assets on Behalf of Clients Policy, the Company hereby discloses key information regarding the execution venues to which Client orders may be transmitted. This disclosure aims to ensure that Clients have a clear understanding of:

- Which categories of execution venues are used;
- The criteria applied when selecting such venues;
- Any potential conflicts of interest that may arise; and
- The possibility of orders being executed outside of a trading platform, where applicable.

This information is provided in clear and comprehensible terms, made publicly available on the Company’s website, and regularly updated to reflect changes in the Company’s execution arrangements or regulatory obligations.

1. List of Execution Venues or Categories of Venues Used

The Company maintains a list of approved execution venues, which includes:

- Regulated trading platforms
- Authorised crypto-asset service providers

The list of venues is reviewed on a periodic basis and updated where necessary. Transmission to a venue may be suspended or terminated if standards are no longer met.

2. Criteria for Venue Selection

Execution venues are selected based on objective, risk-based criteria, including:

- Regulatory status and authorisation (MiCA or equivalent frameworks)
- Operational reliability and uptime record
- Depth of liquidity and trading volumes
- Execution quality (price, speed, fill ratio)
- Settlement efficiency and counterparty risk
- Technical compatibility and secure connectivity
- Jurisdictional risk and enforceability of contractual obligations

3. Potential Conflicts of Interest

The Company does not route Client orders based on:

- Financial incentives or kickbacks
- Volume-based discounts

- Non-monetary benefits
- Internal business preferences

Where the Company is part of a group that owns or controls a trading platform, routing to such a venue is only permissible where:

- The Client's interests are demonstrably served
- No inducement or conflict of interest exists
- Routing is consistent with the best execution policy

As of the date of this disclosure, the Company confirms that there are no identified conflicts of interest arising from the use of affiliated or related execution venues.

4. Possibility of Execution Outside a Trading Platform

Clients are informed that their orders may be executed outside of a trading platform, including with third-country entities not subject to MiCA. In such cases:

- Explicit Client consent is required prior to transmission
- Risks are disclosed, including settlement rules, transparency standards, and counterparty exposure

This ensures that Clients are fully informed of potential risks before providing consent.