

Pricing Policy

The Company provides the exchange of crypto-assets for funds and/or other crypto-asset service to Clients. The Company is committed to establishing the criteria of determining the price of supported crypto-assets on which Company provides the exchange of crypto-assets for funds and other crypto-asset service to Clients. This Policy applies to all Clients of the Company, regardless of whether they are retail, professional, or institutional Clients.

The Company's Pricing Policy aims to provide a fair, transparent, and market-oriented method for setting the prices of supported crypto-assets for exchange services. Understanding the importance of pricing in exchanging, the Company is dedicated to offering Clients competitive rates while maintaining high cost-efficiency.

Our objectives of this Policy are to align price with value and risk so that prices fairly reflect the benefits delivered to customers while accounting for the Company's cost base, capital requirements and risk profile. Remain competitive and transparent so that pricing decisions are benchmarked against market standards and communicated clearly so customers can understand what they pay for. Support long-term strategy in a way that pricing promotes sustainable growth, reward innovation and fund future investment without encouraging excessive risk-taking or regulatory breaches.

1. Definitions. For this Policy, the following definitions apply:
 - a. Supported crypto-assets means the crypto-assets, including cryptocurrencies and tokens, that the Company is authorized to exchange under Company's policies and procedures, as specified in the Web-site.
 - b. KYB (Know Your Business) means the due-diligence procedure the Company conducts to confirm the legal identity, ownership structure and financial soundness of any business entity with which it transacts, in line with the Company's Anti-Money Laundering (AML) Policies and Procedures.
 - c. Exchange Service means the activity whereby the Company, using its own capital, enters into contracts with clients to purchase or sell crypto-assets for fiat funds or, alternatively, to exchange one crypto-asset for another (including any swap functionality).
 - d. Platform is the digital infrastructure operated by the Company, including, but not limited to, its official website, through which Clients may access the Company's services, subject to the applicable terms and policies.
2. Methods Determining the price of Supported crypto-assets
 - a. The price at which a Supported crypto-asset is bought or sold constitutes a critical element of Company's Pricing Policy. The Company aims to offer competitive and transparent exchange rates.
 - b. The Company determines the price of Supported crypto-asset based on current market data obtained from reputable third-party sources, such as major cryptocurrency exchanges or data aggregators.
 - c. For the purpose of Section 2.2, the Company will analyze prices on various platforms used in the market.
 - d. The final exchange rate shown to the Client at the time of the transaction includes all internal fees. However, external fees (e.g., blockchain fees or fiat payment processing charges) may also apply.
 - e. The Company ensures compliance with pricing transparency obligations under MiCA Regulation by implementing:
 - i. Maintaining pricing transparency;
 - ii. Clear fee disclosure;
 - iii. Regular audits and compliance checks to confirm adherence to regulatory requirements.
 - iv. Availability of exchange services

- f. The Company's exchange services are generally available 24/7 under normal market conditions. However, in rare cases of extreme market disruption, access may be affected, in line with the Company's Non-discriminatory Commercial Policy and internal procedures. During such times, price publication may be temporarily suspended. If a requested transaction exceeds the available limit, it will be automatically declined, and the Client will be informed.
- 3. Transaction fees
 - a. Withdrawal cryptocurrency is free, while deposit fees vary depending on the specific cryptocurrency.
 - b. The Company levies only its standard service fees and imposes no additional surcharges. Customers should, however, be aware that external costs—such as bank-wire fees, card-processing charges for crypto-to-fiat transactions, or blockchain network (gas) fees may apply. No account-opening, administration, or maintenance fees are charged by the Company.
- 4. Final Provisions
 - a. The Company undertakes to cooperate fully with competent regulatory authorities and supervisory bodies, in particular with the Czech National Bank and the Financial Analytical Office of the Ministry of Finance of the Czech Republic, regarding any inquiry, audit, or request for information related to the implementation or content of this Policy. The Company may also disclose, upon request, relevant extracts or summaries of this Policy to Clients, regulators, or business partners, provided such disclosure does not compromise any confidential or proprietary information.
 - b. Clients who believe that the pricing of a Supported Crypto-Asset, or any aspect of this Policy, has been applied incorrectly or unfairly may submit a complaint in accordance with the Company's official Complaints Handling Procedure. All complaints shall be acknowledged in writing and investigated promptly and impartially. The Company shall provide a reasoned response within the timeframe stipulated by applicable regulations. Where appropriate, the Company may offer remedial action or rectification. Clients shall also be informed of their right to escalate the matter to an alternative dispute resolution body or competent regulatory authority, where applicable.