

## **Summary – Reception and Transmission of Orders for Crypto-Assets on Behalf of Clients Policy**

### **Purpose and Scope**

The policy establishes the internal framework for SmartAtlas Ltd. S.r.o. in receiving and transmitting client orders for crypto-assets in accordance with Regulation (EU) 2023/1114 on Markets in Crypto-Assets (MiCA). Its purpose is to ensure that all client orders are handled fairly, promptly, and transparently, while safeguarding against conflicts of interest, market abuse, and operational risks. The scope covers all staff, systems, and processes involved in client order handling.

### **Regulatory Framework**

The regulatory foundation lies in MiCA, particularly Articles 3(1)(23), 59–74, 80, and 92, which impose requirements on crypto-asset service providers acting as Persons Professionally Arranging or Executing Transactions (PPAETs). This designation requires the Company to maintain effective systems for order handling, conflict management, and detection of market abuse.

### **Definitions and Principles**

Key terms such as execution venue, order management system, suspicious transaction or order report, best execution, order aggregation, and inducements are defined to ensure clarity. The Company emphasizes acting honestly, fairly, and in the best interests of clients. It prohibits acceptance of inducements for routing orders and commits to applying best execution practices even though MiCA does not replicate MiFID II obligations in full.

### **Client Order Handling**

All client orders must be received through secure and documented channels, logged in the Order Management System, and timestamped with precise accuracy. Orders are transmitted only through secure, auditable connections such as encrypted APIs or FIX protocols. Aggregation of orders is permitted only where it does not disadvantage clients and where clients have been informed.

### **Execution Venue Selection and Disclosure**

Execution venues are chosen based on regulatory status, reliability, liquidity, execution quality, settlement efficiency, technical compatibility, and jurisdictional risk. No preferential routing is permitted on the basis of financial incentives, rebates, or group interests. Intra-group routing is allowed only when it demonstrably serves the client's interests. Clients are informed of the list or categories of execution venues, the criteria for their selection, potential conflicts of interest, and the possibility that orders may be executed outside a trading platform.

### **Conflicts of Interest**

Conflicts may arise through incentives for preferential routing, related-party transactions, or synergies between activities. The Company mitigates these risks through segregation of duties, prohibition of inducements, independent monitoring, and transparent disclosure. Where conflicts cannot be fully avoided, explicit client consent is required.

## **Confidentiality**

The Company enforces strict safeguards to prevent misuse of client order information, including front-running and order flow disclosure. Employees are bound by confidentiality obligations and receive compliance training.

## **Record-Keeping**

The Company maintains complete and accurate records of all orders for at least five years, including client identification, order type, asset codes, and timestamps. The Order Management System ensures data integrity, audit trails, and retrievability for regulatory purposes.

## **Monitoring and Reporting**

Effective monitoring mechanisms are in place to detect market abuse, including suspicious trading patterns. Where suspicion arises, a Suspicious Transaction or Order Report (STOR) is submitted to the Czech National Bank. Cross-border reporting obligations apply when orders involve third-country entities.

## **Operational Resilience**

The Company ensures the continuous availability and cybersecurity of its systems through contingency planning, stress testing, and high-availability measures. Special controls are in place for the use of distributed ledger technology, with fallback procedures to mitigate associated risks.

## **Client Communication and Consent**

Clients receive clear disclosures before services are provided, including the nature of services, the venues used, potential risks, and applicable fees. Explicit client consent is required before executing orders outside regulated platforms or with third-country venues. Clients are notified promptly of any material changes that affect execution arrangements.

## **Audit, Review, and Responsibilities**

The policy is reviewed at least annually and subject to internal audits. Compliance monitoring is continuous, and the Company cooperates fully with regulatory inspections. Responsibilities are distributed across the Management Board, Compliance Officer, Order Handling Staff, IT and System Administration, Risk Management, and Internal Audit.