ZEBEDEE EUROPE B.V. Pricing Policy

1. Introduction

ZEBEDEE EUROPE B.V. (“**ZBD EU**”) is authorized by the Dutch Authority for the Financial Markets ("**AFM**") and operates as a licensed crypto asset service provider (“**CASP**”) under the Markets in Crypto Assets Regulation (“**MiCAR**”).

ZBD EU offers exchange services between BTC and fiat currencies and vice-versa. Therefore, ZBD EU has established this Pricing Policy (“**Policy**”), which outlines the pricing practices and procedures implemented by ZBD EU for its MiCAR exchange transactions. The purpose of this Policy is to ensure compliance with MiCAR and to maintain transparency and fairness for ZBD EU’s customers.

2. Pricing Principles

The following principles guide ZBD EU’s exchange pricing practices:

- **Transparency:** ZBD EU will provide clear and comprehensive information regarding its exchange pricing, including any fees or charges associated with transactions - and specifically, the exchange rate between BTC and fiat currencies.
- **Fairness:** ZBD EU’s pricing will be fair and non-discriminatory, ensuring that customers receive equitable treatment regardless of age, gender, location, or any other demographic trait.
- **Simplicity:** ZBD EU’s pricing will be uncomplicated, ensuring that customers can easily understand it.
- **Competitiveness:** While adhering to regulatory requirements, ZBD EU will strive to offer competitive conversion rates, charges and fees to its customers. ZBD EU will consider the fees and charges for comparable products and services and whether its own fees and charges are significantly different to alternatives at the detriment of the consumer.
- **Accuracy:** ZBD EU’s pricing will be based on accurate and up-to-date market data, and any deviations will be minimized to maintain accuracy.

3. Exchange Pricing Structure

ZBD EU’s exchange pricing (including exchange rate, fees and charges) consists of the following components:

- **Spot Rates:** ZBD EU utilizes spot exchange rates. These rates are obtained and updated regularly (near-real time) to ensure accuracy. The spot rates used by ZBD EU represent the current market rate and are determined by obtaining live spot prices from one or more exchange providers – including at least one with which ZBD EU uses for exchange services to account for volume and market volatility of Bitcoin when determining the price. The spot exchange rate is only a component of the final price that is charged to ZBD EU customers for exchanging to or from bitcoin and does not represent the actual exchange rate which ZBD EU offers to its customers. Additional components of the final price are added and listed below:
- **Fees and Charges:** Any fees or charges associated with exchange transactions and charged to customers will be clearly communicated to customers. These may include
    - a margin added to the spot rate to determine the final price: The margin will be calculated based on a number of factors, including transaction size, ZBD EU's cost to provide the service, and exchange volatility;
    - transaction fees: will be calculated based on the costs ZBD EU incurs to distribute the service including based on fees that ZBD EU is charged by its bank and or other third party suppliers / partners involved in the processing such as an acquirer. Any fees ZBD EU incurs from its infrastructure partners will be passed on to ZBD EU customers; and
    - any other applicable charges, which may include a reasonable markup on integrated third-party services.

4. Pricing Transparency

To ensure transparency, ZBD EU will:

- Publish its exchange pricing information on its website and other relevant channels including making the pricing information available to customers in the respective ZBD EU application when they initiate an exchange.
- Clearly communicate the exchange rate, fees and charges associated with exchange transactions requested by customers.
- Clearly communicate a firm price, including fees and charges, which it will honor should customers choose to continue with the exchange transaction.
- Provide customers with access to real-time exchange rates and pricing information via the website or ZBD EU's applications.

ZBD EU shall execute transaction orders at the prices displayed at the time when the order for exchange is final. The conditions for an order to be final are:

- The customer has the equivalent funds (fiat or BTC) available in their associated account or e-money wallet for exchange (when exchanging from a ZBD EU balance);
- The customer has made a payment to ZBD EU for the purchase of BTC and this is received;
- The customer has completed identity verification required for exchange transactions;

- The executing of an exchange transfer is subject to the transfer and balance limitations imposed by ZBD EU on customer accounts and activity; and
- The customer accepts the firm price and confirms that they wish to exchange the value.