

Risks, Pricing, and Sustainability Information *Bittimaatti Oy*

<i>Version</i>	*1.0 New Version**1.1 Pricing information refined in section 2. Clarification added to section 3 regarding non-discriminatory business policy. 1.2 Pricing information refined in section 21.3 Added risks related to cryptocurrencies.**1.4 Whitepaper links added for ETH, LTC, BTC. Added prior year's exchange volumes and average price.*1.5 <i>Structure changed, risks first, added provision of preliminary information as files after registration.</i>
<i>Approved by</i>	<i>Board of Directors</i>
<i>Approval Date</i>	23.05.2025
<i>Implementation Date</i>	01.11.2024
<i>Latest Version</i>	11.07.2025
<i>Prepared by</i>	<i>Board of Directors & CEO</i>

Applicable Regulation	Last Updated
Act on Virtual Asset Service Providers and Virtual Asset Markets (402/2024)	28.06.2024
Regulation (EU) 2023/1114 of the European Parliament and of the Council on Markets in Crypto-assets (MiCA)	09.01.2024
Commission Delegated Regulation (EU) 2025/305 of 31 October 2024 supplementing Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to regulatory technical standards specifying the information to be included in the application for authorisation as a crypto-asset service provider	31.3.2025
Commission Delegated Regulation (EU) 2025/422 of 17 December 2024 supplementing Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to regulatory standards specifying the content, methodologies and presentation of information regarding sustainability indicators for climate-related and other environmental adverse impacts	31.3.2025
Content changes	18.6.2026 / JMO

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1. General Description

This document describes the pricing and sustainability information concerning the services of Bittimaatti Oy (hereinafter "the Company"). More specifically, the document describes the pricing and sustainability information for the licensed operations under the Company's cryptocurrency services.

1.1. Definitions:

1.1.1. Information to be shared with customers

The following information is shared with customers on the Company's website upon registration and after registration:

1. Risks, pricing, and sustainability information_Bittimaatti CASP, this document
2. Terms of Use (<https://bittimaatti.fi/en/terms/>), as a file
3. User Instructions (<https://bittimaatti.fi/en/instructions/>), as a file
4. Privacy Statement (<https://bittimaatti.fi/en/data-privacy-statement/>), as a file
5. Conflict of Interest General Overview,
6. Whistleblow (via the front page footer)
(https://docs.google.com/forms/d/e/1FAIpQLSeyxf2-2h8PFOqhCMHdPDuxmuBjIMjy8_AKBGDKw2_ocRQt7w/viewform)
7. Information on handling customer complaints and complaint form
(<https://bittimaatti.fi/asiakasvalitus-kundklagomal-customer-complaint/>), as a file

1.1.2. Pricing Information

Pricing information related to the service refers to information concerning the prices and payment terms set by the Company for the services offered. The Company's licensed

services are limited to the purchase and sale of cryptocurrencies carried out in automated remote service points, "Bittimaatti" ATMs. Pricing information includes the following sub-areas:

- Purchase price of cryptocurrencies and the principles for its formation
- Sale price of cryptocurrencies and the principles for its formation

1.1.3. Sustainability Information

Sustainability information related to the service refers to information concerning the environmental impacts, social impacts, and economic sustainability of the service.

2. Risks Related to Cryptocurrencies

Cryptocurrencies are a high-risk asset class. The risks presented below do not cover all possible risks that may be associated with cryptocurrencies. It is also possible that not all risks have been identified or could have been foreseen yet.

The main risks associated with cryptocurrencies are:

- a. **Market Risk:** Trading cryptocurrencies is risky because their value changes rapidly. The value can rise or fall quickly, and the cryptocurrency can permanently lose its value.
- b. **Liquidity Risk:** Cryptocurrencies may have low liquidity, which makes it difficult or impossible to trade at the desired moment. This risk is particularly pronounced for smaller cryptocurrencies.
- c. **Security Risk:** Hacking and phishing attempts can lead to the loss of cryptocurrencies.
- d. **Blockchain Risk:** Transactions made on the blockchain are generally irreversible. Errors and delays can lead to the loss of cryptocurrency or delay in transfer.
- e. **Operational Risk:** Cryptocurrencies involve vulnerabilities, such as unforeseen situations or problems arising from new technology related to blockchain technology and DeFi. These can lead to losses or delays.
- f. **Legislative Risk:** Different states approach cryptocurrencies differently, and changes in legislation can be unpredictable. Legislation can result in negative effects on the service user.
- g. **Tax Risk:** The taxation of cryptocurrencies varies in different countries, and tax-related matters are open in many ways in different countries. This can lead to unexpected tax events.
- h. **Misuse Risk:** Cryptocurrencies involve a significant risk of being defrauded. This can happen, for example, through scam websites, counterfeit wallets, or investment scams. Scammers can use various means, such as social manipulation or technical tricks, to gain control of the user's cryptocurrencies. One of the most significant scam styles targeting Bittimaatti customers is the "romance scam," where the customer is led to believe that by sending money, their new love interest will be able to come to Finland to be with them.

Due to the risks associated with cryptocurrencies, the use of the service entails a significant risk that the customer may lose a substantial part of the capital used in the exchange transaction or even the entire capital. By using the service, the customer confirms understanding and accepting the risks associated with the use of the service and cryptocurrencies.

3. Pricing Information

This section describes the pricing information for purchase and sale transactions. A purchase transaction means buying a crypto-asset from Bittimaatti and receiving it into the customer's self-administered crypto-asset wallet. A sale transaction means selling crypto-assets held by the customer for euros at a Bittimaatti ATM.

The purchase and sale prices are announced on the service's website and on the ATM screens before and during the transaction. The principles for price formation are communicated to the customer on Bittimaatti's website and in the service's terms of use.

In purchase and sale orders, the price at which the order can be executed is shown on the ATM screen. The ATM informs the customer when the selected purchase or sale amount reaches the transaction limit and does not allow a larger order to be executed.

3.1. Purchase Price

The prices displayed to the customer at the ATM and on the company's website are always final prices, and all the elements listed below are included in them. The purchase prices of cryptocurrencies offered at the ATMs include the following elements:

1. Fair market price - defined by price data available from known crypto exchanges. These exchanges include, for example:
 - a. Bitstamp
 - b. Kraken
 - c. Binance
2. Commission, which consists of a percentage relative to the purchase transaction. This is the Company's primary element for business profit, and its determination is a purely business-related element aimed at profit seeking and operational profitability.

The commission percentage is normally between 5-15%, which the Company can vary based on the Company's business profitability. The size of the commission is determined so that it is commercially reasonable for the Company to offer the service and be able to conduct profitable business. Changes to the commission percentage are made at most once per quarter and are always decided so that the CEO proposes the change (based, for example, on the desire to test the effect of a pricing change on increasing sales or profitability) and the Board approves it.

1. Fixed transaction fee per transaction. This fee is charged to cover the DLT network transfer fee when the crypto-asset is sent to the customer. This is normally €1. This fee can be adjusted normally between €1 and €10, depending on the recent network costs of the cryptocurrency in question. The fee is always set manually, and the parameters affecting its adjustment are:
 - a. The transfer fee required to send the crypto-asset in under 2 hours exceeds the normal €1 limit for more than 72 hours.
 - b. The new transfer fee is calculated from the network's average transfer fee over the preceding 24 hours.
 - c. If the network transfer fee is significantly over €10 per transfer, temporary solutions may be considered, either raising the transfer fee above the €10 limit

or lowering the transfer priority so that blockchain confirmation of funds transferred to the customer may take significantly longer than 2 hours.

The final price of crypto-assets purchased from the ATM is thus determined as follows:

Fair market price + Commission (between 5-15%) + fixed transaction fee per transaction (normally €1) = final price shown to the customer.

3.2. Sale Price

The prices displayed to the customer at the ATM and on the company's website are always final prices, and all the elements listed below are included in them. The sale prices of cryptocurrencies offered at the ATMs include the following elements:

1. Fair market price - defined by price data available from known crypto exchanges. These exchanges include, for example:
 - a. Bitstamp
 - b. Kraken
 - c. Binance
2. The commission percentage is normally between 5-15%, which the Company can vary based on the Company's business profitability. The size of the commission is determined so that it is commercially reasonable for the Company to offer the service and be able to conduct profitable business. Changes to the commission percentage are made at most once per quarter and are always decided so that the CEO proposes the change (based, for example, on the desire to test the effect of a pricing change on increasing sales or profitability) and the Board approves it.

The final price of crypto-assets sold at the ATM is thus determined as follows:

Fair market price + Commission (between 5-15%) = final price shown to the customer.

3.3. History of Realised Price Data

Year	Total Exchange Volume	Average Price (Buy) - BTC	Average Price (Buy) - ETH	Average Price (Buy) - LTC	Average Price (Sell) - BTC	Average Price (Sell) - ETH	Average Price (Sell) -LTC
2024 (EUR)	2,176,725	60,845.87	2,819.19	72.23	63,171.54	2,757.00	69.41

4. Sustainability Information

This chapter describes the sustainability information of the crypto-assets traded by the company at a general level. Customers are provided with sustainability information on various crypto-assets on offer through websites, as well as by the parent company Coinmotion.

It is generally stated that Bittimaatti does not discriminate against its customer base in any way, nor restrict the use of services, unless there are grounds for it based on the Company's statutory AML obligations. The service is intended for all private individuals who wish to exchange crypto-assets for fiat currency or vice versa.

4.1. Bitcoin [Whitepaper](#)

1. Environmental Sustainability

Energy Consumption: Bitcoin uses the proof-of-work (PoW) consensus mechanism, which currently requires an enormous amount of computing power and energy to validate transactions and add new blocks to the blockchain. This makes Bitcoin one of the most electricity-consuming cryptocurrencies. Estimates of Bitcoin's annual energy consumption are comparable to the energy consumption of small states, such as the Netherlands. The high energy consumption used for Bitcoin's PoW consensus mechanism currently makes it the world's most secure information system and the most effective immutable information preserver and maintainer.

Carbon Footprint: Bitcoin mining can be a significant environmental hazard, especially in areas where mining is done using fossil fuels. This raises concerns that Bitcoin mining may accelerate climate change unless it is done with renewable energy sources. The positive aspects of Bitcoin mining are that it enables highly efficient flexible consumption, which is essential for building renewable energy production such as wind and solar power.

2. Social Sustainability

Financial Inclusion: Bitcoin has provided many people with access to a decentralized monetary system that is not dependent on traditional financial institutions or central banks. This can promote financial inclusion in areas where traditional banking services are not easily accessible.

Risks and Criminal Activity: Bitcoin, like other means of exchange, always entails the risk of being used for criminal activity. However, due to its open blockchain and traceability, Bitcoin is not a very attractive target for large-scale criminal use today, as the capacity of authorities to analyse money flows occurring on the blockchain is remarkably high.

3. Economic Sustainability

Volatility: Bitcoin is known for its strong price fluctuations. This makes it an unstable currency for daily use for the time being. Bitcoin's volatility has been continuously decreasing on average.

Store of Value: One of Bitcoin's most well-known and central features is its limited supply, which makes it an excellent store of value in the long term. This is why it is often referred to as "digital gold."

4.2. Ethereum [Whitepaper](#)

4. Environmental Sustainability

Proof-of-Stake (PoS) Mechanism: With "The Merge" update in September 2022, Ethereum transitioned from proof-of-work to the proof-of-stake (PoS) consensus mechanism, which significantly reduced its energy consumption. In the PoS mechanism, staked ether (ETH) is used for validation instead of computing power, making the process significantly less energy-intensive.

Carbon Footprint: Following this transition, Ethereum has succeeded in dramatically reducing its environmental impacts. The PoS mechanism requires a fraction of the energy that Bitcoin's PoW protocol uses.

5. Social Sustainability

Diversity of Use Cases: Ethereum is not only a cryptocurrency, but also a platform for decentralized applications (dApp) and smart contracts. This makes Ethereum a central platform for projects related to decentralized finance (DeFi), NFT markets, and other innovations that can promote financial inclusion and community empowerment globally.

Ethics and Security: Ethereum also has risks of criminal activity, especially due to its diverse applications. Use cases of decentralized financial services (DeFi) and smart contracts may include vulnerabilities that have enabled scams and hacks.

6. Economic Sustainability

Volatility: Ethereum is also susceptible to strong price fluctuations, but its value is tied both to its use as a currency and its significance as an application platform.

Therefore, from an economic perspective, Ethereum has two roles: both as an investment object and as a technology.

Ecosystem Development: Ethereum's success largely depends on its continuous development and improvements. Its community and developers are committed to improving scalability, security, and usability, which makes it potentially economically sustainable in the long term.

4.3. Litecoin [Whitepaper](#)

1. Environmental Sustainability

Energy Consumption: Litecoin uses the proof-of-work (PoW) consensus mechanism, just like Bitcoin, which requires computing power for processing transactions and adding new blocks to the blockchain. However, Litecoin's PoW process uses the Script algorithm, which is less energy-intensive than the SHA-256 algorithm used by Bitcoin. This makes Litecoin mining less energy-consuming, although it is not as efficient as proof-of-stake (PoS) cryptocurrencies, such as Ethereum.

Carbon Footprint: Litecoin's carbon footprint is smaller than Bitcoin's, but it is still significant due to the mining machines and electricity consumption required by the PoW mechanism. Mining activities are heavily dependent on the type of energy used (renewable or fossil), which affects its environmental profile.

2. Social Sustainability

Faster Transactions: Litecoin's key difference from Bitcoin is its faster transaction times and lower transaction costs. This makes it more practical for daily use, which can support financial inclusion, especially in developing markets or in situations where fast and cost-effective money transfers are important.

More Democratic Mining: Litecoin's Script algorithm was originally designed to make mining more accessible to private miners (unlike Bitcoin's SHA-256, which favours large mining farms). This can contribute to a more decentralized and inclusive mining environment, although in practice Litecoin mining has also become concentrated in some cases.

3. Economic Sustainability

Volatility: Litecoin, like other cryptocurrencies, is susceptible to significant price fluctuations. Although Litecoin has a more stable reputation as the "silver" of the

crypto world (while Bitcoin is considered "gold"), its value can fluctuate strongly according to market movements. This poses challenges to its usability as a daily payment instrument but also makes it an attractive speculative investment.

Speed and Scalability: Litecoin is designed to be faster and lighter than Bitcoin, making it a more scalable alternative. Its block time is approximately 2.5 minutes compared to Bitcoin's 10 minutes, which improves transaction speed and reduces congestion. This can contribute to its economic sustainability as a payment system.