

CANAAN HOLDINGS LLC

CONFLICT OF INTEREST MANAGEMENT POLICY

Public-facing institutional policy | Version 1.0 | October 9, 2026

Scope: Holdings and applicable subsidiaries, subject to verified formation, licensing and service status.

01. Entity scope and legal separation

This policy addresses Canaan Holdings LLC (Delaware); Canaan Sports Management LLC (Delaware, Pennsylvania foreign qualification status to be verified); Canaan Family and Talent Services LLC (Pennsylvania); Canaan Business Advisory LLC (Delaware, exact registered name to be verified); Canaan Private Wealth (formation and adviser registration status to be verified); and the proposed Canaan Athlete Enterprise Registry (CAER), whose legal entity and intellectual-property arrangements remain subject to confirmation. Each entity is a separate legal person only to the extent duly formed. Neither common ownership nor common branding merges their obligations. Each engagement, invoice, contract and regulatory representation must identify the actual contracting entity.

02. Application and interpretation

This public policy states intended governance and disclosure standards. It does not amend any operating agreement, engagement letter, subscription agreement, privacy notice, or mandatory regulatory filing. Where requirements conflict, applicable law and binding agreements control. No website statement establishes a registration, license, insurance coverage, audit or independent oversight that has not actually been obtained.

03. Accountability and review

The Holdings managing member is accountable for designating an owner for each control, documenting approval, maintaining version history, and reviewing the policy at least annually and following material changes. Delegated executives must escalate significant exceptions promptly. Internal records of reviews and exceptions are not automatically public.

04. Investor and client inquiries

Requests for material information should be directed through the official website contact channel. Confidential financial, client, employee and trade-secret information will be released only when authorized and lawful. An inquiry does not create an advisory, fiduciary or investment relationship.

05. Conflict definition

A conflict exists where an individual or entity has an incentive or duty that could impair objective judgment or fair treatment, including an apparent conflict reasonably perceived by stakeholders.

06. Enterprise conflicts register

Each subsidiary must maintain a register identifying conflict, parties, affected clients, financial incentives, severity, owner, mitigation, approval, disclosure and next review date. Actual conflicts must be described as actual, not merely hypothetical.

07. Cross-referrals and dual services

Referrals among Sports Management, Family and Talent Services, Business Advisory, Private Wealth and CAER may benefit the group economically. Clients must remain free to choose independent providers. Fees, ownership, referral payments, information sharing and any preferential treatment require clear disclosure and legally required consent.

08. Adviser-specific protections

If Private Wealth becomes an investment adviser, applicable fiduciary, Form ADV, advertising, custody and compensation requirements must be assessed independently. Referral and affiliate compensation can jeopardize fee-only descriptions. No affiliate arrangement may be treated as approved without specialized compliance review.

09. Athlete and university interests

Representation of athletes, schools, collectives, sponsors or merchants may create adverse interests. Separate conflict screening is required before simultaneous engagements, NIL rights verification, agency negotiations or licensing. Where conflict cannot be adequately managed, an engagement must be declined or terminated.

10. Related-party transactions

Founder, executive, investor and affiliate transactions require written terms, fair-value support where practical, disclosure of beneficial interests, disinterested review where available and documented approval before execution.

11. Gifts and inducements

Gifts, travel, sponsorships, entertainment and other benefits capable of influencing decisions must be logged, evaluated against applicable rules and rejected where improper. No employee may accept undisclosed compensation for steering a client.

12. Recusal and escalation

An interested decision-maker must disclose the conflict and abstain from approval where required. If no disinterested reviewer exists, external independent review should be considered. Disclosure alone does not cure an unmanageable conflict.

13. Monitoring and violations

Review conflicts upon onboarding, new transactions, material changes and at least annually. Breaches may result in transaction suspension, client notice, remediation, discipline or external reporting as required.

Implementation and legal precedence

This publication-ready policy is a governance statement, not a certification of implementation. Before website publication, management must confirm entity names, formation and registration status, actual business practices, approval authority, contractual consistency and legal review. No provision represents that any specific internal control is already operating unless separately verified.