

Conflicts of Interest Policy



This Conflicts of Interest Policy (the “**Policy**”) sets out the governance standards, preventive controls, and response mechanisms adopted by the Company to ensure that situations giving rise to actual, potential, or perceived conflicts of interest are appropriately identified, disclosed, and addressed. The Policy applies to conflicts involving the Company, its officers, employees, contractors, representatives, affiliated parties, and Clients, including conflicts arising between Clients themselves. Its purpose is to safeguard impartiality, protect Client interests, and ensure compliance with applicable legal and regulatory obligations.

Article 1: Objective, Coverage, and Regulatory Alignment

- 1.1.** The Company maintains a formal conflict governance framework designed to prevent circumstances in which the Company’s interests, or those of its personnel or partners, could improperly influence decision-making, service delivery, or treatment of Clients.
- 1.2.** This Policy applies across all business activities, services, and operational functions of the Company and extends to financial, operational, informational, and incentive-based conflicts, including those involving third-party relationships or compensation arrangements.
- 1.3.** By accessing or continuing to use the Company’s services, Clients confirm their awareness of this Policy and acknowledge that conflict management measures are implemented to promote fair, consistent, and transparent treatment of all Clients.

Article 2: Conflict Detection and Disclosure Mechanisms

- 2.1.** The Company employs ongoing monitoring, internal controls, staff training, and periodic reviews to identify circumstances that may give rise to conflicts of interest, including but not limited to situations where Company personnel, systems, or commercial arrangements could benefit at the expense of a Client.
- 2.2.** Potential conflict scenarios may include, without limitation, preferential treatment of certain Clients, execution outcomes that disproportionately advantage one Client over another, or arrangements involving commissions, referrals, or incentives that could impair neutrality.



- 2.3. Clients who reasonably believe that a conflict of interest exists are required to notify the Company promptly through officially designated communication channels and provide sufficient information to enable objective assessment, including relevant account identifiers, transaction references, and a clear description of the concern.
- 2.4. The Company may request additional information or documentation to support the review process. Submissions determined to be intentionally misleading, abusive, or made in bad faith may be disregarded.

Article 3: Conflict Management and Corrective Actions

- 3.1. Where a conflict of interest is identified or reasonably suspected, the Company shall assess the nature, scope, and potential impact of the conflict and determine appropriate mitigation measures proportionate to the risk involved.
- 3.2. Remedial actions may include, where appropriate, adjustment, suspension, or cancellation of affected transactions; restriction of access to certain services or functions; reassignment of responsibilities; or implementation of enhanced monitoring controls.
- 3.3. In circumstances involving multiple Clients, relevant factual information may be disclosed to affected parties strictly on a need-to-know basis and in compliance with confidentiality and data protection requirements.
- 3.4. Preventive safeguards may include segregation of duties, controlled access to sensitive information, supervision of high-risk activities, prohibition of incentive structures that encourage adverse outcomes for Clients, and disclosure of material third-party arrangements.

Article 4: Client Responsibilities and Procedural Conduct

- 4.1. The Company does not act as an advisor or mediator in personal disputes between Clients or between Clients and third parties, except where required by law or expressly agreed in writing.
- 4.2. Clients involved in a conflict review process are required to cooperate fully, provide accurate information, and refrain from conduct that could compromise the integrity of the review, including public statements intended to influence outcomes.
- 4.3. Reports of potential conflicts are generally reviewed within a reasonable timeframe, typically ranging from seven (7) to twenty-one (21) business days, subject to complexity, jurisdictional considerations, or the need for additional documentation.



Article 5: Policy Administration, Amendments, and Finality

- 5.1. The Company reserves the right to amend, revise, or update this Policy at any time to reflect regulatory developments, operational changes, or enhancements to governance practices.
- 5.2. Any amendment shall take effect upon publication through official Company channels, and continued use of the Company's services shall constitute acceptance of the revised Policy.
- 5.3. This Policy constitutes the complete and authoritative framework governing conflicts of interest between the Company and Clients and supersedes any prior statements, representations, or understandings relating to conflict management.

Article 6: Oversight, Review, and Assurance

- 6.1. The effectiveness of the Company's conflict management framework is subject to periodic review by Compliance, Legal, Risk Management, or other authorized governance functions.
- 6.2. Such reviews assess the adequacy of identification procedures, effectiveness of mitigation controls, consistency between documented policies and operational practices, and timeliness of conflict resolution.
- 6.3. Where appropriate, the Company may engage independent external auditors or advisers to conduct impartial evaluations of its conflict management arrangements, with recommendations incorporated into policy or procedural enhancements as necessary.
- 6.4. Material weaknesses or deficiencies identified through reviews shall be documented and addressed through corrective action plans overseen by the relevant governance functions.