



Conflicts of Interest Management Policy

I. Regulatory Purpose and Ethical Commitment

This Conflicts of Interest Management Policy (**the "Policy"**) establishes the governance framework through which the Company identifies, evaluates, monitors, mitigates, and where appropriate, discloses actual, potential, or perceived conflicts of interest arising from its business activities.

The Company is committed to conducting its operations with integrity, transparency, and fairness. The protection of Client interests is a fundamental principle embedded in the Company's operational, compliance, and risk management procedures. This Policy forms part of the broader compliance architecture governing the Company's Services and shall be read together with the Service Terms, Order Execution Policy, and other relevant internal governance policies.

Continued engagement with the Company's Services constitutes acknowledgment of and agreement to the principles described herein.

II. Definition and Scope of Conflicts of Interest

A conflict of interest may arise where competing interests impair, or may reasonably be perceived to impair, the Company's ability to act objectively, fairly, and in the best interests of its Clients.

Such conflicts may occur in situations including, but not limited to:

- Where the Company acts as counterparty to Client transactions;
- Where financial incentives may influence operational decisions;
- Where remuneration structures could encourage preferential treatment;



- Where proprietary trading activities overlap with Client positions;
- Where third-party compensation arrangements may influence service delivery;
- Where one Client's interests conflict with those of another Client;
- Where personal relationships of employees create potential bias.

The existence of a conflict does not necessarily imply wrongdoing; however, failure to appropriately manage such circumstances may undermine Client confidence and regulatory compliance.

III. Identification and Ongoing Monitoring

The Company maintains a structured internal process to proactively detect and assess conflict scenarios. This includes:

- Periodic compliance audits;
- Transaction monitoring;
- Employee declaration requirements;
- Risk-based operational reviews;
- Governance committee oversight;
- Documentation of identified conflict instances in internal registers.

Conflict assessments are conducted both at the transactional level and at the organizational level to ensure systemic risks are addressed.



IV. Mitigation and Control Measures

Where a conflict of interest is identified, the Company shall implement proportionate mitigation strategies, which may include:

- Segregation of duties between departments;
- Information barriers (commonly referred to as “Chinese Walls”);
- Restriction of employee access to sensitive information;
- Enhanced compliance supervision;
- Remuneration policy adjustments;
- Independent review of affected transactions;
- Disclosure to Clients where necessary.

These controls are designed to prevent undue influence, reduce risk of bias, and ensure equitable treatment of Clients.

V. Disclosure Framework

Where conflict risk cannot be fully eliminated, and where mitigation alone is insufficient to protect Client interests, the Company may disclose the nature of the conflict in sufficient detail to enable informed decision-making by affected Clients.

Such disclosure shall:

- Be clear and not misleading;
- Provide adequate explanation of the risk;
- Avoid revealing confidential internal processes beyond what is reasonably necessary.



The Company is not required to disclose proprietary methodologies, internal pricing mechanisms, or confidential compliance procedures unless mandated by law.

VI. Client-Initiated Conflict Concerns

Clients who believe a conflict of interest may exist must submit a written notice from their registered email address, including:

- Full legal name;
- Account identification number;
- Detailed factual explanation of the concern;
- Supporting documentation where available.

Upon receipt, the Company will conduct an internal review consistent with this Policy and applicable Service Terms.

Requests lacking sufficient detail, submitted in bad faith, or manifestly unfounded may be declined without further obligation.

VII. Remedial Actions

Where a material conflict is confirmed, the Company may take appropriate corrective action, which may include:

- Adjusting affected transactions;
- Suspending or closing specific positions;
- Restricting account functionality;
- Terminating business relationships;
- Implementing structural operational changes.



Where more than one Client is impacted, the Company may notify relevant parties to the extent necessary and permissible under confidentiality obligations.

VIII. Employee and Representative Obligations

All directors, officers, employees, and authorized representatives of the Company are required to:

- Declare any personal, financial, or external interests that may conflict with Company obligations;
- Avoid activities that create undue influence or reputational risk;
- Participate in periodic compliance training;
- Comply with internal ethical standards and conduct policies.

Failure by personnel to disclose potential conflicts may result in disciplinary action, including termination.

IX. Prohibition of Coercive Conduct

Clients are expected to engage constructively in any conflict review process.

The Company shall not tolerate:

- Harassment or threats toward staff;
- Public dissemination of unverified allegations;
- Attempts to exert pressure through coercive tactics.

Such conduct may result in account suspension, termination, or legal action.

X. Timeline for Review and Determination



Conflict assessments will typically be completed within fourteen (14) to thirty (30) business days, depending on complexity.

Where additional time is required due to regulatory consultation or data analysis, interim updates may be provided.

The Company's determination shall be considered final unless regulatory escalation rights apply under governing law.

XI. Regulatory Compliance and Oversight

The Company maintains oversight mechanisms to ensure this Policy aligns with applicable regulatory frameworks and international best practices.

Periodic independent reviews may be conducted to evaluate the effectiveness of conflict mitigation controls.

XII. Recordkeeping and Documentation

All identified conflicts, investigations, mitigation measures, and disclosures shall be documented and retained in accordance with regulatory record retention requirements.

Such records may be produced to competent authorities upon lawful request.

XIII. Inducements and Third-Party Compensation Transparency

Where the Company receives compensation, commissions, or non-monetary benefits from third parties in connection with the provision of Services, such arrangements shall be evaluated to ensure they do not impair the Company's duty to act fairly.

Where required, material inducements shall be disclosed in a transparent manner.

XIV. Periodic Review and Policy Amendments

This Policy shall be reviewed periodically to ensure continued relevance and effectiveness.



The Company reserves the right to amend or update this Policy at its discretion. Revised versions shall take effect upon publication on the official website.

Continued use of the Services constitutes acceptance of any amendments.