

## CONFLICTS OF INTEREST GOVERNANCE POLICY

This **Conflicts of Interest Governance Policy** (the “Policy”) has been developed to ensure that all potential or actual conflicts of interest arising in the course of the Company’s operations are identified, assessed, and effectively managed. It is the Company’s objective to uphold transparency, integrity, and fairness in all business interactions with Clients, counterparties, and other stakeholders. By continuing to use our services, you acknowledge that you understand and agree to the principles and procedures outlined herein.

Conflicts of interest may arise when personal, financial, or other considerations interfere with the Company’s duty to act in the best interests of its Clients. The Company undertakes reasonable steps to detect, prevent, and, where necessary, disclose such conflicts in a timely and responsible manner.

Clients are expected to raise any concerns regarding suspected conflicts of interest by submitting a formal written report to the Company. This communication must include accurate and complete information, such as the Client’s full name, account number, registered email address, and a thorough explanation of the concern. Upon receipt, the Company will initiate an internal review in accordance with this Policy and the applicable Terms of Service. Where necessary, the Company may request further information to complete its evaluation. Claims found to be lacking in merit, clarity, or good faith may be declined without further obligation.

In instances where a conflict is confirmed, the Company may take immediate action to mitigate risk or harm to affected parties. This may include the suspension or closure of relevant trading positions or accounts. If the conflict involves more than one Client or stakeholder, the Company may notify the involved parties of the issue where such disclosure is deemed necessary for resolution and not in violation of confidentiality obligations.

The Company maintains continuous oversight of business operations to identify conflict scenarios. These may include, but are not limited to, situations where the Company or its employees benefit financially at the expense of a Client; where the interests of one Client are placed ahead of another’s; or where compensation from third parties presents an undue influence over services provided. Additional circumstances may also trigger conflict assessments.

To prevent or manage potential conflicts, the Company may implement one or more of the following controls: the restriction of information exchange between departments; surveillance of employee and service provider activities; internal barriers to prevent undue influence over investment decisions; and measures to restrict access to sensitive or confidential data. Where permissible and relevant, inducements or commissions must be disclosed in full and handled with transparency.

The Company is not required to provide individual investment advice in relation to a conflict and is under no obligation to disclose internal processes beyond what is necessary for the resolution of a specific case. However, when a disclosure is warranted, the Company reserves the right to inform affected Clients with sufficient detail to ensure understanding and consent, where applicable.

Clients agree to cooperate fully with any conflict investigation process, including the provision of requested documentation or clarification. The Company will aim to evaluate and respond to conflict matters within 14 to 30 business days, subject to complexity. Public disclosures, defamatory statements, or attempts to coerce the Company through threats or harassment will not be tolerated and may result in legal consequences, account suspension, or termination of service.

The Company reserves the right to review, update, or amend this Policy at its sole discretion. Changes shall take immediate effect upon publication on the Company's official website. Clients are encouraged to consult this Policy regularly to ensure they remain informed of their rights and responsibilities.

All employees of the Company are required to disclose any relationships or interests that may create a potential conflict with the Company's obligations to its Clients. The Company conducts regular training and awareness programs to ensure all personnel understand the importance of conflict identification, avoidance, and ethical management in accordance with this Policy.

