



CONFLICT OF INTEREST POLICY

1. INTRODUCTION

INSTANT TRADING EU LTD (the '**Company**') is incorporated in the Republic of Cyprus with Certificate of Incorporation No. HE 266937. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission ('**CySEC**'), with a licence No. 266/15, and operates under the Provision of Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets and Other Related Matters Law of 2017, Law 87(I)/2017, as subsequently amended from time to time (the '**Law**'). The Company's office is located at Spetson 23A, Leda Court, Block B, Office B203, 4000 Mesa Geitonia, Limassol, Cyprus.

According to the provisions of the Law, the Company is required to establish, implement and maintain an effective conflicts of interest policy (the "**Policy**") designed to prevent conflicts of interest. The Policy must be set out in writing and be appropriate to the size and organisation of the Company and the nature, scale and complexity of its business.

Conflict of interest is defined as any situation where the financial interests and/or objectives of a Client are incompatible or in direct competition with the financial interests and/or objectives of:

- the Company, its appointed representatives/agents(hereinafter 'relevant persons') or any other person with direct or indirect links to the aforementioned; or
- another Client, or group of Clients.

However the Company acknowledges that conflict of interest cannot be prevented all together, and in such situations the Company will disclose such conflict as soon as it is identified.

By opening a trading account with the Company a client (the "**Client**") agrees/consents to the fact that the Policy has been disclosed to him/her and that it will be treated as in accordance with the conditions/specifications outlined in it.

2. SCOPE

The Policy aims to identify and prevent or manage conflicts of interest between the Company, including its managers, employees and tied agents, or any person directly or indirectly linked to them by control, and its clients or between one client and another, or combinations thereof, including those caused by the receipt of inducements from third parties or by the investment firm's own remuneration and other incentive structures.

Specifically, the Policy:

- identifies, with reference to the specific investment services and activities and ancillary services carried out by or on behalf of the Company, the circumstances which constitute or may give rise to a conflict of interest entailing a risk of damage to the interests of one or more clients; and
- specifies the procedures to be followed and the measures to be adopted to prevent or manage such conflicts.

Conflicts of interest should be regulated only where an investment service or ancillary service is provided by the Company. The status of the client to whom the service is provided — as either retail, professional or eligible counterparty — is irrelevant for this purpose.

3. SITUATIONS OF CONFLICTS OF INTEREST

For the purpose of identifying the types of conflicts of interest that may arise, the Company shall take into account whether itself or a relevant person or a person directly or indirectly linked by control to the Company, may in the course of providing investment and ancillary services or a combination thereof:

- a) is likely to make a financial gain, or avoid a financial loss at the expense of the Client;
- b) has interest in the outcome of a service provided to a Client, or of a transaction carried out on behalf of the Client, which differs from that Client's interest in the same outcome;
- c) has a financial gain or other incentive to favour the interest of a Client, or group of Clients, over the interest of another Client, or group of Clients;
- d) has received from a person other than the Client, an inducement in relation to a service provided to the Client, in the form of monies, goods or services, other than the standard commission or fee for that service;
- e) carries the same business as the Client.

Specifically, given the Company's current business model, the following potential conflicts of interest have been identified:

- A. personal account dealing;
- B. inside and proprietary information;
- C. inducements;
- D. selection of service providers;
- E. remuneration of staff;
- F. access to electronic data;
- G. investment research;
- H. supervision and segregation of departments.

In respect of these conflicts, the Company maintains and operates procedures with a view to taking all appropriate steps to prevent conflicts of interest from constituting or giving rise to material risk of damage to the interests of the Company's clients.

4. MANAGING CONFLICTS OF INTEREST

The Company have established and implemented and shall maintain and operate effective organisational and administrative procedures with the purpose to prevent and/or manage any identified conflict of interest that may give rise to a risk of damage to the interests of the Client. As such the Company shall undertake measures and controls to ensure that relevant persons engaged in different business activities, involving a potential conflict of interest, carry on those activities in a manner that deters rise of conflict of interest as follows:

- a) exchange of information between relevant persons engaged in activities involving a risk of a conflict of interest shall be limited to the amount of information needed to carry out their relevant duties and responsibilities, 'need-to-know' basis;
- b) establishment of 'Chinese Walls' restricting the flow of confidential information both through electronic systems, through establishment of security access levels, and physical separation of department location;
- c) relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, shall have a distinct separate supervision;
- d) removal of any direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration of different relevant persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities;
- e) an inducement, gift or any other incentive log, registering the offer or receipt of benefits to relevant persons, as well as limits/controls where conflict of interest may arise from such inducement, gift or any other incentive;
- f) prohibition of inducement, gift or any other incentive to relevant persons when they hold key positions link with the related service or product offered by the Company;
- g) implement remuneration policy applicable to all relevant persons ensuring that their reward is not in conflict with the Clients best interest;
- h) implement personal account dealing policy for relevant persons in relation with their own investment trading conducts, stating that they must disclose any of their dealings to the Company;
- i) measures to prevent or limit any person from exercising inappropriate influence over the way in which a relevant person carries out investment or ancillary services or activities;
- j) limits and/or controls on the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services where such involvement may impair the proper management of conflicts of interest;
- k) relevant persons involved in multiple investment or ancillary services that may give rise to conflict, shall have their duties segregated;
- l) information in relation with a specific financial instrument or service which are disseminated to Clients, shall be produced by a relevant persons that has no direct interest to that instrument or service and must be approved by Compliance function prior dissemination;
- m) when selecting service providers, in the event of any personal relationship between the Company and the third party, or a person connected to them the Company takes this into account and considers potential conflicts or the appearance of conflicts in making its selection and as far as possible refrain connected parties from being involved in the actual decision making process.
- n) disclosure of any identified situation of Conflict of Interest to Clients;
- o) external business interests shall be subject to scrutiny and approval by Compliance function to test the level of Conflict of Interest that may arise if any.

The Company pays special attention to the activities collective portfolio management, risk management, investment advice and individual portfolio management. In particular, such special attention is appropriate where the Company or a person directly or indirectly linked by control to the Company performs a combination of two or more of these activities.

5. RECORD KEEPING

The Company shall maintain and regularly update a register of the kinds of investment service or activity carried out by the Company in which a conflict of interest entailing a material risk of damage to the interests of one or more Clients has arisen or, in the case of an on-going service or activity may arise, including any actions taken, as well as any consents given.

6. DISCLOSURES

Where the measures are not sufficient to prevent or manage a conflict of interest relating to a Client, the Company will disclose the conflict of interest before proceeding with any further business transactions with the Client. The Company may refuse to proceed with the relevant transactions if the disclosure deemed to be not sufficient measure for managing the conflict, at the Company's discretion.

This Policy is subject to review and change as deemed necessary by the Company and the Company reserves the right to make any amendments as appropriate at any time. The Client will find the latest update of this Policy on the Company's website.

7. UPDATING AND REVIEW OF THE POLICY

At least on an annual basis, the Company shall assess and review its Policy, and shall take all appropriate measures to address any deficiencies. The Company should avoid over-reliance on disclosure of conflicts of interest since it is considered a deficiency in the Company's overall Policy.