

Conflict of Interest Disclosure



Introduction

The Conflict of Interest Disclosure applies to all users of the Company's services and relevant parties of the official User Service Agreement. This disclosure is intended to inform the clients of potential conflicts of interest that may arise during the course of the business operations.

All parties involved must comply with the relevant procedures when identifying, filing, or submitting their corresponding concern regarding the conflict of interest. If the concern is relevant to the official User Service Agreement, the Company's team will assess and manage it.

Nature of Conflict of Interest

Conflicts of interest may arise in various forms, including but not limited to:

- a) **Personal Trading:** Employees or affiliates of the Company may engage in personal trading activities that could potentially conflict with the interests of clients. Such activities could include trading in the same securities or markets as our clients, potentially influencing market prices or execution outcomes.
- b) **Market Making:** The Company may act as a market maker, which involves facilitating the buying and selling of financial instruments. This role could create conflicts of interest in executing client orders and managing the Company's own positions, particularly in situations where there is a potential impact on market liquidity or pricing.
- c) **Advisory Services:** In providing advisory services, the Company may have interests that differ from those of clients, leading to potential conflicts of interest. This could arise, for example, when recommending certain investment products or strategies that may benefit the Company or its affiliates.
- d) **Compensation:** Company employees may receive compensation, such as bonuses or incentives, based on certain performance metrics, which could influence their actions and create conflicts of interest. For instance, employees may be incentivized to prioritize certain clients or transactions over others, potentially affecting the quality or impartiality of service provided.

Client Acknowledgement

By engaging with the Company's services, clients acknowledge that they have read and understood this Conflict of Interest Disclosure. Clients further acknowledge that while the Company strives to minimize conflicts of interest, they may still arise from time to time.

Identifying Conflict of Interest

If the Client intends to report a conflict of interest, the full name, trading account number, registered email, and important information about such a matter must be provided and sent to the Company's official email address. The Client acknowledges that the Company may require additional documents and information if deemed necessary to resolve such a conflict. The Company may take the appropriate actions to resolve any identified conflicts of interest. However, the Company can still reject or cancel any conflict of interest on reasonable grounds, especially if such conflict might result in further conflicts.



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In order to identify the types of conflict of interest that occur during the provision of investment and ancillary services, which may negatively affect the Client's interests, the Company takes into account whether it or the relevant person is in any of the following situations as a result of providing investment services, ancillary services, or investment services:

- a) The Company or any of its employees is likely to make a financial profit or avoid a financial loss at the Client's expense.
- b) A Client is likely to make a financial profit or avoid a financial loss at the expense of another Client.
- c) The Company or any of its employees or a client receives or is intended to receive an endorsement related to a service provided to the Client by a third party in the form of money, goods, or services, apart from the standard commission or fee for that particular service.

In case of identifying conflicts, the Company may conduct the following measures without limitation:

- a) Prevent or manage the exchange of information between the relevant parties involved in the conflict, in which case the exchange of such information may negatively affect the interests of one or more clients.
- b) Oversee the relevant parties with the primary duty of providing any service to Clients with interests that may conflict.
- c) Remove all connections between the remuneration of a Client engaged in an activity and the remuneration of the other Client or profit made by such Client engaged in another activity in which conflict of interests have arisen concerning those activities.
- d) Restrict or limit any party from exercising inappropriate influence over the way of any activity, service, or investment.
- e) Restrict, prevent, or manage the respective party to simultaneously or continuously get involved in, but not limited to, taking personal interests in obtaining confidential information from the Company or governing access to its electronic data.
- f) Protocols to prevent giving or receiving improper inducements and proper inducements are disclosed appropriately.

Conflict Managements

The Company reserves the right to hold, cancel, and terminate any ongoing activity in the Client's trading account if it identifies a conflict or once a filed conflict of interest is accepted. If any identified or received conflict arises between or among the parties involved in the User Service Agreement or other agreement or contract, the Company may disclose such conflict in order for the respective party to act accordingly.

The Company is not obligated, in any way, to advise the Client during any arising conflict. The Company reserves the right to disclose the general nature or sources of the conflict of interest to the relevant parties undertaking any business of the Client.

The Client understands and accepts that all conflicts of interest will be assessed for up to 14 business days. Such conflict will be resolved indefinitely, depending on the type of conflict.

While all conflicts of interest are assessed constructively, the Client acknowledges and agrees that any conflict resolution requires action from all relevant parties. The Client agrees that he/she



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will not disclose or publish any form of statement regarding such conflict before being assessed to resolve the matter. The Client further agrees that threatening or blackmailing the Company or any of its workforce is strictly prohibited and may result in legal actions, regardless of the conflict that arises. Any supposed threat or blackmail to the Company or its workforce may result in not only legal actions but also a restriction, termination, or cancellation of access, service, and obtained profits.

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