

CONFLICT OF INTEREST MANAGEMENT POLICY

Last updated 25 September 2024

This policy of IFC MARKETS LTD (the "Company") is subject to the guidelines of the corporate Compliance Manual as amended or restated from time to time. The purpose of this Conflict of Interest Management Policy is to help prevent situations where conflicting interests could improperly influence a person's duties or decisions in their role. This Conflict of Interest Management Policy aims to ensure that potential conflicts are handled proactively, transparently, and ethically.

1. Definition and Scope

It is a legal obligation of the Company to maintain and update a Conflict of Interest Management Policy and take all reasonable steps to identify and manage possible conflicts of interest. Therefore the Company, on an ongoing basis:

- monitors its offerings (products and/or services) for potential conflicts of interest;
- assesses whether corporate policies and procedures are effective and adequate for resolving any such issues.

2. When do conflicts of interest arise?

Conflicts of interest may arise in the course of business between the Company's staff (officers, managers, employees or any person directly or indirectly linked to them by control, i.e. "relevant persons") and Customers, or between one Customer and another. They arise where the Company or a relevant person has an interest of their own that is in conflict with the interest of a Customer.

While it is not possible to create an exhaustive list of all possible conflicts of interest, some examples can be given relevant to our business context:

- the Company is likely to make a financial gain, or avoid a financial loss at the expense of the Customer;
- the Company has an interest in the outcome of a service provided to the Customer which is distinct from the Customer's interest in that outcome;
- the Company has a financial or other incentive to favour the interest of another customer or group of customers over the interests of a particular Customer;
- the Company carries on the same business as the Customer;
- the Company receives or will receive from a person other than the Customer an inducement in relation to a service provided to the Customer.

3. Managing potential conflicts of interest

This is achieved through the entire body of the corporate policies and procedures.

Corporate policies and procedures:

- Establish proper motivation of personnel while discouraging excessive trading or other acts that may impair the Customer's best interests;
- Do not permit employees to undertake deals on their own behalf;
- Do not permit staff to accept any employment or business interest outside the Company without the prior approval of the Company;
- Do not allow to accept any gifts or hospitality other than as considered normal and minor in this line of business;
- Ensure a fair, reasonable and transparent fee structure without it being in conflict with the best interests of the Customer;
- Ensure the segregation of duties that may give rise to conflict of interest if performed by the same person;
- Establish a "need-to-know" procedure governing the handling of confidential or inside information and set Chinese Walls where appropriate;
- Ensure independent monitoring and reporting by the Compliance Department;
- Establish disclosure, review, confidential reporting of any conflicts of interest with escalation to the proper level of management with the aim at ethical resolution.

This policy will be updated from time to time but will always remain compliant with the law, ethical standards and best practices of the Company's business.