

Conflict of Interest Disclosure

SECTION 1. INTRODUCTION AND APPLICABILITY

1.1 Purpose and Scope

1.1.1 This **Conflict of Interest Disclosure** supplements and forms part of the Service Usage Policy governing your access to and use of the Company's Platform and Services.

1.1.2 The purpose of this Disclosure is to describe the Company's approach to identifying, assessing, managing, mitigating, and disclosing actual, potential, or perceived conflicts of interest that may arise in connection with the provision of its Services.

1.1.3 The Company is committed to conducting its business activities with integrity, fairness, transparency, and professionalism while seeking to ensure that the interests of Users are treated appropriately and consistently.

1.1.4 Although the Company maintains procedures designed to manage conflicts effectively, circumstances may arise where competing interests cannot be entirely avoided.

1.1.5 By accessing or using the Services, you acknowledge that you have reviewed and understood the principles contained within this Disclosure.

1.2 Principles of Conflict Management

1.2.1 The Company seeks to identify conflicts of interest at the earliest practicable stage.

1.2.2 Where conflicts are identified, the Company shall take reasonable steps to prevent, manage, mitigate, disclose, or otherwise address such conflicts in accordance with applicable legal, regulatory, and operational requirements.

1.2.3 The Company aims to ensure that conflict-related decisions are made objectively and without undue influence from personal, financial, commercial, or other competing interests.

SECTION 2. IDENTIFICATION OF CONFLICTS OF INTEREST

2.1 General Conflict Scenarios

2.1.1 A conflict of interest may arise where the interests of the Company, its personnel, service providers, affiliates, representatives, or Users differ from, compete with, or potentially influence one another.

2.1.2 Conflicts may be actual, potential, perceived, direct, or indirect in nature.

2.2 Categories of Potential Conflicts

2.2.1 Conflict situations may include, without limitation:

- (a) circumstances where the Company may obtain a financial benefit at the expense of a User;
- (b) situations where one User's interests may be prioritized over those of another User;
- (c) circumstances where the Company has an incentive to favor a particular transaction, product, service, or outcome;
- (d) situations involving personal interests of employees, officers, contractors, or representatives;
- (e) relationships involving affiliates, strategic partners, service providers, or third parties;

- (f) compensation arrangements that may influence business decisions; or
- (g) any other circumstance that may reasonably impair objective decision-making.

2.3 Third-Party Relationships and Incentives

2.3.1 The Company may engage third-party service providers, technology partners, payment processors, liquidity providers, affiliates, marketing partners, or other external parties.

2.3.2 Certain commercial arrangements may involve commissions, referral fees, incentives, rebates, or other forms of compensation.

2.3.3 The Company seeks to ensure that such arrangements do not improperly influence decisions affecting Users.

SECTION 3. PREVENTION AND MITIGATION MEASURES

3.1 Internal Controls

3.1.1 The Company maintains internal controls designed to identify and manage conflicts of interest.

3.1.2 Such controls may include:

- (a) segregation of duties;
- (b) supervisory oversight;
- (c) approval requirements;
- (d) compliance monitoring;
- (e) internal review procedures; and
- (f) restricted access controls.

3.2 Information Barriers

3.2.1 The Company may implement information barriers designed to restrict the inappropriate exchange of confidential, commercially sensitive, or privileged information.

3.2.2 Access to sensitive information may be limited to personnel with a legitimate business need to know.

3.2.3 Users acknowledge that the Company may maintain operational separation between departments, personnel, functions, or business activities for conflict management purposes.

3.3 Employee Personal Interests

3.3.1 Employees, officers, contractors, and representatives are required to disclose personal interests, external business activities, financial interests, or relationships that may give rise to a conflict of interest.

3.3.2 The Company may require corrective measures where such interests present an unacceptable level of risk.

3.4 Gifts, Benefits, and Entertainment

3.4.1 The Company may maintain controls governing the acceptance, offering, or receipt of gifts, hospitality, entertainment, benefits, or other incentives.

3.4.2 Any such arrangements must not impair objectivity, compromise professional judgment, or adversely affect the interests of Users.

SECTION 4. USER REPORTING OF CONFLICT CONCERNS

4.1 Submission of Conflict Concerns

4.1.1 Users who believe that a conflict of interest may exist are encouraged to notify the Company promptly.

4.1.2 Notifications should be submitted through the communication channels designated by the Company and should include sufficient information to enable a meaningful review.

4.1.3 Users may be requested to provide supporting documents, transaction records, correspondence, or additional information relevant to the concern raised.

4.2 Assessment of Reported Concerns

4.2.1 Upon receipt of a conflict-related concern, the Company may conduct an internal assessment to determine whether a conflict exists and whether further investigation is required.

4.2.2 The Company reserves the right to decline claims that are incomplete, unsupported, frivolous, abusive, or submitted in bad faith.

SECTION 5. MANAGEMENT AND RESOLUTION OF CONFLICTS

5.1 Conflict Assessment Procedures

5.1.1 Where a conflict has been identified, the Company shall evaluate the nature, scope, materiality, and potential impact of the conflict.

5.1.2 The Company may consider the interests of affected Users, legal obligations, regulatory requirements, operational considerations, and risk-management objectives during its assessment.

5.2 Conflict Resolution Measures

5.2.1 Depending upon the circumstances, the Company may implement one or more measures including:

- (a) disclosure of the conflict;
- (b) restriction of activities;
- (c) reassignment of responsibilities;
- (d) enhanced supervisory oversight;
- (e) modification of operational procedures;
- (f) suspension of transactions;
- (g) restriction of account activity; or
- (h) termination of relevant relationships where necessary.

5.2.2 The specific measures adopted shall be determined by the Company based upon the circumstances of the particular conflict.

5.3 Disclosure to Affected Parties

5.3.1 Where appropriate and legally permissible, the Company may disclose relevant information regarding a conflict to affected Users.

5.3.2 Any disclosure shall be limited to the information reasonably necessary to enable informed decision-making while preserving confidentiality obligations.

SECTION 6. USER RESPONSIBILITIES

6.1 Cooperation Requirements

6.1.1 Users are expected to cooperate with reasonable requests for information, clarification, or documentation relating to conflict assessments.

6.1.2 Failure to provide requested information may affect the Company's ability to investigate or resolve the matter.

6.2 Good Faith Participation

6.2.1 Users shall engage in the conflict review process honestly, respectfully, and in good faith.

6.2.2 Threatening, abusive, coercive, misleading, or defamatory conduct directed toward the Company or its personnel may result in restrictions, suspension of Services, termination of Accounts, or other appropriate action.

SECTION 7. MONITORING, TRAINING, AND COMPLIANCE OVERSIGHT

7.1 Ongoing Monitoring

7.1.1 The Company maintains ongoing monitoring procedures designed to identify emerging conflict risks and evaluate the effectiveness of existing controls.

7.1.2 Monitoring activities may include periodic reviews, internal audits, compliance assessments, supervisory reporting, and operational testing.

7.2 Training and Awareness

7.2.1 The Company may provide employees, officers, contractors, and representatives with periodic training relating to conflict identification, ethical conduct, disclosure obligations, and conflict management procedures.

7.2.2 Personnel are expected to comply with applicable conflict management standards and internal requirements.

SECTION 8. RECORDS, POLICY ADMINISTRATION, AND DISCLOSURE UPDATES

8.1 Record Retention

8.1.1 The Company may maintain records relating to conflict assessments, disclosures, investigations, mitigation measures, communications, and related compliance activities.

8.1.2 Such records may be retained for legal, regulatory, operational, compliance, audit, and risk-management purposes.

8.2 Amendments and Updates

8.2.1 The Company reserves the right to amend, revise, supplement, replace, or update this Disclosure at any time.

8.2.2 Amendments shall become effective upon publication through the Platform or other communication channels designated by the Company.

8.2.3 Continued use of the Services following publication of amendments constitutes acceptance of the updated version.

SECTION 9. USER ACKNOWLEDGEMENT

9.1 Acceptance of Disclosure

9.1.1 By accessing or using the Services, you acknowledge that you have read and understood this Conflict of Interest Disclosure.

9.1.2 You acknowledge that conflicts of interest may arise despite the implementation of reasonable controls and safeguards.

9.1.3 You agree to cooperate with the Company's conflict management procedures and accept that conflict assessments and mitigation measures shall be undertaken in accordance with this Disclosure.