

SUMMARY OF CONFLICTS OF INTEREST POLICY

MITRADE EU LIMITED

1. Introduction

- (1) The Summary of Conflicts of Interest Policy (the **"Policy"**) is issued by Mitrade EU Limited (the **"Mitrade"**) pursuant to and in compliance with the Investment Services and Activities and Regulated Markets Law of 2017 L. 87(I)/2017, as amended from time to time and the Commission's Delegated Regulation (EU) 2017/565. It is not intended to create third party rights or duties that would not already exist if this Policy was not made available, nor does it form part of any legal agreement entered between Mitrade and a client.
- (2) Conflict of interests may arise when, in the course of providing investment or ancillary services, the interest of the client could be damaged to the advantage of Mitrade, including its shareholders, management, partners, employees, persons directly or indirectly linked to Mitrade by means of control and any persons who are directly involved in the provision of services to Mitrade under an outsourcing agreement (the **"Relevant Persons"**) or to the advantage of another client.
- (3) Mitrade is committed to act honestly, fairly and professionally and in the best interests of its clients. This Policy provides an overview on how Mitrade identifies, prevents and manages the conflicts of interest that may arise during the course of its normal business activities.

2. Identification of Conflicts of Interest

- (1) For the purposes of identifying conflicts of interest that arise in the course of providing investment and ancillary services and whose existence may damage the interests of a client, Mitrade takes into account any of the following situations:
 - a) Mitrade or a Relevant Person is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
 - b) Mitrade or a Relevant Person may have an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
 - c) Mitrade or a Relevant Person receive or will receive inducements from a third party in relation to a service provided to the client, in the form of monetary or non-monetary benefits or services;
 - d) the Company or a Relevant Person may have a financial or other incentive to favour the interest of another client or group of clients over the interests of the client; or
 - e) Mitrade or a Relevant Person may carry on the same business as the client.
- (2) Considering the investment and ancillary services we offer, Mitrade has identified the following 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:
 - a) Mitrade acts as principal to its clients' transactions and therefore, may have financial gains when a client experience losses;
 - b) Mitrade or a Relevant Person may have an interest in maximizing trading volumes in order to increase Mitrade's trading revenue or their personal remuneration. This may be inconsistent with the client's needs and objectives or their financial circumstances;

- c) employees' remuneration may conflict with their duty to act in the best interests of clients; and
- d) Mitrade may pay inducements to third parties for the referral of new clients.

3. Managing Conflicts of Interests

- (1) Mitrade maintains effective organisational and administrative procedures to manage possible conflicts of interests, including the ongoing monitoring of its business activities to ensure that these internal controls remain appropriate and effective.
- (2) The procedures and controls that Mitrade follows to manage the identified conflicts of interest include, but are not limited, to the following measures:
 - a) Appropriate product governance arrangements to ensure:
 - that the design of the financial instruments we offer, including their features, do not adversely affect clients or do not lead to problems with market integrity; and
 - that financial products are manufactured and distributed in accordance with the intended target market.
 - b) An automated process is in place to assess client's knowledge and experience, that prevents manual intervention by Mitrade's employees.
 - c) Execution arrangements for obtaining the best possible result, when executing client orders. The arrangements include amongst others:
 - pricing of the financial instruments offered, based on prices received by independent and reputable third-party liquidity and data providers;
 - real time price validation controls before a price becomes available on the platform;
 - on-going monitoring of the prices and spreads quoted to ensure the fairness of the price;
 - automated execution, with no manual intervention for the prompt, fair and expeditious execution of customer orders, where no preferential treatment may be given to a particular client to the detriment of another client;
 - symmetrical platform parameters;
 - monitoring and evaluating the execution factors and other specific trading metrics, such as speed of execution and slippage to ensure that the arrangements deliver the best possible result on a consistent basis; and
 - policies and procedures for the selection and review of our liquidity and data providers;
 - d) Effective procedures to prevent or control the exchange of information between Relevant Persons engaged in activities involving a risk of a conflict of interest where the exchange of that information may harm the interests of one or more clients.
 - e) Chinese walls restricting the flow of confidential and inside information within Mitrade, and physical separation of departments.
 - f) Segregation of duties and responsibilities that may give rise to a conflict of interest if performed by the same person.
 - g) The separate supervision of Relevant Persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of Mitrade;

- h) The removal of any direct link between the remuneration of Relevant Persons principally engaged in one activity and the remuneration of, or revenues generated by, different Relevant Persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities;
- i) Measures to prevent or limit any person from exercising inappropriate influence over the way in which the Relevant Person carries out investment services.
- j) Remuneration policies and practices that do not create incentives leading employees to favor their own interests or Mitrade's interests to the potential detriment of a client.
- k) Prohibition on gifts or other inducements from any person which may give rise to conflicts with Mitrade's duties to act honestly, fairly and professionally in accordance with the best interest of its clients.
- l) Policies and procedures on inducements, where Mitrade may pay and/or receive fees/commissions or any non-monetary benefits in connection with the provision of investment and/or ancillary services only when such fees/commissions and/or non-monetary benefits will enhance the quality of the offered services to its clients. Mitrade ensures that such fees and/or commissions and/or non-monetary benefits do not impair its duty to act in the best interest of the client.
- m) Procedures for personal account transactions for Relevant Persons' own investments.
- n) Policies and procedures for the protection and confidentiality of personal data and other information.
- o) Procedures governing access to electronic data.
- p) Procedures for the approval and monitoring of marketing communications to ensure they comply with Mitrade's duty to communicate in a fair, clear and not misleading manner.
- q) All employees receive proper training and guidance about their duty to treat clients fairly and comply with Mitrade's internal policies and procedures.
- r) Mitrade's Compliance and Internal Audit functions monitor the adequacy and effectiveness of the above controls and report to Mitrade's Board of Directors.

4. Disclosures

- (1) Where a conflict of interest arises and Mitrade's organisational or administrative arrangements in place are not sufficient to ensure with reasonable confidence that the risk of damage to your interests will be prevented, we will disclose such conflict of interest before undertaking further business with you.
- (2) The disclosure shall be in writing and include sufficient detail to enable you to make an informed decision with respect to the services in the context of which the conflict of interest arises.
- (3) If Mitrade believes that the disclosure is not sufficient to manage the conflict of interest, it may choose not to provide the requested service.

5. Record Keeping

- (1) Mitrade maintains and regularly updates a record of all the activities where a conflict of interest has arisen or may arise.

6. Amendment of This Policy and Additional Information

- (1) Mitrade shall assess and periodically review, at least on an annual basis, this Policy and shall take all appropriate measures to address any deficiencies.
- (2) All the updated policies, including but not limited to, this Policy, will be uploaded on Mitrade's website indicating the date of when that policy was last reviewed. Mitrade reserves the right to review and/or amend its Policy and arrangements whenever it deems this appropriate according to the terms of the Client Agreement. The Client consents and agrees that the latest versions of any of the terms and/or policies published on the Mitrade's official website shall prevail as this has been communicated via a durable medium.
- (3) Should you require any further information and/or have any questions about conflicts of interest, please direct your request and/or questions to compliance.eu@mitrade.com



MITRADE EU LIMITED IS INCORPORATED IN THE REPUBLIC OF CYPRUS, WITH REGISTRATION NUMBER HE 420923 AND REGISTERED ADDRESS AT 79, SPYROU KYPRIANOU AVE., MGO PROTOPAPAS BUILDING, 1ST FLOOR, 3076, LIMASSOL, CYPRUS. MITRADE EU LIMITED IS AN INVESTMENT FIRM, AUTHORISED AND REGULATED BY THE CYPRUS SECURITIES AND EXCHANGE COMMISSION (CIF NO.438/23).