

## 1. INTRODUCTION

1.1. This policy can be used as a reference to ensure that conflicts of interest within the Company are identified and managed appropriately. Conflict of interest can arise between the Company and its employees, managers or directors, and the Clients. A conflict of interest may arise between the following parties:

- a) Between the Client and the Company
- b) Between the Clients of the Company
- c) Between the Company and its workforce
- d) Between the Company's departments

1.2. The Company takes reasonable procedures in identifying, managing, and preventing conflicts that arise related to the Company's scope of services. Conflicts will be identified accordingly where the Company may apply the following:

- a) Partake in interest in the outcome of a service provided to the Client or a transaction executed on behalf of the Client that may be distinct from the Client's interest in that outcome; and
- b) Make a financial profit or avoid loss at the expense of the Client.

1.3. If the Company finds an actual or potential conflict of interest, the Company may implement any of the following:

- a) Decline to act where there is an unnecessary conflict, a conflict unrelated to the Company's services, or when such conflict is deemed the Client's liability
- b) Cease engaging in the activity that caused the conflict
- c) Accept the conflict of interest but will take steps to protect the Client's interest
- d) Disclose the conflict of interest and consent the Client to act

## 2. IDENTIFYING CONFLICTS

2.1. The Company has established procedures to identify and manage conflicts of interest. The Company implements several methods to manage conflicts and control confidential information movement. The following are some occurrences that may cause a conflict of interest:

- a) The Company or any of its employees makes financial gains or avoids losses at the expense of the Client
- b) The Company is interested in the outcome of a service or a trade executed on behalf of the Client, which is different from the Client's interest in the outcome
- c) The Company receives information from a third party to provide him/her with a particular service or product or receives a commission for these services and products.

