

Conflict-of-Interest Governance Framework

OVERVIEW STATEMENT

This Conflict-of-Interest Governance Framework (the “Framework”) outlines the Company’s structured approach to identifying, mitigating, and resolving conflicts of interest that may arise in the course of providing services. The Company is committed to maintaining the highest standards of integrity, impartiality, and client protection through transparent policies, proactive detection, and responsive controls.

APPLICATION

This Framework applies to all clients (“Clients”) engaging with the Company, as well as all employees, agents, and representatives acting on behalf of the Company. It governs both actual and potential conflicts that may occur between the Company and its Clients, or among Clients themselves, across all service environments and business lines.

Definitions

1. **Company:** The legal entity providing services under this Framework.
2. **Client(s):** Any individual or entity engaging with the Company for services covered by this Framework.
3. **Conflict of Interest:** Any circumstance where the Company’s, an employee’s, or a Client’s interests could improperly influence the impartiality of decisions or actions.
4. **Framework:** This Conflict-of-Interest Governance Framework, including all amendments.
5. **Compliance Contact:** The designated Company representative responsible for receiving and managing conflict reports.
6. **Confidential Information:** Any information disclosed or obtained during conflict investigations, subject to confidentiality requirements.

PART A: SCOPE AND COMMITMENT

Section 1.1: Purpose and Governance Objective

This Framework establishes the Company’s internal governance standards for detecting, disclosing, and addressing conflicts of interest involving its operations, Clients, and related

third parties. It aims to foster an ethical environment where decisions are made with fairness and without undue influence or bias.

Section 1.2: Client Acknowledgment

By engaging in services provided by the Company, Clients confirm their understanding of and consent to the terms of this Framework, including all compliance protocols and conflict management processes incorporated herein.

PART B: IDENTIFICATION AND ESCALATION

Section 2.1: Conflict Recognition Parameters

The Company proactively monitors its business functions to detect potential or actual conflicts. Such scenarios may include:

- Instances where personal or financial interests of Company employees could influence professional judgment;
- Situations where the outcome for one Client may negatively impact another;
- Circumstances where external incentives or benefits received by the Company, its staff, or a Client could compromise objectivity.

Section 2.2: Client Reporting Obligations

Clients who identify or suspect a conflict are encouraged to notify the Company in writing. Notifications must include:

- The Client's legal name and account number;
- Contact details and preferred method of communication;
- A detailed account of the situation, including relevant documentation where available.

All submissions must be directed to the Company's designated compliance contact for timely review.

Section 2.3: Company Review Rights

The Company may request additional information to complete its internal review. Reports deemed baseless, repetitive, or irrelevant to this Framework may be dismissed without further investigation.

PART C: MITIGATION STRATEGIES AND RESOLUTION

Section 3.1: Remedial Measures and Trade Interventions

When a conflict is validated, the Company reserves the right to implement corrective actions, which may include nullifying or amending transactions, suspending trading privileges, or taking any other step deemed necessary to maintain fairness and regulatory compliance.

Section 3.2: Client Disclosure and Confidentiality Assurance

Where necessary, the Company will inform relevant Clients of conflict-related findings while observing confidentiality obligations and applicable data protection laws.

Section 3.3: Conflict Prevention Controls

To reduce the likelihood of recurring or systemic conflicts, the Company maintains safeguards that may include:

- Separation of decision-making functions and access rights;
- Policies restricting acceptance of gifts or inducements;
- Transaction monitoring tools to detect irregular activity;
- Compliance training for staff on impartial conduct;
- Transparent reporting mechanisms for employees and Clients alike.

PART D: RIGHTS, CONDUCT, AND ENFORCEMENT

Section 4.1: Discretionary Limits and Liabilities

The Company is not obligated to provide advisory or arbitration services outside the scope of this Framework. However, it will address documented conflicts with professional diligence and good faith.

Section 4.2: Client Conduct Requirements

Clients shall:

- Fully cooperate with investigations in a timely manner;
- Avoid discussing unresolved matters publicly to protect reputational integrity;
- Refrain from using threats, coercion, or harassment, which may result in restricted access or legal action.

Section 4.3: Resolution Timeline

The Company aims to resolve substantiated conflicts within five (5) to fourteen (14) business days, depending on the complexity of the case and the sufficiency of the

information provided, and will provide status updates as needed.

PART E: GENERAL PROVISIONS

Section 5.1: Escalation to External Authorities

Clients may escalate unresolved issues to regulators or dispute bodies after exhausting the Company's internal process.

Section 5.2: Record Keeping

The Company will retain records of all conflict reports, investigations, and resolutions as required by law or policy.

Section 5.3: Training and Awareness

Regular training on conflict management is provided to employees; Clients are informed of Framework updates via official channels.

Section 5.4: Amendments and Binding Effect

This Framework may be amended at the Company's discretion and is effective immediately upon publication. Continued use of services constitutes acceptance.