FXPRIMUS

CONFLICTS OF INTEREST POLICY

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Authorised & Regulated by CySEC, license no. 261/14 and
registration number HE 337614VAT no. 10337614L
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1. INTRODUCTION

1.1 Primus Global Ltd (the "FXPRIMUS" or "Company") is a Cyprus Investment Firm (the "CIF") incorporated in the Republic of Cyprus under the Department of the Registrar of Companies and Official Receiver, holding a Certificate of Incorporation with Number HE 337614.

1.2 FXPRIMUS is authorised and regulated by the Cyprus Securities and Exchange Commission (the "CySEC") (www.cysec.gov.cy), with License Number 261/14 and the operations of the Company are governed by the Investment Services and Activities and Regulated Markets Law 87(I)2017, which transposes the Directive 2014/65/EU on Markets in Financial Instruments ("MiFID II").

1.3 The Company provides herein a summary of the policy we maintain in order to manage conflicts of interest in Respect of the duties we owe to our Clients. This Policy forms part of our agreement. The Policy applies to all its directors, employees, any persons directly or indirectly linked to the Company (hereinafter called "related persons") and refers to all interactions with all Clients.

2. IDENTIFICATION OF CONFLICTS OF INTEREST

For the purposes of identifying the types of conflict of interest that arise in the course of providing investment and ancillary services or a combination thereof and whose existence may damage the interests of a Client, the Company takes into account, whether the Company or an associate or some other person connected with the Company, is in any of the following situations, whether as a result of providing investment or ancillary services or investment activities or otherwise:

- The Company or an associate or some other person connected with the Company is likely to make a financial gain, or avoid a financial loss, at the expense of the Client;
- The Company or an associate or some other person connected with the Company has 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;
- The Company or an associate or some other person connected with the Company has a financial or other incentive to favor the interest of another Client or group of Clients over the interests of the Client;
- The Company or an associate or some other person connected with the Company carries on the same business as the Client;
- The Company or an associate or some other person connected with the Company receives or will receive from a person other than the Client an inducement in relation to a service provided to the Client, in the form of monies, goods or services, other than the standard commission or fee for that service.

3. PROCEDURES AND CONTROLS TO MANAGING

CONFLICTS OF INTERESTS

3.1 In general, the procedures and controls that the Company follows to manage the identified conflicts of interest include the following measures:

- 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.
- 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 the Company.
- 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.
- Measures to prevent or limit any person from exercising inappropriate influence over the way in which a relevant person carries out investment or ancillary services or activities.
- A 'need to know' policy governing the dissemination of confidential or inside information within the Company.
- High walls restricting the flow of confidential and inside information within the Company, and physical separation of departments.
- Procedures governing access to electronic data.
- Segregation of duties that may give rise to conflicts of interest if carried on by the same individual.
- Personal account dealing requirements applicable to relevant persons in relation to their own investments.
- A gifts and inducements log registering the solicitation, offer or receipt of certain benefits.
- Prohibition of external business interests conflicting with our interests as far as the Company's officers and employees are concerned, unless Board of Directors approval is provided.
- A policy designed to limit the conflict of interest arising from the giving and receiving of inducements.
- Appointment of Internal audit or to ensure that appropriate systems and controls are maintained and report to the Company's Board of Directors.
- Establishment of the four-eyes principle in supervising the Company's activities.
- The Company also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate.
- Non-disclosure and confidentiality agreements with all related parties, outsourced service providers, or members of the group in relation to Client's personal information.
- Monitoring procedures for services provided by related parties and outsourced service providers to ensure they act in the best interest of Clients.
- Prohibition on officers and employees of the Company having external business interests

conflicting with the interests of the Company without the prior approval of the Company's board of directors.

- Staff members are required to immediately notify the Company in case they perceive that a conflict of interest may be created due to the undertaking of a specific task/work.
- Staff members are forbidden to accept gifts, promotions, discounts, or any other monetary or benefit in kind from Clients or third parties, which may create conflicts of interest. Gifts of low value to relevant persons may be accepted after approval from the Company.

4. Personal transactions and Conflict of Interest

4.1 Employees may not undertake a personal transaction to prevent potential conflicts of interest between the Company & its members and the Clients, in the following cases:

- Relevant employees involved in the provision of Investment Advice, Reception and Transmission or Execution of client orders, technical support of trading activities, and back-office activities such as setting limits for trading on client accounts, recording deposit and withdrawals in clients accounts, or otherwise having accesses enabling them to amend client balances, are not allowed to operate trading accounts with the Company or in any instruments involved in client transactions.
- Relevant employees who effectively direct the business of the companies are not allowed to operate trading accounts with the Company in any financial instruments where the Company acts as a principal in its dealings with the client account holders.

4.2 By entering into a Client Agreement with the Company for the provision of Investment Services, the Client consents to an application of this Policy on them. Further, the Client consents to and authorizes the Company to deal with the Client in any manner which the Company considers appropriate, notwithstanding any conflict of interest or the existence of any interest in a Transaction, without prior reference to the Client.

5. Record keeping

5.1 The Company shall maintain and regularly update the Conflict of Interest register, logging all conflicts of interest that may arise as a result of the provision of investment and ancillary services and may entail a risk of damage to the interests of one or more clients.

6. Disclosure of Information

6.1 If during the course of a business relationship with a Client or group of Clients, the organizational or administrative arrangements/measures in place are not sufficient to avoid or manage a conflict of interest, the Company will disclose the conflict of interest before undertaking further business with the Client or group of Clients. The disclosure will be in a durable medium, clearly stating that the

arrangements established are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of the Client will be prevented. The disclosure will include a specific description of the conflicts of interest that arise, explain the risks to the Client, and detail the steps undertaken to mitigate these risks. If a Client decides not to go ahead with the service due to the conflict disclosed, the Company will have no choice but to decline the provision of services if the conflict cannot be effectively managed.

6.2 Declarations of past interests must be disclosed for a period of five years or for as long as the individual continues to have liabilities or obligations related to those past positions or situations, whichever is longer. This requirement ensures transparency and allows the Company to identify and manage any potential conflicts that may arise from previous engagements or commitments, thereby maintaining the integrity and trust in its operations.

7. COMPANY'S CONTACT DETAILS

7.1 Clients shall communicate with the Company with the communication methods described within this policy and/or at the following address:

Correspondence Address:
Primus Global Ltd
25 Kolonakiou Street | Office 101 Zavos Kolonakiou Centre
4103 Limassol
Cyprus

Customer Service:
Phone: +357 25 262084
E-mail: support@fxprimus.eu

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Conflicts of Interest Document

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