

CONFLICTS OF INTEREST POLICY

1. INTRODUCTION

- 1.1. TIOMARKETS CY Ltd (the “TIOMarkets” 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 399709.
- 1.2. TIOMarkets is authorised and regulated by the Cyprus Securities and Exchange Commission (the “CySEC”) (www.cysec.gov.cy), with License Number **TBC** and the operations of the Company are governed by the Investment Services and Activities and Regulated Markets Law 87(I)2017, as amended, 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.

4. Specific Identification of Conflicts of Interest and Measures for their Management

- 4.1. The Company is constantly conducting an in-depth analysis of its business and organisational arrangements including best execution arrangements, inducement practices, remuneration practices and investment research/marketing communication

procedures, to ensure that all likely conflict of interest situations are identified regardless of materiality. The Company has identified the following circumstances which give rise to a conflict of interest entailing a risk of damage to the interests of one or more Clients, as a result of providing investment services:

- a) Commissions received by its Liquidity Provider:

The Company's Liquidity Provider pays the Company a rebate commission for the order flow sent for execution. In order for the Company to manage the potential conflicts arising out of this practice, it has put in place the below procedures and arrangements regarding the commissions received by its Liquidity Provider:
- i) The Company has examined this and has recorded how the commissions received from its Liquidity Provider enhance the quality of the services provided to Clients and the steps taken in order not to impair the Company's duty to act honestly, fairly and professionally in accordance with the best interests of its Clients.
- j) The Company declares that this benefit does not induce it to favour the particular Liquidity Provider over other Liquidity Providers and it is confident that the Client would be better off under this arrangement compared to the use/employment of other arrangements (including other Liquidity Providers).

5. Disclosure of Information

The Company must adequately consider how to manage all conflicts of interest before resorting to disclosure. This will be a last resort after all appropriate steps have been taken.

If during the course of a business relationship with a Client or group of Clients, the organisational or administrative arrangements/measures in place are not sufficient to avoid or manage a conflict of interest relating to that Client or group of Clients, 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 state that the organisational and administrative arrangements established by the Company to prevent or manage the conflicts are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of the Client will be prevented;
- include a specific description of the conflicts of interest that arise in the provision of investment services and ancillary services;
- explain the risks to the Client that arise as a result of the conflicts of interest and the steps undertaken to mitigate these risks;
- include sufficient detail, taking into account the nature of the client, to enable the Client to make an informed decision with respect to the services in the context of which the conflict of interest arises.

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. **COMPANY'S CONTACT DETAILS**

6.1. Clients shall communicate with the Company with the communication methods described within this Agreement and/or at the following address:

Correspondence Address:

TIOMARKETS CY Ltd
80 Athinon, 3040 Limassol, Cyprus

Customer Service:

Phone: +357 25 251008
E-mail: info@tiomarkets.eu