

CONFLICT OF INTEREST



LEGAL INFORMATION

Vestrado Ltd. is a company incorporated under the Laws of Saint Vincent and the Grenadines with Registration Number 25911 IBC 2020 having its head office at Hinds Building, Kingstown, St. Vincent & the Grenadines and rendering the investment and ancillary Services (hereinafter the “Company”) to its Clients through the Trading Platform. The Client acknowledges that the Company’s official language is English.

INTRODUCTION

The Company shall provide all of its Clients, prior to the provision of any investment and/or ancillary services or any combination thereof, with a “Conflicts of Interest Policy”. Clients have the right to request more information about this Policy.

Despite the best efforts of the Company, please note that, some “Conflicts of Interest” can not be eradicated all together, and in such instances, the Company has adopted a transparent and fair approach of disclosing such instances as soon as they become apparent. The Company provides herein the Policy it maintains in order to manage conflicts of interest in respect of the duties it owes to its Clients.

The Conflicts of Interest Policy:

- Identifies the circumstances which constitute or may give rise to a “Conflict of Interest” entailing a market risk of damage to the interests of one or more Clients;
- Specifies procedures to be followed and measures to be adopted in order to manage such “Conflicts of Interest”. This Policy sets out the Company’s approach to identify and manage “Conflicts of Interest” which may arise during the course of



its business activities.

SCOPE OF THE POLICY

The Policy applies to its directors, employees and any persons directly or indirectly linked to the Company (hereinafter called 'related persons') and refers to all interactions with all Clients.

For the purpose of identifying the types of conflict of interest that may 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 a relevant person 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 a relevant person 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;
- The Company or a relevant person has a financial or other incentive to favour the interest of another Client or group of Clients over and above the interests of Client;
- The Company or a relevant person is likely to make a financial gain, or avoid a financial loss, at the expense of the Client;
- The Company or a relevant person participates in the same business as the Client;
- The Company or a relevant person 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 different and distinct from the Client's interest in that outcome.

PROCEDURES AND CONTROLS TO MANAGE CONFLICTS OF INTEREST

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

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- Effective procedures to prevent or control the exchange of information between relevant persons engaged in activities involving the risk of a conflict of interest where the exchange of that information to Management 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 appointment of a Compliance Department to monitor and report on the above to the Company's Management;
- The appointment of an Internal Auditor to ensure that appropriate systems and controls are maintained and reports are made to the Company's Management;
- Chinese walls restricting the flow of confidential and inside information within the Company, and physical separation of departments;
- A gifts and inducements log registering the solicitation, offer or receipt of certain benefits. The prohibition of any external business interests of the Company's officers and employees conflicting with the Company interests, unless the



Company's Management approval is given;

- Personal account dealing requirements applicable to relevant persons in relation to their own investments;
- The establishment of the four-eye principle in supervising the Company's activities;
- The Company also undertakes the ongoing monitoring of business activities to ensure that internal controls are appropriate.

DISCLOSURE

When the Company becomes aware of a situation where a conflict arises, the Company will disclose it to the Client prior to undertaking investment business with that particular Client, or if the Company does not believe that disclosure is appropriate to manage the conflict, the Company may opt not to proceed with the transaction or matter giving rise to the conflict. The Company reserves the right to review and/or amend its Policy and arrangements whenever deemed appropriate.

