

Conflicts of interest Policy

Idea

The idea of this Policy is to indicate in writing the procedures adopted by Cryptokg (hereinafter the "Company"), in accordance with the organization, size, complexity and nature of the Company's business for identification and quality management and control, while not forgetting the need disclosing conflicts of interest that arise as a result of the Company's activities, and reduce the risk of disadvantage to the client or legal liability, disapproval from the regulatory authorities or damage to the commercial interests and reputation of the Company. The next scope of the Conflict of Interest Policy is to ensure that the Company complies with the legal aspects and regulations that it undertakes to comply with, as well as internal actions, including general and departmental.

Politics

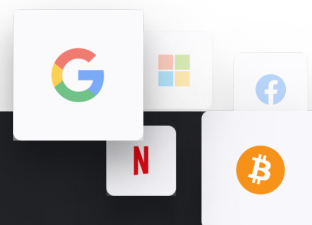
The company has established effective measures and policies to control, prevent and manage the exchange of data between relevant parties that engage in activities that pose a risk of conflicts of interest.

How the Company manages conflicts of interest

a. Description

A conflict of interest directly takes into account situations where a Company or a person is in a position where one way or another uses official or professional potential for the purpose of obtaining benefits, including corporate or personal. A conflict of interest arises at the time of certain situations:

1. A company, a person or an official that is indirectly or directly related to control over the Company, can obtain financial profit or avoid financial losses by attracting funds from the client.
2. The Company, a person or an official that is indirectly or directly related to the control by the Company, has an interest in the result of providing a service to the Client or a transaction conducted on behalf of the Client, and this interest is different from that which the Client receives in relation to the result.
3. The Company, a person or an official that is indirectly or directly related to the control by the Company, decides to defend the interests of the Client or a group of Clients in favor of another Client, prompted by a financial or similar form of incentive.
4. A company, a person or an official that is indirectly or directly related to control over the Company, conducts the same activities with the Client.
5. A company, a person or an official that is indirectly or directly related to the control by the Company, receives or receives from a third-party incentive the Service that is provided to the



Client. The following categories are considered an incentive: money, goods, services, which do not include basic commissions for this service.

The relevant person in relation to the Company is:

1. Members of the Board of Directors, persons or partners who have held similar positions, directors and related agents of the Company.
2. Members of the board of directors, persons or partners who have occupied a similar position, directors of related agents of the Company.
3. Company employees or related agents.
4. Individuals who offer services at the disposal and control of the Company.
5. A related agent of the Company that also provides the Company with investment services or conducts investment activities.
6. Individuals who also provide services to the Company or related agents of the Company under an outsourcing agreement with the direction of the provision of investment services or activities by the Company.

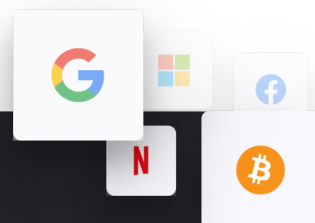
In the event of a conflict of interest, the affected party may become the Company, its employees and customers.

A conflict of interest can arise between:

1. The Company and the Client;
2. Client and Client;
3. The company and its employees;
4. Client and employee of the Company.

A conflict of interest arises in the following situations:

1. When fulfilling the order requested by the Client, the Company receives general financial losses or has the ability to avoid them.
2. In case of refusal to fulfill the order requested by the Client, the Company receives a general financial benefit.
3. Since the market tends to move in a specific direction, in the process of executing an order that was requested by the Client, the Company may incur financial losses.



4. The negative impact of market movements on the hedging policy of the Company leads to a decision to reject the Client's orders, in order to further prevent financial losses by the Company.

b. Ensuring independence

The company takes the necessary measures to guarantee the degree of independence:

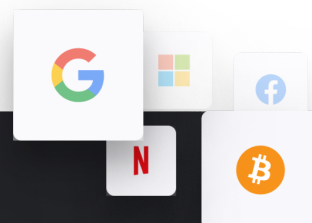
1. Actions to prevent or control the exchange of data between persons who engage in activities associated with risks of conflict of interest.
2. Certain individuals will be subject to further supervision. These persons refer to those who conduct business on behalf of or provide services to Clients, whose interests may give rise to a conflict, or whose interests are contrary to the interests of the Company.
3. Any connection between the promotion of persons who are directly or indirectly involved in any type of activity and the income / remuneration received by various relevant persons involved in another type of activity will be removed if there is a possibility of a conflict of interest:

Dealing room employees do not own the remuneration, which is related to the work of the Clients. Actions are taken to prevent and limit a person's ability to negatively affect the performance of a person's direct duties, which are associated with investments or similar additional services and activities.

4. The involvement of the relevant person in the following activities is monitored: receiving and transmitting tasks and orders of the Client, including portfolio solutions and calculating efficiency.

c. The top management of the Company is obliged to:

1. Be actively involved in all processes that relate to the implementation of policies and procedures, monitoring conflicts of interest and governance.
2. To properly ensure that the necessary measures are taken to identify possible and emerging conflicts within and between business areas, the adoption of reasoned decisions related to this conflict.
3. Raise awareness and ensure compliance with employees and others associated with the Company by regularly promoting training. Extensive and accurate communication of policies, expectations and procedures. Raising awareness of conflict of interest processes, sharing experience throughout the Company.
4. Ensure that adequate and effective strategies are used to manage and mitigate risk.
5. Use the data that is stored by the management in order to keep abreast of any procedures.



6. Ensure reliable 24/7 review of processes and procedures.

d. Chinese Wall

The company has created a China wall that complies with the norms and standards of legislation between departments.

There are clear, contingent lines of responsibility to ensure that the data held by the person in charge is not misused.

Moreover, the Company is equipped with physical barriers, which allows transaction data to remain between employees. In the process of carrying out a share of the business by employees, access to data, communication and documentation was limited.

e. Conflict of interest management

If the actions that were taken by the Company to regulate the conflict of interest are insufficient to avoid the risk of damage to the interests of the Client, the Company has the right to disclose the conflict of interests for the Client, preventing damage to the interests of the Client. Prior to a transaction or receipt by a Client of an investment / ancillary service, the Company is required to disclose any potential or actual conflicts of interest.

Conflict of Interest Disclosure

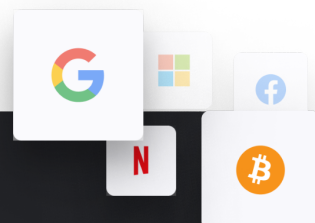
If a potential conflict of interest arises, the employee who identifies it is required to promptly contact their management to assist in the risk assessment and immediately submit a completed report form with all details, including:

- Prevention and correction actions;
- The relevance of these actions;
- Conditions that can be imposed;
- Whether the conflict continues, the method of management and further consultation of the Client.

f. Marketing and communications

The company needs to make sure that any recommendation it makes is accompanied by a clear statement. Such notices are required to be prepared in accordance with the requests of the legislation. So, in accordance with the requirements of EFSA, the Company is obliged to keep records that will be regularly monitored and updated, are related to investment and ancillary services that were provided by the Company or from its brand, and which involve the risk of a conflict of interest.

Any emerging conflict of interest must be communicated to the CEO and the employee so that conflicts of interest are taken into account.



Find out why millions of users from over 140 countries are trading with CryptoKG

