



**INFINITY
MARKET**

CONFLICTS OF INTERESTS POLICY



1. INTRODUCTION

1.1. INFINITY MARKET (the "Company") is a Private Company. The address of the Company's registered office 80 Coleman Street 1st Floor London, Coleman Street, London, EC2R 5BJ with Company number: 04691575.

1.2. The Company takes all appropriate steps to identify, prevent or manage conflicts of interest. The Company is committed to act honestly, fairly and professionally with ultimate purpose the best interests of its clients (hereinafter referred to as 'Client', 'you', 'your' as appropriate).

1.3. Please ensure you take sufficient time to read this Policy as well as any other legal documentation and additional information available to you via our Website prior to opening an account and/or carrying out any activity with us. Should you need any further clarification, please contact us.

2. SCOPE OF THE POLICY

2.1. The scope of this Policy is to set out our approach to identify and prevent or manage conflicts of interest, which may arise during the course of our business activities.

2.2. We are required to take all appropriate steps to identify and to prevent or manage conflicts of interest between: (a) us, including our managers, employees and tied agents, or any person directly or indirectly linked to them by control and our clients; or, (b) between you and another client, that arise in the course of providing any investment and ancillary services, or combinations thereof, including Company's remuneration scheme and other incentive structures.

2.3. In case where the steps taken by the Company to identify, prevent or manage conflicts of interest from adversely affecting the interest of its client are not sufficient to ensure, with reasonable confidence, that risks of damage to client interests will be prevented, the Company shall clearly disclose to the client the general nature and/or sources of conflicts of interest and the steps taken to mitigate those risks before undertaking business on its behalf.

2.4. The disclosure shall be made: (a) in a durable medium; and (b) shall include sufficient detail, taking into account the nature of the client, to enable that client to take an informed decision with respect to the service in the context of which the conflict of interest arises.



3. IDENTIFICATION OF CONFLICTS OF INTEREST

To identify potential conflicts of interest that may arise during the provision of investment or ancillary services—whether individually or in combination—the Company assesses situations that could adversely affect a client’s interests. This assessment includes consideration of whether the Company or any relevant person is involved in any of the following scenarios, either through service provision, investment activities, or other circumstances:

- a. The Company or a relevant person stands to gain financially or avoid a financial loss at the client’s expense;
- b. The Company or a relevant person has a vested interest in the outcome of a service provided to the client or a transaction conducted on the client’s behalf that differs from the client’s own interest in that outcome;
- c. The Company or a relevant person has a financial or other incentive to prioritize the interests of another client or group of clients over those of the client;
- d. The Company or a relevant person is engaged in the same business as the client;
- e. The Company or a relevant person receives, or expects to receive, inducements from a third party in connection with a service provided to the client—such as money, goods, or services—other than the standard commission or fee for that service.

4. MANAGING CONFLICTS OF INTEREST

4.1 The Company has established and maintains effective organizational and administrative arrangements designed to prevent and manage any identified conflicts of interest that may negatively impact clients. These procedures are tailored to the size and structure of the Company, as well as the nature, scope, and complexity of its operations. Internal controls are regularly monitored and reviewed to ensure their adequacy, and corrective actions are implemented promptly where deficiencies are found.

4.2 To safeguard a sufficient level of independence and ensure conflicts of interest are properly managed, the Company follows specific procedures and adopts the following measures:

- a. Implementing robust controls to restrict or regulate the flow of information between relevant persons involved in activities where conflicts of interest may arise, especially where such information exchange could harm one or more clients;



b. Ensuring the separate supervision of relevant persons whose primary responsibilities involve providing services to clients with potentially conflicting interests, including when such interests differ from those of the Company itself.

c. 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;

d. 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;

e. Measures to prevent or control the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services or activities where such involvement may impair the proper management of conflicts of interest.

4.3. More specifically, some of the procedures already established includes but are not limited: (list is not exhaustive):

a. A 'need to know' policy governing the dissemination of confidential or inside information within INFINITY MARKET group;

b. Chinese walls restricting the flow of confidential and inside information within INFINITY MARKET I group, and physical separation of departments; Information barriers will be in place to prevent communication of material information and other sensitive information from one company of the group to other companies so as to control the flow of such information.

c. Procedures governing access to electronic and/or in hard copy data and information.

d. Material information will be confined only to persons who have a need to know that information in order to carry out their responsibilities.

e. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual;

f. Establishment of in-house Compliance Function to monitor and report on the above to the Company's Board of Directors;



- g. The Compliance Officer will be responsible for reviewing the company's transactions and to ensure the priority of client interests. Because personnel, regulations, business practices, and products constantly change, the role of the Compliance Officer (particularly the role of keeping the firm up to date on such matters) is that much more important. In this regard, each staff member will annually confirm in writing receipt of the procedures manual and agree to abide by its terms.
- h. Establishment of the four-eyes principle in supervising the Company's activities;
- i. Prohibition of external business interests conflicting with the Company's interests as far as the Company's officers and employees are concerned, unless Board of Directors approval is provided.
- j. INFINITY MARKET ' employees must comply with all rules regulations and directives of the competent authorities, the code of business contact for Investment Firms and for the natural persons employed by them;
- i. INFINITY MARKET' employees are strictly forbidden to trade for themselves either on the INFINITY MARKET I platform or on any other platform either directly or through an intermediary/related party;
- l. INFINITY MARKET ' employees must report to their supervisor any potential conflict of interest related to a proposed transaction.
- m. INFINITY MARKET' employees must be entitled to the same benefits, thus avoiding any conflict of interest.
- n. INFINITY MARKET' employees must follow the same code of operations, thus avoiding any conflict of interest.
- o. INFINITY MARKET' employees must report to their supervisor any special relationship they or any related party might have with a proposed transaction that might affect their judgment.
- p. INFINITY MARKET' employees must consider commission rates, timeliness of trade executions, and the ability to maintain anonymity, minimize incomplete trades, and minimize market impact.
- q. INFINITY MARKET' employees must not trade on material non-public information. In the case that an employee holds material non-public information he must report it to the supervisor or the compliance officer and in such case the financial instrument will be placed either in the restricted list or the watch list.



5. RECORD KEEPING

5.1. The Company shall keep and regularly update a record of the kinds of investment or ancillary service or investment activity carried out by or on behalf of the Company in which a conflict of interest entailing a material risk of damage to the interests of one or more clients has arisen or, in the case of an ongoing service or activity, may arise.

6. DISCLOSURE OF INFORMATION

6.1. Where a client conflict arises during the course of a business relationship, and the organizational and administrative arrangements and/or measures we have in place are not sufficient to ensure with reasonable confidence, that risks of damage to your interests will be prevented, we will disclose such a conflict before undertaking further business with you.

6.2. The Company reserves the right to assess and periodically review, at least annually, and if necessary amend this Policy and arrangements, at its sole discretion, whenever it deems necessary, in order to address any deficiencies.

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