



CONFLICTS OF INTEREST POLICY



A. POLICY OBJECTIVE

This Conflicts of Interest Policy (“the Policy”) is issued in compliance with applicable **Saint Lucia legislation**, including (but not limited to) the **International Business Companies Act**. Kira Markets Limited (“the Company”) is committed to taking all reasonable steps to **identify, manage, and prevent conflicts of interest** within its operations.

The Company is dedicated to acting **honestly, fairly, and professionally** while serving the best interests of its clients and adhering to principles set forth in relevant legislation and regulatory standards.

The purpose of this Policy is to:

- Define the Company’s approach to identifying and managing conflicts of interest.
- Outline scenarios that may give rise to conflicts of interest.
- Apply to all Directors, employees, and individuals directly or indirectly linked to the Company (hereinafter referred to as “Related Persons”).
- Govern all interactions with Clients.

B. CRITERIA FOR IDENTIFYING CONFLICTS OF INTEREST

Conflicts of interest may arise when the Company, an associate, or a Related Person has an interest, relationship, or arrangement that conflicts with the Client’s interest. These situations may include, but are not limited to:

- **Financial Gain:** The Company or a Related Person makes a financial gain or avoids a financial loss at the Client’s expense.
- **Conflicting Interests:** The Company or a Related Person has an interest in the outcome of a transaction or service that conflicts with the Client’s interest.
- **Preferential Treatment:** Financial or other incentives lead to favoring one Client or group of Clients over another.
- **Competing Business:** The Company or a Related Person engages in business activities that compete with those of the Client.

Inducements: Receiving payments, goods, or services from parties other than the Client in connection with services provided

C. EXAMPLES OF IDENTIFIED CONFLICTS OF INTEREST

While it is not possible to create an exhaustive list, the following situations may constitute conflicts of interest that could harm Client interests:

- **Competing Interests:** The Company may provide services to associates or other Clients whose financial interests conflict with those of the Client.
- **Commission-Driven Services:** The Company may aim to maximize trading volumes to increase commission revenue, which may not align with a Client's goal of minimizing costs.
- **Third-Party Inducements:** The Company may receive commissions or other inducements from liquidity providers for transmitting Client orders.
- **Performance-Based Compensation:** Employee bonuses linked to trading volumes could incentivize behaviors conflicting with Client interests.
- **Business Relationships:** Relationships with third-party providers may lead to biased recommendations favoring providers offering higher commissions.
- **Copy Trading Strategies:** Compensation to strategy providers based on subscriber numbers may introduce bias.

D. PROCEDURES AND CONTROLS FOR MANAGING CONFLICTS OF INTEREST

To mitigate conflicts of interest, the Company has established the following procedures and controls:

- **Monitoring:** Continuous monitoring of business activities to ensure internal controls remain appropriate.
- **Information Barriers:** Effective measures to control the exchange of sensitive information between Related Persons to prevent harm to Client interests.
- **Supervision:** Separate supervision of functions where interests may conflict.
- **Influence Prevention:** Controls to prevent inappropriate influence over Related Persons providing services to Clients.
- **Simultaneous Functions:** Measures to prevent Related Persons from engaging in overlapping services that could impair conflict management.
- **Inducements Policy:** Policies to limit conflicts arising from receiving or offering inducements.
- **Chinese Walls:** Physical and procedural separation to restrict confidential information flow.

Access Controls: Procedures governing access to electronic data.



- **Segregation of Duties:** Division of responsibilities to prevent conflicts of interest.
- **Personal Account Dealing:** Restrictions on personal trading by Related Persons.
- **Compliance Oversight:** A Compliance Department to monitor and report conflicts to the Board of Directors.
- **External Business Interests:** Employees must obtain prior approval from the Board for any external business interests that may conflict with Company interests.
- **Confidentiality Policies:** Dissemination of sensitive information is limited on a “need- to-know” basis.
- **Internal Audits:** Appointment of an Internal Auditor to ensure systems and controls remain effective.
- **Four-Eyes Principle:** Dual oversight for critical supervisory activities.

E. CLIENT CONSENT

By entering into a Client Agreement with the Company, the Client consents to this Policy and authorizes the Company to manage conflicts of interest as it deems appropriate. Should the Company be unable to resolve a conflict, it will notify the Client before proceeding further.

F. DISCLOSURE OF INFORMATION

Where the Company’s internal measures are insufficient to avoid or manage a conflict of interest, the Company will **disclose the conflict** to the affected Client(s) before proceeding with any further business.

G. LANGUAGE OF COMMUNICATION

The official language for communication and contractual documentation is **English**. Translations of this Policy provided to Clients are for convenience only. In case of discrepancies, the **English version** shall prevail.

H. POLICY REVIEW

Kira Markets Limited is committed to continuously improving this Policy. It will be reviewed at least **every six months** to ensure its effectiveness and relevance.