



Conflict of Interest Policy

Purpose

This Conflict of Interest Policy is designed to protect the integrity of StocktiX Ltd's decision-making processes, ensure client interests are safeguarded, and maintain the trust and confidence of all stakeholders. We are committed to identifying, preventing, and managing conflicts of interest that may arise during our business activities.

Definition of Conflict of Interest

A conflict of interest occurs when StocktiX Ltd, its employees, or representatives have competing professional or personal interests that could impair their ability to act impartially. Such conflicts may arise in situations where:

If you do not understand anything contained in this document, please contact us. Authorised and regulated by the U.S.

Securities and Exchange Commission (SEC). StocktiX Ltd, Registered office: 370 17th St, Denver, CO 80202.

- The firm's responsibilities to one client conflict with those to another or with its own interests.
 - An employee's personal or financial interests interfere with their ability to perform duties objectively.
 - The firm or its representatives receive benefits that influence their decisions to the detriment of a client.
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Examples of Conflicts of Interest

Conflicts of interest may arise in the following scenarios:

1. Financial Incentives:

When the firm or its employees stand to gain financially (or avoid a loss) at the expense of a client.

2. Third-Party Benefits:

Receiving monetary or non-monetary benefits from third parties related to services provided to a client, beyond standard fees or commissions.

3. Client Relationships:

Acting for multiple clients whose interests may conflict in the same transaction or industry sector.

4. Non-Public Information:

Accessing confidential or non-public information that could influence decisions unfairly.

5. Internal Interests:

When the firm's commercial interests conflict with its duty to act in the client's best interests.

Policy Principles

To manage and mitigate conflicts of interest, StocktiX Ltd adheres to the following principles:

1. Transparency:

Conflicts of interest will be disclosed to affected parties wherever they cannot be avoided or adequately mitigated.

2. Fair Treatment:

All clients will be treated fairly, and their interests will be prioritized over the firm's interests.

3. Independence:

Employees and representatives will maintain independence in their actions and decision-making processes.

4. Confidentiality:

Confidential information obtained from clients will be used solely for the purposes of providing agreed-upon services and will not be disclosed without consent.

Measures to Manage Conflicts of Interest

StocktiX Ltd has implemented the following measures to identify, manage, and mitigate conflicts of interest:

1. Policies and Procedures:

A comprehensive framework guides employees on identifying and addressing conflicts of interest effectively.

2. Training:

Regular training ensures all employees understand their responsibilities and the importance of maintaining integrity in all business dealings.

3. Segregation of Duties:

Conflicting roles and responsibilities are segregated within the firm to prevent undue influence.

4. Monitoring and Auditing:

Continuous monitoring and regular audits are conducted to ensure compliance with conflict management policies.

5. Disclosure:

When conflicts cannot be fully mitigated, we will provide clear, written disclosure to affected clients, detailing the nature of the conflict and steps taken to address it.

6. Responsibilities of Employees

All employees of StocktiX Ltd are required to:

1. Act with honesty, integrity, and impartiality in all dealings.
2. Disclose any actual or potential conflicts of interest to their supervisor or the compliance team immediately.

3. Avoid situations where their personal interests may conflict with their professional duties.
4. Adhere to confidentiality agreements and ensure client information is not disclosed without authorization.

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment.

Client Protections

We are committed to protecting client interests through the following safeguards:

1. Clear communication and disclosure of any relevant conflicts of interest.
2. Fair and equal treatment of all clients, regardless of their size, relationship, or transaction type.
3. Proactive management of potential conflicts to ensure impartial and high-quality services.