



# Conflict of Interest Policy

## 1. Introduction

The identification, prevention, and proper management of conflicts of interest represent a critical responsibility for any financial services firm. At StocktiX Ltd, we are committed to identifying, monitoring, and managing all actual and potential conflicts of interest that may arise between us and our clients or between different clients of our firm.

If we determine that our measures to manage conflicts of interest are insufficient to ensure, with reasonable confidence, that the risks of damage to a client's interests can be prevented, we will disclose the general nature and/or sources of the conflicts of interest to the client before undertaking any business. This document outlines our policies for managing

conflicts of interest and provides a summary of key measures we have in place.

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## **2. Definition of Conflicts of Interest**

A conflict of interest arises when StocktiX Ltd is in a position where its duty to one party conflicts with its duty to another or with its own self-interest. For instance:

- When an employee or Broker's personal interests interfere with their professional obligations.
  - When inappropriate personal benefits are received due to their role at StocktiX Ltd, including non-economic benefits.
  - When the firm has a financial incentive to favor one client over another.
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### **3. Examples of Conflicts of Interest**

Conflicts of interest could arise in the following situations (this list is not exhaustive):

#### **3.1 Non-Public Information:**

When StocktiX Ltd or its employees have access to information that is not publicly available.

#### **3.2 Personal Relationships:**

Due to personal relationships of employees or management, or if these individuals serve on the boards of other companies.

#### **3.3 Financial Analysis or Recommendations:**

When producing, publishing, or distributing financial analyses or information that directly or indirectly influences investment decisions.

#### **3.4 Similar Business Sectors:**

When acting on behalf of clients operating in the same business sectors.

#### **3.5 Financial Incentives:**

If StocktiX Ltd stands to gain financially (or avoid a loss) at the expense of a client.

### **3.6 Third-Party Payments:**

Receiving money, goods, or services from a third party, beyond standard fees or commissions, in relation to services provided to a client.

### **3.7 Conflicting Client Interests:**

When StocktiX Ltd has a relationship with a client that conflicts with the interests of another client.

### **3.8 Internal Conflicts:**

When StocktiX Ltd's commercial interests conflict with its duty to clients.

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## **4. Managing Conflicts of Interest**

StocktiX Ltd has implemented robust measures to prevent, identify, and manage conflicts of interest. These measures include:

### **4.1 Policy and Training:**

Clear policies and regular training to ensure employees and Brokers understand how to identify and manage conflicts.

#### **4.2 Confidentiality Agreements:**

Confidentiality Agreements are used to protect client information and prevent misuse of sensitive data.

#### **4.3 Segregation of Duties:**

Assigning separate teams to manage conflicting interests and ensuring that employees work independently when required.

#### **4.4 Disclosure:**

Where a conflict cannot be fully managed, we will transparently disclose the nature of the conflict to the affected client.

#### **4.5 Monitoring and Auditing:**

Regular monitoring and audits to ensure adherence to our policies.

### **5. Clients in Similar Business Sectors**

When StocktiX Ltd acts on behalf of clients in the same business sectors, the following principles apply:

#### **5.1 General Sector Knowledge:**

StocktiX Ltd may use general sector knowledge and experience

gained from past dealings to benefit clients but will not disclose any client-specific information without explicit permission.

## **5.2 Confidential Information:**

Confidential information acquired during client engagements will only be used as necessary for providing services and will not be shared externally unless legally required.

## **6. StocktiX Ltd and Its Own Interests**

Occasionally, StocktiX Ltd's commercial interests may conflict with those of its clients. In such cases, we will:

- Transparently disclose the conflict to the client.
- Take all reasonable steps to mitigate any potential harm to the client's interests.