

INSTANT TRADING EU LTD

Conflict of Interest Policy

Version 4

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1. Introduction and Purpose

INSTANT TRADING EU LTD (the ‘Company’) is incorporated in the Republic of Cyprus with Certificate of Incorporation No. HE 266937. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (‘CySEC’), with a licence No. 266/15, and operates under the Provision of Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets and Other Related Matters Law of 2017, Law 87(I)/2017, as subsequently amended from time to time (the ‘Law’). The Company’s office is located at Spetson 23A, Leda Court, Block B, Office B203, 4000 Mesa Geitonia, Limassol, Cyprus.

The Company has established a Conflicts of Interest Policy, following the implementation of the Markets in Financial Instruments Directive 2014/65/EU (“MiFID II”) and in accordance with the provisions of the Law. The Policy aims to identify and prevent or manage conflicts of interest between the Company, including its managers, employees and tied agents, or any person directly or indirectly linked to them by control, and its clients or between one client and another, or combinations thereof, including those caused by the receipt of inducements from third parties or by the investment firm’s own remuneration and other incentive structures.

Specifically, the Policy:

- a) identifies, with reference to the specific investment services and activities and ancillary services carried out by or on behalf of the Company, the circumstances which constitute or may give rise to a conflict of interest entailing a risk of damage to the interests of one or more clients; and
- b) specifies the procedures to be followed and the measures to be adopted to prevent or manage such conflicts.

2. Scope

The Policy applies to all its directors, employees, any persons directly or indirectly linked to the Company (hereinafter called “Related Persons”) and refers to all interactions with all Clients. Related person means any of the following persons:

- a) a member of the board of directors, partner or equivalent, manager or tied agent of the Company;
- b) a member of the board of directors, partner or equivalent, or manager of any tied agent of the Company;
- c) an employee of the Company or of a tied agent of the Company, as well as any other natural person whose services are placed at the disposal and under the control of the Company or a tied agent of the Company who is involved in the provision by the Company of investment services or/and the performance of investment activities;

- d) a natural person who is directly involved in the provision of services to the Company or to its tied agent under an outsourcing arrangement for the purpose of the provision by the Company of investment services or/and the performance of investment activities.

Due to the nature of Contracts for Difference (CFDs), the Company does not assess or accommodate clients' environmental, social, or governance (ESG) preferences, as such products are not suitable for sustainability-related objectives.

The Company does not provide crypto-asset services, including trading, custody, or promotion. Therefore, conflicts related to such services are not applicable.

3. Identification of Conflict of Interest

Conflict of interest is defined as any situation when in the course of providing investment and/or ancillary services, the interest of the client could be damaged to the advantage of:

- a) the Company, its appointed representatives/agents (hereinafter 'relevant persons') or any other person with direct or indirect links to the aforementioned; or
- b) another Client or a group of Clients.

For the purpose of identifying the types of conflicts of interest that may arise, the Company shall take into account whether itself or a relevant person or a person directly or indirectly linked by control to the Company, may in the course of providing investment and ancillary services or a combination thereof:

- a) make a financial gain, or avoid a financial loss at the expense of the Client;
- b) has an interest in the outcome of a service provided to a Client, or of a transaction carried out on behalf of the Client, which differs from that Client's interest in the same outcome;
- c) has a financial gain or other incentive to favor the interest of the Client, or a group of Clients, over the interest of another Client or a group of Clients;
- d) receives from a person other than the Client an inducement in relation to a service provided to the Client, in the form of monies, goods or services, other than the standard commission or fee for that service;
- e) carries the same business as the Client;
- f) In respect of the Company, acting as a financial intermediary in Initial Public Offering (IPO), the Client should be informed whether the parties involved in the issue or offer hold equity securities of the issuer, or equity securities of any subsidiaries of the issuer, or have a direct or indirect economic interest that depends on the success of the issue, or have any understanding or arrangement with major shareholders of the issuer.

Furthermore, a conflict of interest arises between the following parties:

- a) the Client and the Company;
- b) two clients of the Company;
- c) the Company and its employees;

- d) a client of the Company and an employee/manager of the Company;
- e) the Company's Departments.

4. Managing Conflicts Of Interest

The Company has established and implemented and shall maintain and operate effective organisational and administrative procedures with the purpose to prevent and/or manage any identified conflict of interest that may give rise to a risk of damage to the interests of the Client. As such the Company shall undertake measures and controls to ensure that relevant persons engaged in different business activities, involving a potential conflict of interest, carry on those activities in a manner that deters rise of conflict of interest as follows:

- a) exchange of information between relevant persons engaged in activities involving a risk of a conflict of interest shall be limited to the amount of information needed to carry out their relevant duties and responsibilities, 'need-to-know' basis;
- b) establishment of 'Chinese Walls' restricting the flow of confidential information both through electronic systems, through establishment of security access levels, and physical separation of department location. Chinese walls are essentially information barriers which are used to prevent inside or highly confidential information possessed by one part of the business from being inappropriately passed to or obtained by another part of the business. When a Chinese wall is used as a way of managing conflicts of interests, individuals on the other side of the wall will not be regarded as being in possession of knowledge denied to them as a result of the Chinese wall.
- c) relevant persons whose principal functions involve carrying out activities on behalf of or providing services to clients, whose interests may conflict, shall have a distinct separate supervision;
- d) removal of any direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration of different relevant persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities;
- e) an inducement, gift or any other incentive log, registering the offer or receipt of benefits to relevant persons, as well as limits/controls where conflict of interest may arise from such inducement, gift or any other incentive;
- f) prohibition of inducement, gift or any other incentive to relevant persons when they hold key positions link with the related service or product offered by the Company;
- g) implement remuneration policy applicable to all relevant persons ensuring that their reward is not in conflict with the Clients best interest;
- h) implement personal account dealing policy for relevant persons in relation with their own investment trading conducts, stating that they must disclose any of their dealings to the Company;
- i) 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;
- j) Tools like Autochartist are used for technical analysis support only

- k) limits and/or controls on the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services where such involvement may impair the proper management of conflicts of interest;
- l) relevant persons involved in multiple investment or ancillary services that may give rise to conflict, shall have their duties segregated;
- m) information in relation with a specific financial instrument or service which are disseminated to Clients, shall be produced by a relevant persons that has no direct interest to that instrument or service and must be approved by Compliance function prior dissemination in order to comply with relevant MiFID II and ESMA standards.
- n) when selecting service providers, in the event of any personal relationship between the Company and the third party, or a person connected to them the Company takes this into account and considers potential conflicts or the appearance of conflicts in making its selection and as far as possible refrain connected parties from being involved in the actual decision making process.
- o) disclosure of any identified situation of Conflict of Interest to Clients.
- p) all employees are required to undergo annual training on conflict of interest identification and mitigation measures, including updates to the Policy and use of tools such as Autochartist.
- q) Establishment of an in-house Compliance Department to monitor and report on the above to the Company Board of Directors. The Department will also update the relevant internal procedures and ensure compliance with such procedures
- r) Appointment of an Internal Auditor to ensure that appropriate systems and controls are in place and maintained which in turn shall evaluate and report to the Company's Board of Directors
- s) Establishment of the four-eyes principle in supervising the Company's activities.

In circumstances not covered by the point mentioned above and given the nature of a conflict of interest situation, the Compliance Department and/or the Senior Management shall decide whether to proceed with the relevant circumstance and notify the client accordingly.

Summary table in line with Article 34(2) of Regulation (EU) 565/2017

Investment/ Ancillary Service	Potential Conflict Circumstances	Risk of Damage to Client Interests	Mitigation/Control Measures
Reception and transmission of orders in relation to CFDs	<ul style="list-style-type: none"> - Firm earns revenue primarily from spreads/commissions, creating incentive to encourage higher trading volumes. - Possible preferential routing of client orders to certain liquidity providers where the firm has commercial arrangements. 	<ul style="list-style-type: none"> - Clients may be induced to trade excessively. - Execution quality may not be optimal. 	<ul style="list-style-type: none"> - Order execution policy ensuring best execution. - Monitoring of staff incentives to avoid mis-selling.

Execution of orders on behalf of clients	<ul style="list-style-type: none"> - Acting as counterparty to client CFD trades (market maker model). - Pricing and spreads determined by the firm. 	<ul style="list-style-type: none"> - Firm profits may be contrary to client interests (client losses = firm gains). - Risk of unfair pricing or slippage. 	<ul style="list-style-type: none"> - Transparent pricing methodology. - Regular spread/price quality monitoring against market benchmarks.
Portfolio management (if applicable)	<ul style="list-style-type: none"> - Allocation of client funds into instruments where firm has higher revenue interest (e.g. CFDs vs other products). 	<ul style="list-style-type: none"> - Suboptimal portfolio choices damaging long-term client returns. 	<ul style="list-style-type: none"> - Suitability checks and product governance framework. - Compliance oversight.
Ancillary service: research or analysis	<ul style="list-style-type: none"> - Research may be influenced by firm's trading positions or marketing goals. 	<ul style="list-style-type: none"> - Misleading or biased research may induce client losses. 	<ul style="list-style-type: none"> - Clear labelling of marketing vs. independent research. - Conflict disclosure in research materials.
Ancillary service: foreign exchange services related to CFDs	<ul style="list-style-type: none"> - FX conversions for margin deposits and withdrawals at non-competitive rates. 	<ul style="list-style-type: none"> - Client costs increased unnecessarily. 	<ul style="list-style-type: none"> - Transparent disclosure of conversion rates and charges. - Regular benchmarking.
Marketing and client onboarding	<ul style="list-style-type: none"> - Aggressive marketing targeting retail clients. - Incentives (e.g. bonuses, gifts) leading to unsuitable trading. 	<ul style="list-style-type: none"> - Clients trade products not suitable for their knowledge/experience 	<ul style="list-style-type: none"> - Marketing reviewed by compliance. - Ban on misleading promotions. - Suitability/appropriateness tests.
Staff remuneration and sales practices	<ul style="list-style-type: none"> - Sales staff rewarded on trading volumes or deposits. 	<ul style="list-style-type: none"> - Pressure to mis-sell or encourage excessive trading. 	<ul style="list-style-type: none"> - Balanced KPIs including compliance, - Independent monitoring of calls and interactions. - Remuneration Policy specifying the remuneration procedures as per the regulatory requirements was established - The Compliance Officer is required to review all variable remuneration practices applied by the Company.

Use of client information	- Misuse of confidential client data for firm's benefit (e.g. trading against client positions).	- Breach of trust and potential client losses.	- Information barriers, restricted access policies. - Monitoring of proprietary vs. client trading.
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5. Personal Transactions and conflicts of interest

All employees of the Company that are involved in any investment activities must be aware of the restrictions on personal transactions detailed below. This section also includes personal transactions which may be performed by persons who are employed by companies which perform an outsourced activity to the Company, if any. If any prohibited personal transactions are entered into, the Company must be notified promptly.

Employees of the Company that are involved in the provision of investment services and the dissemination of investment research or other activities must not enter into the personal transactions that which will cause the following:

- enter into a transaction prohibited under section 9 of the Insider Dealing and Market Manipulation (Market Abuse) Law N.166(I)/2005;
- misuse or cause improper disclosure of confidential information;
- enter in a transaction that is likely to conflict with any obligations of the Company, or the employee that are stated under the law.

In cases where the employee has come into contact with information which is not publicly available to clients or cannot readily be inferred from information that is so available, the employees must not act or undertake personal transactions or trade, other than as market makers acting in good faith and in the ordinary course of market making, or in the execution of an unsolicited client order, on behalf of any other person, including the Company.

The employees must not disclose any opinion other than in the normal course of business, if the person who is given the opinion is likely to enter into a transaction which is contrary to the above. The employee also should not provide advice or provide to anyone any information, other than in the proper course of his/her employment, especially if it is clear that the person who is receiving such information will advise another party who might acquire or dispose of financial instruments to which that information relates.

Any client's orders that have been relayed to any employees of the Company must not be disclosed to another party.

An employee of the Company who has knowledge of a potential client's order must not carry out a personal transaction that is the same as the client order, if this will cause a conflict of interest.

In respect of these conflicts, the Company maintains and operates procedures with a view to taking all appropriate steps to prevent conflicts of interest from constituting or giving rise to material risk of damage to the interests of the Company's clients.

6. Reporting of conflict of interest

In the case of identification of a possible conflict of interest, a staff member must refer it initially to his immediate supervisor to assist in the assessment of a material risk of damage and send a completed Conflict of Interest Notification Form together with full details to allow regulatory scrutiny of:

- a) corrective and preventive actions;
- b) how these actions were considered appropriate;
- c) any conditions imposed; and
- d) whether there are still ongoing conflicts and how they are being managed and advised to the Client
- e) The Head of Compliance for inclusion within the reports reviewed by the Board of Directors.

7. Disclosures

Where the measures are not sufficient to prevent or manage a conflict of interest relating to a Client, the Company, as a measure of last resort, will disclose the conflict of interest before proceeding with any further business transactions with the Client. The Company may refuse to proceed with the relevant transactions if the disclosure deemed to be not sufficient measure for managing the conflict, at the Company's discretion.

Such disclosure shall:

1. Be made in a durable medium and,
2. clearly state that the organisational and administrative arrangements established by the Company to prevent or manage the conflicts are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of the Client will be prevented;
3. include a specific description of the conflicts of interest that arise in the provision of investment services and ancillary services;
4. explain the risks to the Client that arise as a result of the conflicts of interest and the steps undertaken to mitigate these risks;
5. Include sufficient details, taking into account the nature of the client, to enable that client to make an informed decision with respect to the service in the context in which the conflict of interest arises.

If a Client decides not to go ahead with the service due to the conflict disclosed, the Company will have no choice but to decline the provision of services if the conflict cannot be effectively managed.

8. Record Keeping

The Company maintains a Conflicts Register that records the nature of each identified conflict, mitigation measures taken, disclosures (if any), and the conflict's current status. This Register is reviewed quarterly and retained for a minimum of five years.

The records will be kept by the Compliance Officer. Any actions must be recorded and reported to the Board of Directors without any delay.

9. Updating And Review Of The Policy

The Company shall assess and review its Policy at any time and in any case at least annually or when it is deemed necessary, by the Compliance Officer and further approved by the Board of Directors.

10. Client's Consent

By entering into an Agreement with the Company for the provision of Investment Services, the Client is consenting to an application of this Policy on him/her. Further, the Client consents to and authorises the Company to deal with the Client in any manner which the Company considers appropriate, notwithstanding any conflict of interest or the existence of any material interest in a Transaction, without prior reference to the Client.