CONFLICTS OF INTEREST POLICY

VERSION 2.0

01/2023

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1.Introduction and aim of the Policy

1.1 Olympic Markets Ltd, is a private limited Company incorporated under section 15 of the Labuan Companies Act 1990 (Act441) with registration number LL17699, fully authorized and regulated by the Labuan Financial Services Authority (LFSA) under License number MB/22/0106. Our registered address is at Unit B, Lot 49, 1st Floor Block F Lazenda Warehouse 3, Jalan Ranca-Ranca 87000 F.T. Labuan Malaysia, offering it services through its various brand names and websites.

1.2 Based on the implementation of the Labuan Financial Services and Securities Act 2010 as amended from time to time and under the Laws of Malaysia Act 705 ("the Law"), Olympic Market Ltd (hereinafter called the "Company") is required to present a Conflicts of Interest Policy designed to detect and avoid Conflicts of Interest.

1.3 Under the above regulatory framework, the Company established, implemented, and maintains an effective Conflicts of Interest Policy.

2.Scope of the Policy

2.1.The aim of this Policy (hereinafter the "Policy") is to specify the procedures put in place by the Company, for identifying and reasonably managing and controlling and where possible, mitigating and where necessary disclosing any Conflict of Interest arising in relation to its business. The Company is required to take all reasonable steps to detect and avoid Conflicts of Interest between:

a. The Company, including its directors, managers, employees, tied agents, appointed representatives and/or any person directly or indirectly linked to the Company by control, and its Clients, or between

b. One Client and another Client, that arise in the course of providing any investment and ancillary services, or combinations thereof, including those caused by the receipt of inducements from third parties or by the Company's own remuneration and other incentive measures, which adversely affect the Company' s Clients.

2.2.The Company is committed to act honestly, fairly, and professionally and in the best interest of its Clients and to comply with the principles set out in the above legislation when providing investment services to its Clients.

3.Identifying Conflicts of Interest

3.1 For the purposes of identifying the types of Conflict of Interest that may arise during the course of the business relationship between us. It is the obligation of the Firm to take into account (as a minimum) whether:

a) Where the Company or a relevant person, is likely to make a financial gain, or avoid a financial loss, at the expense of the Client.

b) Where the Company or a relevant person, has an interest in the outcome of a service provided to a client, or of a transaction carried out on behalf of a Client, which is distinct from the Client's interest in that outcome.

c) Where the Company or a relevant, has a financial or other incentive to favor the interest of another Client or group of Clients over the interests of the Client or group of Clients.

d) Where the Company or a relevant person, participates in the same business as the Client.

e) Where the Company or a relevant person, receives from a person other than the Client, an inducement in relation to a service provided to the Client, in the form of goods or services, other than the standard commission or fee for that service.

4.Managing Conflicts of Interest (Procedures and Controls)

4.1 For the Company to manage the Identified Conflicts of Interest the following procedures and controls are followed and include measures such as:

a. An effective security Policy to prevent or control the exchange of information between relevant persons engaged in activities involving a risk of a Conflict of Interest where the exchange of that information may harm the Interests of a Client or Clients

b. The separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, Clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Company

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. 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. 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

f. Inside and proprietary information Policy for any person, who, in pursuit of the Company's activities, possess inside or proprietary information and must preserve its confidentiality and disclose it only to other persons who have a valid business reason for receiving it

g. Establishing "Chinese Walls" to restrict the flow of confidential and inside information within the Company and/or to prevent or control the exchange of information between relevant persons engaged in activities involving a risk of a

Conflict of Interest where the exchange of that information may harm the interests of one or more Clients, and physical separation of departments

h. Procedures governing access to electronic data

i. Segregation of duties that may give rise to Conflicts of Interests if carried on by the same individual

j. Implementation of a personal account dealing Policy applicable to relevant persons in relation to their own investments

k. Establishment of a Policy designed to limit the Conflict of Interest arising from the giving and receiving of inducements

l. Formation of the four-eyes principle designed to supervise the Company's activities

5.Disclosures

5.1 Where the Company's organizational and administrative arrangements in place to prevent Conflicts of Interest are not sufficient to ensure, with reasonable confidence, that risks of damage to Client interests will be prevented, the Company shall disclose the risk to the Client
5.2 Where the Company does not believe that a disclosure is sufficient to manage a conflict, the Company may choose not to proceed with the transaction giving rise to the conflict.

6.Updating and review of the Policy

6.1 This Policy is subject to review and change as the company deems necessary. The company reserves the right to make any amendments as appropriate.

6.2 Latest version of the Policy can be found on the Company's Main Website.

7.Contact Information:

7.1 Any questions and enquires arising from the present should be addressed to the Company's Compliance Department at compliance@olympicmarkets.com