



AMEGA

Conflict of Interest Policy

Effective March 23, 2023

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1. Introduction

- 1.1. This Conflict of Interest Policy (the 'Policy') outlines the manner in which Amega Global Ltd (referred to as the 'Company'), where applicable, identifies, manages, mitigates or controls any possible conflicts of interest which may arise, during the course of your business relationship with the Company.
- 1.2. For your benefit and protection, please ensure that you take sufficient time to read this and any other additional documentation and information available to you via our Website, prior to opening an account and/or carrying out any activity with us. You should contact us for any further clarification, or seek independent professional advice.

2. Scope of the policy

- 2.1. According to applicable legislation we must take reasonable steps to ensure that conflicts and potential conflicts of interest between the Company and its Clients and between one Client and another are identified and then prevented or managed in such a way that the interests of a Client are not adversely affected and to ensure that all our Clients are fairly treated and not prejudiced by any such conflicts of interest. Our aim is to take all reasonable steps to implement or maintain any arrangements, which will identify and manage such conflicts. The Policy applies to all its directors, employees, any persons directly and indirectly linked to the Company (hereinafter called 'related persons') and refers to all interactions with all clients.
- 2.2. We are committed to act honestly, fairly and professionally and in the best interest of our Clients and to abide by the principles set out in applicable legislation, when providing investment services to our Clients.

3. Identification of 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. The Company and/or relevant person is likely to make a financial gain, or avoid a financial loss, at the expense of the Client;
 - b. The Company and/or relevant person has an interest in the outcome of a service provided to the Client or of a transaction carried out on behalf of the Client, which is distinct from the Client's interest in that outcome;
 - c. The Company and/or relevant person carries on the same business as the Client;
 - d. The Company and/or relevant person receives and/or pays from a person other than the Client an inducement in relation to the service provided to the Client, in the form of money, goods or services, other than the standard commission or fee for that service.
- 3.2. Conflicts of interest may arise in a number of situations, including the below:
- a. The Company is acting as a principal to client trades, and has an interest opposite to the interest of its clients;
 - b. The Company provides to its clients' market commentaries and technical analysis;
 - c. The Company may pay commission (or other related fees) to a third party as a result of your introduction to the Company.

4. Managing conflicts of interest

- 4.1. The Company establishes, implements and maintains an effective conflict of interest policy. Where a conflict of interest arises, the Company endeavors to manage such conflict promptly and fairly.
- 4.2. The Company has therefore set up internal policies and we take all reasonable steps to identify and manage potential conflicts of interests.
- 4.3. The Company maintains and operates effective organizational and administrative procedures to manage the identified conflicts of interest. The Company also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate. Where we become aware of a conflict or potential conflict of interest, we must prevent or manage that conflict of interest by using appropriate arrangements.
- 4.4. In general, the procedures and controls that the Company follows regarding conflicts of interest include the following measures:
 - a. Effective procedures to prevent or control the exchange of information, or restrict the communication of the relevant 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;
 - b. Disclose the conflict of interest to the Client in writing either generally or in relation to a specific transaction;
 - c. The separate supervision of relevant persons whose principal functions involve carrying out activities of 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;
 - d. 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;
- e. 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;
 - f. Measures 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 interests;
 - g. The appropriate disclosure(s) to the Client in a clear, fair and not misleading manner to enable the Client to make an informed decision; and
 - h. A periodic review (at least annually) of our execution arrangements
- 4.5. Some of the policies and procedures established to prevent conflicts of interests are shown below:
- a. A 'need to know' procedure governing the dissemination of confidential information or inside information within the Company
 - b. Chinese Walls restricting the flow of confidential and inside information within our Company and physical separation of department
 - c. Procedures governing access to electronic data
 - d. A remuneration structure that ensures remuneration methodologies do not compromise the Company's duty to act in the best interest of Clients and the various control mechanisms' independence and objectivity
 - e. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual

- f. Personal account dealing requirements applicable to relevant persons in relation to their own investments
 - g. A policy designed to limit the conflict of interest arising from the giving and receiving of inducements
 - h. Establishment of the four eyes principle in supervising the Company's activities.
- 4.6. The Compliance Department is responsible for identifying and managing potential conflicts of interests and reporting directly to the Board of Directors and Senior Management in relation to the latter. The Compliance Department is responsible for updating the Company's relevant internal procedures and ensures compliance with such procedures.
- 4.7. In addition, the Company employs a number of systems, controls, policies and procedures to manage conflicts of interest. A summary of the key Company policy requirements and controls are set out below.

5. Disclosure

- 5.1. Where a Client specific conflict arises and we do not have organizational and administrative arrangements in place to prevent or manage such conflicts of interest and the measures we have in place internally are not sufficient to ensure, with reasonable confidence, that risks of damage to your interests will be prevented, we will disclose such risk to you.
- 5.2. Where we do not believe that disclosure is appropriate to manage the conflict, we may choose not to proceed with the transaction or matter giving rise to the conflict.
- 5.3. This Policy is subject to review and change as we deem necessary. We reserve the right to make any amendments as appropriate.

6. Contact information

- 6.1. Any questions relating to this Policy should be firstly addressed to our Customer Support Department at support@amegafx.com. You may also contact our Compliance Department at compliance@amegafx.com.