4XC

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LEGAL DOCUMENTATION

CONFLICT OF INTEREST POLICY

4XC is a trade name of 4XC (Seychelles) Ltd, a company registered in Seychelles under number 8428661-1 and licensed by the Financial Services Authority (FSA) under License number SD139.

CONFLICT OF INTEREST POLICY

Client-facing procedure for handling conflicts of Interest.

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- *Authorised and regulated by the Seychelles Financial Services Authority as a Securities Dealer.*
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CONTENTS

1. Introduction
2. Purpose & Scope
3. Definitions
4. Regulatory Framework
5. Our Commitment to Clients
6. Understanding Conflicts of Interest
7. Types of Conflict relevant to 4XC
8. Identification of Conflicts
9. Management of Conflicts
10. Information Barriers and Confidentiality
11. Remuneration, Incentives and Inducements
12. Personal Transactions
13. Gifts & Entertainment
14. Third-Party Relationships and Outsourcing
15. Disclosure of Conflicts of Interest
16. Circumstances Where We May Decline to Act
17. Client Responsibilities
18. Related Documents
19. Policy Review
20. Contact Information

EXECUTIVE SUMMARY

At 4XC, we recognise that conflicts of interest can arise in the normal course of providing financial services. While many such conflicts are routine within the financial services industry, we are committed to identifying, preventing, managing and, where appropriate, disclosing conflicts in a manner that protects the interests of our Clients.

This Policy explains the principles, governance arrangements and controls we maintain to identify, manage and, where appropriate, disclose conflicts of interest fairly, transparently and professionally. It forms part of the Company's wider governance and compliance framework and should be read together with the Client Service Agreement, Best Execution Policy, Risk Disclosure statement, Privacy Policy, Complaint Handling Policy and any other legal documentation applicable to your relationship with 4XC.

1. INTRODUCTION

4XC (Seychelles) Ltd ("4XC", "the Company", "we", "our" or "us") is committed to conducting its business with honesty, integrity, fairness and professionalism, while acting in the best interests of its Clients at all times.

As a regulated investment services provider, we recognise that conflicts of interest may arise during the normal course of our business activities. These conflicts may occur between the Company and a Client, between different Clients, between our employees and Clients, or as a result of relationships with third parties, service providers or business partners.

While conflicts of interest cannot always be avoided, the Company maintains organisational, administrative and operational arrangements designed to identify, manage and monitor them before they adversely affect Clients.

The purpose of this Policy is to explain the principles we apply when identifying and managing conflicts of interest, the circumstances in which conflicts may arise, and how we seek to ensure Clients continue to receive fair and professional treatment.

Where a conflict of interest cannot be effectively managed through our internal arrangements, we will disclose the nature of that conflict to you in sufficient detail to enable you to make an informed decision regarding the relevant service or transaction. In circumstances where we believe that a conflict cannot be appropriately managed or adequately disclosed, we reserve the right to decline to provide the relevant service or to proceed with the transaction.

Nothing contained in this Policy limits or reduces any legal or regulatory obligations owed by the Company to its Clients under applicable laws or regulations.

2. PURPOSE AND SCOPE

4XC (Seychelles) Ltd ("4XC", "the Company", "we", "our" or "us") is committed to conducting its business with honesty, integrity, fairness and professionalism, while acting in the best interests of its Clients at all times.

As a regulated investment services provider, we recognise that conflicts of interest may arise during the normal course of our business activities. These conflicts may occur between the Company and a Client, between different Clients, between our employees and Clients, or as a result of relationships with third parties, service providers or business partners.

The purpose of this Policy is to provide Clients and prospective Clients with a clear understanding of how the Company identifies, manages and, where appropriate, discloses conflicts of interest arising in connection with the provision of its investment and brokerage services.

The Company maintains organisational and administrative arrangements designed to prevent conflicts of interest from adversely affecting the interests of Clients. Where conflicts cannot reasonably be prevented, they are managed fairly, transparently and in accordance with applicable legal and regulatory obligations.

This Policy outlines the principles adopted by the Company to:

- identify actual, potential and perceived conflicts of interest;
- implement appropriate measures to prevent or manage conflicts where practicable;
- disclose material conflicts of interest where internal arrangements are not sufficient to ensure that the risk of harm to a Client is effectively managed;
- promote the fair and equitable treatment of all Clients; and
- maintain confidence in the integrity of the Company's business practices and decision-making processes.

This Policy applies to all investment products, financial instruments and services offered by the Company, including any ancillary services provided in connection with those activities.

It also applies throughout the Client relationship, from onboarding and account opening until the termination of the business relationship.

The principles contained within this Policy apply to all directors, officers, employees, appointed representatives, contractors and other persons acting on behalf of the Company, as well as to relationships with third-party service providers, introducing brokers, liquidity providers and other business partners where those relationships may give rise to an actual or potential conflict of interest.

3. DEFINITIONS

For the purposes of this Policy, the following terms shall have the meanings set out below unless the context requires otherwise:

Applicable Laws and Regulations means all laws, regulations, license conditions and regulatory requirements applicable to the Company in the jurisdictions in which it operates.

Client means any retail Client, professional Client, eligible counterparty (where applicable), prospective Client or other person to whom the Company provides, or intends to provide, investment or related services.

Company, **4XC**, **we**, **our** or **us** means **4XC (Seychelles) Ltd**.

Conflict of Interest means any situation in which the interests of the Company, a Client, an employee, a director, an appointed representative, a third-party service provider or any other associated person differ in a manner that could create a material risk that the interests of one party may be disadvantaged or improperly influenced.

Confidential Information means any non-public information relating to a Client, the Company or any other person which is obtained during the course of business and is subject to legal, contractual or regulatory obligations of confidentiality.

Financial Instruments means financial products or instruments offered by the Company in accordance with its licences and the Client Service Agreement.

Material Conflict of Interest means a conflict of interest that could reasonably be expected to influence the impartial provision of services or have the potential to cause disadvantage or prejudice to the interests of a Client.

Order Execution Policy means the Company's policy governing the execution and transmission of Client orders.

Personal Transaction means any transaction in a Financial Instrument carried out by, or on behalf of, an employee, director or other relevant person outside the normal course of performing their duties for the Company.

Policy means this Conflict of Interest Policy, as amended from time to time.

Related Party means any entity within the Company's corporate group or any affiliated entity under common ownership or control.

Relevant Person means any director, officer, employee, appointed representative, contractor or any other individual acting on behalf of the Company in connection with the provision of its services.

Third Party means any person or organisation, other than the Company or the Client, that provides products, services or support to the Company, including liquidity providers, payment service providers, technology providers, custodians, professional advisers and outsourced service providers.

Unless the context otherwise requires, words importing the singular shall include the plural and vice versa, references to one gender shall include all genders, and headings are included for convenience only and shall not affect the interpretation of this Policy.

4. REGULATORY FRAMEWORK

The Company operates within a regulated financial services environment and is committed to conducting its business in accordance with all applicable legal, regulatory and ethical standards.

As part of its regulatory obligations, the Company maintains effective organisational and administrative arrangements designed to identify, manage and monitor conflicts of interest that may arise in the provision of investment and related services to Clients.

This Policy forms part of the Company's broader governance and compliance framework and supports the effective identification, management and disclosure of conflicts of interest.

The Company regularly reviews its policies, procedures and internal controls to ensure they remain appropriate, effective and consistent with applicable laws, regulatory expectations, industry best practices and the evolving nature of its business activities.

Effective conflict of interest management extends beyond regulatory compliance and forms an essential part of maintaining Client confidence, market integrity and fair business practices.

The principles set out in this Policy are supported by appropriate governance arrangements, operational controls and compliance procedures designed to ensure conflicts of interest are managed consistently throughout the Company.

Where changes to applicable laws, regulatory requirements or the Company's business activities require amendments to this Policy, the Company will review and update the Policy as appropriate to ensure its continued effectiveness.

Nothing contained in this Policy limits or replaces any rights or protections afforded to Clients under applicable laws and regulations, nor does it limit the Company's obligation to comply with all legal and regulatory requirements governing the services it provides.

5. OUR COMMITMENT TO CLIENTS

At 4XC, maintaining the trust and confidence of our Clients is fundamental to the way we conduct our business. We recognise that our Clients place significant reliance on us to provide investment and brokerage services in a fair, transparent and professional manner. As such, we are committed to conducting our business with integrity and ensuring that the interests of our Clients remain central to the investment and related services we provide.

Our objective is not only to comply with applicable legal and regulatory requirements, but also to promote a culture of fairness, accountability and ethical conduct throughout the Company. Effective conflict of interest management supports these objectives and helps protect the interests of our Clients.

The Company maintains organisational and administrative arrangements designed to identify, assess and manage actual, potential and perceived conflicts of interest and to minimise any adverse impact on Clients where such conflicts cannot reasonably be avoided.

In fulfilling our obligations to our Clients, we are guided by the following principles:

- **Integrity** – We conduct our business honestly, ethically and with professionalism at all times.
- **Fair Treatment** – We seek to treat all Clients fairly, consistently and without discrimination, ensuring that no Client is unfairly disadvantaged in favour of another Client or the Company.
- **Transparency** – We aim to communicate openly with our Clients regarding the services we provide and will disclose Material Conflicts of Interest where disclosure is necessary to enable a Client to make an informed decision.
- **Accountability** – We maintain clear governance arrangements, internal controls and oversight procedures to ensure that conflicts of interest are appropriately identified, monitored and managed.
- **Confidentiality** – We respect the confidentiality of Client information and maintain appropriate controls to protect sensitive information from unauthorised access, misuse or inappropriate disclosure.
- **Continuous Improvement** – We regularly review our governance arrangements, policies and internal procedures to ensure they remain appropriate, effective and aligned with changes to our business activities, industry developments and regulatory expectations.

The Company expects all directors, officers, employees, appointed representatives and any other persons acting on its behalf to uphold these principles and to conduct themselves in a manner that supports the fair treatment of Clients and the effective management of conflicts of interest.

Where the Company determines that a conflict of interest cannot be effectively managed through its internal arrangements, we will take appropriate action to protect the interests of our Clients. Depending on the circumstances, this may include implementing additional controls, providing appropriate disclosure, seeking a Client's acknowledgement or consent, where appropriate or required by law, or declining to provide the relevant service where we believe this is necessary to ensure fair treatment.

By embedding these principles throughout its governance framework and day-to-day operations, the Company seeks to maintain the trust of its Clients and uphold high standards of integrity, transparency and responsible business conduct.

6. UNDERSTANDING CONFLICTS OF INTEREST

A conflict of interest is not, in itself, evidence of wrongdoing or improper conduct. Conflicts of interest can arise naturally in the course of providing financial services, particularly where a financial services provider offers multiple products and services, acts on behalf of different Clients, or maintains commercial relationships with other organisations.

A conflict of interest exists where the interests of the Company, one of its Clients, an employee, a Related Party or another person connected with the Company differ from the interests of a Client in a way that could create a risk that the Client's interests may not receive fair and objective consideration.

In fulfilling our obligations to our Clients, we are guided by the following principles:

- **Actual conflicts** exist where competing interests currently affect, or have the potential to affect, the impartial provision of a service.

- **Potential conflicts** are situations that could reasonably develop into actual conflicts if appropriate controls are not maintained.

- **Perceived conflicts** arise where a reasonable person could conclude that a conflict may exist, even if no actual conflict has occurred. Managing perceived conflicts is important in maintaining confidence in the Company's integrity and reputation.

Not every conflict of interest results in harm to a Client. Many conflicts are routine within the financial services industry and can be effectively managed through appropriate governance, internal controls and oversight procedures.

The Company's objective is not to eliminate every conflict of interest, but to identify and manage conflicts appropriately so that they do not adversely affect the interests of Clients.

Our approach is intended to ensure that conflicts of interest are managed consistently and that Clients can have confidence in the integrity of the Company's decision-making.

Clients should also be aware that conflicts of interest are not always financial in nature. They may arise from commercial relationships, access to confidential information, competing business objectives, personal interests, external appointments, remuneration arrangements or other circumstances that have the potential to influence decision-making. For this reason, the Company considers a broad range of factors when identifying and assessing potential conflicts.

The following sections of this Policy explain the types of conflicts that may arise in connection with our business activities and the measures we have implemented to manage them appropriately.

7. TYPES OF CONFLICT RELEVANT TO 4XC

As an international investment and brokerage services provider, the Company recognises that conflicts of interest may arise in a variety of circumstances during the provision of services to its Clients. Many of these situations are common within the financial services industry and do not necessarily result in Clients being disadvantaged. Nevertheless, the Company considers it important that such situations are identified, appropriately managed and, where necessary, disclosed. Examples include, but are not limited to, the following:

7.1. **Acting for Multiple Clients**: The Company provides services to a diverse range of Clients whose investment objectives, trading strategies or commercial interests may differ.

Situations may arise where the Company is simultaneously providing services to multiple Clients whose interests may differ or compete. The Company is committed to treating all Clients fairly and does not seek to favour one Client over another.

Appropriate procedures are maintained to ensure that decisions relating to one Client do not unfairly disadvantage another.

7.2. **Commercial Interests of the Company:** As a commercial organisation, the Company earns revenue from the products and services it provides.

This may give rise to situations where the Company's commercial interests differ from those of a Client. The Company is committed to ensuring that its commercial objectives do not improperly influence the manner in which services are provided or decisions are made on behalf of Clients.

The Company maintains governance arrangements and oversight designed to ensure that its commercial interests do not compromise the fair treatment of Clients.

7.3. **Relationships with Liquidity Providers and Third-Party Service Providers:** The Company has established commercial relationships with liquidity providers, payment service providers, technology providers, introducing brokers, professional advisers and other third-party service providers that support the delivery of its services.

Although these relationships are necessary for the efficient operation of the Company's business, they may give rise to competing commercial interests.

The Company performs appropriate due diligence, maintains oversight of these relationships and implements controls designed to ensure that they do not adversely affect the quality of services provided to Clients.

7.4. **Employee and Personal Interests:** Conflicts may arise where an employee, director or other representative has a personal, financial or business interest that could influence, or appear to influence, the impartial performance of their duties.

The Company implements policies and internal controls requiring such interests to be identified, declared and appropriately managed.

Employees are expected to conduct themselves with integrity and to avoid situations that could compromise, or reasonably appear to compromise, their professional judgement.

7.5. **Access to Confidential Information:** During the course of providing services, the Company and its personnel may have access to confidential or commercially sensitive information relating to Clients or the Company's business activities.

The inappropriate use or disclosure of such information could create a conflict of interest or provide an unfair advantage to another person.

The Company applies strict confidentiality obligations and information security controls designed to protect confidential information and prevent its misuse.

7.6. **Remuneration and Incentive Arrangements:** The Company recognises that remuneration structures and incentive arrangements have the potential to influence behaviour if they are not appropriately designed and monitored.

Accordingly, the Company designs and monitors its remuneration arrangements to promote responsible conduct, support the fair treatment of Clients and does not encourage behaviour that is inconsistent with the Company's legal, regulatory or ethical obligations.

7.7. **Personal Transactions:**
Employees and other Relevant Persons may, subject to applicable laws and the Company's internal policies, undertake personal investment activities.

The Company maintains procedures governing personal transactions to reduce the risk that such activities could conflict with the interests of Clients or result in the misuse of confidential information.

7.8. **Gifts, Hospitality and Business Courtesies:** The exchange of gifts, hospitality or other business courtesies may give rise to actual or perceived conflicts of interest if they have the potential to influence business decisions or create an obligation towards another party.

The Company adopts standards governing the acceptance and provision of gifts and hospitality to ensure that business decisions remain objective, independent and in the best interests of Clients.

7.9. **Outsourcing and Related Party Relationships:** The Company may engage Related Parties or external service providers to perform certain operational or support functions.

Where such arrangements exist, the Company maintains governance and oversight procedures designed to ensure that outsourcing or related party relationships do not compromise the Company's ability to act fairly, independently and in the best interests of its Clients.

7.10. **Other Circumstances:** The Company acknowledges that not all conflicts of interest can be identified in advance.

New products, services, technologies, commercial arrangements or regulatory developments may create additional conflicts over time.

The Company therefore maintains an ongoing process for identifying, assessing and managing new or emerging conflicts as part of its broader governance and risk management framework.

The examples described above are not exhaustive and are provided to illustrate the types of situations in which conflicts of interest may arise. The Company continuously monitors its business activities and operating environment to identify, assess and manage new or evolving conflicts and to ensure that appropriate controls remain in place.

8. IDENTIFICATION OF CONFLICTS

The effective management of conflicts of interest begins with their timely identification. Accordingly, the Company maintains procedures designed to identify actual, potential and perceived conflicts before they adversely affect the interests of Clients or the integrity of its decision-making processes.

The Company adopts a proactive approach to identifying conflicts of interest and recognises that conflicts may arise at any stage of the Client relationship, throughout the development of new products or services, or as a result of changes to business activities, commercial relationships or regulatory requirements.

When assessing whether a conflict of interest exists, the Company considers a range of factors, including whether the Company, a Related Party or a Relevant Person:

- may obtain a financial or other benefit at the expense of a Client;
- has an interest in the outcome of a service or transaction that differs from the Client's interests;
- has an incentive to favour the interests of one Client, group of Clients or third party over another;
- receives, or may receive, remuneration, incentives or other benefits from a source other than the Client in relation to services provided;
- has access to confidential or commercially sensitive information that could influence the impartial provision of services;
- is subject to competing personal, professional or commercial interests that may affect objective decision-making; or
- is involved in any circumstance that could reasonably be expected to impair the fair treatment of a Client or create the perception of improper influence

The Company recognises that conflicts of interest are not static and may evolve over time. Accordingly, conflict identification forms part of the Company's ongoing governance, compliance and risk management processes rather than being limited to the commencement of a Client relationship.

Conflicts of interest may be identified through a variety of mechanisms, including:

- periodic reviews of business activities, products and services;
- risk and compliance monitoring;
- the assessment of new products, services, systems or business initiatives;
- due diligence relating to third-party service providers, Related Parties and commercial relationships;
- employee declarations of outside interests, personal relationships and other relevant circumstances;
- internal reporting procedures;

- Client feedback and complaints;
- regulatory developments and changes to applicable legal requirements; and
- regular reviews of the Company's organisational structure and operational processes.

Directors, officers, employees and other Relevant Persons are expected to promptly identify and report any actual, potential or perceived conflicts of interest as soon as they become aware of them.

Where a conflict of interest is identified, the Company assesses its nature, significance and potential impact on affected Clients. This assessment determines the most appropriate course of action, including whether the conflict can be effectively managed through existing controls, whether additional safeguards should be implemented, whether disclosure to the Client is required, or whether the Company should decline to provide the relevant service.

The identification and assessment of conflicts of interest is subject to ongoing review. The Company regularly evaluates the effectiveness of its conflict identification procedures to ensure they remain appropriate, proportionate and responsive to changes in the Company's business operations, products, services and regulatory environment.

9. MANAGEMENT OF CONFLICTS

Once a conflict of interest has been identified and assessed, the Company seeks to prevent or appropriately manage the conflict through the implementation of proportionate organisational, administrative and operational controls.

The Company's approach is to prevent conflicts of interest wherever reasonably practicable. Where this is not possible, appropriate organisational, administrative and operational controls are implemented to ensure conflicts are effectively managed and do not adversely affect Clients.

The nature and extent of the measures implemented will depend upon the circumstances of the conflict, the level of risk identified and the potential impact on the Client. The Company considers each situation on its own merits and applies controls that are appropriate, proportionate and consistent with its legal and regulatory obligations.

The Company's conflict management framework is designed to support fair, objective and independent decision-making throughout the organisation and includes a combination of governance arrangements, operational controls, monitoring activities and ongoing oversight.

Without limiting the measures that may be adopted in any particular circumstance, the Company may implement one or more of the following controls to manage conflicts of interest:

9.1. **Organisational and Administrative Controls:** The Company maintains organisational structures and internal procedures designed to reduce the likelihood that conflicts of interest will adversely affect Clients.

These arrangements include clearly defined responsibilities, appropriate segregation of duties, reporting lines, management oversight and governance processes intended to promote independent and objective decision-making.

The Company periodically reviews its organisational arrangements to ensure they remain appropriate for the nature, scale and complexity of its business activities.

9.2. **Segregation of Duties:** Where appropriate, responsibilities are allocated in a manner that reduces the potential for conflicts to arise.

The Company ensures, where appropriate, that individuals responsible for performing certain functions are appropriately independent from activities that could create competing interests or influence their decision-making.

Segregation of duties assists in maintaining objectivity, reducing operational risk and supporting the fair treatment of Clients.

9.3. **Information Barriers:** Where necessary, the Company maintains appropriate information barriers designed to restrict the inappropriate flow of confidential or commercially sensitive information between individuals or business functions.

These arrangements assist in preventing the misuse of confidential information and reduce the risk that one area of the business may improperly influence another.

Further information regarding the Company's approach to confidentiality and information barriers is provided in Section 10 of this Policy.

9.4. **Compliance Oversight:** The Company maintains an independent compliance function responsible for monitoring the effectiveness of the Company's conflict management arrangements and promoting compliance with applicable legal and regulatory requirements.

The Compliance function provides guidance regarding the identification, assessment and management of conflicts of interest and oversees the ongoing effectiveness of the Company's internal controls.

9.5. **Employee Awareness and Training:** Effective conflict management depends upon the awareness and professionalism of Relevant Persons.

Relevant Persons receive appropriate guidance and training regarding their obligations to identify, avoid, report and appropriately manage conflicts of interest encountered during the course of their duties.

The Company promotes a culture in which ethical conduct, transparency and accountability are fundamental expectations of all personnel.

9.6. **Ongoing Monitoring:** Conflict management is an ongoing process rather than a one-time assessment.

The Company continually monitors its business activities, commercial relationships, products, services and operational arrangements to identify changes that may create new conflicts or alter the significance of existing conflicts.

9.7. **Escalation and Internal Reporting:** Where a Relevant Person becomes aware of an actual, potential or perceived conflict of interest that cannot be resolved through existing procedures, the matter must be promptly reported through the Company's internal governance arrangements for further assessment.

Appropriate management and compliance personnel will determine the most suitable course of action, taking into account the interests of affected Clients and the Company's legal and regulatory obligations.

9.8. **Record Keeping:** The Company maintains appropriate records relating to identified conflicts of interest and the measures implemented to manage them as per the requirement of the law; 7 years from the date the business relationship ended.

Maintaining accurate records assists the Company in monitoring trends, reviewing the effectiveness of its controls, demonstrating compliance with applicable regulatory requirements and supporting the continuous improvement of its conflict management framework.

9.9. **Periodic Review:** Conflict management arrangements are reviewed on a regular basis to ensure they remain effective and proportionate to the nature, scale and complexity of the Company's business.

Reviews may be undertaken following significant changes to business activities, regulatory developments, organisational changes, new products or services, or where experience indicates that improvements to existing arrangements are appropriate.

Where a conflict cannot be effectively managed through the measures described in this Policy, the Company will consider implementing additional safeguards, making

appropriate disclosure or declining to provide the relevant service.

The following sections of this Policy describe a number of specific measures that support the Company's overall conflict management framework, including information barriers, confidentiality arrangements, remuneration practices and relationships with third parties.

10. INFORMATION BARRIERS AND CONFIDENTIALITY

The Company recognises that access to confidential, commercially sensitive or non-public information may give rise to actual, potential or perceived conflicts of interest if such information is not appropriately protected.

Accordingly, the Company maintains organisational, administrative and technical measures designed to safeguard confidential information and to restrict access to information on a strict need-to-know basis.

Information barriers (historically referred to as "Chinese Walls") are an important component of the Company's conflict management framework. These arrangements are designed to prevent the inappropriate sharing or misuse of confidential information between individuals, departments or business functions where such disclosure could create a conflict of interest or compromise the fair treatment of Clients.

The Company ensures that confidential information is accessible only to persons who require it to perform their legitimate business responsibilities. Access rights are established in accordance with the Company's operational requirements and are reviewed periodically to ensure they remain appropriate.

The Company's information barrier arrangements may include, where appropriate:

- restrictions on access to confidential or commercially sensitive information;
- appropriate segregation of business functions and responsibilities;
- controlled access to electronic systems, records and databases;
- confidentiality obligations applicable to directors, officers, employees and Relevant Persons;
- information security measures designed to protect Client information from unauthorised access, disclosure or misuse; and
- monitoring procedures designed to identify inappropriate access to or use of confidential information.

All Relevant Persons are expected to respect the confidentiality of information obtained during the course of their duties and must not use confidential information for personal benefit or for the benefit of another person where doing so would be inconsistent with applicable legal or regulatory obligations or the Company's internal policies.

The Company also expects Relevant Persons to exercise appropriate care when communicating confidential information, whether verbally, electronically or in writing, and to take reasonable steps to ensure that confidential information is protected from unauthorised disclosure at all times.

Where the Company engages Third Parties to provide services on its behalf, appropriate contractual and operational safeguards are implemented to help ensure that confidential information is protected and handled in accordance with applicable legal, regulatory and contractual obligations.

The Company's approach to confidentiality extends beyond the duration of an individual's employment or engagement with the Company. Relevant Persons remain subject to continuing obligations regarding the protection and appropriate use of confidential information following the termination of their employment or other relationship with the Company, where required by law or contract.

By maintaining effective information barriers and Confidentiality arrangements, the Company seeks to reduce the risk of conflicts of interest arising from the inappropriate use, disclosure or sharing of information and to preserve the integrity of its business operations and the confidence of its Clients.

11. REMUNERATION INCENTIVES AND INDUCEMENTS

The Company recognises that remuneration arrangements, incentive programmes and the receipt or provision of certain benefits have the potential to create conflicts of interest if they are not appropriately designed and managed.

Accordingly, the Company's remuneration practices are designed to support the fair treatment of Clients, promote responsible business conduct and remain consistent with the Company's legal, regulatory and ethical obligations.

The Company does not permit remuneration arrangements that are intended to encourage directors, officers, employees or Relevant Persons to place their own interests, or those of the Company, ahead of the interests of Clients.

Where remuneration or incentive arrangements are implemented, they are designed to promote professional conduct, sound decision-making and compliance with the Company's policies and applicable regulatory requirements.

The Company may receive fees, commissions, spreads or other forms of remuneration in connection with the investment and brokerage services it provides. Such remuneration forms part of the Company's normal business activities and enables it to provide products and services to its Clients.

Where applicable, the Company may also make payments to, or receive payments from, Third Parties, including introducing brokers, liquidity providers, technology providers or other service providers, provided such arrangements comply with applicable legal and regulatory requirements and do not impair the Company's ability to act honestly, fairly and professionally in the best interests of its Clients.

The Company maintains appropriate governance and oversight arrangements designed to identify, assess and manage any conflicts of interest that may arise from remuneration or inducement arrangements. Where necessary, additional controls or disclosures may be implemented to ensure that the interests of Clients remain appropriately protected.

The Company will not accept or provide any fee, commission, non-monetary benefit or other inducement where doing so would reasonably be expected to compromise the Company's independence, influence the impartial provision of services or otherwise create an unacceptable conflict of interest.

Where applicable laws or regulations require the disclosure of fees, commissions, inducements or other benefits received in connection with the provision of services, the Company will provide such information in accordance with those requirements.

Clients should also be aware that the Company's pricing, fees, spreads, commissions and other charges applicable to its products and services are described within the Client Service Agreement, applicable Schedule of Fees and other relevant Client documentation.

The Company maintains appropriate remuneration governance and oversight to ensure that commercial considerations do not compromise the fair treatment of Clients or the integrity of the services it provides.

12. PERSONAL TRANSACTIONS

The Company recognises that personal investment activities undertaken by directors, officers, employees and other Relevant Persons have the potential to create actual, potential or perceived conflicts of interest if they are not appropriately managed.

Accordingly, the Company maintains policies and internal controls governing personal transactions to help ensure that such activities do not compromise the fair treatment of Clients, the integrity of the Company's business operations or compliance with applicable legal and regulatory requirements.

Relevant Persons are expected to conduct their personal financial affairs in a manner that avoids conflicts between their personal interests and their duties to the Company and its Clients. Personal investment activities must not influence, or appear to influence, decisions made on behalf of Clients or the Company.

The Company maintains appropriate procedures designed to reduce the risk that personal transactions may:

- conflict with the interests of Clients;
- involve the misuse of confidential or non-public information;
- create an inappropriate personal benefit arising from information obtained through employment or engagement with the Company;
- interfere with the objective and impartial performance of professional responsibilities; or
- undermine the confidence of Clients in the integrity and fairness of the Company's business practices.

Relevant Persons are prohibited from using confidential information, including information relating to Client activities or the Company's business operations, for personal gain or for the benefit of any other person.

Where appropriate, the Company may require certain categories of personal transactions to be subject to internal oversight or approval in accordance with its internal policies and procedures. Such arrangements are designed to promote transparency, maintain effective governance and support compliance with applicable legal and regulatory obligations.

The Company also expects Relevant Persons to promptly disclose any personal, financial or external business interests that could reasonably be expected to give rise to a conflict of interest or otherwise impair their ability to perform their duties objectively and in the best interests of Clients.

Failure to comply with the Company's internal requirements relating to personal transactions may result in appropriate disciplinary or other internal action and, where applicable, may be reported to the relevant regulatory or competent authority in accordance with applicable legal or regulatory obligations.

By maintaining appropriate controls over personal transactions, the Company seeks to reduce conflicts of interest arising from personal investment activities and to support the fair treatment of Clients.

13. GIFTS & ENTERTAINMENT

The Company recognises that the giving or receiving of gifts, hospitality, entertainment or other business courtesies may, in certain circumstances, give rise to actual, potential or perceived conflicts of interest.

While the exchange of modest business courtesies may form part of normal commercial relationships, inappropriate gifts or hospitality may influence, or appear to influence, the impartiality of business decisions or create obligations that are inconsistent with the Company's commitment to treating Clients fairly.

Accordingly, the Company maintains policies and procedures governing the acceptance and provision of gifts, hospitality and entertainment to help ensure that business decisions are made objectively, independently and in the best interests of Clients.

Relevant Persons are expected to exercise sound judgement when offering or accepting gifts, hospitality or other benefits and must avoid any arrangement that could reasonably be expected to:

- compromise their independence or objectivity;
- improperly influence a business decision;
- create a sense of obligation or preferential treatment;
- conflict with the interests of a Client; or
- adversely affect the reputation or integrity of the Company.

The Company expects that any gifts or hospitality exchanged in the course of business are reasonable, proportionate, consistent with accepted business practices and transparent where appropriate.

Where appropriate, gifts and hospitality may be subject to internal review, approval, recording or monitoring in accordance with the Company's internal governance procedures. These arrangements are intended to promote transparency, support effective oversight and assist in the identification and management of potential conflicts of interest.

The Company does not permit the offering or acceptance of gifts, hospitality or other benefits where they are intended, or could reasonably be perceived, to improperly influence business decisions, secure an unfair commercial advantage or otherwise compromise the Company's ability to act honestly, fairly and professionally.

The principles described in this section also apply, where relevant, to interactions with Clients, prospective Clients, Introducing Brokers, Third Parties, suppliers, service providers and other business partners.

By maintaining appropriate controls over gifts and entertainment, the Company seeks to preserve the independence of its decision-making and uphold high standards of integrity and professional conduct.

14. THIRD-PARTY RELATIONSHIPS AND OUTSOURCING

The Company works with a range of Third Parties to support the provision of its products and services. These relationships enable the Company to deliver efficient, secure and reliable services while maintaining appropriate operational resilience and access to specialist expertise.

Third Parties engaged by the Company may include, where applicable, liquidity providers, payment service providers, banking institutions, technology providers, cloud service providers, outsourced service providers, custodians, professional advisers, Introducing Brokers and other commercial partners.

The Company recognises that commercial relationships with Third Parties and Related Parties may, in certain circumstances, give rise to actual, potential or perceived conflicts of interest. Such conflicts may arise where business, financial or commercial interests differ from those of the Company's Clients or where external relationships have the potential to influence business decisions.

Accordingly, the Company maintains appropriate governance arrangements designed to identify, assess and manage conflicts of interest that may arise from its relationships with Third Parties.

Before entering into material business relationships or outsourcing arrangements, the Company undertakes appropriate due diligence to assess the suitability, capability and integrity of the relevant Third Party, taking into account the nature of the services to be provided and the potential risks associated with the relationship.

Where appropriate, the Company also seeks to ensure that Third Parties engaged on its behalf are subject to contractual obligations that require them to:

- maintain appropriate standards of confidentiality and information security;
- comply with applicable legal and regulatory requirements relevant to the services they provide;
- implement appropriate controls to manage conflicts of interest where relevant;
- protect Client information from unauthorised access, disclosure or misuse; and
- cooperate with the Company in fulfilling its legal, regulatory and contractual obligations.

The Company recognises that outsourcing operational functions does not transfer or reduce its responsibility for the services provided to Clients. Accordingly, the Company maintains appropriate oversight of outsourced activities and periodically reviews Third-Party relationships to ensure they continue to meet the Company's operational, regulatory and service standards.

Where the Company enters into commercial arrangements with Related Parties or affiliated entities, such arrangements are subject to appropriate governance and oversight designed to ensure that business decisions continue to be made objectively, independently and in the best interests of Clients.

The Company also monitors Third-Party relationships on an ongoing basis to identify changes in circumstances that may create new or heightened conflicts of interest. Where appropriate, additional controls, enhanced oversight or further disclosures may be implemented to address such risks.

Where a conflict arising from a Third-Party relationship cannot be effectively managed, the Company will consider implementing additional safeguards, making appropriate disclosure or declining to enter into or continue the relevant arrangement.

By maintaining effective oversight of Third-Party relationships and outsourcing arrangements, the Company seeks to ensure that external business relationships support, rather than compromise, its commitment to providing support, rather than compromise, the Company's ability to act in the best interests of its Clients.

The Company retains responsibility for outsourced functions and does not outsource its regulatory obligations.

15. DISCLOSURE OF CONFLICTS OF INTEREST

The Company manages conflicts of interest primarily through organisational, administrative and operational arrangements. Disclosure is not the Company's preferred method of managing conflicts and will generally be considered only where the Company reasonably concludes that its existing controls are not sufficient, on their own, to manage the risk of harm to a Client.

Where the Company determines that a Material Conflict of Interest cannot be adequately prevented or managed through its internal arrangements, the Company will provide the affected Client with appropriate information regarding the nature of the conflict before proceeding with the relevant service or transaction, where required by applicable law or where the Company considers such disclosure necessary to enable the Client to make an informed decision.

Any disclosure provided by the Company will be clear, fair and not misleading and will contain sufficient information, taking into account the nature of the Client and the circumstances of the conflict, to enable the Client to understand:

- the general nature and source of the conflict of interest;
- the potential risks that the conflict may present to the Client;
- the measures the Company has implemented to prevent or manage the conflict; and
- any other information that the Company reasonably considers necessary to enable the Client to make an informed decision regarding the relevant service or transaction.

The Company recognises that disclosure alone may not always be an appropriate or sufficient means of addressing a conflict of interest. Accordingly, where the Company determines that disclosure would not adequately protect the interests of a Client or would otherwise be inconsistent with its legal or regulatory

obligations, the Company may implement additional safeguards or decline to provide the relevant service or proceed with the relevant transaction.

The timing and manner of any disclosure will depend on the nature of the conflict and the circumstances in which it arises. Where practicable, disclosure will be made before the Company undertakes the relevant activity or enters into the relevant transaction, allowing the Client sufficient opportunity to consider the information provided.

Disclosure may be provided through this Policy, the Client Service Agreement, product-specific documentation, separate written communications or by any other appropriate means, having regard to the nature of the conflict and applicable legal or regulatory requirements.

Where appropriate, the Company may seek a Client's acknowledgement or consent before proceeding with a service or transaction following the disclosure of a Material Conflict of Interest. However, such acknowledgement or consent does not relieve the Company of its continuing obligation to act honestly, fairly, professionally and in accordance with its legal and regulatory responsibilities.

The Company maintains appropriate records of Material Conflicts of Interest that require disclosure, together with the measures implemented to manage those conflicts, in accordance with its internal governance arrangements and applicable legal or regulatory requirements.

By adopting a transparent approach to conflict disclosure, the Company seeks to ensure that Clients receive relevant information where disclosure is appropriate while maintaining effective conflict management arrangements.

16. CIRCUMSTANCES WHERE WE MAY DECLINE TO ACT

The Company is committed to identifying and managing conflicts of interest wherever reasonably practicable. However, there may be exceptional circumstances in which the Company determines that a conflict of interest cannot be effectively prevented, managed or appropriately disclosed without creating an unacceptable risk to the interests of one or more Clients, the integrity of the Company's decision-making processes or the Company's legal and regulatory obligations.

In such circumstances, the Company reserves the right to decline to provide a particular service, enter into a transaction, continue a business relationship or undertake any activity where it reasonably considers that doing so is necessary to ensure the fair treatment of Clients or to comply with applicable legal and regulatory requirements.

The Company may decide to decline to act where, for example:

- a Material Conflict of Interest cannot be effectively managed through the Company's existing organisational and administrative arrangements;
- the Company considers that disclosure alone would not adequately protect the interests of an affected Client;
- proceeding with the relevant service or transaction could compromise the Company's ability to act honestly, fairly, professionally or independently;
- the Company identifies circumstances that may expose Clients or the Company to unacceptable legal, regulatory, operational or reputational risks;
- applicable laws or regulatory requirements prohibit or restrict the Company from proceeding; or
- the Company otherwise considers that declining to act is necessary to protect the interests of Clients or maintain the integrity of its business operations.

Where it is appropriate and reasonably practicable to do so, the Company will seek to inform the affected Client of its decision and, where possible, provide a general explanation of the reasons for that decision. However, the Company may be prevented from providing detailed information where doing so would:

- a Material Conflict of Interest cannot be effectively managed through the Company's existing organisational and administrative arrangements;
- the Company considers that disclosure alone would not adequately protect the interests of an affected Client;
- proceeding with the relevant service or transaction could compromise the Company's ability to act honestly, fairly, professionally or independently;

- the Company identifies circumstances that may expose Clients or the Company to unacceptable legal, regulatory, operational or reputational risks;
- proceeding with the relevant service or transaction could compromise the Company's ability to act honestly, fairly, professionally or independently;
- the Company identifies circumstances that may expose Clients or the Company to unacceptable legal, regulatory, operational or reputational risks;
- applicable laws or regulatory requirements prohibit or restrict the Company from proceeding; or
- the Company otherwise considers that declining to act is necessary to protect the interests of Clients or maintain the integrity of its business operations.

Where it is appropriate and reasonably practicable to do so, the Company will seek to inform the affected Client of its decision and, where possible, provide a general explanation of the reasons for that decision. However, the Company may be prevented from providing detailed information where doing so would:

- breach legal or regulatory obligations;
- compromise confidential or commercially sensitive information;
- prejudice the interests of another Client or Third Party; or
- otherwise be inconsistent with applicable law or the Company's obligations of confidentiality.

The Company's decision to decline to provide a particular service or proceed with a transaction does not automatically affect the broader relationship between the Company and the Client. Unless otherwise required by law, regulation or the Client Service Agreement, each situation will be considered individually, taking into account the specific circumstances and the Company's obligations at the relevant time.

The Company will exercise this discretion reasonably, consistently and in good faith, having regard to its legal, regulatory and contractual obligations, the interests of its Clients and the principles set out in this Policy.

By reserving the right to decline to act where appropriate, the Company seeks to ensure that conflicts of interest are managed responsibly and that the interests of Clients remain a primary consideration when providing its products and services.

17. CLIENT RESPONSIBILITIES

While the Company maintains comprehensive arrangements to identify, manage and, where appropriate, disclose conflicts of interest, Clients also play an important role in supporting an open and transparent business relationship.

Clients are encouraged to read this Policy together with the Client Service Agreement and the Company's other relevant Client documentation to ensure they understand the manner in which the Company conducts its business and manages conflicts of interest.

If a Client believes that a conflict of interest may exist or requires further information regarding any aspect of this Policy or the services provided by the Company, they are encouraged to contact the Company using the details provided at the end of this Policy.

Clients should promptly notify the Company of any information that may be relevant to the provision of services or that could reasonably give rise to a conflict of interest in connection with the services provided by the Company.

The Company values open communication and will seek to address any questions or concerns relating to conflicts of interest in a fair, timely and professional manner.

18. RELATED DOCUMENTS

This Policy forms part of the Company's broader governance and compliance framework and should be read together with the following documents, as applicable:

- Client Service Agreement
- Best Execution Policy
- Risk Disclosure Statement
- Complaints Handling Policy
- Privacy Policy
- Cookie Policy (where applicable)
- Anti-Money Laundering and Know Your Customer documentation
- Any product-specific terms, disclosures or notices issued by the Company from time to time

These documents collectively govern the relationship between the Company and its Clients and should be read together where relevant, to obtain a complete understanding of the Company's products, services and regulatory obligations.

In the event of any inconsistency between this Policy and the Client Service Agreement, the terms of the Client Service Agreement shall prevail to the extent permitted by applicable law, unless the inconsistency relates to a mandatory legal or regulatory obligation that cannot be overridden by contract.

19. POLICY REVIEW

The Company reviews this Policy annually to ensure that it remains appropriate, effective and aligned with applicable legal, regulatory and operational requirements.

Accordingly, this Policy is subject to periodic review and may be amended from time to time to reflect changes in applicable laws or regulations, the Company's business activities, industry developments and best practices or its internal governance arrangements.

The most current version of this Policy will be made available through the Company's website or otherwise provided to Clients upon request.

Continued use of the Company's services following the publication of an updated version of this Policy constitutes acknowledgement of the revised Policy to the extent permitted by applicable law and the Client Service Agreement.

20. CONTACT INFORMATION

If you require further information regarding this Policy or believe a conflict of interest may exist in connection with the services provided to you, please contact our Customer Support team using the official contact details published on the Company's website.

4XC (Seychelles) Ltd

Website: https://www.4xc.com/sc

Email: support-sc@4xc.com

Registered Office: 4XC (Seychelles) Ltd - Office 3, Room B11, 1st Floor, Providence Complex, Providence, Mahé, Seychelles

The Company welcomes enquiries from Clients and prospective Clients and is committed to responding to requests for information in a professional, timely and helpful manner.