



Conflicts of Interest Policy

TFI Ecommpay Ltd (Previously TFI Markets Ltd) (hereinafter called the "**Company**" or "**TFI**") is an investment firm regulated by the Cyprus Securities and Exchange Commission (License No. 117/10). This Conflicts of Interest Policy (hereinafter called the "**Policy**") is provided to you in accordance with the provisions of the Investment Services and Activities and Regulated Markets Law of 2017 (No.78(I)/2017), implementing Directive 2014/65/EC of the European Parliament and of the Council on Markets in Financial Instruments (MiFID).

Under the above legislation, the Company is required to take all appropriate steps to detect and avoid conflicts of interest. The Company is committed to act honestly, fairly and professionally and in the best interests of its clients and to comply, in particular, with the principles set out in the above legislation when providing investment services and other ancillary services related to such services.

Purpose

The purpose of this document is to set out the Company's approach in identifying and managing conflicts of interest which may arise during the course of its normal business activities. The policy applies to all Related Persons (directors, employees and any other persons directly or indirectly linked to the Company) and refers to all interactions with all clients.

Identification of Conflicts of Interest

For the purposes of identifying the types of conflict of interest that arise in the course of providing investment and ancillary services or a combination thereof and whose existence may damage the interests of a Client, the Company takes into account, whether the Company or a Related Person, is in any of the following situations, whether as a result of providing investment or ancillary services or investment activities or otherwise:

- a. The Company or a Related Person is likely to make a financial gain, or avoid a financial loss, at the expense of the Client;
- b. The Company or a Related 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 or a Related Person has a financial or other incentive to favour the interest of another Client or group of Clients over the interests of the Client;
- d. The Company or a Related Person carries on the same business as the Client;
- e. The Company or a Related Person receives or will receive 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

Measures to avoid Conflicts of Interest

The Company has set up internal policies and has an in-house Compliance Department that is responsible identifying and managing potential conflicts of interests, for updating the relevant internal procedures and for ensuring compliance with such procedures. Some of the aforementioned policies are the following:

In general, the procedures and controls that the Company follows and measures adopted shall include at least the following, in order to ensure the requisite degree of independence:

- a) effective procedures 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;
- 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 firm;
- 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) 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;
- e) 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 interest.

Some measures include, but are not limited to the following:

1. Careful monitoring of personal employee trading
2. Material non public information is confined only to persons who have a need to know that information in order to carry out their responsibilities
3. Chinese walls which restrict the flow of information between the departments and physical separation of departments
4. Limits on the access of different departments to IT systems that could (i) contain information that could lead to conflict of interest (ii) lead to the alteration of information by unauthorized persons and (iii) restrict the possibility of the improper use of privileged or confidential information concerning customers
5. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual
6. Employees are required to disclose any relationship with a client that could lead to preferential client treatment
7. Employees' pay in any department is never set by someone from another department with which there is or may be a conflict of interest

When the organizational or administrative steps taken to handle conflicts of interest are not considered sufficient to guarantee, with reasonable certainty, that the risk of harming the customer's interests is prevented, the Company shall clearly inform the Client of the general nature or source of the conflicts of interest before acting on his behalf.

Record Keeping

The Company shall maintain and regularly update a register of the kinds of investments or ancillary service or investment activity carried out by or on behalf of the Company in which a conflict of interest entailing a risk of damage to the interests of one or more clients has arisen or, in the case of an ongoing service or activity, may arise.

Reporting

The Senior Management shall receive on a frequent basis, and at least annually, written reports on situations referred in the record keeping section.

Disclosure

Where a conflict or interest arises and the Company becomes aware of it, it shall take all reasonable steps to address it and if not possible, as a measure of last resort, the Company shall disclose it to the Client prior to providing investment services to the Client.

The Company shall assess and periodically review this policy, at least on an annual basis.

The Company maintains an updated copy of its conflicts of interest policy posted on its Website.

The Client should direct any question he might have about conflicts of interest to the Company's Compliance Department at compliance@tfiecommpay.com.