



SKYBOUND

CONFLICTS OF INTEREST POLICY

SKYBOUND WEALTH EUROPE LTD

Version: V3.0
September 2026

CONFLICTS OF INTEREST POLICY

1. About This Policy

Skybound Wealth Europe Ltd (“SWE”, “we”, “us” or “our”) is a Cyprus Investment Firm, registered under number HE 332423 and authorised and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under licence number 308/16.

SWE provides investment advice and reception and transmission of orders in relation to financial instruments. We do not execute client orders. Where applicable, we transmit orders to an appropriate third party for execution.

This Client Summary explains how conflicts of interest may arise and the arrangements we use to prevent or manage them. It summarises SWE's full written Conflicts of Interest Policy and does not replace any specific disclosure provided in relation to a service or transaction. A conflict does not necessarily mean that a client will be disadvantaged. Our responsibility is to identify conflicts early and take appropriate steps to protect our clients' interests.

Our conflicts arrangements apply, as relevant, to SWE, members of its Board, managers, employees, tied agents (if any), outsourced service providers and other persons directly or indirectly linked to SWE by control.

2. Legal And Regulatory Framework

This Policy is issued in accordance with the conflicts-of-interest requirements set out in the Cyprus Investment Services and Activities and Regulated Markets Law of 2017, Law 87(I)/2017, which transposes Directive 2014/65/EU on markets in financial instruments (“MiFID II”), including Articles 23 and 24; Commission Delegated Regulation (EU) 2017/565, including Articles 33 to 35 and the sustainability-related amendments introduced by Commission Delegated Regulation (EU) 2021/1253; Commission Delegated Directive (EU) 2017/593, including Article 11; and CySEC Directive DI87-01 for the Safeguarding of Financial Instruments and Funds belonging to Clients, Product Governance Obligations and the Rules Applicable to the Provision or Reception of Fees, Commissions or any Monetary or Non-Monetary Benefits, as amended by Directive DI87-01(A). Each of the above applies as amended from time to time.

SWE is authorised by CySEC as a Class 3 Cyprus Investment Firm under the Investment Firms Regulation (EU) 2019/2033 and the Investment Firms Directive (EU) 2019/2034 (“IFR/IFD”). The organisational and remuneration arrangements described in this Policy are applied in a manner proportionate to SWE's size, internal organisation, and the nature, scale and complexity of its business, consistent with its Class 3 classification.

This Policy is reviewed and updated to reflect legal and regulatory developments, including the EU Retail Investment Strategy, which introduces enhanced inducement, cost and marketing-communication requirements for investment firms and is expected to be transposed into Cyprus law in the coming years.

3. What Is A Conflict Of Interest?

A conflict of interest is a situation in which the interests of SWE, a person connected with SWE, or one client may compete with the interests of another client. A conflict may be actual, potential or perceived and may arise between:

- SWE, its directors, employees or other persons connected with SWE, and a client;
- one client and another client or group of clients; or
- SWE or a client and a third party, including a product provider, platform, service provider or introducer.

When identifying conflicts, we consider whether SWE or a relevant person:

- could make a financial gain or avoid a financial loss at a client's expense;
- has an interest in the outcome of a service or transaction that differs from the client's interest;
- has an incentive to favour one client, product, provider or third party over another;
- carries on the same business as a client; or
- receives or may receive money, goods or services from a third party in connection with a service provided to a client.

4. Where Conflicts May Arise In Our Business

4.1. Non-independent investment advice

SWE provides investment advice on a non-independent basis. This means that our recommendations are based on a defined panel of products, platforms and providers rather than a comprehensive analysis of the whole market. A conflict could arise if a commercial arrangement, fee or other benefit creates an incentive to favour one product or provider. We assess suitability using the client's circumstances, knowledge and experience, financial situation, ability to bear losses, objectives, risk tolerance and sustainability preferences, where applicable. We document the reasons for our recommendation and consider the relevant product's target market.

4.2. Fees, commissions and third-party benefits

A conflict may arise where a recommendation to invest, transfer, switch, replace or retain an arrangement generates initial or ongoing remuneration for SWE, another Skybound group company or a third party. A conflict may also arise where SWE pays or receives a fee, commission or non-monetary benefit in connection with an introduction or an arrangement with a product provider or platform.

Where such a third-party payment or benefit is permitted, it must be designed to enhance the quality of the relevant service and must not impair our duty to act honestly, fairly and professionally in the client's best interests. Before providing the relevant service, we disclose the existence, nature and amount of the payment or benefit, or the method used to calculate it where the amount cannot be determined. Where required, we also provide information about the actual amount of any ongoing payment or benefit at least annually.

4.3. Sustainability preferences

When providing investment advice, a conflict may arise if commercial incentives, limited product availability or the quality of sustainability data affects how sustainability features are presented or how a client's sustainability preferences are matched to a product. We identify and manage these conflicts as part of our suitability and product-review arrangements.

4.4. Remuneration and personal interests

Employee remuneration, sales objectives, personal investments, outside appointments, family or business relationships, and gifts or hospitality may create or appear to create a conflict. These matters are subject to internal controls, disclosure requirements and Compliance oversight. We do not remunerate or assess staff in a way that incentivises them to recommend a particular product when another product available through our service would better meet the client's needs.

4.5. Group and third-party relationships

SWE may work with other Skybound group companies and external providers. A conflict could arise where commercial interests, referral arrangements, shared services or access to confidential information may influence, or appear to influence, a decision affecting a client.

4.6. Client orders and competing client interests

When receiving and transmitting orders, a conflict could arise if one client's order is treated more favourably than another's or if commercial or personal factors influence the choice of receiving entity. SWE applies order-handling and transmission arrangements designed to achieve fair treatment and the best possible result for clients, in accordance with its Best Order Execution Policy.

4.7. Digital and distribution channels

A conflict could also arise from how information about products, services or costs is presented to clients, including through digital tools, client portals, marketing materials or automated communications, where design, defaults or content could steer a client towards a particular product, provider or outcome that does not best serve their interests. We review these channels and communications to ensure they present information fairly and do not create or reinforce a conflict of interest.

5. How We Prevent Or Manage Conflicts Of Interest

SWE maintains organisational and administrative arrangements proportionate to the nature, scale and complexity of its business. Depending on the circumstances, these arrangements may include:

- Board and senior-management oversight, supported by independent Compliance monitoring and escalation;
- identifying, assessing, recording and periodically reviewing actual and potential conflicts in a conflicts register;
- separating duties and supervision where activities or responsibilities could conflict;
- restricting access to confidential information and using appropriate information barriers;
- documented suitability assessments and review of the rationale for investment recommendations;
- product-governance controls and due diligence, including target-market assessment and periodic review of products, platforms, providers and sustainability-related conflicts;
- controls over remuneration, fees, commissions, inducements, gifts and hospitality;
- personal account dealing controls and declarations of outside interests;

- staff training, attestations and prompt escalation of identified conflicts; and
- additional supervision, independent review, recusal from a decision, or declining to provide a service where a conflict cannot be adequately managed.

6. Governance, Records And Review

Compliance maintains and regularly updates a record of the services and activities in which a conflict that could damage a client's interests has arisen or may arise. Senior management and the Board receive written reports on relevant conflicts on a regular basis and at least annually.

SWE reviews its Conflicts of Interest Policy and the effectiveness of its controls at least annually and whenever there is a material change to its business or regulatory obligations. Identified deficiencies are addressed promptly. Over-reliance on disclosure rather than effective prevention or management is treated as a deficiency.

7. Disclosure To Clients

Disclosure is a measure of last resort. It is not a substitute for effective arrangements to prevent or manage conflicts. If our arrangements are not sufficient to ensure, with reasonable confidence, that the risk of damage to a client's interests will be prevented, we will disclose the conflict before undertaking business for that client.

The disclosure will be made in a durable medium and will describe the nature and source of the conflict, the fact that our arrangements are not sufficient, the risks created for the client, and the steps taken to mitigate those risks. It will contain enough detail for the client to make an informed decision about the relevant service. Where a conflict cannot be prevented, appropriately managed or clearly disclosed, SWE may decline to act or may stop providing the affected service.

8. What This Means For You

- You may receive a specific conflict disclosure before we provide a recommendation or transmit an order.
- You should read any disclosure carefully and ask us if you require further information before deciding whether to proceed.
- This document should be read together with your Client Service Agreement, applicable fee disclosures, the Best Order Execution Policy and relevant product documents.
- A copy of SWE's full Conflicts of Interest Policy and further details about our arrangements are available on request.

9. Contact Us

If you have questions about this Policy or a conflict that may affect the service we provide to you, please contact your adviser or use the details below.

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10. Document Control

Owner: SWE Compliance Function

Approver: The Group Head of Compliance recommends the Policy.

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Next review date: At least annually, or sooner following a material change to SWE's business or regulatory obligations