



CONFLICTS OF INTEREST POLICY

Born2trade Ltd (Mauritius)

www.born2trade.com

Table of Contents

1. Introduction	3
2. Scope	3
3. Conflicts Identified	3
4. How Conflicts Are Managed	3
5. Disclosure	4
6. Records and Review	4



1. Introduction

1.1 This Policy describes how Born2trade Ltd (Mauritius) (the “Company”), trading under the Born2trade brand, identifies, prevents, manages and, where necessary, discloses conflicts of interest that may arise in the course of its business.

1.2 A conflict of interest arises where the interests of the Company, its staff, its group companies or its partners differ from the interests of a client, or where the interests of one client differ from those of another.

1.3 This Policy is adopted in line with the Company’s obligations as an Investment Dealer licensed by the Financial Services Commission (FSC) of Mauritius.

2. Scope

2.1 This Policy applies to the Company’s directors, officers, employees and contractors, to staff of B2T Technology LTD (Cyprus) who provide services to the Company, and to partners, introducing brokers and other persons acting in connection with the Company’s services (together, “Relevant Persons”).

3. Conflicts Identified

The Company has identified the following main areas where conflicts may arise:

- **Acting as principal (market making).** The Company is the counterparty to client trades. To the extent that it does not hedge its exposure, the Company may profit when clients lose and lose when clients profit.
- **Pricing and execution.** The Company sets the prices and spreads at which clients trade, may add a mark-up to liquidity-provider prices on some Account Types, and decides how client positions are hedged.
- **Hedging decisions.** The Company decides whether and how to hedge its exposure to client positions, which can be influenced by the client’s trading results.
- **Partners and introducing brokers.** Partners are paid commissions or rebates per lot traded by the clients they introduce, which may encourage them to promote frequent trading.
- **Bonuses and promotions.** Promotions may encourage clients to trade more or to use higher leverage.
- **Copy trading (St Lucia only).** Providers receive fees from followers; the Company may receive platform fees and benefits from the trading volume generated.
- **Staff remuneration and personal trading.** Sales or retention staff may be rewarded for deposits or trading volume; staff may trade personally in the same instruments.
- **Group companies and suppliers.** Services are provided by group company B2T Technology LTD and by third-party liquidity providers, technology and payment providers, who may offer inducements.

4. How Conflicts Are Managed

4.1 **Execution.** Prices are derived from liquidity-provider feeds and the Company applies its Order Execution Policy equally to all clients in the same Account Type and execution group. Dealing staff may not manually alter prices or delay individual client orders, except under documented risk procedures for Abusive Trading.

4.2 **Hedging and risk decisions.** Hedging and risk-management decisions are made under written criteria (exposure, trading style and abuse indicators) and are recorded. Such decisions never change the price at which the client’s trades are executed.

4.3 Segregation of functions. Dealing and risk management are separated from sales, marketing and partner management. Compliance reviews promotions and partner marketing before use.

4.4 Remuneration. Staff remuneration is not linked to client losses. Sales incentives are designed so that staff are not rewarded for encouraging clients to trade beyond their means.

4.5 Partners. Partners must comply with the Partner Agreement, may not advise clients or trade on their behalf, and must disclose that they are paid by the Company. Partner commissions are disclosed on the Company's website.

4.6 Promotions. Promotions are subject to their own published terms, are not offered where prohibited, and are reviewed by Compliance before launch.

4.7 Personal trading. Relevant Persons with access to client order or position information may not trade on the basis of that information and must disclose personal trading accounts to Compliance.

4.8 Gifts and inducements. Relevant Persons may not accept gifts, hospitality or payments that could reasonably be expected to influence their duties, other than of minor value and recorded with Compliance.

4.9 Client money. Client funds are held in designated client accounts separate from the Company's own funds, as described in the Client Agreement.

5. Disclosure

5.1 Where the arrangements above are not sufficient to ensure, with reasonable confidence, that the risk of damage to a client's interests will be prevented, the Company will disclose the general nature and source of the conflict to the client before providing the service, so that the client can make an informed decision. Where disclosure alone is not sufficient, the Company may decline to act.

6. Records and Review

6.1 The Company keeps a register of identified conflicts and the measures taken.

6.2 This Policy is reviewed at least annually by senior management and Compliance, and whenever a material change occurs.

6.3 Questions about this Policy can be sent to compliance@born2trade.com.