



**FASSET®**

**CONFLICT OF INTEREST MANAGEMENT  
POLICY  
VERSION 1**



## INTRODUCTION

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FASSET FZE (“FASSET” or the “Company”) is authorised as a Virtual Asset Service Provider and conducts Broker-Dealer activities in or from Dubai under the supervision of the Virtual Assets Regulatory Authority (“VARA”).

It is FASSET’s policy to ensure that the best interests of clients are served at all times and that we avoid Conflicts of Interest at all times - this is our primary responsibility.

## PURPOSE

Under the VARA Rules, the Firm is obliged to avoid Conflicts of Interest arising. The purpose of this document is to provide retail and qualified clients with information on this Conflict of Interest Policy (“Policy”).

This Policy is a key component of Fasset’s corporate governance system and is intended to define the procedures and processes that must be followed in order to prevent and where applicable, manage actual or potential conflicts of interest involving Fasset’s shareholder, Board members, officers, managers and other employees in their relationships with the Company, as well as any conflict of interest situations that could potentially arise with customers, suppliers or other stakeholders.

## SCOPE AND APPLICABILITY

This Policy is applicable to all Directors, officers, managers and employees of Fasset and subsidiaries of the Group in which Fasset has a controlling interest, as well as Fasset’s business partners. In companies where Fasset has a non-controlling interest, every reasonable effort will be made to ensure that they have standards and practices that are consistent with those set out in this Policy. Fasset expects and strives to encourage its business partners to develop and implement ethics programs and standards that are in alignment with ours. In cases where Fasset believes that such parties have failed to comply with our policies or their contractual commitments, it reserves itself the right to take the appropriate actions.

This Policy establishes the framework by which the Firm identifies, prevents, manages, mitigates, and, where necessary, discloses conflicts of interest arising from its Broker-Dealer activities. We also ensure that policies, procedures and controls help to:

1. Identify circumstances, relationships and arrangements, which give rise to or could potentially give rise to a conflict of interest;
2. Where conflicts of interest arise, eliminate or reduce to the greatest extent, the conflict of interest and actively manage the Conflict of Interest;
3. Where a conflict of interest cannot be eliminated, to disclose the nature and source of the conflict of interest to clients, along with an explanation of the efforts which have been made to eliminate the conflict of interest and the nature and implications of the remaining conflict of interest; and
4. Disclose and maintain records of conflicts of interest as appropriate. However, disclosure is used only where internal controls cannot sufficiently eliminate the risk of client detriment.



## WHAT IS A CONFLICT OF INTEREST?

As defined herein, a conflict of interest is whenever an employee has personal, professional, financial or other similar types of interests which could have the potential to compromise or bias his or her professional judgement, loyalty and objectivity as a Fasset employee.

Fasset defines conflicts of interest broadly: actual conflicts of interest (the employee is faced with a real and existing conflict), potential conflicts (the employee is in or could be in a situation that may result in a conflict of interest) or perceived conflicts (the employee is in or could be in a situation that appears to be a conflict of interest, even if this is not the case).

Further examples are given below, but not limited to, any situation that may arise where FASSET, its directors, senior management, employees, shareholders, affiliates, or any person acting on its behalf:

- a. Is likely to obtain a financial or non-financial benefit at the expense of a client;
- b. Has an interest in the outcome of a transaction or service that differs from the client's interest;
- c. Has an incentive to prioritise proprietary trading over client execution;
- d. Receives inducements, rebates, or third-party payments connected to client activity;
- e. Allocates liquidity, pricing, or execution priority in a manner that disadvantages clients;

The few examples shown above are by no means exhaustive.

Sources of conflict at the personal level may also arise where employees are seconded to another business while undertaking services for FASSET where, for example:

- a. Time spent in conducting the affairs of another business compromise the time, proper attention and care to FASSET;
- b. The third party may itself have a competing interest or interest which may conflict with those of FASSET's clients.

## COMMITMENTS AND GUIDING PRINCIPLES

Fasset has determined the following principles and guidelines with regard to conflicts of interest:

1. All Fasset employees have a duty and obligation to act in the best interests of the Company, including those of its stakeholders, in their daily professional activities and must never place themselves in a position where their self-interest may conflict with this duty.
2. Likewise, Fasset and its Group of companies shall conduct their businesses in such a way as to uphold and safeguard the rights and legitimate interests of all of its stakeholders, under the principle of fair treatment and non-discrimination.
3. Fasset prohibits unfair competition, which exists whenever an employee breaches his or her duty and obligation to be loyal to the Company and to serve its best interests by engaging in competition with the Company. For a situation to be considered unfair competition, no actual damage or financial loss to Fasset needs to have occurred; the mere risk or potential damage to the Company shall suffice. The prohibition on unfair competition shall be enforced not only while the employee is on duty, but also during periods of suspended employment, including but not limited to vacation and holidays, extended leaves of absence, paid/unpaid leaves of absence, suspended employment due to disciplinary action or temporary disability.
4. In conducting any transaction that could involve a conflict of interest within the framework of this Policy, the governance or control bodies within the Company shall act impartially, responsibly and professionally.



5. Fasset undertakes to be cooperative, transparent and forthcoming in response to any regulatory or supervisory authority, body or agency that may request information on any conflict of interest.
6. Fasset prohibits using the Company as a platform to promote outside, personal business or any other type of interests or to benefit friends or immediate or close family members.
7. All Fasset employees are required to promptly, voluntarily and straightforwardly disclose the existence and nature of any known or potential conflicts of interest, whether their own or of others, as soon as they are aware of the situation and to immediately notify their supervisor/line manager and submit the matter to the Compliance Office for approval.
8. Fasset and its Group shall act at all times in compliance with the law and the corporate governance standards and principles of the Company.
9. Any breach of this Policy by Fasset employees may lead to disciplinary action.



## **PREVENTION AND MANAGEMENT OF CONFLICTS OF INTEREST**

The general principles that shall apply when faced with a conflict of interest are as follows:

1. Duty to abstain from being involved in any discussions or decision-making related to the conflicted matter or transaction.
2. Duty to abstain from accessing proprietary or confidential information related to the conflicted matter or transaction.
3. Duty to be transparent and openly and candidly make a conflict of interest disclosure.
4. Duty to cooperate in resolving conflicts of interest

## **OVERSIGHT, ASSESSMENT AND REVIEW**

The Compliance Department shall periodically, and at least on a yearly basis, review and assess any potential conflicts of interest existing in Fasset in order to implement the necessary mechanisms designed to prevent any interferences with the objectivity, unbiased judgment, and loyalty of Fasset employees in their decision-making responsibilities.

The Compliance Department shall periodically review this Conflict of Interest Policy, and submit recommendations to the Board of Directors regarding any amendments or revisions to the Policy as may be necessary or advisable to ensure that appropriate and effective controls are in place and working as intended to minimize the risks of fraud and corruption in Fasset.