



Giv Trade

Conflicts Of Interest Policy

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Giv Trade Mauritius registered in Mauritius under Registration Number 197387, authorized and regulated by the Financial Services Commission (FSC) under License No. GB22201329.

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GIV TRADE MAY ALSO BE REFERRED TO OR WRITTEN AS "GIV TRADE," "GIV," "GIV GROUP," "THE COMPANY," "WE," "OUR," OR "US," ALONG WITH ITS SUCCESSORS (HEIRS WHERE APPLICABLE), ASSIGNS, AND ANY AFFILIATED OR CONNECTED PERSONS.

1. INTRODUCTION

This policy outlines GIV Trade's strategy for identifying situations that may lead to Conflicts of Interest and the appropriate systems to prevent or manage them.

GIV Trade will maintain a Conflicts of Interest Register detailing the types of investments or services conducted on behalf of the company where a Conflict of Interest, posing a risk of harm to the interests of one or more clients, has arisen or, in the case of ongoing services or activities, may arise.

This policy and the register will be amended and updated whenever a material change occurs and will be reviewed at least annually.

This policy should be read in conjunction with the company's Client Agreement. 'Financial Instruments' refers to all financial products provided by the company under the Client Agreement.

2. SCOPE

This policy applies to GIV Trade, including all its directors, employees, and any individuals directly or indirectly associated with the company (hereinafter referred to as 'Related Persons'). It governs all interactions with Clients.

3. CONFLICTS OF INTEREST

The services provided by GIV Trade to its clients may potentially lead to conflicts of interest, posing a significant risk of harm to the interests of one or more clients or the company itself. This document aims to identify these potential conflicts and outlines the procedures and measures in place to prevent or manage them.

Conflicts of Interest may arise between a client and GIV Trade, including its managers, employees, or any individuals directly or indirectly connected to the company by control, or between two or more clients during the provision of any investment or ancillary services, or combinations thereof. Treating customers fairly is central to the core values of GIV Trade.

4. MANAGING CONFLICTS OF INTEREST

Conflicts of Interest may arise in any situation where there is an incompatibility between:

- the interests of GIV Trade or its Related Persons and the duty that GIV Trade owes to a client.



- the differing interests of two or more clients (since GIV Trade owes a distinct duty to each client).
- the interests of GIV Trade and other Group entities; or
- the interests of GIV Trade, other Group entities, and Third-Party Providers.

Such conflicts can prejudice a client in various ways regardless of whether GIV Trade experiences any financial loss and irrespective of whether the actions or motivations of the involved employees are intentional. To identify current or potential conflicts of interest, GIV Trade must, at a minimum, consider whether the Company, any relevant person (for example, a director, employee, appointed representative, or a director, partner, or employee of an appointed representative, or any person directly involved in providing services to the Company or its appointed representative under outsourcing agreements) or any person directly or indirectly linked by control to the Company:

- Is likely to gain financially or avoid a financial loss at the expense of the client.
- Has an interest in the outcome of a service provided to the client or of a transaction executed on behalf of the client that is distinct from the client's interest in that outcome.
- Has a financial or other incentive to favor one client (or group of clients) over another.
- Operates in the same or a similar business as the client; and/or
- Receives an inducement from a third party—whether monetary or non-monetary—related to the execution of the service provided to the client.

GIV Trade has identified the following circumstances in which general types of potential Conflicts of Interest may arise:

- The Company or an associate conduct designated investment business for other clients, including its associates (and the clients of its associates).
- A director or employee of the Company, or an associate, is also a director or partner of, holds or deals in the securities of, or has any other interest in, a company whose securities are traded on behalf of a client.
- A director or employee of the Company, or an associate, is involved in the management of a company whose securities are traded on behalf of a client.
- A transaction is conducted in units or shares of a fund or company for which the Company or an associate act as manager, operator, or adviser.
- A transaction is executed in securities for which the Company or an associate—or a partner, director, or employee thereof—is simultaneously trading on its/their own account or holds either a long or short position.
- The Company or a Related Person has an interest in the outcome of a service provided to the client or a transaction executed on the client's behalf that is distinct from the client's interest in that outcome.
- The Company or a Related Person has a financial or other incentive to favor the interests of another client or group of clients over the interests of the client.
- The Company or a Related Person operates in the same business as the client.
- The Company may match a client's orders with those of another client by acting on behalf of both clients.
- The Company may provide additional services to its associates or to other clients who have interests in financial instruments or underlying assets that conflict or compete with the interests of the client.
- The Company may act as the principal in clients' transactions (particularly in derivative

financial instruments) and, therefore, may profit if the client incurs a loss.

- The Company may have an interest in maximizing trading volumes to increase its commission revenue, which may conflict with the client's objective of minimizing transaction costs. In doing so, the Company may gain financially or avoid a loss at the client's expense.
- In pursuing its commercial interests, the Company may act in ways that do not fully align with the client's best interests, especially in situations where the Company's profitability depends on client losses. This potential Conflict of Interest can be amplified in transactions involving high-leverage products, such as CFDs, NDFs, or other speculative instruments, where the risks of both gains and losses are significantly greater.
- The Company may recommend a higher-fee product over a lower-fee alternative to enhance its revenue.
- The Company may pay excessive commissions or fees for brokerage or custodial activities that could ultimately harm the client.
- The Company may receive or pay inducements to or from third parties.
- The Company might use an affiliated party or another company within the same group for brokerage or custodianship at rates less favorable than those available elsewhere.
- An affiliated party may have the opportunity to negotiate the terms of a joint transaction for its own benefit.
- The fee structure for clients and the compensation structure for managers may be inadequately designed.
- Related persons may accept gifts from any party with a material interest likely to conflict with the duty owed to clients in connection with treating them fairly.
- The Company may transmit clients' orders for certain securities and financial instruments to third-party execution brokers for processing. At the execution broker's discretion, these orders may be aggregated with the broker's own orders, those of its associates, and/or orders from its clients. Furthermore, the execution broker may split or aggregate client orders before execution in a manner that could disadvantage individual clients or specific orders.
- For certain derivative financial instruments, the Company may purchase the underlying asset at its proprietary prices, with the asset maintained in the Company's account with third-party brokers.

5. PREVENTION AND MANAGEMENT

GIV Trade has identified specific potential Conflicts of Interest that may arise concerning its activities. The general nature and/or source of these conflicts will be disclosed to clients before undertaking business, providing sufficient detail to enable the client to make an informed decision about the service in the context in which the conflict has arisen. For each potential situation, GIV Trade has analyzed whether the risk is actual or potential for one or more of its clients.

It is not always possible to prevent actual Conflicts of Interest from arising. In such cases, GIV Trade will manage Conflicts of Interest through measures such as segregating duties or establishing Chinese Walls. Under certain circumstances, GIV Trade may have to decline to take on a new client.

When considering the development of new products, services, or changes to its business model or operations, Senior Management will evaluate whether additional potential Conflicts of Interest may arise.

Senior Management and Compliance will regularly update the Conflicts of Interest Policy and the Register of Potential Conflicts of Interest as necessary and will formally review the adequacy of these arrangements annually. Senior managers will receive written reports on the Company's Conflicts of Interest records on an annual basis.

a) Measures

The Company takes the following measures to prevent and manage conflicts of interest:

- When receiving and transmitting client orders, the Company does not give preferential treatment to any client to the detriment of others and does not disclose one client's order details to another client.
- When executing orders on behalf of clients and acting as the client's counterparty, the Company manages its market risk exposure by hedging client orders on a one-to-one basis, in line with its license.
- Related persons are generally prohibited from accepting gifts from individuals with a material interest likely to conflict with the duty owed to clients in connection with fair treatment.
- The Company conducts ongoing monitoring of business activities to ensure the adequacy of internal controls.
- Effective procedures are in place to prevent or control the exchange of information between related persons engaged in activities involving a risk of Conflict of Interest.
- Separate supervision is provided for related persons whose principal functions may conflict with client interests or represent differing interests.
- Measures are implemented to prevent or control the simultaneous or sequential involvement of related persons in separate investment services where such involvement could impair proper conflict management.
- Any deviation from the Company's policies requires Board approval.

b) Inducements

The Company will not act honestly, fairly, or professionally in the client's best interest if it pays or receives any fee, commission, or non-monetary benefit related to investment or ancillary services, except for:

- Fees, commissions, or non-monetary benefits paid to or by the client or a person on behalf of the client.
- Fees, commissions, or non-monetary benefits paid to or by a third party, provided that:
 - The existence, nature, and amount of the benefit (or the calculation method) are disclosed to the client comprehensively, accurately, and understandably before providing the service.
 - The payment enhances the quality of the service to the client and does not impair compliance with the Company's duty to act in the client's best interest.
- Proper fees necessary for providing investment services, such as custody costs, settlement and exchange fees, regulatory levies, or legal fees, which do not create conflicts with the Company's duty to act honestly, fairly, and professionally.
- The Company will ensure compliance with these requirements before paying or receiving any inducements.

c) Personal Account Dealing

Employees may only engage in personal investment activities that comply with applicable laws or regulations, do not interfere with their job responsibilities, and do not pose a reputational risk to the Company. Transactions must be free from business and ethical conflicts of interest. Employees must not misuse proprietary or client confidential information and must ensure that clients are not

disadvantaged by their dealings.

Giv Trade Personal Account Dealing measures have been established to ensure that personal account dealing by members of staff complies with the above measures.

d) Outside Employment and Business Interests

Employees may not engage in outside employment, directorships, or provide services to others without prior written approval from senior management. Participation in outside business interests that could interfere with work responsibilities or create conflicts with the Company, or its clients is strictly prohibited.

e) Aggregation of Orders

When aggregating client orders, the Company ensures that aggregation does not disadvantage any client whose order is included.

f) Disclosure

When existing arrangements are insufficient to manage Conflicts of Interest with reasonable confidence, GIV Trade will disclose the general nature and/or source of potential or actual conflicts to its client in writing before undertaking business on its behalf. This disclosure, made in a durable medium, will include sufficient details to enable the client to make an informed decision concerning the service in the context in which the conflict arises, particularly when providing investment services and/or ancillary services. The description will explain the general nature and sources of conflicts of interest, the associated risks to the client, and the steps taken to mitigate those risks.

g) Segregation of Duties

The Company ensures effective segregation of duties to prevent Conflicts of Interest that may arise if tasks are performed by the same individual.

h) Information Barriers

GIV Trade maintains comprehensive policies in its Information Security and Data Protection Policies, including Information Barriers (commonly known as Chinese Walls), to restrict access to sensitive, price-sensitive, and confidential information. These measures are designed to prevent market abuse, conflicts of interest, and unethical activities that could harm the interests of one or more clients.

i) Access to Electronic Data

GIV Trade implements security measures governing electronic data access. Employees do not have physical access to records unrelated to their department's work unless necessary. Specific permissions and access rights are assigned to different departments.

j) Remuneration and Oversight

Giv Trade Senior Management oversees and determines appropriate remuneration for staff members. Compensation for non-investment management staff is based on the Company's overall results and is not tied to the success of any individual transaction. Sales staff remuneration is partially based on business production. Senior management, risk takers, staff engaged in control functions, and any employee receiving total remuneration that places them in the same remuneration bracket as senior management and risk takers qualify as Remuneration Code Staff. GIV Trade ensures compliance with MiFID II regulations and considers potential Conflicts of Interest in its remuneration structures. Staff are subject to appropriate management and supervision to ensure that GIV Trade has effective arrangements in place to properly manage conflicts of interest.

6. CLIENT'S CONSENT

By entering into a Client Agreement with GIV Trade for the provision of Investment Services, the Client consents to the application of this Policy to their account. Furthermore, the Client authorizes GIV Trade to manage their account in any manner deemed appropriate by the Company, even if such management involves Conflicts of Interest or the Company's own interests in a transaction, without prior consultation

with the Client. In situations where the Company is unable to effectively manage a Conflict of Interest, it will promptly inform the Client.

7. RECORD KEEPING

GIV Trade will maintain and regularly update a written record of the types of investment or ancillary services or activities conducted by or on behalf of the Company in which a Conflict of Interest, posing a material risk of harm to the interests of one or more clients, has arisen or, in the case of ongoing services or activities may arise. These records, organized in a register, will be retained for a minimum of five years from the date of creation and will be continuously managed by the Compliance Officer.

8. REPORTING

Conflicts of Interest, whether actual or potential, must be reported to the Compliance Officer immediately. GIV Trade staff are trained to identify and report any such conflicts as part of their duty to uphold the Company's ethical standards.

9. CONTACT INFORMATION

If you have any questions regarding Conflicts of Interest, please contact Giv Trade Compliance Department at compliance@givtrade.com