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Accuindex EU Ltd

(ex. Ruizean Markets Ltd)

(Regulated by the Cyprus Securities & Exchange Commission)

Conflicts of Interest Policy

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1. Introduction

Accuindex EU Ltd (ex. Ruizean Markets Ltd) (hereinafter referred to as the "**Company**") is an Investment Firm incorporated in the Republic of Cyprus through the Department of Registrar of Cyprus and Official Receiver with incorporation number HE 360650 regulated by the Cyprus Securities and Exchange Commission (hereinafter referred to as the "**CySEC**") with license number 340/17 and operated under the Markets in Financial Instruments Directive (EU Directive 2004/39/EC – MiFID) as in force and/or as this may be amended from time to time. Following the implementation of the Markets in Financial Instruments Directive (MiFID II) in the European Union and in accordance with the Provision of Investment Services law, the Exercise of Investment Activities law, the Operation of Regulated Markets and Other Related Matters Law of 2017, Law 87(I)/2017 in Cyprus (hereinafter referred to as the "**Law**"), as in force and/or as this may be amended from time to time, the Company is required to provide its clients and potential clients with its Conflicts of Interest Policy (hereinafter referred to as the "**Policy**").

Under Applicable Regulations the Company is required to have arrangements in place to manage conflicts of interest between the Company and its clients and between other clients and take all reasonable efforts and steps to avoid conflicts of interest and when they cannot be avoided the Company shall ensure that clients are treated fairly and at the highest level of integrity and that their interests are protected at all times.

In accordance with CYSEC Rules and this Policy, 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 applicable legislation when providing investment services and/or other ancillary services related to such investment services. Further, the Company has in place arrangements to identify and manage conflicts of interest that arise between the Company and its Clients and between the Company's different clients.

2. SCOPE & OVERVIEW

A "conflict of interest" is a situation where the Company or an Employee, or other associate of the Company, and/or companies of, (including the Group's managers, Employees, or any person directly or indirectly linked to them by control) and their clients or, between one client and another that has competing professional or personal interest, which may prevent services being provided to clients in an independent or impartial manner. The Company is committed to identifying, monitoring and managing all actual and potential conflicts of interest that can and/or may arise between us and our clients and any person directly or indirectly associated with the Company.

The Policy applies to all its directors, Employees, any persons directly or indirectly linked to the Company (hereinafter referred to as the "**Relevant Persons**") and refers to all interactions with all clients. The Policy is addressed to all Company's Clients irrespective of Client Classification/Categorisation. This Policy is not intended to, and does not, create third party rights or duties that would not already exist if the Policy had not been made available, however

it does forms part of the contractual obligations between the Company and the Client based on the establishment of the business relationship between them.

As such, this Policy refers to all interactions with all clients and applies to any of the following Relevant Persons:

a. A director, partner or equivalent, manager or tied agent (or where applicable, appointed representative) of the Company;
b. A director, partner or equivalent, or manager of any tied agent (or where applicable, appointed representative) of the Company;
c. An Employee of the Company or of a tied agent (or where applicable, appointed representative) of the Company;
d. Any other natural person whose services are placed at the disposal and under the control of the Company or a tied agent (or where applicable, appointed representative) of the Company and who is involved in the provision by the Company of regulated activities;
e. A natural person who is involved in the provision of services to the Company or its tied agent (or where applicable, appointed representative) under an outsourcing arrangement for the purpose of the provision by the Company of investment services and activities.

The Company and/or other persons connected with the Company may have an interest, relationship or arrangement that is material in relation to any transaction and or service offered affected under the Company's General Terms of Business. Such interests, relationships or arrangements may not necessarily be separately disclosed to our Clients at or prior to the time of the services offered. However, the Company, at a minimum, shall:

a. identify with reference to the investment and ancillary services carried out by the Company, the circumstances which constitute or may give rise to a conflict of interest entailing a material risk of damage to the interests of one or more Clients;
b. specify procedures to be followed and measures to be adopted in order to manage such conflicts;
c. ensure that the procedures and measures taken are designed to ensure that relevant persons engaged in different business activities involving a conflict of interest carry on those activities at a level of independence appropriate to the size and activities of the Company and to the materiality of the risk of damage to the interests of Clients;
d. Where, however the Company does not consider that the arrangements under this Policy are sufficient to manage a particular conflict, the Client shall be informed of the nature of the conflict so that he/she can proceed accordingly and make an informed decision.

The affected parties if conflict of interest arises can be the Company, its Employees or its clients. More specifically, a conflict of interest may arise, between the following parties:

a. The Client and the Company;
b. Two of more Clients of the Company;
c. The Company and its Employees/Manager(s);
d. One or more Client(s) of the Company and an Employee/Manager of the Company;
e. Company's Departments.

3. PURPOSE

The purpose of this policy is to set out the Company's approach to identifying and managing conflicts of interest which may arise during the course of its business activities. The Policy applies to all its directors, Employees, any persons directly or indirectly linked to the Company (hereinafter called "Relevant Persons") and refers to all interactions with all clients.

This document sets out the Company's Conflicts of Interest Policy in a format suitable for distribution to Clients and created in order to be appropriate and in relation to the size and organizational structure of the Company as well as the nature, scale and type of business it undertakes and provides.

The process entails the following factors:

- Identification of conflicts of interest situations
- Management of conflicts of interest situations
- Disclosure of conflict of interest in cases where such situations identified cannot be mitigated/resolved
- Retain updated records of identified conflict of interest situations

4. IDENTIFICATION OF CONFLICTS OF INTEREST

While it is not feasible to define precisely or create an exhaustive list of all relevant conflicts of interest situations that may arise, as per the current nature, scale and complexity of the Company's business, the following list includes circumstances which constitute or may give rise to a conflict of interest entailing a material risk of damage to the interests of one or more Clients, as applicable.

When the Company offers Investment Services to the Client, the Company, an associate or some other person connected with the Company, may have an interest, relationship or arrangement that is material in relation to the Transaction concerned or that conflicts with the Client's interest. The Company hereby identifies and discloses a range of circumstances which may give rise to a conflict of interest and potentially but not necessarily be detrimental to the interests of one or more of its Clients. Such a conflict of interest may arise if the Company, or any person directly or indirectly controlled by the Company or a Client, is likely to make a financial gain, or avoid a financial loss, at the expense of a Client or may have an interest, relationship or arrangement that is material in relation to the transaction concerned or that conflicts with the Client's interest. In general, the Company adheres to a policy that the creation of conflicts of interest must, insofar as is possible, be prevented. This is applied through a combination of control measures that play a role in various aspects of our business operations, such as:

- The 'four eyes' principle check: (at least) 2 people are involved in all major decisions;
- Separation of duties: tasks that, when combined, could result in a conflict of interest for an Employee are divided up and allocated to different Employees;

- Clear written instructions to our staff, through which conflicts of interest are, insofar as is possible, prevented. These instructions range from a code of conduct, which prescribes the general rules of conduct, through to operational procedures in the various processes where conflicts of interest could arise (underwriting, claims management, accounting);
- Education and training: our Compliance department regularly provides internal training courses to our staff involving the proper application of the rules of conduct;
- Compliance: our Compliance Department (a department within the company who independently checks whether we are complying with the law) is involved in the introduction of new rules of conduct that will, insofar as is possible, prevent conflicts of interest from arising, among other things.

Based on our business model, experience and day-today services provided to our Clients, the Company has identified the following circumstances (not exhaustive) which may give rise to a conflict of interest:

a. the Company may be providing other services to associates or other Clients of the Company who may have interests in Financial Instruments or investments or Underlying Assets, which are in conflict or in competition with the Client's interests;
b. the Company's bonus scheme may award its Employees based on the trading volume etc.;
c. the Company may receive or pay inducements to or from third parties due to the referral of new Clients or Clients' trading;
d. the Company or a Relevant Person has an interest in the outcome of a service provided to the Client, which is distinct from the Client's interest in that outcome;
e. the Company or a Relevant Person has a financial or other incentive to favour the interest of another Client or group of Clients over the interests of the Client;
f. the Company or a Relevant Person carries on the same business as the Client
g. 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;
h. the Company or a related person carries on the same business as the Client.
i. the Company may be matching a Client's Transaction with that of another Client by acting on that person's behalf as well as for the Client where the Company acting or seeking to act as principle and/or agent for both parties and/or to receive and/or retain commission(s) or other charges from both parties;

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

1. Accuindex EU Ltd or a Relevant Person is likely to make a financial gain, or avoid a financial loss, at the expense of the client;

2. Accuindex EU Ltd or a Relevant 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;
3. Accuindex EU Ltd or a Relevant Person has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;
4. Accuindex EU Ltd or a Relevant Person carries on the same business as the client;
5. Accuindex EU Ltd or a Relevant 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, other than the standard commission or fee for that service.

It should be noted that the above circumstances which constitute or may give rise to a conflict of interest, are not conclusive. To be conclusive, the Company explicitly examines and investigates further each of the above circumstances on a case by case basis and undertakes additional due diligence measures in order to have solid evidence that the case in question constitutes indeed a conflict of interest.

5. IDENTIFYING AND MANAGING CONFLICTS OF INTERESTS

The Company maintains and operates effective organizational and administrative procedures to identify and manage conflicts of interest. Should a Conflict of Interest arise, it is managed promptly and fairly. The Company has in place arrangements to ensure that:

- There is a clear distinction between the different departments' operations;
- No single person will gather conflicting information, thus counterfeiting or hiding information from investors is minimized;
- The Company's employees are prohibited from investing in securities for which they have access to non-public or confidential information;
- 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 is prevented or controlled;
- There is 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 Company;
- There is no 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;
- Transactions by the company's employees are neither performed nor executed by themselves, but by another member of staff of the company;
- Employees sign a confidentiality agreement. No associated person may disclose inside information to others, except disclosures made in accordance with the Company's policies and procedures, to other Company personnel or persons outside the Company who have a valid business reason for receiving such information;
- There are effective procedures in place to prevent or control the exchange of information (flow 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;

- Establishment of in-house Compliance function to monitor and report sources that may entail conflict of interest to the Board of Directors of the Company;
- Appointment of Internal Auditor to ensure that appropriate systems and controls are maintained and report to the Company's Board of Directors;
- Establishment of the four-eyes principle in supervising the Company's activities;
- Any person will be prevented from exercising inappropriate influence over the way in which a relevant person carries out investment or ancillary services or activities;
- Relevant information is recorded promptly in a secure environment to enable identification and management of Conflicts of Interests;
- Adequate records are maintained of the services and activities of the Company where a Conflict of Interest has been identified;
- Where necessary, Relevant Persons are subject to personal account transaction rules;
- In certain jurisdictions appropriate disclosure may be made to the Client in a clear, fair and not misleading manner to enable the Client to make an informed decision;
- There is a periodic review of the adequacy of the Company's systems and controls.

6. MANAGING CONFLICTS OF INTEREST

To ensure that the Company manages conflicts of interest effectively, the Managing Director together with the Compliance Department and Heads of Relevant Departments will have overall responsibility to enable that the Company identifies and manages any conflicts of interest appropriately, effectively and in line with the applicable laws in accordance to the CySEC Rules, Circulars, Directive, Guidance and Regulations.

The Company has set up internal policies and has an in-house Compliance Department that is responsible for identifying and managing potential conflicts interests. The Compliance Department will also update the relevant internal procedures and ensure compliance with such procedures. The Company maintains and operates effective organizational and administrative procedures to manage the identified conflicts of interest. The Company also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate.

7. PROCEDURES AND CONTROLS TO MANAGING CONFLICTS OF INTERESTS

In general, the procedures and controls that the Company follows to manage the identified conflicts of interest include the following measures:

1. 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;
2. The separate supervision of Relevant Persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may

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conflict, or who otherwise represent different interests that may conflict, including those of the Company;

3. 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;
4. 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;
5. 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. Such measures include the following:

a) A 'need to know' policy governing the dissemination of confidential or inside information within the Company.
b) Chinese walls restricting the flow of confidential and inside information within the Company, and physical separation of departments. Communication of information and data between the various business units of the Company, whether the Company's officers and/or Employees have access to data in the possession of business units to which such access is not permitted so that to prevent the flow of confidential information in a way that which adversely affect the interest of the Clients. The Company's Compliance Department is responsible for maintaining such Chinese Walls, by means of regular checks and monitoring.
c) Procedures governing access to electronic data.
d) Segregation of duties that may give rise to conflicts of interest if carried on by the same individual.
e) Establishment of Personal Transaction Policy covering the disclosure and requirements applicable to Relevant Persons in relation to their own investments.
f) A gifts and inducements log registering the solicitation, offer or receipt of certain benefits.
g) The prohibition of external business interests conflicting with the Company's interests as far as the Company officers and Employees are concerned, unless the written Board of Directors approval is provided.
h) A policy designed to limit the conflict of interest arising from the giving and receiving of inducements.
i) Establishment of an in-house Compliance Department to monitor and report on the above to the Company's Board of Directors. The Department will also update the relevant internal procedures and ensure compliance with such procedures.
j) Appointment of an Internal Auditor to ensure that appropriate systems and controls are in place and maintained which in turn shall evaluate and report to the Company's Board of Directors.
k) Establishment of the four-eyes principle in supervising the Company's activities.

6. the Company also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate;
7. Relevant persons are required to immediately notify the Company in case they perceive that a conflict of interest may be created due to the undertaking of a specific task/work;
8. All Clients are to be treated fairly;
9. All the Company's representatives hold an authorisation/license or are in the process of obtaining an authorisation/license, if required, for performing and/or offering the services and/or business activities as applicable;
10. In circumstances not covered by the points mentioned above and given the nature of a conflict of interest situation, the Compliance Department and/or the Senior Management shall decide whether to proceed with the relevant circumstance and notify the Client accordingly.
11. The employees of the Company ensure that documents containing confidential information will not be accessible by unauthorized persons.
12. All employees are bound by professional secrecy and confidential information is only being shared if this is deemed necessary for performing a job function.
13. All employees are at all times bound to act loyally to the Company and be in full compliance with its procedures.
14. All employees receive instructions and guidance regarding managing of conflicts of interest.
15. Whenever the Company implements a bonus scheme, this is compounded of several elements and each trade related element does not alone affect the bonus significantly.
16. The persons providing investment services possess all the necessary certificates of professional competence required for providing the relevant services or have been granted with relevant exception from CySEC.
17. The Company takes all necessary steps to employ persons with the highest educational, ethical and professional courtesy standards, in line also with CySEC's Guidelines GD-IF-01 (Circular C025).

8. EXPRESS CLIENT'S CONSENT

By entering into a Client Agreement with the Company for the provision of investment services, the client is consenting and accepting the application of this Policy as this may be amended and/or updated from time to time. Further, the Client consents to and authorizes the Company to deal with the Client in any manner which the Company considers appropriate, notwithstanding any conflict of interest and/or the existence of any material interest in the investment services and/or activities provided, without prior reference to the Client. In the event that the Company is unable to deal with a conflict of interest situation it shall revert to the Client.

9. DISCLOSURE OF INFORMATION

If in the course of a business relationship with a client the organisational or administrative arrangements/measures in place are not sufficient to avoid or manage a conflict of interest, before the Company provides any services, Ruizean Markets Ltd shall disclose to the Client or

potential Client the general nature and any conflicts of interest potentially present. This shall be made in a durable medium and include sufficient detail, taking into account the nature and profile of the Client, to enable the Client to take an informed decision with respect to the investment or ancillary service in the context of which the conflict of interest arises. The Compliance Department shall have the responsibility to oversee such communication. Following such communication, the consent of the Client shall be obtained and recorded before proceeding with the provision of the services.

10. POTENTIAL SOURCES OF CONFLICTS OF INTEREST

Taking into consideration the services the Company offers, potential Conflict of Interest circumstances may include, but are not limited to:

- Reception and transmission of orders;
- Execution of orders;
- Safekeeping and administration of financial instruments for the account of clients, including custodianship and related services such as cash/collateral management.
- The Company or Relevant Person receives substantial gifts or entertainment (including non-monetary inducements) that may influence behaviour in a way that conflicts with the interest of the Client of the Company;
- A transaction is affected in financial instruments in respect of which the Company may benefit from a commission, fee, mark-up or mark-down payable otherwise than by a client, and/or Company may also be remunerated by the counterparty to any such transaction;
- A director or employee of the Company is a director of a fund and/or any company being a client of the Company;
- A transaction is affected in financial instruments issued by an affiliated company or the client or customer of an affiliated company
- Introducing agents may have other interests than the Company and/or their clients;
- White Label Partners may have other interests than the Company and/or their clients;
- Representatives/ Introducing agents of the Company may be aware of large client orders to acquire or dispose of a large quantity of a particular financial instrument and either the Company or its representatives/Introducing agents purchase (or sell) the financial instrument beforehand.

The Company should analyse potential conflicts of interests each time a financial instrument is manufactured. In particular, the Company shall assess whether the financial instrument creates a situation where end clients may be adversely affected if they take:

a) an exposure opposite to the one previously held by the Company itself; or
b) An exposure opposite to the one that the Company wants to hold after the sale of the product. The Company may use technology or software, such as bridges and plugins that process client orders using pre-defined and/or configurable rules and settings that allow the Company to define under which conditions a client order can be confirmed and even what will be the Company's possible profit from it.

c) The Company shall monitor asymmetric slippage. The Company in relation to its execution arrangements should include a record of all time stamps, from order reception, intra-trade benchmark shifts, hedging of the trade and client execution.

A. Reception & Transmission (RTO) and Execution of Client's Orders

The Brokerage Department is responsible for the RTO and Executions of Client's Orders. Possible conflicts of interest situations may include:

- Influence of issue conditions for brokerage / selling commission purposes
- Unjustified use or dissemination of confidential information
- Preferential transmission of particular orders
- Possible incentive for preferential allocation to clients who are frequent traders to generate commission income
- Use of information derived from brokerage in relation to client orders for the benefit of other clients
- Use of knowledge of client orders for personal account trading
- Exertion of influence by management on order execution
- Preferential execution of particular orders

Sufficient Procedures are adopted and implemented by the Company for the reception and transmission, as well as execution, of client orders in relation to one or more financial instruments, on a daily basis, as follows:

a. Straight-Through Processing (STP) of client's orders
b. Information barriers / strict confidentiality / GDPR / segregation of functions
c. Review of payments and/or mispricing
d. Market-based monitoring of prices
e. Disclosure of any conflict of interest that could bear a material influence best execution of the client's order
f. Internal Audit mandate includes the comparison of commissions/fees charged to clients and report on identified variances
g. Departmental segregation/Chinese Walls
h. Transparent allocation principles and verification of compliance with the allocation principles
i. Separation/segregations of reporting lines
j. Personal Transactions are prohibited = traders/employees have to place orders with another Broker and disclose relevant information to Compliance Department and Senior Management on their Personal Transactions Declaration upon employment for monitoring and restriction of employee transactions
k. Compliance with statutory obligation of market manipulation and insider trading legislation.

Prohibited Transaction Practices

In order to prevent potential conflicts of interest between the Company and the Clients, the following transaction practices are prohibited:

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a. Investment Services provided to a Client with the purpose of influencing the price of financial instruments for the benefit of the Company or related persons is prohibited, particularly with respect to transactions that the Company or any related person may affect before or after the provision of the said investment services.
b. Clients' transaction information used by the Company for own benefit and/or the announcement to third persons of such information is prohibited.
c. The preferential treatment of the Company's personnel at the expense of its Clients, during the provision of the investment services to a Client is prohibited.
d. Any transactions affected by the Company's personnel and/or directors for their own account/benefit or for the account/benefit of persons related to them is prohibited, even on the basis of confidential information which they acquire during the course of their employment with the Company are prohibited.

Information barriers

The Company respects the confidentiality of information it receives about its Clients and operates a "Need to Know" approach and complies with all applicable laws in respect of the handling of that information. Access to confidential information is restricted to those who have a proper requirement for the information consistent with the legitimate interest of a Client of the Company. The Company has established and operates internal organisational arrangements to avoid conflicts of interest by controlling, managing or restricting as deemed appropriate the flow of confidential information between different areas of business or within a specific division or department. In particular, Chinese Walls are a key tool for conflict of interest prevention avoiding insider dealing and market manipulation risks. Chinese Walls can involve separation of premises, personnel, reporting lines, files and IT-systems and controlled procedures for the movement of personnel and information between the Company and any other part of the Company Group. The Company maintains permanent information barriers between different departments.

Policies and procedures

The Company has developed and implemented policies and procedures throughout its business to prevent or manage potential conflicts of interests. Its employees receive guidance and training in these policies and procedures, and they are subject to monitoring and review processes.

Remuneration Policy

The Company has established, implemented and maintains remuneration policies and practices that comply on the one hand with the requirements of section 24 of the Investment Services and Activities and Regulated Markets Law (87(I)/2017of 2017, as in force ('the Law') in relation to conflicts of interests and on the other hand, with the conduct of business rules set out in section 25 of the Law. Moreover, the remuneration policies and practices of the Company is consistent with:

a. Circular C031 of CySEC concerning the guidelines on remuneration policies and practices
b. ESMA Guidelines on Remuneration policies and practices (MiFID), ESMA/2013/606

c. The questions and answers 2 and 3 of Chapter 2 of ESMA/2016/904, 'Questions and Answers – Relating to the provision of CFDs and other speculative products to retail investors under MiFID' of 1st June 2016.
d. The questions and answers of 31 March 2017, ESMA35-36-794, 'Questions and Answers - Relating to the provision of CFDs and other speculative products to retail investors under MiFID' of March 2017.

The Company when designing or reviewing its remuneration policies and practices it considers the conduct of business and conflicts of interest risks that may arise and takes reasonable measures to avoid or manage them appropriately and efficiently. The Company's remuneration policies and practices, inter alia, have been designed in such a way so as not to create incentives that may lead persons to favour their own interests, or the Company's interests, to the potential detriment of clients. Furthermore, the Company has established, implemented and maintains adequate control mechanisms for compliance with remuneration policies and practices being implemented and maintained by the Company. The same remuneration policies and practices adopted by the Company are applied apart from the staff and to the service providers, Introducing Brokers and to third parties which perform outsourced critical operational functions, when they are acting on behalf of the Company.

Separate supervision/functions

There is a clear distinction between the different departments' operations. Two departments or businesses will be managed by different senior staff members, if running them under supervision of one person, may create conflicts of interest. In this way it is secured that no single person will gather conflicting information, thus counterfeiting or hiding information from investors is minimized. Furthermore, the four-eyes principle in supervising the Company's activities is established.

Pay

Pay and bonuses are linked to the profits of the Company or the business or department where an employee works. Pay and bonuses linked to the performance of another department, with possible conflicting interests, is avoided at all times.

Inducements

The Company does not offer, solicit or accept any inducements, other than the following:

a. A fee, commission or non-monetary benefit provided to or by a client or a person on behalf of a client;
b. A fee, commission or non-monetary benefit provided to or by a third party or a person acting on behalf of a third party, under the following conditions:
    i. the fee, commission or benefit is disclosed to a client, prior to the provision of the relevant service; and
    ii. it is designed to enhance the quality of the relevant service to a client and in line with Company's duty to act in the best interests of a client;
c. Proper fees for the provision of investment services, settlement and exchange fees, regulatory levies or legal fees, and which cannot give rise to conflicts with Company's duties to act honestly, fairly and professionally in accordance with the best interests of its clients

Personal account dealing

For the purpose of this Conflict of Interest Policy, "Personal Transaction" means a trade in financial instrument effected by or on behalf of a relevant person, where at least one of the following criteria are met:

a. The relevant person is acting outside the scope of the activities he carries out in that capacity,
b. The trade is carried out for the account of any of the following persons:
    i. the relevant person,
    ii. any person with whom he has a family relationship, or with whom he has close links,
    iii. a person whose relationship with the relevant person is such that the relevant person has a direct or indirect material interest in the outcome of the trade, other than a fee or commission for the execution of the trade

To prevent conflicts arising from the use of information obtained from clients, and market abuse in general, all employees are subject to personal account dealing rules. Employees are prohibited to keep investor accounts in other Investing Firms without Company's prior authorization and are obliged to bring this to Company's attention. They are also obliged to authorize the Company to request transaction reports from other Investment Firms.

Furthermore, the Company requires all employees to have Personal Account trades approved before dealing to ensure that dealing does not occur in securities in circumstances where such dealings should be restricted. Relevant persons are informed on the restrictions on personal transactions and the measures established by the Company in connection with personal transactions and Notification procedures. In addition, the Company has established, implemented and maintains adequate arrangements aimed at preventing the following activities in the case of any relevant person who is involved in activities that may give rise to a conflict of interest, or who has access to inside information within the meaning of section 5 of the Market Manipulation (Market Abuse) Law or to other confidential information relating to clients or transactions with or for clients by virtue of an activity carried out by him on behalf of the Company:

a. Entering into a personal transaction which meets at least one of the following criteria:
    i. That person is prohibited from entering into it under the Market Abuse Law;
    ii. It involves the misuse or improper disclosure of that confidential information;
    iii. It conflicts or is likely to conflict with an obligation of the Company under the Law.

b. Advising or procuring, other than in the proper course of his employment or contract for services, any other person to enter into a transaction in financial instruments which, if a personal transaction of the relevant person, would be covered by point (a) above or investment research reports or the misuse of information relating to pending client orders.

c. Disclosing, other than in the normal course of his employment or contract for services, any information or opinion to any other person if the relevant person knows, or

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reasonably ought to know, that as a result of that disclosure that other person will or would be likely to take either of the following steps:

i. To enter into a transaction in financial instruments which, if a personal transaction of the relevant person, would be covered by point (a) above or investment research reports or the misuse of information relating to pending client orders;

ii. To advise or procure another person to enter into such a transaction. The above arrangements have been designed to ensure that:

a) Each relevant person is aware of the restrictions on personal transactions, and of the measures established by the Company in connection with personal transactions and disclosure.
b) The Company is informed promptly of any personal transaction entered into by a relevant person, either by notification of that transaction or by other internal procedures enabling the Company to identify such transactions. In the case of outsourcing arrangements, the Company always ensures that the firm to which the activity is outsourced maintains a record of personal transactions entered into by any relevant person and provides that information to the Company promptly on request.
c) A record is kept of the personal transaction notified to the Company or identified by it, including any authorisation or prohibition in connection with such a transaction.

Employees' Understanding

All of our employees are made aware of this policy to highlight and emphasize the importance of identifying and managing conflicts of interest.

All employees are required to adhere to the Company's Conflict of Interest Policy which requires employees to notify Compliance of all situations whereby an employee becomes aware of conflicting and/or inside dealing information. Employees are also required to notify Compliance of any situation where information received might constitute conflicting and/or inside information. The Compliance Department will record the circumstances of the situation and take such action as is necessary and appropriate informing also Senior Management of the Company.

Employees must never permit their personal interest to conflict with, or to appear to conflict with, the interests of the Company. When faced with a situation involving a potential conflict of interest, ask yourself whether public disclosure of the matter could embarrass the Company or you, or would lead an outside observer to believe a conflict of interest, including those in which you may have been placed inadvertently due to either business or personal relationship with customers, suppliers, business associates, or competitors of the Company, or with other Company employees.

Company's employees are also subject to rules designed to avoid conflicts of interest with activities they undertake outside the Company.

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Gifts

Company's employees will not accept any gifts other than those considered normal in their line of business. Excessive gifts from Clients may result in a conflict of interest, something the Company is committed to avoiding.

Declining to act

The Company may decline to act for a client in cases where it believes the conflict of interest cannot be managed in any other way.

11. ASSESSMENT – RESOLUTION – NOTIFICATION & RECORD KEEPING

The Compliance Department is responsible for assessing, managing and mitigating all conflicts of interest situations, including but not limited to, assessing the following:

1. Whether the situation represents an actual or potential conflict of interest for either the Client or the Company
2. Whether the situation identified is a perceived conflict for either the Client or the Company and the risk that it may become an actual conflict
3. How the conflict of interest can be appropriately managed and/or mitigated and the degree of materiality of the conflict of interest
4. Whether the conflict of interest identified requires immediate notification to Senior Management for further assessment, giving information on the seriousness of the risk and direction on the level of reporting/action required.

Further, the Company takes all the necessary actions to resolve conflicts of interest identified, including, but not limited to, the management and mitigation of the conflict(s) identified in such a way (i) as to prevent the conflict of interest arising in the future; (ii) as to ensure the interests of the Client, or the Company or the Company's Employee are not permitted to disadvantage or lead to a loss for the Client's and/or the Company's interests; and further (iii) communicate and notify the conflict of interest to the Client(s) in writing so that the Client(s) may decide upon a satisfactory course of action and make an informed decision about whether or not he/she wishes to proceed prior to engaging to a business relationship with the Company (new Client) and/or proceed with further services provided by the Company (existing Client).

Finally, the Compliance Department maintains a Conflicts of Interest Register of all circumstances in which a conflict of interest has been identified and/or arisen, containing the measures taken to mitigate or manage the conflict of interest identified and/or arisen, a description of the circumstances which constituted or may have constituted a conflict of interest, names of the persons involved, the name of the person responsible for the mitigation of the conflict, a description of the steps taken in order to mitigate the conflict - including client disclosures and subsequent resolutions. The Conflicts of Interest Register is updated any time a conflict of interest has been identified and/or arisen or may have arisen and is kept for the durations of the business relationship with the Client and for a minimum of five years after the conclusion of such business relationship.

The Company reserves the right to amend its policies at any time by making them public on its official website. The client consents and agrees that the latest version of any of the Documentation and/or Policies published on Accuindex EU Ltd's official website at www.accuindex.eu shall prevail.

12. DISCLOSURE

Where a conflict arises, and Accuindex EU Ltd (ex. Ruizean Markets Ltd) is aware of it, it will disclose the conflict to the client prior to undertaking investment business for that client or, if it does not believe that disclosure is appropriate to manage the conflict, Accuindex EU Ltd (ex. Ruizean Markets Ltd) may choose not to proceed with the transaction or matter giving rise to the conflict.

Accuindex EU Ltd (ex. Ruizean Markets Ltd) reserves the right to review and/or amend its Policy and arrangements whenever it deems this appropriate.

Additional information and/or clarifications in relation to this policy and/or this document is available upon explicit written request. Should a Client and/or prospective client have further questions in relation to conflicts of interest he/she may direct his/her questions to Ruizean Markets Ltd Back office/Client Support Department via e-mail at: support.cy@accuindex.com.

13. REVIEW OF THIS POLICY

The Company reserves the right to amend its policies at any time by making them public on its official website. Policies shall be reviewed/amended annually and/or as and when it is deemed necessary by Regulatory Authorities and the Compliance Officer and further approved by the Board of Directors. The client consents and agrees that the latest versions of any of the Documentation and/or Policies published on Accuindex EU Ltd.'s official website shall prevail as this has been communication via a durable medium. Additional information and/or clarifications in relation to this policy and/or this document is available upon explicit written request. Questions may be directed to our Back Office/Client Support Department via e-mail at: support.cy@accuindex.com.