



Conflict of Interest Policy



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1. Introduction

- 1.1. Altum Ltd (hereinafter referred to as the "Company") is incorporated under the laws of the Republic of Seychelles and licensed by the Financial Services Authority (FSA). The Company is committed to the highest standards of Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) compliance in accordance with the Anti-Money Laundering and Countering the Financing of Terrorism Act, 2020 (the "AML & CFT Act 2020") and related regulations.
- 1.2. The purpose of this Conflict of Interest Policy ("the Policy") is to define the Company's principles and internal framework for identifying, managing, preventing, and disclosing actual or potential conflicts of interest that may arise in the course of its business activities.
- 1.3. The Company recognises that, in the ordinary course of providing investment and related services, situations may occasionally arise where the interests of the Company, its employees, or its clients diverge. Such situations may, if not properly managed, compromise the fair treatment of clients or the integrity of the financial markets.
- 1.4. Therefore, the Company maintains a robust set of organisational and administrative arrangements to ensure that conflicts of interest are identified promptly, managed effectively, and disclosed transparently where necessary.
- 1.5. The Company is committed to conducting all of its business with the highest standards of integrity, fairness, and professionalism, and to act honestly and in the best interests of its clients at all times.

2. Definition of Conflict of Interest

- 2.1. A **conflict of interest** is defined as any situation in which the interests of the Company or of a "relevant person" may conflict, directly or indirectly, with the interests of a client or group of clients.
- 2.2. Such conflicts may arise between:
 - The Company and its clients;
 - One client and another client;
 - The Company's employees and clients; or
 - Different departments or related entities within the Company.
- 2.3. A conflict of interest may occur in various forms, including but not limited to situations where:
 - The Company or an employee is likely to make a financial gain, or avoid a financial loss, at the expense of a client;
 - The Company or an employee has an interest in the outcome of a service provided to a client that is distinct from the client's interest in that outcome;
 - The Company or an employee has an incentive to favor the interests of one client or group of clients over another;
 - The Company or an employee receives from a third party an inducement in relation to a service provided to a client, in the form of money, goods, or services, other than the standard commission or fee; or
 - The Company or an employee engages in personal transactions or external business activities that may conflict with the client's interests.
- 2.4. Conflicts of interest are not limited to financial considerations. They may also include professional, personal, or reputational incentives that could impair objectivity or independence in decision-making.

3. Scope and Application

- 3.1. This Policy applies to all directors, officers, employees, agents, contractors, consultants, and other individuals directly or indirectly connected with the Company who may, by virtue of their position or function, influence the provision of investment or ancillary services.
- 3.2. It covers all business areas of the Company, including client onboarding, order execution, portfolio management, client communications, marketing, and the handling of confidential or inside information.
- 3.3. This Policy forms an integral part of the Company's internal control and compliance framework and operates in conjunction with other policies, including the Personal Account Dealing Policy, the Remuneration Policy, and the Gifts and Inducements Policy.

4. Duties of Relevant Persons

- 4.1. All relevant persons are required to exercise sound judgment, integrity, and transparency in their professional conduct to prevent situations that could give rise to conflicts of interest.
- 4.2. Each relevant person has a continuing obligation to:
 - Avoid activities or relationships that could create conflicts of interest;
 - Immediately report any actual, potential, or perceived conflicts to the Compliance Officer; and
 - Act in a manner that places the interests of the client above their own or the Company's, whenever a conflict cannot be fully avoided.
- 4.3. Members of the Board of Directors bear a heightened responsibility to ensure that strategic decisions and governance processes are free from any undue influence

or bias. Any director must promptly disclose to the Board any circumstance which may give rise to a conflict and must abstain from participating in related deliberations or decisions.

5. Identification of Conflicts of Interest

- 5.1. The Company undertakes continuous monitoring to identify circumstances that may give rise to conflicts of interest, including those that could materially affect the interests of one or more clients.
- 5.2. Examples of such situations include, but are not limited to:
 - The Company acts as counterparty to a client's transaction;
 - The Company allocates trades among multiple client accounts;
 - Employees have access to confidential or price-sensitive information;
 - The Company receives or pays inducements from third parties related to client transactions;
 - Employees maintain personal accounts or outside business interests relevant to the Company's operations;
 - The Company's affiliate or service provider is involved in a transaction relating to a client's order;
 - The custody, safekeeping, and administration of client funds or securities, where operational decisions or allocations could impact client interests;
 - Personal relationships exist between employees and clients, suppliers, or service providers; or
 - The Company offers financial instruments issued, structured, or promoted by related entities.

5.3. Each identified conflict is recorded in the Conflict of Interest Register, maintained by the Compliance Department, together with the mitigating measures and any disclosures made.

6. Management and Prevention of Conflicts

6.1. The Company has established adequate internal systems and controls to prevent and manage conflicts of interest. These measures include, but are not limited to:

- a) Organisational Independence – Departments performing conflicting functions operate independently under separate supervision.
- b) Segregation of Duties – Responsibilities are distributed to ensure no single individual can influence multiple stages of a client transaction.
- c) Information Barriers – Strict internal controls restrict the flow of confidential or inside information between departments.
- d) Remuneration Controls – Employee compensation is designed to align with the fair treatment of clients and compliance with regulatory obligations.
- e) Personal Account Dealing Restrictions – Employees must seek prior approval for personal trades and are prohibited from trading based on inside information.
- f) Inducements and Gifts Register – All gifts or benefits received or offered must be declared, evaluated, and, where appropriate, declined or approved by Compliance.
- g) External Interests and Secondary Employment – Employees must obtain written approval from senior management before engaging in any external business activities that could create a conflict.
- h) Four-Eyes Principle – Key decisions require approval from at least two qualified officers to ensure fairness and oversight.

- i) Ongoing Monitoring – The Compliance and Internal Audit functions conduct regular reviews to assess the adequacy of controls and ensure adherence to the Policy.

7. Disclosure of Conflicts

- 7.1. Where the Company's internal measures are insufficient to prevent a conflict of interest from adversely affecting a client, the Company will disclose the conflict to the client in a clear, fair, and not misleading manner, before carrying out any business on their behalf.
- 7.2. Such disclosure will include:
 - The general nature and/or sources of the conflict;
 - The steps taken to mitigate the risk; and
 - An explanation of how the conflict may affect the service provided.
- 7.3. Disclosure will be made in a durable medium and recorded for audit purposes. The Company will not proceed with the transaction without obtaining the client's consent, unless doing so would contravene the client's best interests or applicable regulation.
- 7.4. Where the Company determines that a conflict of interest cannot be prevented or adequately managed to ensure fair treatment of the client, it reserves the right to decline to act or to discontinue the provision of the affected service.

8. Inducements

- 8.1. The Company may pay or receive fees, commissions, or non-monetary benefits from third parties only when such arrangements are designed to enhance the

quality of the service provided to the client and do not impair the Company's duty to act honestly, fairly, and professionally.

- 8.2. The Company maintains full transparency regarding all such arrangements and discloses relevant details to clients upon request.
- 8.3. Any inducement that creates or is likely to create a conflict of interest with a client's best interest is strictly prohibited.

9. Staff Remuneration

- 9.1. The Company's remuneration framework ensures that compensation does not create or encourage conflicts of interest.
- 9.2. Remuneration is based on both quantitative and qualitative performance criteria, including compliance with regulatory obligations, fair treatment of clients, and adherence to the Company's internal policies.
- 9.3. Senior management periodically reviews the remuneration policy to ensure its continued alignment with client protection principles.

10. Record Keeping

- 10.1. The Company maintains detailed records of all conflicts of interest identified, including their nature, parties involved, actions taken, and disclosures made to clients.
- 10.2. The **Conflict of Interest Register** is reviewed and updated regularly by the Compliance Department and retained for a minimum period of **seven (7) years**.



11. Training and Awareness

- 11.1. All staff receive initial and ongoing training to ensure they fully understand their responsibilities regarding conflicts of interest and the procedures for managing them.
- 11.2. The Compliance Officer ensures that the Policy is distributed to all relevant persons and that acknowledgment of understanding and adherence is obtained.
- 11.3. Regular refresher sessions and internal communications reinforce awareness of the importance of integrity, transparency, and client-first conduct.

12. Review and Amendment

- 12.1. This Policy is subject to review at least annually, or whenever there are material changes in the Company's business model, regulatory environment, or operational structure.
- 12.2. Any amendments must be approved by the Board of Directors and communicated to all employees and clients, where relevant.
- 12.3. The latest approved version of this Policy is always made available on the Company's official website.

13. Contact Information

For any Conflict of Interest related enquiries, please contact:

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Email: compliance@altumbrokers.com