

# Conflict of interest Policy

## **1. Introduction**

1.1. "Kabwohe Omukace OÜ" (hereinafter referred to as "the Company")(operating under the trading name "TradeStap"), whose registered office is at Rävala pst 8, 10143, Tallinn linn, Harju maakond, Eesti Vabariik, is registered as Corporation under Entity Number 14789250.

1.2. This document outlines the Company's policy for properly managing any potential conflicts of interest that may develop throughout the course of its operations. This conflict of interest policy (the "Policy") is established with the goal of enabling the Company to take all reasonable steps to identify conflicts of interest between itself, its managers and employees, tied agents, or other relevant persons, as well as any person directly or indirectly linked to them by control.

1.3. When providing investment services and other ancillary services relating to such investment services, the Company is committed to acting honestly, fairly, and professionally in the best interests of its Clients, and to follow the principles set forth in the aforementioned legislation.

## **2. Scope**

2.1. The Policy applies to all its directors, employees, any persons directly or indirectly linked to the Company (hereinafter called "Related Persons") and refers to all interactions with all Clients.

## **3. General Identification of conflicts of interest**

3.1. When the Company deals/transacts with the Client, the Company (or an associate or another person connected with the Company) may have an interest, relationship, or arrangement with the Transaction in question, which may conflict with the Client's interests.

3.2. As a result of providing investment services, the Company has recognized the following conditions that form or may constitute a conflict of interest, creating a risk of damage to one or more Clients:

- the Company may have an interest in maximizing trading volumes in order to increase its commission revenue, which is inconsistent with the Client's personal objective of minimizing transaction costs.
- the Company may be matching the Client's orders with that of another Client by acting on such other Client's behalf as well as on the Client's behalf.

- the Company may be providing other services to associates or other Clients of the Company who may have interests in Financial Instruments or Underlying Assets, which are in conflict or in competition with the Client's interests.
- the Company is likely to make a financial gain, or avoid a financial loss, at the expense of the client.
- the Company may receive or pay inducements to or from third parties due to the referral of new Clients or Clients' trading.
- the Company or a Related 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.
- 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.
- the Company or a related person carries on the same business as the Client.
- In some cases, the Company may be the counterparty to its client's positions (i.e., act as Principal) and therefore may stand to profit if the client losses.
- In some cases, the Company may trade its proprietary positions and at the same time may have knowledge of Client's future transactions via stop limit orders, as applicable.

#### **4. General Conflicts of Interest Prevention, Management Procedures, and Controls**

4.1. To identify and manage conflicts of interest, the Company maintains and runs appropriate organizational and administrative procedures. If a conflict of interest does occur, it is resolved quickly and fairly. The Company has implemented procedures to ensure that:

- There is a clear distinction between the operations of different departments;
- No single person will gather conflicting information, reducing the risk of counterfeiting or hiding information from investors;
- There is the separate supervision of Related Persons whose principal functions involve providing services to Clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Company.

There are measures to prevent or limit any person from exercising inappropriate influence over the way in which the Related Person carries out investment services or ancillary services or activities.

Relevant persons are prohibited from recommending or soliciting the purchase or sale of any asset while in possession of inside information about that asset;

Relevant persons are prohibited from purchasing or selling, or causing the purchase or sale of a asset for an employee or employee-related account, a proprietary account of the Company, or an account over which an employee exercises investment discretion, while in possession of proprietary information

about a contemplated block transaction in the asset, or for a customer account when

such customer has been provided such information by any relevant person;

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 non-disclosure agreement;

There are adequate procedures in place to prohibit or control the exchange of information (flow of information) between relevant persons engaged in activities that may involve a conflict of interest and where the exchange of that information may harm the interests of one or more clients;

Implementation of the four-eyes paradigm in the Company's operations;

Any person will be prohibited from exerting undue influence on how a relevant person conducts investment or ancillary services or activities;

Relevant information is recorded promptly in a secure environment to enable identification and management of Conflicts of Interests;

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 non-misleading manner to enable the Client to make an informed decision;

The adequacy of the Company's systems and controls is periodically reviewed.

## **5. Information barriers**

5.1. The Company maintains the confidentiality of the information it receives

about its Clients by using a “Need to Know” approach and adhering to all applicable laws in its processing of such data. Access to confidential information is limited to those with a reasonable need for the information that is consistent with the legitimate interests of a Company client.

5.2. Internal organizational arrangements have been formed and are in place to avoid conflicts of interest by controlling, managing, or restricting private information flow across different business sectors or inside a certain division or department as considered appropriate. Chinese Walls, in particular, are an essential instrument for preventing conflicts of interest and reducing the risks of insider trading and market manipulation. Separation of buildings, staff, reporting lines, files, IT systems, and restricted procedures for personnel and information movement between the Company and any other portion of the Company Group are all examples of Chinese Walls. Between departments, the Company maintains persistent information barriers.

## **6. Separate management/functions**

6.1. The operations of the several departments are clearly separated. If two departments or enterprises are handled by different senior staff members, conflicts of interest may arise if they are overseen by the same person. This ensures that no single person gathers conflicting information, reducing the risk of counterfeiting or hiding information from investors. In addition, the four-eyes principle is formed for monitoring the Company's activity.

## **7. Inducements**

7.1. The following are the only inducements that the Company offers, solicits, or accepts:

(a) A fee, commission, or non-monetary benefit provided to or by a client or a person acting 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, if the following conditions are met:

-the fee, commission, or benefit is disclosed to a client prior to the provision of the relevant service; and

-it is designed to improve the quality of the service to a client and in line with Company's duty to act in the best interests of a client;

(c) Appropriate fees for investment services, such as custody expenses, settlement and exchange fees, regulatory levies, or legal fees, that do not

conflict with the Company's obligations to act honestly, fairly, and professionally in its customers' best interests.

## **8. Dealing with personal accounts**

8.1. A "Personal Transaction", as defined in this Conflict of Interest Policy, is a financial instrument trade effected by or on behalf of a relevant person that meets at least one of the following criteria:

(a) The relevant person is acting beyond the limits of his or her official responsibilities,

(b) The trade is carried out on behalf of any of the following persons: the relevant person, any person with whom he has a family relationship or with whom he has close links, a person with whom the relevant person has a direct or indirect material interest in the outcome of the trade, other than a fee or commission for the trade execution.

8.2. Personal account dealing regulations apply to all workers to prevent disputes emerging from the use of information gained from clients, as well as market abuse in general. Employees are forbidden from maintaining investor accounts in other Investing Firms without prior authorization from the Company and are required to notify the Company of this. They must also grant the Company permission to request transaction reports from other Investment Firms. Furthermore, the Company requires all workers to have Personal Account trades approved before dealing in order to ensure that assets are not traded in situations when such trading should be restricted.

8.3. 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.

8.4. Furthermore 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) Making a personal transaction that meets at least one of the following requirements:

-It is forbidden under the Market Abuse Law for that individual to enter into it;

- It includes the misuse or improper disclosure of confidential information;
  - It conflicts or is likely to conflict with a Company obligation 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 any information or opinion to any other person other than in the normal course of his employment or contract for services if the relevant person knows, or reasonably should know, that other person will or is likely to take either of the following steps as a result of that disclosure:
- To advise or procure another person to enter into a transaction in financial instruments that, if it were 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;
  - To advise or procure another person to enter into such a transaction.

## **9. Disclosure of Information**

9.1. The Company must adequately consider how to manage all conflicts of interest before resorting to disclosure. This will be a last resort after all appropriate steps have been taken.

9.2. Where the Company's organizational or administrative arrangements are insufficient to ensure, with reasonable confidence, that risks of damage to client interests will be avoided, the Company will either decline to act or, where confidentiality considerations allow, will disclose the general nature and/or sources of conflicts of interest to the client or potential client before undertaking business on its behalf, so that client can make an informed decision.

9.3. If a client decides not to go ahead with the service due to the conflict disclosed, the Company will have no choice but to decline the provision of services if the conflict cannot be effectively managed.

## **10. Amendment of the Policy and Additional Information**

10.1. According to the terms of the Client Agreement between the Company and the Client, the Company reserves the right to review and/or amend its Policy and arrangements whenever it deems it necessary.

10.2. If you require any additional information or have any issues regarding conflicts of interest, please send an e-mail to [complaint@](mailto:complaint@)(домен компании)