

CONFLICTS OF INTEREST POLICY

Introduction

ORO FINTECH LTD ("the Company") is incorporated and registered under the laws of Seychelles with company number 8425077-1. The registered office of the company is located at Suite 3, Global Village, Jian's Complex Mont Fleuri, Mahe, Seychelles. The Company is authorised by the Financial Services Authority of Seychelles, under the Securities Act, with Securities Dealer's License Number SD046.

In compliance with applicable regulatory requirements, the Company implements the Conflicts of Interest Policy ("the Policy") in order to identify and handle circumstances that might give rise to a conflict of interest between the Company and the Client or between the Company's clients. This Policy shall apply to Company's employees, directors, managers, partners, any natural or legal person who is directly or indirectly involved in the provision of services to the Company ('related entities') and its Clients.

Identification of Conflicts of Interests

Conflicts of interest might during the provision of investment services between the following parties:

- The Client and the Company
- Two Clients of the Company
- The Company and its Employees
- The Client and an Employee / Manager of the Company
- Company's Departments

For the identification of such incident, the Company shall take into consideration whether the Company or related entities:

- Is likely to make a financial gain, 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 carried out on behalf of the Client, which is distinct from the Clients interest in that outcome;

- Has a financial or other incentive to favour the interest of one Client (or group of Clients) over another;
- Carries on the same business as the Client;
- Receives or will receive from a person or other than a Client an inducement in relation to a service provided to a Client, in the form of monies, goods or services, other than the standard commission or fee for that service.

Additionally, the following circumstances may give rise to a conflict of interest (indicatively);

- The Company or any related entity might have an interest in the outcome of a service provided to the Client or of a transaction executed on behalf of the Client, which differs from the Client's interest
- The Company might benefit from a commission, fee, mark-up or mark-down payable otherwise than by a client
- The Company's employee bonus scheme may award its employees based on the financial results of the Company which are linked/associated with the trading volume generated by Clients;
- A transaction is effected in financial instruments issued by an affiliated company or the client or customer of an affiliated company;
- A transaction is effected in financial instruments in respect of which the Company or a company of the Company's group, or its director or employee is contemporaneously trading or has traded on its own account or has either a long or short position;

Procedures in place for management of Conflicts of Interests

Internal procedures and controls ensure proper management of conflicts of interests. Inter alia, the Company implements the below measures:

- Clear distinction between the different departments' operations
- Company's employees are forbidden from trading in securities for which they have access to confidential or non-publicly available information
- Hiding information from investors (including conflicting information) is prohibited.
- Different supervision of related entities whose main function involve the provision of services/ activities on behalf of clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Company;
- Internal procedures controlling the exchange of information between related entities whose activities might create conflict of interest if the exchange of such information may be detrimental for the Client /s.

- Internal procedures for supervision of related entities whose activities might create conflict of interest.
- Policies for limitation of conflict of interest arising from inducements.
- Chinese walls and physical separation of departments, clear responsibility and reporting lines restricting the flow of confidential information interdepartmentally
- Clear segregation of duties
- '4 eyes principle' for supervision of the Company's activities.
- Internal controls to prevent and limit exercise of inappropriate influence by any person over the way in which a relevant person provides investment services and/or activities
- Internal reporting mechanism in case of identification of possible conflicts of interest. The said reporting channels enable employees to report to their supervisor such incidents in order to assist during the evaluation and assessment of material risk of damage.

The Company shall decide the rectification measures to be taken and to identify ongoing conflicts and to manage them effectively. Records of incidents identified shall be kept by the Company in line with regulatory requirements for record keeping.

Disclosure of Information

In case during the business relationship between the Company and the Client (or group of Clients), the implemented measures are not adequate to avoid or manage incidents of conflicts of interest in relation to the Client (or group of Clients), the Company shall inform and disclose to the Client (or group of Clients) the conflicts of interest before proceeding with the provision of further services to the Client (or group of Clients).