

CONFLICTS OF INTEREST POLICY

This policy is a summary version of the main policy implemented by AT Global Markets (Australia) Pty Ltd (“ATFX Connect”) (“we”, “us”, “our”, “ours” and “ourselves” as appropriate) to prevent or manage conflicts of interest in respect of our obligations to its clients.

As a financial services company ATFX Connect faces actual and potential conflicts of interest from time to time. By identifying existing and potential conflicts of interest and following the measures we have adopted to prevent such conflicts, ATFX Connect ensures that all reasonable and appropriate steps are taken to implement the conflicts of interest policy, in order to prevent such conflicts from adversely affecting the interests of our clients.

This statement discloses:

Potential conflicts of interest that you, as an existing client or potential client, might face when engaging in business dealings with ATFX Connect ;

The laws and regulations regarding conflicts of interest that ATFX Connect is required to comply with;

The policy that ATFX Connect adopts for the purpose of the prevention -or management of conflicts of interest.

DEFINITION AND IDENTIFICATION OF CONFLICTS THAT MIGHT ARISE

Conflicts of interest are defined as situations where a client’s or a potential client’s interest conflicts with that of another client or clients, and/or ATFX Connects’ interests. As a result, there is a risk that the interests of one or more clients could be harmed. For the purposes of this policy, our interests include the interests of our managers, employees or any person who is directly or indirectly linked to us by control (i.e. entities within the same group as us). When a company provides a service to a client, conflicts of interest may arise in one or more of the situations below: When a company or a relevant person:

- a. is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- b. has an interest in the outcome of a service provided to or a transaction carried out on behalf of the client, which is different from the client’s interest in that outcome;

- c. has a financial or other incentive to favour the interest of one or more clients over the interests of another client;
- d. carries on the same business as the client; or
- e. is in receipt or will receive from a person other than the client, an inducement, other than standard commission or fee in relation to a service provided to the client.

With regard to ATFX Connect, the following are the main conflicts of interest that may occur when providing services to our clients:

- i. When ATFX Connect executes a transaction for you, we are entering into the trade as principal; and
- ii. You may have been introduced to us by a third party who receives remuneration from your trades such as an introducing broker.

LAWS AND REGULATION

All Australian Financial Services (AFS) Licensees must comply with the obligation to manage conflicts of interest under the Corporations Act in s912A (1) (aa) and in accordance with Australian Securities and Investments Commission (ASIC) Regulatory Guide (RG) 181 "Licencing Managing Conflicts of Interest". S912 A (1) (aa) states that a licensee must have in place adequate arrangements for the management of conflicts of interest that may arise wholly, or partially, in relation to activities undertaken by the licensee or a representative of the licensee in the provision of financial services as part of the financial services business of the licensee or representative. ASIC defines conflicts of interest as circumstances where any of the interests of the clients to whom ATFX Connect provides services are inconsistent with the interests of ATFX Connect and its representatives. These include actual, apparent and potential conflicts of interest.

ATFX CONNECTS' POLICY

ATFX Connect implements and maintains an effective conflicts of interest policy in order to prevent or manage conflicts of interest, or potential conflicts of interest, resulting in a risk of damage to the interests of clients.

ATFX Connect keeps an up-to-date record of all business activities (in particular, the specific kinds of investment services and activities and ancillary services, carried out by the company, or on its behalf) in which a conflict of interest has arisen or could arise entailing a risk of damage to one or more clients' interests.

ATFX Connects' conflicts of interest policy adopts procedures and measures to maintain appropriate independence between employees of the

company who are involved in different activities and to manage or prevent the conflicts of interest identified, including:

- a. Segregation of duties and responsibilities;
- b. Separate supervision of relevant persons;
- c. A Personal Account Dealing policy;
- d. A Gifts policy;
- e. Conflicted Remuneration Policy and Procedures

The Conflicted Remuneration Policy ensures that ATFX Connect does not offer remuneration packages that reward behaviour that would disadvantage the interests of clients in the company's favour or that of other clients. Employees are rewarded on a balanced scorecard basis which takes into account a broad range of metrics and personal attributes.

DISCLOSURE

Whilst ATFX Connect implements and maintains a comprehensive and robust Conflicts of Interest policy, in some cases, the organisational and administrative arrangements might not be sufficient to ensure with reasonable confidence that the risk of damage to the interests of the client will be prevented. In such a case, the company will disclose the general nature and/or sources of the conflicts to the client (or both), as well as the risks to the client that arise as a result of the conflict and the steps undertaken to mitigate these risks before carrying on a business for the client.

Any disclosure shall be in a durable medium and contain:

1. a statement that the organisational and administrative arrangements established by us to prevent or manage that conflict are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of the client will be prevented;
2. a specific description of the conflicts of interest that arise in the provision of investment services or ancillary services;
3. an explanation of the risks to the client that arise as a result of the conflicts of interest
4. sufficient information to allow the client to make an informed decision.
5. ATFX Connect treats disclosure of conflicts as a measure of last resort to be used only where the effective organisational and administrative arrangements established by us to prevent or manage conflicts of interest are not sufficient to ensure, with reasonable

confidence, that risks of damage to the interests of the client will be prevented.

COMPLIANCE AND SUPERVISION

ATFX Connects' employees are responsible for complying with this policy. Senior management is responsible for ensuring that the systems and controls in place meet the Company's obligations under the applicable regulations.

The Compliance Department is responsible for periodically, and on at least an annual basis, reviewing, and reporting to the Board of ATFX Connect in respect of the contents of this policy and whether it meets the Company's regulatory obligations and those of ATFX Connects' internal policies as well as the effectiveness of the steps taken within the framework for preventing or managing the conflicts of interest identified. The Compliance Department will take all appropriate measures to address any deficiencies.