



CONFLICTS OF INTEREST POLICY

Applicability and objectives

This Conflicts of Interest Policy (the “Policy”) sets out the control standards and procedures that should exist in Finalto EU Ltd (“Finalto EU”), under the brand Finalto Europe, in relation to client complaints management. The overall aim is to ensure compliance with the relevant legislative requirements that pertain the management and avoidance of conflicts of interest.

This Document is effective from September 2025 and shall remain effective until a more recent version is released. Finalto EU reserves the right to amend or supplement this Document at any time. This Document does not replace our Standard terms of business which we ask that you read carefully before you enter into any trading. The prevailing version of this Document is always available on our website.

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FINALTO EU LTD

148, Strovolos Avenue, 4th Floor, Strovolos, CY-2048, Nicosia, Cyprus

Phone: +357 22008376 · Email: cs@finalto.com · Web: <https://www.finalto.com/eu/>

Registered in Cyprus, No. 264/15

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1 Purpose and Introduction

1.1 Introduction

This Conflicts of Interest Policy ('the Policy') sets out how we seek to manage conflicts of interest that may arise when we undertake investment services. Treating clients fairly is central to our culture and ethos. We are committed to be acting honestly, fairly and in accordance with the clients' best interests. If any terms of this Policy are unclear to you, you should seek independent legal advice.

1.2 Company Information

Finalto EU Ltd ("Finalto EU" "we" or "us") is a regulated investment services firm, authorized in the conduct of its activities by the Cyprus Securities and Exchange Commission ("CySEC") under license number 264/15. Finalto EU is located at 148 Strovolos Avenue, 2048 Strovolos, P.O.Box 28132 Nicosia, Cyprus.

Finalto Europe is a global brand used and owned by Finalto EU.

1.3 Our Business Activities

We consider it essential that we identify and manage conflicts of interest as they relate to our investment services we carry out at any time.

Finalto EU is an investment firm and as such provides investment services to its clients. Finalto EU provides one or more of the following investment services:

- Receiving and transmitting orders;
- Execution of orders; and
- Dealing on own account.

This document sets out the Company's procedures in relation to the prevention, identification, management, reporting and ongoing monitoring of conflicts of interest. Senior management within the Company are responsible for ensuring that the systems, controls and procedures are appropriate to prevent, identify and manage conflicts of interest. The Compliance Officer assists in the prevention, identification and monitoring of actual and potential conflicts of interest.

Please note that Finalto Europe does not deal with retail clients.

2 Our Commitment for Treating Customers Fairly

Treating Customers Fairly is central to our corporate culture and ethos.

We have a duty to act honestly, fairly, professionally and in the best interests of our clients when dealing with them. Our framework for Treating Customers Fairly is premised on six key principles as follows:

- i) Clients should be confident that treating them fairly is central to our corporate culture and ethos;

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- ii) We market products and services to our clients having regard to whether they are appropriate for them, based on the targeted clients' knowledge and experience;
- iii) We provide our clients with clear, fair, not misleading and not aggressive information at all times: before, during and after their trading with us;
- iv) We do not offer clients investment advice. We communicate non-client specific market information and "colour" from sources which we reasonably believe, acting diligently, are credible;
- v) We provide high levels of client service and experience as measured by: best possible prices, speed of execution, quality of our knowledge on client enquiries. We do not promise what we cannot deliver. We are not aggressive or misleading in our dealings with clients and do not permit business or other introducers to be so either; and
- vi) We are transparent on the basis that clients deal with us, especially where clients trade with us on a principal-to-principal basis. We advise clients of conflicts and the Over-the-Counter ("OTC") and non-transferability nature of our CFD product suite.

3 Conduct

Finalto EU promotes the employees of the Group to adhere to a clear code of conduct. This, in part, deals with how Conflicts of Interest are managed internally and the processes, procedures adopted by the Group to this end. In relation to conflicts of interest, key points to note include:

- i) All employees are bound by the terms of Finalto EU Policies and have to annually declare their continuous adherence to them;
- ii) All employees should, at all times, be in full compliance with internal policies and procedures;
- iii) Employees are advised on how to identify conflicts of interest and how to escalate these to their line management and the Compliance Department;
- iv) All employees are bound by professional secrecy. Confidential information is only to be shared if essential for performing their specific duties and responsibilities;
- v) All employee trading or participation in businesses that competes with the Group must be declared and then receive approval following a review from the Compliance Department in line with the Finalto EU's Personal Account Dealing Policy;
- vi) Non-Group related executive or non-executive roles are only possible with prior permission, unless this relates to social causes
- vii) Employees are prohibited from personally trading using the knowledge gained from inside/non - public information and must complete training concerning Anti-Money Laundering ("AML") and the prevention of Financial Crime ("FC"); and
- viii) The safekeeping of confidential information for all Group employees.

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4 The Legal and Regulatory Framework under which this Policy is Issued and Implemented

This Policy is issued pursuant to, and in compliance with the requirements of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (“MiFID II”), the Law of the Republic of Cyprus No 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets which transposed MiFID II into Cyprus legislation and the Investment Services and Activities and Regulated Markets Law of the Republic of Cyprus Law No 144(I)/2007 to the extent it remains applicable after coming into force of MiFID II.

In this Policy, we collectively refer to all the above legislations, regulations and guidelines as “Regulations”.

5 Identification of Potential Conflicts of Interest and their Source and our Approach to Managing these

Conflicts of interest are unavoidable in financial institutions such as Finalto EU with a diverse range of activities, including those trading as Principal with their clients. Finalto EU seeks to manage conflicts of interest fairly at all times.

Finalto EU 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 clients. Such a conflict of interest may arise if Finalto EU or any person directly or indirectly employed, remunerated or controlled by Finalto EU and its affiliates, or a client, is likely to make a financial gain, or avoid a financial loss, at the expense of a client.

We also map out here below our approach to managing these indicative areas of conflicts of interest:

Circumstances of potential conflict of interest*	Our approach to managing these (indicative actions)
<p>When a client enters into any order to Buy or Sell a CFD on our online trading platforms, the client trades with us as the counterparty. We are the Principal to each trade that the client enters.</p> <p>This means that:</p> <ul style="list-style-type: none"> The client may only close each position he trades with us. The client’s positions are not transferable to any other regulated investment firm. This is a major 	<ul style="list-style-type: none"> We have introduced an Order Execution Policy that sets out our obligations in delivering Best Execution to our clients. Best Execution is the process by which Finalto EU seeks to obtain the best possible result when executing client orders. Generally, Best Execution is determined on the basis of the total consideration paid to or by the client, unless the objective of execution of the order dictates otherwise. Prices quoted for CFDs are based on the published prices of underlying instruments on the regulated

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<p>difference to when clients trade for example in Shares. In such cases, clients can move their holding in Shares to be traded through another investment firm – broker. In CFDs, clients can only trade/close their position with the investment firm – broker they initially opened their position with.</p> <ul style="list-style-type: none"> • If clients make profits on their trading, we lose. If the clients register losses on their trading, this means we profit. 	<p>exchanges where such instruments are regularly traded or, with respect to Foreign Exchange, based on the aggregation of prices received from global investment banks and other liquidity providers</p> <ul style="list-style-type: none"> • We regularly advise the CySEC as our home regulatory authority of the number of winning and losing clients. • We disclose our Spreads and charges on our trading platform. • Our marketing communication is developed on the basis of being fair, clear and not misleading to clients and is issued following approval by the Compliance Department.
<p>The settings of the trading platform may be at non-symmetrical parameters. A key area relates to trading slippage. Slippage refers to the difference a client expects to pay for a trade and the actual price at which the trade is executed. Slippage occurs because there is a slight time delay between the client entering the trade and the time the broker receives the order. During this time delay, the price may have changed. Slippage can be much higher in fast-moving, volatile markets. It can either work in favor of or against the client. Conflicts may arise if the application of slippage parameters is not symmetrical. That is the broker enables a higher negative slippage for the client whilst limiting the client’s potential profit in positive slippage.</p>	<ul style="list-style-type: none"> • All trading platform parameters are symmetrical. • There is also full disclosure of the risk of negative slippage as well as positive slippage in the Order Execution Policy and in our Standard Terms of Business. • We have monitoring procedures in place in order to ensure that the slippage parameters are indeed symmetrical.
<p>Finalto EU , its employees, 3rd parties acting on behalf of or on the basis of specific agreements with Finalto EU (such as introducers, websites and social media) may have an interest in maximizing trading volumes in order to increase dealing revenues or their variable remuneration pay. This may be inconsistent with the need for client’s to trade prudently or for minimizing clients’ transaction costs. Finalto EU employees may also receive bonuses or other forms of variable pay that links to the trading performance of clients.</p>	<ul style="list-style-type: none"> • Employees who receive any form of variable pay (including performance related pay) may be subject to vesting periods with malus and claw back provisions. • Incidents of conflicts of interest or any other compliance breach can lead to the suspension of unvested rights and / or claw back of any awards and / or termination of employment. • Awards are structured so as to have regard to long term client satisfaction as opposed to short term Company gains, recognizing that our long-term success is premised on maintaining satisfied clients over the long term. • We do not engage with third party introducers which operate call centers. • Partners, including affiliates, intermediary service providers and business introducers, may receive volume-based remuneration. We limit the types of remuneration which can be received to types which do not generate any additional conflict of interest, thus minimizing any additional conflict which may negatively impair a client. For example,

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	<p>profit sharing arrangements are prohibited in relation to clients' activity.</p> <ul style="list-style-type: none"> • Any fees paid to a third party are part of the fees already charged by a client therefore, a client will not incur any further costs due to such remuneration arrangements. • Any payment to a third party is reviewed and approved by a member of the Finance Department, while a dedicated member of the Compliance Department monitors on an on-going basis the remuneration arrangements with third parties. • Any websites, affiliates or other online introducers do not have any role in our assessment of the clients' knowledge and experience for onboarding purposes, such decision to onboard being at the entire discretion of Finalto EU . • Local registrations with regulatory authorities have to be adhered to by affiliates where appropriate.
<p>Where investment research or market information is provided this does not take account of the circumstances and investment objectives of individual clients. Finalto EU, or legal and natural persons affiliated with it, may have a position or trade in financial instruments that may be covered by such investment research.</p>	<ul style="list-style-type: none"> • We do not offer any form of investment advice and our disclaimers make this fact explicitly clear. • Market research is performed on behalf of Finalto EU by third parties who are segregated from our Dealing, Sales and Retention employees. • We remunerate such third parties on the basis of fixed fee arrangements which are not related to the trading generated from our clients. • Other than being a Principal to clients' trading or hedging for the market risk emanating for this trading, neither Finalto EU or its holding company or affiliates trade in any form of financial instrument for the purpose of short term financial gains.
<p>Employees or business associates may have a personal holding in a security of a company and where such employees or business associates are involved in executing clients' orders, and – in breach of internal policy – encourage or push the client to trade in such a security.</p>	<ul style="list-style-type: none"> • We monitor client communications to ensure that our staff do not engage in any form of investment advice. • All employees are bound by our Personal Account Dealing Policy as in force and effect from time to time. • Other indicative points as set out in the Conduct section outlined above.
<p>The company may act as a manufacturer and/or distributor of its products, defining its target market, and therefore has an interest in maximizing its trading volumes by selling its products and services to a large variety of persons. Such incentive may be conflicting with the company's obligation to assess the appropriateness of each prospective client. Such appropriateness assessment will determine whether a</p>	<ul style="list-style-type: none"> • The scoring methodology for the assessment of appropriateness was conducted following consultation meetings with all stakeholders within the Company under the direction of the Compliance Department so as for us to be in a position to reasonably determine whether complex Financial Instruments such as the CFDs are appropriate for the client to invest in.

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<p>client is appropriate to use the company's services and is conducted at the onboarding stage.</p>	<ul style="list-style-type: none"> • Checks are performed on an on-going basis to ensure the system reflects the correct scoring and applies all rules set by Finalto EU . • The Compliance Department performs sample reviews for each of Finalto EU's Appropriateness categories (Experienced, Less Experienced, Inexperienced) to evaluate whether the client's categorization following the appropriateness scoring is in line with the latest scoring rules of Finalto EU . • The assessment is performed in an automated way, thus Finalto EU and its employees are not able to manually interfere in the process. • On an ongoing basis and at least annually the Company performs an analysis and review of its appropriateness assessment and scoring methodology to determine its adequacy.
<p>A potential conflict of interest that may impact the client is how Finalto EU onboards new clients. It is in Finalto EU's commercial interest to increase the client base, which drives revenue and growth and the number of clients onboarded is a key metric for how Finalto EU measure performance. However, onboarding a client may not always be in the client's best interest.</p> <p>Furthermore, Finalto EU is an order-execution only dealer which means that the Company does not provide a suitability review of any trades requested by the clients, while the products offered are complex and high risk, and may not be appropriate for everyone.</p>	<ul style="list-style-type: none"> • As part of the account application, applicants provide various background information that allows the Company to assess their appropriateness to maintain an account both in terms of understanding the associated risks and ability to financially withstand the risks. • The appropriateness assessment is dictated by the Compliance department, the assessment is performed automatically by the system and not manually by Firm employees to ensure it is performed in accordance with the system methodology and remove any element of manual interference. • The Firm further includes, under the guidance of the Compliance department, checks around the Firm's target market rejecting any customers found not to have the profile or risk appetite to trade in CFDs/Spread bets. • The Company clearly informs clients of the risks associated with the Company's products, to ensure that the client understands the risks. This is accomplished through the use of prominent risk warning disclaimers and disclosures across the website and promotional materials. • If the client would like to receive advice in respect of the suitability of that trade to his personal circumstances, then the client should deal with a full-service investment advisor that offers a suitability review of each trade.
<p>The way in which Finalto EU remunerates or offers financial incentives to the employees could conflict with their duty to act in the best interests of clients. For example, employees in the dealing department may be incentivised to not act in the best interest of the clients when executing their trades and setting execution parameters to maximise their remuneration.</p>	<ul style="list-style-type: none"> • No employees of the dealing department receive any form of commissions and there is no formula to calculate any annual discretionary bonus to firm profitability. Same for any third parties referring customers to the Firm, receive one off fixed payment for the referral to remove any incentivisation to act in a misleading or inappropriate way such as offering investment advice.

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	<ul style="list-style-type: none"> All client communication is recorded and monitored to ensure that interactions are fair, clear and not misleading. Particularly, monitoring is in place to ensure to inappropriate or unauthorised contact and that no unauthorised investment advice or misleading information were provided. Furthermore, disclosures are published on the website, and all staff are bound by our Code of Conduct.
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**Note that the above are only indicative areas of potential conflicts of interest.*

Conflicts of Interest Scenario examples:

- i. Scenario: The Company or Relevant Person receives substantial gifts or entertainment from third parties (including non-monetary inducements) that may influence behaviour in a way that conflicts with the interests of the Clients of the business.

Control in place: A register of gifts and entertainment provided by clients will be kept. Training will be given to ensure employees are not influenced by such gifts and entertainment.

- ii. Scenario: The Company may introduce clients known to its employees, which may influence employees' behaviour in such a way that may conflict with the interests of other Clients of the business.

Control in place: Employees will be required to notify their line manager and Compliance Department of any connection with a client.

- iii. Scenario: The Company or Relevant Person may know someone or have an account with one of the Company's liquidity provider, which may influence behaviour in a way that conflicts with the interests of the Company's clients.

Control in place: Employees will be required to notify their line manager and Compliance Department of any connection with a liquidity provider.

- iv. Scenario: The Relevant Person may confirm legitimacy of documents during the Onboarding process in an attempt to expedite the Onboarding process.

- v. Scenario: Finance employee creates an expense claim for himself or anyone else, or increases an amount on an approved expense claim when the payment is set up.

Control in place: All payments have to go through a two-step review and two-step bank approval, i.e. two finance employees will have to log into the bank, one to set up the payment and another person to approve the payment. In addition, an employee never sets up his own expense claim.

- vi. Scenario: A Finance employee pays a withdrawal out to a bank account not owned by the client.

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Control in place: All payments have to go through a two-step review and bank approval. Finance will set up payment for withdrawals and Operations will review the payments and the transfer out of the trading account and approve the payment in the bank.

- vii. Scenario: A Finance employee creates an invoice and pays out.

Control in place by Finance: All Invoices have to be approved by the relevant head of the department. All payments have to go through a two-step review and bank approval i.e. two finance employees will have to log into the bank, one to set up the payment and another person to approve the payment.

6 Disclosure of Conflicts of Interest

In the case where the measures put in place are not sufficient to avoid or manage a conflict of interest relating to a client, Finalto EU will disclose the conflict of interest before undertaking further business with the client.

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