

International Finance Asia

# Conflicts of Interest Policy

## 1. Introduction

International Finance Asia Ltd. (hereinafter referred to as "the Company") is a Labuan securities firm that operates as a global forex prime broker, incorporated (Certificate of Incorporation No. LL 14391) in Labuan through the Department of Registrar of Companies and Official Receiver.

The Company is authorized and regulated by the Labuan Financial Service Authority (License No. SL/18/0009) and operates under Section 54, to carry business as a securities licensee.

## 2. Scope of the Policy

The purpose of this summary document is to set out the Company's approach to identifying and managing conflicts of interest which may arise during the course of its business activities. 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.

The aim of our Policy is to identify and prevent conflicts of interest which may arise between the Company and its clients or between one client and another. Accordingly, we have adopted a conflicts of interest policy setting out the procedures, practices, and controls in place to achieve this.

### 3. Identification of Conflicts of Interest

For the purposes of identifying the types of conflict of interest that may arise in the course of providing investment and non-core services or a combination thereof and whose existence may damage the interests of a client, the Company takes into account, by way of minimum criteria, the question of whether the Company or a Related Person is in any of the following situations, whether as a result of providing investment or non-core services or investment activities or otherwise:

- a. The Company or any Related Person is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- b. The Company or any 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;
- c. The Company or any Related Person has a financial or other incentive to favor the interest of another client or group of clients over the interests of the client;
- d. The Company or any Related Person carries on the same business as the client;
- e. The Company or any Related Person receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service.

## 4. Managing Conflict of Interest

The Company has set up internal policies and employs an employees' Compliance Officer that is responsible for identifying and managing potential conflicts of interests, maintaining, and operating effective organizational and administrative procedures to manage the identified conflicts of interest. The Company also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate. The procedures followed and measures adopted in the Policy include such of the following as are necessary and appropriate for the Company to ensure the requisite degree of independence:

- a. effective procedures to prevent or control the exchange of information between Related Persons engaged in activities involving a risk of a conflict of interest where the exchange of that information may harm the interests of one or more clients;
- b. the separate supervision of Related Persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Company;
- c. the removal of any direct link between the remuneration of Related Persons principally engaged in one activity and the remuneration of, or revenues generated by, different Related Persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities;
- d. measures to prevent or limit any person from exercising inappropriate influence over the way in which a Related Person carries out investment or ancillary services or activities;
- e. Measures to prevent or control the simultaneous or sequential involvement of a Related Person in separate investment or ancillary services or activities where such involvement may impair the proper management of conflicts of interest.

Some of these policies and procedures established to prevent Conflicts of Interests are shown below:

- a. Procedures governing access to electronic data and security user procedure;
- b. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual;
- c. A policy designed to limit the conflict of interest arising from the giving and receiving of inducements;
- d. Appointment of Internal auditor to ensure that appropriate systems and controls are maintained and report to the Company's Board of Directors;
- e. Establishment of the "Four-Eyes" principle in supervising the Company's activities.

## 5. Disclosure

Where a conflict arises, the Company, if it is aware of it, will disclose the conflict to a client prior to undertaking investment business for that client or, if it does not believe that disclosure is appropriate to manage the conflict, the Company may choose not to proceed with the transaction or matter giving rise to the conflict. The Company reserves the right to review and/or amend its Policy and arrangements whenever it deems this appropriate. Further information about this summary document is available upon request.

## 6. FAQs and Contact

Questions regarding this Procedure should be addressed, in the first instance, to the Customer Service Department, and clients can contact the Customer Support Department: [contact@internationalfinanceasia.com](mailto:contact@internationalfinanceasia.com)