

Summary of conflicts of interest policy

1. Introduction

This summarized Conflicts of Interest Policy (“the Policy”) is provided to you (our Client or prospective Client) pursuant to which **KEY WAY MARKETS LTD** (“the Company”) operating trade name “ae.capex.com”, is required to take all reasonable steps to detect and avoid conflicts of interest.

The Company is committed to act honestly, fairly and professionally and in the best interests of its Clients and to comply, in particular, with the principles set out in the legislation.

In accordance with the FSRA General Rules requirements, whereby the Company has knowledge of a conflict or a material interest between the Company, its Employees and Clients (or any person directly or indirectly linked to them by control; or one Client of the Company and another Client it shall manage that interest by keeping and regularly updating a record of its occurrence and maintaining and operating effective organizational and administrative arrangements to prevent conflicts of interest from constituting or giving rise to a material risk of damage to the interest of a Client. This includes procedures to maintain appropriate independence between members of their staff who are involved in different activities, for example, through the operation of information barriers, physical separation of staff, the segregation of duties and responsibilities and maintenance of a policy of independence which requires their staff, when providing services to a client, to act in the best interests of the client and to disregard any conflicts of interest; and, in some circumstances declining to act for a client or potential client If the Company is unable to ensure fair treatment for a Client, it shall decline to act for that Client. Where the Company has a material interest in a transaction to be entered into with or for a Client or a relationship which may give rise to a conflict of interest in relation to such transaction, it shall not knowingly either advise, or deal, in relation to that transaction unless it takes reasonable steps to ensure fair treatment for the Client.

2. Scope

Fair Treatment: The purpose of this document is to set out the Company’s approach in identifying and managing conflicts of interest which may arise during the course of its normal

business activities. In addition, this document identifies circumstances which may give rise to a conflict of interest.

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. Identification of Conflicts of Interest

When the Company deals/transacts with the Client, the Company (or an associate or some other person connected with the Company) may have an interest, relationship or arrangement that is material in relation to the Transaction concerned or that it conflicts with the Client’s interest.

While it is not feasible to define precisely, or create an exhaustive list of, all relevant conflicts of interest that may arise, as per the current nature, scale and complexity of the Company’s business, the following list includes circumstances which constitute or may give rise to a conflict of interest entailing a material risk of damage to the interests of one or more Clients, as a result of providing investment services:

- a. 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;
- b. 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;
- c. the Company is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- d. the Company’s bonus scheme may award its employees based on the trading volume.;
- e. the Company may receive or pay inducements to or from third parties due to the referral of new Clients or Clients' trading;
- f. Any market information, training and discussions as regards possible market trends should not be construed as trading/investment advice. It is the client responsibility to perform its own market research before entering into any position.

4. Procedures and Controls for Managing Conflicts of Interests

Managing Conflict: The Company shall maintain and operate effective organizational and administrative arrangements with a view to taking all reasonable steps to prevent conflicts of interest from constituting or giving rise to a material risk of damage to the interests of its

Clients, including establishing and maintaining effective information barriers to restrict the communication of relevant information.

In general, the procedures and controls that the Company follows to manage the identified conflicts of interest include the following measures (the list is not exhaustive):

- a. The Company undertakes ongoing monitoring of business activities to ensure internal controls are appropriate.
- b. The Company undertakes 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.
- c. 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.
- d. Measures to prevent or control the simultaneous or sequential involvement of a Related Person in separate investment services where such involvement may impair the proper management of conflicts of interest.
- e. The Company shall have systems and controls including policies and procedures to ensure that neither it, nor an Employee or Associate of it, offers, gives, solicits or accepts inducements such as commissions or other direct or indirect benefits where such inducements are reasonably likely to conflict with any duty that it owes to its Clients. In circumstances where the Company believes on reasonable grounds that the Client's interests are better served by a Person to whom the referral is to be made, any commission or other benefit which the Company or any of its Employees or Associates receives in respect of such a referral would not be a prohibited inducement under the FSRA Rule.
- f. Procedures governing access to electronic data.
- g. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual.
- h. Establishment of in-house Compliance Department to monitor and report on the above to the Company's Board of Directors.
- i. Prohibition on officers and employees of the Company having external business interests conflicting with the interests of the Company without the prior approval of the Company's board of directors.

The Company may provide the information in relation to any commission or other direct or indirect benefit which it, or any Associate or Employee of it, has received or may or will receive, in connection with or as a result of the Company making the recommendation or executing the Transaction. The Company may provide this information to the Client upon request and to the extent allowed by relevant regulations.

5. Client's Consent

By entering into a Client Agreement with the Company for the provision of Investment Services, the Client is consenting to an application of this Policy on him. Further, the Client consents to, and authorizes the Company to, deal with the Client in any manner which the Company considers appropriate, notwithstanding any conflict of interest or the existence of any material interest in a Transaction, without prior reference to the Client.

In the event that the Company is unable to deal with a conflict of interest situation it shall disclose to the Client.

6. Record of Conflict

The Company shall keep for at least six years and regularly update a record of the kinds of service or activity carried out by or on behalf of the Company in which a conflict of interest entailing a material risk of damage to the interests of one or more Clients has arisen or, in the case of an ongoing service or activity, may arise.

7. Disclosure of Information

If during the course of a business relationship with a Client or a group of Clients, the organizational or administrative arrangements/measures in place are not sufficient to avoid or manage a conflict of interest relating to that Client or group of Clients, the Company will disclose the conflict of interest before undertaking further business with the Client or a group of Clients.

The disclosure must:

1. be made in a durable medium; and
2. include sufficient detail, taking into account the nature of the Client, to enable that Client to take an informed decision with respect to the service in the context of which the conflict of interest arises.

8. Attribution of Knowledge:

When a FSRA Rule applies to the Company that acts with knowledge, the Company will not be taken to act with knowledge for the purposes of that FSRA Rule as long as none of the relevant

individuals involved for on behalf of the Company acts with that knowledge as a result of an information barrier arrangement.

9. Amendment of the Policy and Additional Information

The Company reserves the right to review and/or amend its Policy and arrangements whenever it deems this appropriate according to the terms of the Client Agreement between the Company and the Client.

Should you require any further information and/or have any questions about conflicts of interest please direct your request and/or questions to support@ae.capex.com