



CONFLICTS OF INTEREST POLICY

November 2025

1. Introduction

In2Markets Ltd. (hereinafter referred to as the “Company”) is a Cyprus Investment Firm (“CIF”), incorporated under registration number HE 333743 and authorized by the Cyprus Securities and Exchange Commission (“CySEC”) under license number 263/14.

This Conflicts of Interest Policy (hereinafter the “Policy”) has been established in accordance with the requirements of the Markets in Financial Instruments Directive (MiFID II), Law 87(I)/2017, and relevant CySEC Directives. Its purpose is to set out the principles, procedures, and measures implemented by the Company to identify, prevent, manage, and, where necessary, disclose conflicts of interest that may arise during the provision of investment and ancillary services to its Clients.

The Company is committed to taking all reasonable steps to identify and manage conflicts of interest that may occur:

- between the Company (including its managers, employees, tied agents, and any other relevant persons or entities directly or indirectly linked by control) and a Client;
- between two or more Clients of the Company in the course of providing services.

The Company ensures that it conducts its business honestly, fairly, and professionally, and always acts in the best interests of its Clients.

The present Policy provides a summary of the procedures and controls adopted by the Company to detect, prevent, and manage conflicts of interest, and to ensure the integrity and transparency of its business conduct.

In accordance with regulatory requirements, where the arrangements implemented by the Company are not sufficient to ensure, with reasonable confidence, that the risk of damage to Client interests will be prevented, the Company shall clearly disclose to the affected Client:

- the general nature and sources of the conflict;
- the potential risks involved; and
- the steps taken to mitigate such risks;

prior to undertaking business on the Client’s behalf. Such disclosure shall be made in a durable medium.

2. Definition of a Conflict of Interest

A conflict of interest arises when there is a situation in which the Company’s ability to act in the best interests of its Clients is compromised or potentially compromised due to competing interests – either between the Company and a Client, or between different Clients.

A conflict of interest may exist where:

- The Company or an employee has an incentive to place their own interests (financial or otherwise) ahead of those of a Client;
- The Company provides different services to different Clients whose interests may conflict;
- There is a risk that confidential information held by the Company could be misused or improperly disclosed;
- Any situation arises in which the impartiality or objectivity of the Company, its employees, or tied agents may be impaired.

The core principle is that the interests of the Client shall always take precedence over the interests of the Company and/or its personnel. A conflict may exist — or be reasonably perceived to exist — if an activity or decision of a relevant person appears to compromise the fair treatment of a client or the integrity of the service provided.

This Policy applies to all relevant personnel, including but not limited to:

- Directors and Senior Management;
- Employees, regardless of position or seniority;
- Tied Agents and their employees;
- Any third-party service providers or persons performing outsourced functions, whose activities may directly or indirectly impact the interests of the Company's actual or potential Clients.

The Company requires all such persons to identify, prevent, or mitigate conflicts of interest in accordance with this Policy and to escalate any concerns in a timely manner to the Compliance Function.

3. Objectives of the Policy

The objective of this Policy is to ensure that the Company's Clients are treated fairly, with the highest level of integrity, and that their interests are consistently protected. Specifically, the Policy is designed to:

- Identify and manage actual or potential conflicts of interest that may arise in the course of providing investment and/or ancillary services;
- Prevent such conflicts from adversely affecting the interests of Clients;

- Establish clear standards for the conduct of relevant persons in line with the Company's regulatory obligations and ethical standards.

The Policy seeks to identify conflicts of interest that may arise:

- (a) Between the Company and a Client;
- (b) Between a relevant person and a Client;
- (c) Between a Group entity and a Client;
- (d) Between two or more Clients of the Company in the course of providing services to them.

This Policy applies to all Relevant Persons, defined in accordance with Article 4(1)(35) of MiFID II and as follows:

- A member of the Board of Directors, partner (or equivalent), manager, or tied agent of the Company;
- A member of the Board of Directors, partner (or equivalent), or manager of any tied agent of the Company;
- Any employee of the Company or its tied agents, or any other natural person whose services are placed at the disposal of and under the control of the Company or its tied agents, and who is directly involved in the provision of investment services or the performance of investment activities;
- Any natural person who is directly involved in the provision of services to the Company or its tied agents under an outsourcing arrangement, for the purpose of supporting the provision of investment services or the performance of investment activities by the Company.

4. Identification of Conflicts of Interest

In the ordinary course of its business, the Company – including its employees, directors, associates, tied agents, or other relevant persons – may encounter situations in which a personal, financial, or professional interest interferes, or appears to interfere, with the interests of a Client. Such situations may result in actual or potential conflicts of interest.

To determine whether a conflict of interest exists or may arise, the Company considers whether:

- (a) The Company or a relevant person is likely to gain financially or avoid a financial loss at the expense of a Client;
- (b) The Company or a relevant person has an interest in the outcome of a service provided to a Client, which is distinct from the Client's own interest;
- (c) The Company or a relevant person has a financial or other incentive to favour the interests of one Client (or group of Clients) over those of another;
- (d) The Company or a relevant person conducts the same business as a Client;
- (e) The Company or a relevant person receives or may receive an inducement (e.g., gifts, benefits, services) from a third party in connection with a service provided to the Client, other than a standard commission or fee.

4.1 Parties Affected by Conflicts of Interest

Conflicts of interest may arise between:

- The Client and the Company;
- Two or more Clients of the Company;
- The Company and its employees;

- A Client and an employee or manager of the Company;
- Different departments or business units within the Company.

4.2 Common Examples of Conflicts of Interest

While it is not possible to identify all potential conflicts exhaustively, based on the nature, scale, and complexity of the Company's operations, typical scenarios may include:

- The Company may gain or avoid a loss by executing – or not executing – a Client's order;
- The timing or market direction of a trade may create a conflict between the Company's interest and the Client's order;
- The Company acts as Principal to a Client's transaction. In such cases, appropriate controls (e.g., segregation of duties, order execution arrangements, monitoring) are in place to mitigate the risk of harm to the Client;
- The Company may, at its discretion, match one Client's order with another, thereby acting on behalf of both Clients simultaneously;
- A conflict between the Company's commercial interest in maximizing trading volume and commission income and a Client's objective to minimize transaction costs;
- The receipt or payment of inducements from/to third parties for the referral of Clients or based on their trading activity (if applicable);
- The misuse or disclosure of confidential information obtained through different departments (e.g., Reception &

Transmission, Execution, Dealing on Own Account, Investment Advice, Portfolio Management);

- The use of affiliated partners to execute Client transactions on an ad hoc basis;
- Orders generated by the Portfolio Management Department may be executed through the Dealing on Own Account Department, creating a potential internal conflict.

In all such instances, the Company adopts remedial measures and continuously reviews its internal controls to mitigate and, where possible, eliminate conflicts of interest. If a new material conflict arises, the Company will assess its impact and inform affected Clients accordingly in a clear and durable medium, in line with its regulatory obligations.

5. Procedures for Managing Conflicts of Interest

5.1 General Provisions

The Company is committed to managing conflicts of interest in a fair and transparent manner. It ensures that conflicts are identified, evaluated, and addressed in accordance with applicable legal and regulatory requirements. The Company is further required to organize and control its internal affairs responsibly and effectively, safeguarding the interests of its Clients and ensuring the integrity of its services.

To mitigate such risks, the Company has adopted a set of internal procedures designed to detect, prevent, and manage conflicts of interest.

5.2 Preventive Measures and Internal Controls

The following organizational and administrative arrangements are in place:

- There is a clear operational segregation between departments, as set out in internal regulations and job descriptions. This ensures that no single individual can access or control conflicting information or functions, thereby minimizing the risk of data manipulation or concealment;
- The Company maintains effective order execution procedures to ensure the best possible result for Client orders. Further details can be found in the Company's Order Execution Policy, available on its official website www.In2Markets.com;
- Personnel may be substituted only with the prior approval of the Compliance Officer and the Executive Director, provided that a conflict of interest assessment has first been carried out;
- The Company's IT systems implement robust security measures to restrict unauthorized access to sensitive or confidential information that could otherwise give rise to unfair advantage for the Company or certain Clients;
- Employees are prohibited from investing in securities for which they possess non-public or confidential information;
- Personal transactions by employees must be executed by another authorized employee and not by the employee concerned, in accordance with the personal account dealing rules;
- No relevant person shall deal in a financial instrument or recommend such dealing while in possession of inside information;
- Relevant persons must refrain from trading on behalf of Clients or Company accounts if in possession of proprietary or inside

information, particularly in connection with block transactions or pre-arranged trades;

- Staff engaged in investment research must not discuss unpublished reports, views, or recommendations with any person (internal or external) unless there is a valid business need, and only in accordance with the Chinese Wall principle;
- Employees must obtain written authorization from the Company to maintain accounts at other investment firms. The Company reserves the right to request transaction statements from such firms;
- All personal transactions must be promptly disclosed to the Company and are subject to compliance oversight;
- All employees are required to sign and adhere to a Confidentiality Agreement to prevent the unauthorized use or dissemination of non-public information;
- Financial analysts and other relevant persons must not engage in personal trading other than in their capacity as market makers, acting in good faith and in the ordinary course of business;
- Physical separation (Chinese Walls) exists between employees producing investment research and other business units whose interests may conflict with the interests of Clients receiving such research;
- Inducements, including gifts or services, are not accepted by financial analysts or relevant persons involved in research or advisory activities.

5.3 Monitoring, Reporting, and Escalation

The Company ensures ongoing monitoring and review of the effectiveness of its internal procedures and controls for managing conflicts of interest. The Compliance Function is responsible for:

- Keeping records of identified and managed conflicts;
- Reviewing personal transactions, inducements, and replacement approvals;
- Monitoring adherence to segregation of functions and Chinese Walls;
- Reporting any material or repeated conflicts to Senior Management and, where necessary, the Board of Directors.

Employees and other relevant persons must report any actual or suspected conflict of interest to the Compliance Officer immediately upon identification. All reports are handled confidentially and without prejudice to the reporting person.

5.4 Training and Awareness

The Company provides regular training and awareness sessions to all relevant persons, including employees and tied agents, to ensure understanding of:

- The definition and types of conflicts of interest;
- Their obligations under this Policy;
- Procedures for escalation and reporting;
- Regulatory developments and changes to internal controls.

Training is conducted at onboarding and on a periodic basis, and its completion is documented.

5.5 Ensuring Fair Treatment of Clients

The Company is committed to treating all Clients fairly, honestly, and professionally, in accordance with its obligations under MiFID II and Law 87(I)/2017. To uphold this principle, the Company has established the following safeguards:

- Notification procedures for all employees and relevant persons concerning activities that may give rise to a conflict of interest;
- A formal procedure for disclosure of conflicts of interest to Clients, in a durable and transparent format;
- A strict policy of placing Client interests first in all business decisions and operations;
- Implementation of Chinese Walls to prevent the unauthorized flow of confidential or inside information between departments;
- Segregation of Company and Client assets, where applicable, to avoid any risk of misuse or co-mingling;
- Regular monitoring of Best Execution standards to ensure that all Client orders are executed in the Clients' best interests;
- Communication of personal transaction restrictions to all relevant persons, as well as training and notification procedures regarding such restrictions.

The Compliance Officer / AML Compliance Officer is responsible for ensuring that all relevant persons are adequately informed of these obligations and that the procedures are followed in practice.

The Compliance Department is further tasked with identifying and managing conflicts of interest, reporting directly to the Board of Directors and Senior Management, and ensuring that all relevant internal procedures are kept up to date and effectively implemented.

5.6 Notification Procedures for Employees

All executives, employees, and relevant persons of the Company are required to disclose the following information to the Compliance Officer / AML Compliance Officer, in accordance with internal policies and regulatory requirements:

- The opening or closing of personal investment accounts at any other investment firm;
- All personal transactions, which must be notified within 24 hours of execution;
- Any material participation in the share capital of a company in which the Company also holds shares;
- Any financial instruments held by the employee;
- Any relevant information regarding affiliated persons (e.g., spouse, close relatives) that may give rise to a conflict of interest;
- Any transactions executed by the Company in which the employee has a direct or indirect interest, or where a conflict may exist.

The Compliance Officer maintains a record of all personal transactions notified or otherwise identified, including any authorizations or prohibitions issued in connection with such transactions.

6. Client Disclosure of Conflicts of Interest (Article 23(2) MiFID II)

The Company recognizes that disclosure of a conflict of interest to a Client, in accordance with Article 23(2) of Directive 2014/65/EU (MiFID II), shall be treated as a measure of last resort. Such disclosure shall only be made where the organisational and

administrative arrangements implemented by the Company to prevent or manage conflicts of interest are not sufficient to ensure, with reasonable confidence, that the risk of damage to the Client's interests will be prevented.

6.1 Content and Requirements of Disclosure

Any such disclosure shall:

- Clearly state that the measures in place have been assessed as insufficient to ensure, with reasonable confidence, that Client interests will not be adversely affected;
- Contain a specific and detailed description of the conflict of interest that has arisen in the context of the investment and/or ancillary service;
- Provide an explanation of the general nature and sources of the conflict of interest;
- Outline the risks posed to the Client as a result of the conflict;
- Describe the steps taken by the Company to mitigate such risks.

This information must be presented in a manner that is clear, fair, and not misleading, and must be sufficient to enable the Client to make an informed decision regarding the investment or ancillary service in question.

6.2 Format and Medium of Disclosure

Disclosure must be made in a durable medium, prior to the provision of the relevant investment or ancillary service. This may include electronic communication, subject to the following conditions:

- The medium used must be appropriate to the business context between the Company and the Client;
- The Client must be offered a choice between paper and the other durable medium and must have expressly consented to receive the information in the latter;
- The use of electronic communication (e.g., email) is considered appropriate if the Client has provided an email address, which shall be treated as sufficient evidence that the Client has regular access to the internet.

6.3 Ensuring Informed Consent

In all cases where disclosure of a conflict is made, the Company shall take all reasonable steps to ensure that the Client genuinely wishes to proceed with the transaction, fully understanding the nature and implications of the disclosed conflict.

The Company and its employees are obligated to disclose any material interest or conflict that may exist. Such disclosure may be general or transaction-specific, but must always be provided prior to the provision of the service and in sufficient detail, taking into account the nature and categorization of the Client (Retail or Professional).

7. Placing Client's Interests First

In accordance with the core principles of MiFID II and the Company's ethical and regulatory obligations, all employees and relevant persons shall act in a manner that prioritizes the interests of Clients over their own interests or those of the Company. To this end, the Company adheres to the following principle: "Clients' interests must always take precedence over the interests of the Company, its management, employees, or any associated

persons.” This principle applies to all professional activities performed in the context of the provision of investment and ancillary services on the financial markets.

Employees are strictly prohibited from engaging in any conduct or business practice that could:

- Place their personal interests above those of a Client;
- Result in the Company benefitting at the expense of the Client;
- Undermine the trust and integrity of the relationship between the Company and its Clients.

All business decisions, communications, and actions taken on behalf of Clients must be guided by the objective of serving the Clients’ best interests, in accordance with applicable laws, internal policies, and the Company’s fiduciary responsibilities.

8. Segregation of Company’s Assets from Clients’ Assets

The Company maintains strict segregation between its own assets and those of its Clients in accordance with Section 17(8)–(9) of Law 87(I)/2017 and the applicable provisions of MiFID II and CySEC directives. This segregation is designed to safeguard Client assets and prevent their unauthorized use by the Company or third parties.

The Company has established the following arrangements:

- Separate accounting records and books are maintained for each Client to ensure the proper identification and allocation of Client funds and financial instruments;
- The Company ensures that Client assets are legally and operationally segregated from

its own assets, in a manner that protects Clients’ rights in the event of the Company’s insolvency;

- These measures are intended to minimize the risk of loss, misuse, or diminution of Client assets due to fraud, poor administration, inadequate record-keeping, operational errors, or negligence;
- Appropriate internal controls and regular reconciliations are in place to ensure the ongoing accuracy and integrity of records.

In the event that, due to the application of national laws (including those relating to property or insolvency), the above arrangements are not sufficient to meet the safeguarding obligations set out in the Law, the Company shall adopt additional measures as may be required by CySEC to ensure full compliance with regulatory standards.

9. Use of Client Financial Instruments

The Company is committed to the highest standards of client asset protection and adheres to the legal and regulatory restrictions regarding the use of financial instruments held on behalf of Clients.

9.1 Prohibition and Conditions for Use

The Company shall not enter into securities financing transactions (such as securities lending or repurchase agreements) or otherwise use financial instruments held on behalf of a Client for its own account or for the account of another Client, unless all of the following conditions are met:

- The Client has provided prior express consent to such use, on specific and predefined terms;
- In the case of Retail Clients, such consent must be evidenced by a signature or

equivalent legally valid alternative mechanism;

- The use of the Client's financial instruments must be strictly limited to the terms to which the Client has consented.

9.2 Omnibus Accounts Held with Third Parties

In situations where Client financial instruments are held in omnibus accounts maintained by third parties, the Company shall not use those instruments for its own account or that of another Client unless, in addition to the above:

- Each Client whose instruments are held in the omnibus account has given prior express consent (evidenced by signature or equivalent mechanism); or
- The Company has implemented robust systems and internal controls to ensure that only the instruments of Clients who have provided such consent are used.

9.3 Record-Keeping Obligations

The Company maintains detailed records that include:

- The identity of the Client on whose instructions the use of financial instruments has been carried out;
- The exact number of financial instruments used per Client who has granted prior consent;
- All relevant information necessary to allocate any potential loss to the appropriate Client, in a fair and transparent manner.

These measures are designed to ensure full compliance with the Company's fiduciary obligations, support proper audit trails, and protect

Client interests in all market and operational conditions

10. Forbidden Business Practices

To ensure full compliance with its regulatory obligations and to maintain the highest standards of integrity and transparency, the Company prohibits all business practices that may give rise to actual or potential conflicts of interest, or that may compromise the fair treatment of Clients.

The following practices are strictly forbidden:

- **Manipulative Service Provision:** Providing investment or ancillary services to Clients with the intent of influencing the price of financial instruments for the benefit of the Company, any relevant person, or other Clients, particularly in relation to transactions that the Company or a relevant person intends to carry out before or after the provision of the service;
- **Misuse of Client Information:** Using information relating to Client transactions for the benefit of the Company or its relevant persons, or disclosing such information to third parties without authorization;
- **Insider Dealing on Research:** Trading by the Company or relevant persons in financial instruments that are the subject of investment research or analysis conducted by the Company prior to the publication of such materials;
- **Preferential Treatment:** Providing preferential treatment to relevant persons at the expense of Clients, or otherwise acting in a way that compromises fair, transparent, and unbiased service delivery;

- Biased Research Practices: Promising favorable investment research coverage to any issuer in exchange for compensation or influence, or allowing any undue influence over the content or timing of investment research reports;
- Personal Trading on Confidential Information: Executing transactions for personal accounts or accounts of related persons based on confidential or inside information obtained during the course of employment or association with the Company;
- Gifts and Inducements: Accepting gifts, hospitality, or inducements from any party with a material interest in a transaction or Client relationship, where such acceptance may create — or appear to create — a conflict of interest.

The Company maintains and enforces internal policies and procedures to ensure that employees and their connected persons do not offer or accept any form of benefit that may compromise their impartiality or give rise to perceived or actual conflicts of interest.

All employees are required to:

- Be fully aware of the above prohibited practices;
- Refrain from engaging in any such activities;
- Promptly report any suspected or actual violations to the Compliance Officer.

Failure to comply with these provisions may result in disciplinary action, up to and including termination of employment, and may expose the individual and the Company to regulatory sanctions.

11. Record of Services or Activities Giving Rise to Conflicts of Interest

In accordance with its regulatory obligations, the Company maintains a Conflicts of Interest Register, which is kept and regularly updated by the Head of the Back-Office Department, under the supervision and instructions of the Compliance Officer.

This register contains records of all investment or ancillary services and activities carried out by or on behalf of the Company that have given rise, or may give rise, to conflicts of interest entailing a material risk of damage to the interests of one or more Clients. The register is reviewed on a regular basis and forms part of the Company's internal control and monitoring framework.

12. Training and Employee Reporting Obligations

The Compliance Officer / AML Compliance Officer is responsible for the ongoing training and awareness of all employees regarding this Conflicts of Interest Policy and applicable regulatory obligations.

Specifically, the Compliance Officer shall:

- Conduct initial and periodic training sessions to ensure that employees understand the principles and procedures outlined in this Policy;
- Assess employees' knowledge and their ability to identify, escalate, and appropriately handle conflict of interest situations;
- Review and update this Policy at least annually, or more frequently where necessary, and communicate all updates to the relevant staff;
- Provide clear instructions to employees on managing specific conflict situations;

- Ensure that all employees are aware of their duty to promptly report any actual or suspected conflict of interest to the Compliance Officer.

All employees must act with integrity and are personally responsible for identifying and reporting potential conflicts of interest without delay.

13. Reporting of Conflicts of Interest

All employees must remain vigilant and alert to the possibility of conflicts of interest arising during the provision of investment and ancillary services.

Where an employee identifies or suspects a conflict of interest, they must:

- (a) Immediately notify their direct supervisor;
- (b) Complete a Conflicts of Interest Notification Form, including:
 - A full description of the conflict;
 - Any corrective and preventive actions taken;
 - An explanation of how the actions are appropriate and whether any conditions were imposed;
 - Details of any ongoing conflict and how it is being managed, including any Client disclosures.

The completed form shall be forwarded to the Compliance Officer / AML Compliance Officer, who will:

- Evaluate the matter;
- Submit a report to the Board of Directors for review, if necessary;
- Ensure that all such forms are securely stored and made available for regulatory inspection upon request.

14. Client Consent

By entering into a Client Agreement with the Company for the provision of investment and/or ancillary services, the Client expressly consents to the terms and conditions set out in this Conflicts of Interest Policy.

The Client further authorizes the Company to act in any manner it deems appropriate in situations where a conflict of interest or material interest exists, provided that such actions are taken in accordance with applicable laws and this Policy.

If, at any point, the Company determines that it is unable to manage a conflict of interest in a manner that ensures fair treatment of the Client, it shall promptly inform the Client and take appropriate measures, which may include declining to act on the transaction or service request.

15. Disclosure of Information

Before entering into a business relationship, the Company shall inform potential Clients of the possibility that a conflict of interest may arise during the provision of investment or ancillary services.

If an actual conflict of interest is identified during the business relationship, the Company shall:

- (a) Take all reasonable steps to manage, mitigate, or prevent the conflict;
- (b) Where such measures are insufficient to eliminate the risk of harm to the Client's interests, the Company shall:
 - Disclose the conflict to the Client in a clear, fair, and durable medium, prior to carrying out any investment business;
 - Or, where disclosure is not deemed appropriate or sufficient to protect the

Client's interests, the Company may decline to proceed with the transaction or service giving rise to the conflict.

Following disclosure, the Client retains full discretion to decide whether or not to proceed with the establishment or continuation of the business relationship.

16. Independence in Managing Conflicts of Interest

The Company adopts a set of internal organizational and administrative measures to ensure that relevant persons maintain the required degree of independence in situations where conflicts of interest may arise.

These include:

16.1 Structural Measures

- Implementation of Chinese Walls to restrict the flow of confidential or inside information between departments and to prevent improper access or misuse;
- Physical and functional separation of departments where interests may conflict (e.g., Research, Dealing, Compliance);
- Separate supervision of relevant persons whose responsibilities relate to Clients with potentially conflicting interests. For example, the Dealing Room is subject to enhanced monitoring to protect Client interests.

16.2 Remuneration Controls

- No direct link between the remuneration of employees involved in potentially conflicting activities (e.g., sales vs. execution);
- Dealing Room staff remuneration is not linked to Client performance;

- Employees' remuneration is not based on Client trading volumes or value of retail Client orders;
- Remuneration of third parties must not create conflicts with Client interests.

16.3 Additional Safeguards

- Preventing or limiting any inappropriate influence over how relevant persons perform their duties;
- Preventing the simultaneous or sequential involvement of relevant persons in multiple activities that may compromise independence (e.g., order reception and execution);
- Maintaining a gift log to record the solicitation, offering, or acceptance of gifts or benefits that could affect impartiality;
- Ensuring controlled access to electronic data and sensitive information.

16.4 Independent Control Functions

The Company maintains an independent Compliance Function with the authority and resources necessary to monitor and enforce the above measures. To preserve its independence:

- Compliance staff are not involved in the services or activities they monitor;
- They are competent to identify and manage conflicts of interest;
- Their remuneration does not compromise their objectivity;
- In case of multiple functions, responsibilities are structured to ensure sound, honest, and professional performance.

The Company has also appointed an Internal Auditor responsible for reviewing systems and controls and reporting directly to the Board of Directors. The Company applies the four-eyes principle to ensure effective oversight and decision-making across all critical activities.

17. Additional Information

The Company reserves the right to review and amend this Conflicts of Interest Policy and its related procedures at any time it deems appropriate, without prior notice to Clients. All updates shall be made in accordance with applicable laws and regulatory guidance.

For any questions or further information regarding this Policy or the Company's approach to managing conflicts of interest, Clients are encouraged to contact:

Email: support@in2markets.com

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