



Conflict of Interest Policy [Summary]

1. A Conflict of Interest exists where MidChains (the “Firm”), any person who acts for it, or any of its associates:
 - (i) is likely to make a financial gain, or avoid a financial loss, at the expense of a Client;
 - (ii) has an interest in the outcome of a service provided to a Client or in the outcome of a transaction carried out on the Platform for a Client, which is distinct from that of the Client;
 - (iii) has a financial or other incentive to favour the interest of one Client over the interests of another Client;
 - (iv) carries on the same business as the Client; or
 - (v) receives or will receive from a third party an inducement in relation to a service provided to a Client, in the form of monies, goods or services, other than the standard commission or fee for that service.
2. A conflict can arise involving the Firm, Employees or its Clients. More specifically, a Conflict of Interest may arise between the following parties:
 - (i) the Client and the Firm;
 - (ii) two Clients of the Firm;
 - (iii) the Firm and its Employee(s);
 - (iv) a Client of the Firm and Employee(s) of the Firm;
 - (v) different departments within the Firm.
3. In each case, the Firm must take steps to ensure so far as possible that such conflicts are identified and then prevented or managed in such a way that the interests of any Client are not adversely affected.
4. If a conflict or potential Conflict of Interest exists, the Firm will, where possible, manage that interest by:
 - (i) segregating control of responsibility between Employees within the Firm;
 - (ii) setting out arrangements to restrict information flow between the Firm’s different business activities;
 - (iii) written disclosure of the conflict in its Client Agreement or in relation to a specific transaction; the disclosure must include sufficient detail, taking into account the nature of the Client, to enable that Client to take an informed decision with respect to the



- (iv) service in the context of which the Conflict of Interest arises; or
 - (iv) if none of the above is likely to be effective, by declining to act for one or more of the Clients concerned.
5. Employees will have adequate training and access to additional training (where necessary) that forms an essential part of ensuring that risk is appropriately managed. Moreover, awareness of and adherence to applicable law are equally important.
 6. Consequently, the Firm maintains:
 - (i) access to training that is appropriate to the function and the role that is being carried out;
 - (ii) internal audit regularly in accordance with the audit cycles;
 - (iii) implementation of a Code of Ethics designed to promote good business practices;
 - (iv) implementation of a Conflicts of Interests Policy;
 - (v) implement Information Barriers and segregation of duties;
 - (vi) implement physical segregation and access.
 7. In the event of a material conflict of interest being identified, we will undertake to remove that conflict in as appropriate and timely manner as possible.
 8. If we are unable to remove the conflict, we will notify you of it and advise what options are available to take matters forward.