VELSTEIN MARKETS

COMPLIANCE • POLICY 03

Conflicts of Interest Policy

VERSION	EFFECTIVE	DEPARTMENT	REVIEW
1.0	04 Nov 2026	Compliance	04 Nov 2027

Table of Contents

01 Introduction

02 Identification of Conflicts

03 Conflicts Management Procedures

04 Disclosure

05 Review

SECTION 01

Introduction

1.1 Velstein Markets (hereinafter referred to as "the Company") has established this Conflicts of Interest Policy (the "Policy") to identify, prevent, manage, and where necessary disclose conflicts of interest that may arise in the course of providing investment and ancillary services to its clients.

1.2 The Company is duly registered and incorporated in Saint Lucia under Company Registration Number 2026-00749. This Policy has been adopted in compliance with applicable regulatory requirements governing the identification and management of conflicts of interest.

1.3 The Company owes a duty to act honestly, fairly, and professionally in the best interests of its clients. The Company recognizes that conflicts of interest may arise between the Company and its clients, between different clients of the Company, or between the Company's employees and the Company or its clients.

1.4 This Policy sets out the organizational and administrative arrangements the Company has established to identify, prevent, and manage conflicts of interest so as to prevent them from adversely affecting the interests of its clients.

SECTION 02

Identification of Conflicts

2.1 The Company has identified the following circumstances which constitute, or may give rise to, a conflict of interest entailing a risk of damage to the interests of one or more clients:

- Company as counterparty: The Company acts as the counterparty to all client CFD trades. The Company may therefore profit when a client incurs a loss, and vice versa, creating a direct conflict between the Company's financial interest and the client's interest.
- Proprietary trading and hedging: The Company may hedge its net exposure arising from client positions with external liquidity providers. Hedging decisions are made at the Company's discretion and may affect the pricing or execution of client orders.
- Remuneration and incentives: The Company's employees, including account managers and sales staff, may receive variable remuneration linked to trading volumes, revenue, or client acquisition metrics, which could incentivize behavior that is not aligned with the client's best interests.
- Introducing brokers and affiliates: The Company may pay commissions or rebates to introducing brokers, affiliates, or other third parties for referring clients. Such arrangements may create incentives for third parties to recommend the Company's services without adequate regard to suitability.

- Information barriers: The Company's employees may have access to confidential information about client positions, trading strategies, or pending orders that could be used to the detriment of clients.

2.2 The Company maintains a conflicts of interest register that records all identified actual and potential conflicts, the assessment of the risk of client detriment, and the measures adopted to manage each conflict.

2.3 The compliance department is responsible for maintaining and updating the conflicts of interest register on an ongoing basis and for ensuring that newly identified conflicts are promptly assessed and addressed.

SECTION 03

Conflicts Management Procedures

3.1 The Company has implemented the following organizational and administrative arrangements to prevent or manage conflicts of interest:

3.1.1 Chinese Walls and Information Barriers

The Company maintains effective information barriers between departments and individuals where the exchange of information could give rise to a conflict of interest. Access to sensitive client data, trading positions, and order flow information is restricted on a need-to-know basis.

3.1.2 Remuneration Policies

The Company has designed its remuneration policies to minimize conflicts of interest. Variable remuneration for client-facing staff is subject to qualitative criteria, including compliance with internal policies, fair treatment of clients, and adherence to best execution obligations. Compensation structures are reviewed regularly to ensure they do not encourage conduct that is detrimental to clients.

3.1.3 Personal Account Dealing

The Company has established a personal account dealing policy that restricts the ability of employees to trade in financial instruments in a manner that could create conflicts with client interests. All personal trading by relevant employees must be pre-approved by the compliance department and is subject to ongoing monitoring.

3.1.4 Independent Compliance Oversight

The Company's compliance department operates independently of the business units it oversees and reports directly to senior management. The compliance department has the authority to investigate potential conflicts and to require corrective action.

3.2 The Company has further adopted the following measures to manage the specific conflict arising from its role as counterparty to client trades:

- Pricing is derived from independent third-party liquidity providers and is subject to automated surveillance to ensure consistency and fairness.
- Order execution is automated and governed by the Company's Order Execution Policy, which ensures that all clients receive consistent treatment regardless of the Company's hedging position.
- Risk management decisions (including hedging) are made independently of client-facing departments and do not influence the pricing or execution of individual client orders.
- The Company monitors execution quality statistics, including slippage distribution, fill rates, and requote frequencies, to detect any patterns that could indicate unfair treatment of clients.

3.3 Where the Company determines that the organizational and administrative arrangements in place are not sufficient to ensure, with reasonable confidence, that the risk of damage to client interests will be prevented, the Company will disclose the nature and source of the conflict to the affected client(s) before undertaking business on their behalf.

SECTION 04

Disclosure

4.1 The Company will disclose to clients the general nature and sources of conflicts of interest, and the steps taken to mitigate those conflicts, before providing investment services. This Policy constitutes part of that disclosure.

4.2 Where a specific conflict of interest cannot be adequately managed through the organizational and administrative arrangements described in this Policy, the Company will provide the affected client with a clear and specific disclosure of the conflict, including sufficient detail to enable the client to make an informed decision about whether to proceed with the relevant service or transaction.

4.3 Disclosure of a conflict is used as a measure of last resort and does not exempt the Company from its obligation to take all reasonable steps to manage and mitigate the conflict. The Company will continue to seek ways to eliminate or reduce the conflict even after disclosure has been made.

4.4 The Company discloses any material third-party payment arrangements, including commissions paid to or received from introducing brokers, affiliates, or other intermediaries, in its Client Agreement and on its website. Clients may request additional details regarding such arrangements at any time.

SECTION 05

Review

5.1 The Company reviews this Policy at least annually, or more frequently where there is a material change in the Company's business model, organizational structure, product offering, or regulatory environment that may affect the nature or scope of conflicts of interest.

5.2 The compliance department is responsible for conducting the annual review and for reporting its findings and recommendations to the Company's senior management and, where applicable, the board of directors.

5.3 As part of the review process, the Company will assess the adequacy of the existing conflicts management arrangements, consider whether new conflicts have arisen, evaluate the effectiveness of disclosure measures, and determine whether any changes to this Policy are required.

5.4 Clients will be notified of any material amendments to this Policy through the Company's website (https://velsteinmarkets.com) or by direct communication. The most current version of this Policy is available at all times on the Company's website. For questions regarding this Policy, please contact compliance@velsteinmarkets.com.

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Compliance	compliance@velsteinmarkets.com

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