

CONFLICT OF INTEREST MANAGEMENT POLICY

JPM Analytics, 192 Green Road, Penistone, Sheffield, South Yorkshire, England (hereinafter, the "Company"), has prepared a Conflict of Interest Management Policy (the "Policy"). The Policy is designed to take all necessary measures to identify possible conflicts of interest between the Company, including its employees, brokers or other persons in any way connected with the Company, and its clients, as well as between clients that may arise in connection with the services provided or investments made.

IDENTIFICATION OF POSSIBLE CONFLICTS OF INTEREST

The Company takes into account all the circumstances in which the Company or its affiliated person may find itself in any of the following situations:

- a. The Company, or its affiliate, may derive financial benefits or prevent financial loss at the expense of the Client.
- b. The Company or its affiliates may have an interest in achieving a specific result of the service provided to the Client, or in the outcome of a transaction carried out in the interests of the Client, which differs from the result that the Client insists on.
- c. The Company, or a person affiliated with it, derives financial or other benefits in the interests of third parties that are different from the interests of the Client.
- d. The Company or its affiliate is engaged in the same type of activity as the Client.
- e. The Company, or its affiliate, receives or will receive from a third party remuneration other than that specified in the Contract Details (commissions and fees).

REGULATION OF SITUATIONS RELATED TO THE EMERGENCE OF A CONFLICT OF INTEREST



For the Company, the interests of clients are the main priority. Every effort will be made to ensure that each client is treated with integrity and professionalism. The Company, its employees and affiliates should not benefit directly from any conflict of interest. A responsible person has been appointed within the Company's structure to control compliance with legal regulations, as well as to control and monitor possible deviations from the principles of the Policy adopted by the Company. In addition, the Company engages an external auditor to confirm strict compliance with the rules set out in the legal documents posted on the Company's Website.

To implement the above measures, the Company is guided by the following principles in its activities:

- a. Prevention of the possibility of the use of insider information by affiliates, the use of which may affect the results of trading operations.
- b. Ensuring mutual control over transactions in order to prevent abuse by a related party who has excessive powers in any area of the Company's activities.
- c. Setting restrictions on the actions of the related person himself when executing the Client's instructions regarding trading operations on the Client's Account.

If the Client has additional questions regarding other situations related to the Policy, he has the right to request clarification from the responsible employee of the company who monitors compliance with legal regulations at the following e-mail address: office@jpmanalytics.com or through the Personal Account.

