

CONFLICT OF INTEREST POLICY

This Conflict of Interest Policy explains how Alma Expo resolves conflicts of interest that may arise within Alma Expo itself, between Alma Expo and its clients, and between Alma Expo clients. This Policy is periodically updated to reflect changes in the Company's operations, business practices, legal requirements, technologies, and the broader business environment. The Policy applies to all activities carried out by Alma Expo and its employees.

1. Conduct of Business

1.1. Alma Expo conducts all client transactions as principal and hedges its net risk with counterparties; in other words, the clients' goals are generally aligned with the Company's goals, even though the Company acts as principal in all transactions. Since Alma Expo does not provide investment advice, no conflict of interest arises in this regard. Alma Expo only offers CFD contracts, which eliminates the possibility of conflicts between different types of financial products.

1.2. Alma Expo is responsible for identifying and managing other conflicts of interest that may arise in its operations and pose a significant risk of harm to client interests. In particular, Alma Expo has considered potential conflicts of interest that may arise during the execution of transactions for its clients.

2. Conflict Management Procedures

2.1. To manage such conflicts of interest, the following measures have been implemented:

- (a) When executing a client's order, Alma Expo does not give preferential treatment to that client to the detriment of others and does not disclose one client's order details to other clients.
- (b) Alma Expo executes all orders electronically in accordance with policies that ensure compliance with applicable rules and regulations governing transactions on behalf of clients. The Company's procedures ensure prompt, fair, and efficient execution of client orders compared to other orders. These procedures ensure that otherwise comparable orders are executed based on the order in which they are received.
- (c) Alma Expo has implemented procedures to ensure that the execution of client orders is promptly and accurately recorded and that comparable orders are handled sequentially and promptly, unless the characteristics of the order or prevailing market conditions make this impractical, or it is in the client's best interest to proceed otherwise.
- (d) Under Alma Expo's procedures, the Company, its employees, and affiliates are prohibited from improperly using information related to pending client orders.
- (e) All Alma Expo employees are prohibited from conducting personal trading that could lead to actual or perceived conflicts of interest.
- (f) All Alma Expo employees are prohibited from accepting gifts or other forms of incentives from any party with a material interest that is likely to significantly conflict with the duties of Alma Expo and/or its employees in accordance with the fair treatment of clients or the recipient's obligations toward clients.

3. Commitment to Compliance

3.1. Alma Expo is committed to fostering a culture of compliance that effectively identifies and resolves potential conflicts of interest. Therefore, Alma Expo employees are required to monitor emerging circumstances that may give rise to conflicts and implement the necessary measures to resolve them.

4. Disclosure of Conflicts of Interest

4.1. In rare instances where Alma Expo's conflict resolution procedures cannot reasonably ensure the prevention of risks to the client, the Company must clearly disclose the general nature

and/or sources of the conflict of interest to the client before performing any services on the client's behalf.

How and When to Contact Us

If you have any questions regarding this Conflict of Interest Policy or would like to help us improve it, you may contact us via email.