

POLICY FOR MANAGING A CONFLICT OF INTERESTS

The conflict of interests policy aims to provide maximum protection of Client interests and ensure observation by the Company of reasonable professional conduct. The content of the policy, its specific procedures and measures shall be reviewed and updated by the Company on a regular basis to reflect amendments in the statutory framework and/or generally accepted rules for conducting commercial activity. The Company shall always endeavor to operate so as to observe market integrity and make the Client's interests a top priority. This is a key principle of the Company which is supported by another policy and procedures including provisions related to acceptance, processing and execution of Client Orders in the best way, assessing the Client's suitability and compliance with the financial instruments and services of the Company.

To prevent the risk of a conflict of interests and increasing Client confidence the Company implements procedures and takes control measures aimed at:

- preventing conflict of interests, including where necessary the Company's refusal to perform any activity, operation or mandate;
- the Company's conducts its commercial activity in such a way which would ensure that the interests of the Company's clients are upheld and strictly confidential information is held securely with regard to all types of the Company's activities, and the disclosure of which could result in conflict of interests.

The aforementioned control procedures and measures include:

1. Ensuring physical spin-off of units (departments) inside the Company with a view to preventing improper dissemination of confidential information among units (departments) and its use in such a way which could cause damage to market integrity or Client interests (hereinafter "the Chinese Wall Policy").
2. Protection of confidential information.
3. Ensuring equal and fair treatment of all Clients.
4. In order to draw Client attention to transactions which carry the risk of a conflict of interests the Company complies with the following rules.
5. Implementation of internal control at the Company. Internal control includes, inter alia, the following procedures:
 - 5.1 Internal control over document flow
 - 5.2. Operating control
 - 5.3. Regular reconciliation of balances of registered securities.

For additional information regarding the Policy of Managing a Conflict of Interests please contact us by email: info@skanestas.com