

Innomp Group Limited

CONFLICTS OF INTEREST POLICY

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1. Purpose

The purpose of this Policy is to set out the procedures adopted by **Innomp Group Limited** (the “Company”) for identifying, managing, and, where necessary, disclosing actual or potential conflicts of interest that may arise in the course of the Company’s business.

The objective is to reduce the risk of client disadvantage, protect the Company’s reputation, and ensure the integrity and fairness of its services. By maintaining robust conflicts management arrangements, the Company aims to uphold the highest standards of honesty, efficiency, and fairness in the conduct of its business.

2. Policy

The Company has established and maintains a written Conflicts of Interest Policy appropriate to the size, organization, and nature of its operations.

The Company seeks to:

- identify and prevent, or where prevention is not possible, manage conflicts of interest between the Company (including its management, employees, and associated persons) and its clients, or between one client and another;
- operate effective organizational and administrative arrangements to prevent conflicts from adversely affecting client interests; And
- act in good faith, taking reasonable steps to protect clients from material harm arising from conflicts of interest.

Where the Company is part of a wider group, potential conflicts arising from the activities of group members will also be considered.

3. General Principles

The Company will:

- identify circumstances that may give rise to conflicts of interest entailing a material risk of damage to the interests of one or more clients; and
- implement procedures and controls to manage such conflicts effectively.

To ensure independence and fair treatment, the Company adopts the following measures:

- a) procedures to restrict or control the flow of sensitive information between persons where the exchange of such information may harm client interests;
- b) separate supervision of staff engaged in services for clients with potentially conflicting interests;
- c) removal of direct links between remuneration of relevant persons engaged in potentially conflicting activities;
- d) restrictions on inappropriate influence by any person over another in the provision of services; and
- e) limitations on staff involvement in multiple activities where such involvement may compromise conflict management.

4. Circumstances Giving Rise to Conflicts

Conflicts may arise where the Company or its personnel:

- a) stand to make a financial gain or avoid a loss at the expense of a client;
- b) have an interest in the outcome of a client transaction that differs from the client's interest;
- c) are incentivized to favor one client over another;
- d) engage in the same business as the client; or
- e) receive inducements from third parties in connection with services to a client, beyond standard fees or commissions.

The **Compliance Officer** is responsible for maintaining this Policy, ensuring awareness among staff, and monitoring compliance. All employees must promptly report any potential conflict to the Compliance Officer, who, in consultation with management, will determine appropriate measures.

5. Responding to Conflicts

Conflicts of interest may be addressed by:

- a) managing or controlling the conflict through organizational and procedural safeguards; or
- b) avoiding the conflict entirely where management is insufficient.

Where a significant conflict has caused or may cause client detriment, disciplinary measures may be considered.

6. Disclosure of Conflicts

If the Company cannot, with reasonable confidence, prevent a conflict of interest from harming client interests, the Company will disclose the general nature and sources of the conflict to the client before undertaking business on its behalf.

Such disclosure will:

- be provided in durable form (including via the Company's website or written communication);
- include sufficient detail to enable the client to make an informed decision; And

- clearly state that existing organizational measures may not be sufficient to prevent client detriment.

Disclosure is a measure of last resort and over-reliance on disclosure shall not substitute for effective conflict management. Where a conflict cannot be adequately managed or disclosed, the Company may decline to act.

7. Gifts and Entertainment

Gifts and entertainment must never improperly influence, or appear to influence, business judgment.

- Any gift or hospitality exceeding a reasonable threshold (e.g., USD 100 equivalent) must be reported to the Compliance Officer and recorded in the Company's Gift Register.
- Staff may not solicit or accept gifts that could create an actual or perceived conflict of interest.
- Hospitality and business entertainment must be proportionate and transparent.

8. Related Parties and Suppliers

Employees must disclose any financial interests that they or immediate family members hold in entities that do business with, or compete with, the Company. The Company may require divestiture or other measures where such interests create or are likely to create a conflict.

9. Staff Trading

Employees may engage in personal trading only if it does not:

- breach applicable laws;
- misuse confidential or inside information;
- create a conflict of interest; or
- damage the Company's reputation.

All personal transactions must be conducted honestly and must never disadvantage clients..

10. Review and Updates

This Policy is reviewed at least annually, or more frequently if circumstances require. Updates are approved by senior management and published on the Company's website. Clients will be notified of material changes.

Any disputes regarding this Policy are subject to the Client Agreement.