

CONFLICTS OF INTEREST POLICY

Eliprime Finance Limited (“Eliprime”)

Effective: Jan 2026

1. OVERVIEW

Eliprime Finance Limited (“Eliprime”, “we”, “us”, or “the Company”) is committed to acting honestly, fairly, and professionally in accordance with the best interests of its clients.

This Conflicts of Interest Policy has been established to identify, prevent, manage, and, where necessary, disclose conflicts of interest that may arise in the course of our business activities and the provision of services to our clients.

2. OUR APPROACH TO CONFLICTS OF INTEREST

2.1 Commitment to Fair Treatment

Providing high-quality, transparent, and fair services is central to Eliprime’s business model. We take all reasonable steps to ensure that conflicts of interest—whether actual or potential—do not adversely affect the interests of our clients.

2.2 Organisational and Administrative Controls

Eliprime has implemented appropriate organisational and administrative arrangements designed to:

- identify circumstances that may give rise to conflicts of interest;
- prevent conflicts from arising where possible; and
- manage and mitigate conflicts that cannot be avoided.

These arrangements are reviewed and updated regularly, taking into account:

- regulatory requirements issued by the Financial Services Authority of Seychelles (“FSA”);
- industry best practices; and
- operational experience gained from dealings with clients and counterparties.

2.3 Conflicts Register

Eliprime maintains a record of business activities in which conflicts of interest may arise or have arisen. This includes consideration of the activities of staff members, management, and any related or connected parties.

3. EXAMPLES OF POTENTIAL CONFLICTS

Conflicts of interest may arise between:

Eliprime (including its directors, officers, employees, and any persons directly or indirectly linked to it); and a client; or one client and another client.

Examples of potential conflicts include, but are not limited to:

a) Counterparty positioning

Situations where Eliprime may act as principal or intermediary in transactions executed with or routed to third-party liquidity providers.

b) Financial benefit or loss

Where Eliprime derives revenue from spreads, commissions, or trading volume, which may increase as client trading activity increases.

c) Incentives and inducements

Where Eliprime receives fees, commissions, or non-monetary benefits from third parties (such as liquidity providers or service vendors), beyond standard commercial arrangements permitted under applicable regulations.

d) Preferential treatment

Where there may be an incentive to favour one client, group of clients, or counterparty over another.

e) Competing interests

Where Eliprime provides services to clients operating in similar markets or business lines, potentially leading to competing commercial interests.

4. MANAGEMENT AND PREVENTION OF CONFLICTS

Eliprime manages and mitigates conflicts of interest through the following measures:

a) Execution-Only / STP Model

Eliprime operates on an execution-only basis and does not provide investment advice. Client orders are executed or routed to external liquidity providers in accordance with our Order Execution Policy, reducing discretionary influence over trading outcomes.

b) Arm's Length Transactions

All client transactions are conducted on an arm's length basis and in accordance with uniform contractual terms.

c) Identical Contractual Terms

Clients are subject to standardised terms and conditions, ensuring no client is placed in a preferential contractual position.

d) Product Governance

Eliprime offers only clearly defined financial instruments and services. Internal controls ensure that products are appropriate for the intended target market.

e) Separation of Functions

Where applicable, Eliprime maintains internal arrangements to ensure appropriate segregation of duties and supervision between staff whose activities could give rise to conflicts.

f) Staff Conduct and Outside Interests

Employees and directors are required to disclose external business interests or roles that may give rise to conflicts. Such interests are monitored and subject to internal approval procedures.

g) Training and Awareness

Staff receive ongoing training on identifying, managing, and escalating conflicts of interest.

h) Gifts and Hospitality

Gifts and hospitality are permitted only where modest, proportionate, and unlikely to impair Eliprime's duty to act in clients' best interests. All such benefits are subject to internal oversight.

i) Information Barriers

Procedures are in place to control or restrict the flow of information between staff where the exchange of information could disadvantage clients.

j) Remuneration Controls

Staff remuneration structures are designed to avoid incentives that may encourage behaviour contrary to clients' interests.

5. DISCLOSURE OF CONFLICTS

5.1 Disclosure Obligation

Where Eliprime's internal arrangements are insufficient to ensure, with reasonable confidence, that a conflict will not materially harm a client's interests, Eliprime will disclose the general nature and source of the conflict before providing services.

5.2 Content of Disclosure

Any disclosure will:

- describe the nature of the conflict;

- explain the associated risks to the client; and
- outline the measures taken to mitigate those risks.

This disclosure will allow the client to make an informed decision about whether to continue the relationship.

5.3 Declining to Act

If a conflict cannot be adequately managed or mitigated, Eliprime may decline to provide the relevant service.

6. REVIEW AND GOVERNANCE

This Policy is reviewed periodically and updated as necessary to reflect regulatory developments, operational changes, and best practices.

7. CONTACT INFORMATION

If you have any questions regarding this Conflicts of Interest Policy, please contact:

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