



Summary of Conflicts of Interest policy

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EliteProEdge B.V. is registered in England, UK under number 58403949. EliteProEdge is authorized and regulated by the UK financial authorities

Introduction

EPE B.V. ('EPE') owes a certain duty to its clients in respect of managing any conflicts of interest which may arise. Outlined below is a summary of the policy EPE maintains for the managing of conflicts of interest.

Explanation

Conflicts of interest can arise between EPE, its directors, staff, any of its associates and (a) client(s). Client-to-client conflicts may also arise. It is the scope of EPE's conflicts of interest policy to prevent and deal with these conflicts should they arise. EPE aims to maintain effective procedural and operational policies in order to deal with, and prevent any such situations.

Potential conflicts

Conflicts of interest may take many forms but they can all be defined as causing material risk of damage to the interests of a client. Such situations include - but are not limited to - where EPE or a relevant person, or a person directly or indirectly linked by control to EPE:

- is likely to benefit financially at the expense of a client;
- is likely to limit or avoid financial loss at the expense of a client;
- has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
- has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;
- carries on the same business as the client;
- receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monetary or non-monetary benefits or services.

Safeguards

EPE enforces several methods and procedures to prevent or manage conflicts of interest. A summary of these is detailed below.

- A record is kept of the types of conflicts of interest that have arisen or may arise in relation to the investment services carried out by EPE.
- Organizational arrangements, systems, controls, policies and procedures designed to prevent the conflict of interest arising or to mitigate the associated risk of damage;
- Maintenance of appropriate independence between members of staff who are involved in different activities.
- Restriction of personal or sensitive information.
- Employment of a gifts and inducements policy to log and control the receipt of certain gifts by staff and directors.

- A policy on how personal transactions of EPE staff are handled.
- EPE requires its staff and directors to act honestly, fairly and professionally in accordance with the best interest of a client. Staff may not give investment advice.
- EPE has a whistleblowing policy in place with appropriate procedures for the reporting/whistleblowing of conflicts of interest within EPE.
- Disclosure designed to inform the affected parties of the conflict of interest and its likely impact on them.
- Avoiding the service, activity or matter giving rise to the conflict of interest where the conflict of interest cannot be prevented or managed effectively using other means.

If a conflict of interest does arise, EPE will disclose this to the client prior to carrying out any business for that client. If EPE does not believe the disclosure is appropriate to manage the conflict, EPE may opt not to proceed with the transaction or matter giving rise to the conflict.