OFFICIAL PUBLIC POLICY

Conflicts of Interest Policy

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G.1 Potential conflicts

- Ergenso or an affiliate may be the client's contractual counterparty or may earn more when trading volume, spread or financing increases.
- A liquidity provider, payment provider, affiliate, introducer or technology provider may be selected or compensated by Ergenso.
- Staff compensation, sales targets or retention incentives may create pressure inconsistent with a client's interests.
- Research, general commentary and personalised advice may concern products from which Ergenso earns revenue.
- Different clients may compete for limited liquidity or receive different product access based on lawful classification and risk controls.

G.2 Controls

- Separation of advice approval, sales, dealing, payments and complaints where practicable.
- Compensation that does not reward unsuitable advice, obstruct withdrawals or encourage harmful churn.
- Approved product governance, target-market, execution and counterparty review.
- Disclosure of material residual conflicts before the client acts.
- Gifts, personal dealing, outside interests, referral payments and affiliate arrangements recorded and controlled.
- Declining or ceasing an activity where disclosure and controls cannot manage the conflict fairly.

G.3 Advice-specific conflict standard

Before personalised advice, the adviser must identify relevant product, compensation, affiliate, dealing and personal-interest conflicts. The recommendation record must explain why the advice remains suitable and in the client's interests. A disclaimer does not cure unsuitable advice.