

## Giraffe Markets Conflict of Interest Policy

### 1. Introduction

Giraffe Markets is committed to maintaining the highest standards of professionalism, integrity, and ethics in all our activities. As a Forex brokerage company, we acknowledge the importance of identifying and managing conflicts of interest to ensure the best interests of our clients. This Conflict of Interest Policy outlines our approach to addressing conflicts of interest.

### 2. Definition of Conflict of Interest

A conflict of interest arises when the personal or financial interests of Giraffe Markets, its employees, or associated parties may interfere or compromise the impartiality and objectivity in dealing with clients' interests. Conflicts of interest may include, but are not limited to, the following situations:

- Personal interests of employees that conflict with the interests of clients.
- Financial interests of Giraffe Markets that conflict with the interests of clients.
- Relationships with third parties that may influence our decision-making process.

### 3. Identification of Conflicts of Interest

Giraffe Markets is committed to proactively identifying potential conflicts of interest that may impact our clients. To achieve this, we employ the following strategies:

- Periodic reviews of business activities and operations to identify potential conflicts.
- Encouragement of our employees to report any potential conflicts or perceived conflicts.
- Monitoring of personal trading activities of employees to prevent conflicts.

## 4. Management and Mitigation of Conflicts of Interest

Once a conflict of interest is identified, Giraffe Markets will take appropriate measures to manage and mitigate such conflicts. These measures may include, but are not limited to:

- Implementing strict internal policies and procedures to address conflicts of interest.
- Establishing Chinese walls or physical separation between departments to ensure independence.
- Disclosure to clients when Giraffe Markets believes that a conflict of interest exists that cannot be managed effectively.

## 5. Disclosure to Clients

Giraffe Markets is committed to providing clients with transparent information about any potential conflicts of interest that may affect their interests. If we believe that a conflict of interest exists and cannot be adequately managed or mitigated, we will disclose this to affected clients promptly.

## 6. Record-Keeping and Monitoring

Giraffe Markets maintains records of identified conflicts of interest, measures taken to manage them, and any disclosures made to clients. Regular monitoring and review are conducted to ensure the effectiveness of conflict management measures.

## 7. Training and Awareness

Giraffe Markets provides training and guidance to employees to raise awareness of conflicts of interest and the importance of their identification and management.

## 8. Compliance with Regulations

Giraffe Markets is fully committed to complying with all relevant Forex regulations, including MiFID II in Europe, and any other applicable local and international regulations pertaining to the management of conflicts of interest.

## 9. Reporting Violations

Employees are encouraged to report any potential violations or breaches of this policy through the established reporting channels. Giraffe Markets is committed to taking appropriate action to address such violations.

This Conflict of Interest Policy is effective as of [Effective Date] and is subject to periodic review and updates to remain in compliance with changing regulatory requirements.

*For any questions or concerns regarding our Conflict of Interest Policy, please contact our Compliance Department.*