



KLEIS EU LIMITED CONFLICTS OF INTEREST POLICY

KLEIS EU LTD, is a limited company registered in Cyprus under company number HE433552, and is authorized and regulated by the Cyprus Securities and Exchange Commission with License No 436/23. Its registered office is at 160 Archiepiskopou Makariou, 3026, 1st floor, Limassol, Cyprus. The head office address is at 254 Archiepiskopou Leontiou I, Maximos Court A , 7th Floor , 3020 Limassol, Cyprus.

Risk Warning: Please note that trading in forex and other leveraged products may involve a significant level of risk and is not suitable for all investors. Before undertaking any such transactions, you should ensure that you fully understand the risks involved and seek independent advice if necessary.

	POLICY		CMR-P007-002	
	CONFLICT OF INTEREST POLICY		19.02.2024	Page 2 of 9

Table of Contents

1. SUMMARY INFORMATION	3
2. DEFINITION	3
3. INTRODUCTION	4
4. REGULATORY CONTEXT – LEGAL FRAMEWORK	4
5. SCOPE.....	5
6. IDENTIFICATION OF CONFLICTS.....	6
7. MANAGEMENT AND AVOIDANCE OF CONFLICTS	6
8. DISCLOSURE	7
9. MARKETING COMMUNICATION	8
10. ASSESSMENT – RESOLUTION – NOTIFICATION & RECORD KEEPING	8
11. FURTHER INFORMATION	9
12. PRIOR CONSENT.....	9

	POLICY		CMR-P007-002	
	CONFLICT OF INTEREST POLICY		19.02.2024	Page 3 of 9

1. SUMMARY INFORMATION

The company has established, implements and maintains the below written conflicts of interest policy which is appropriate to the size, organisation structure, nature, scale and complexity. Amongst other information this policy contains information on how we identify, manage where possible, mitigate, disclose any conflict of interest which may arise during the course of your business relationship with Kleis EU Ltd.

2. DEFINITION

“Relevant person” shall mean any of the below persons:

- a director, partner or equivalent, manager or tied agent of the company;
- a director, partner or equivalent, or manager of a tied agent of the company;
- an employee of the company or of a tied agent of the company and any other natural person whose services are placed at the disposal and under the control of the company or a tied agent of the company and who is involved in the provision by the company of investment services and activities;
- a natural person who is directly involved in the provision of services to the company or to its tied agent under an outsourcing arrangement for the purpose of the provision by the company of investment services and activities.

“inducement” shall mean any fee or commission paid to the company or a relevant person or any non-monetary benefit given for the provision of an investment or ancillary service to the client, other than:

- a fee, commission or non-monetary benefit paid or provided to or by the client or another person on behalf of the client;
- a fee, commission or non-monetary benefit paid or provided to or by a third person or a person acting on behalf of a third party, where:
 - the existence, nature and amount of the fee, commission or benefit is clearly disclosed to the client in a comprehensive, accurate and understandable manner, prior to the provision of the relevant investment or ancillary service;
 - the payment of the fee or commission or the provision of the non-monetary benefit is designed to enhance the quality of service provided to the client and does not impair the company’s compliance with its duty to act in the best interests of the client.
 - proper fees as is necessary to enable the provision of investment services by the company, such as custody fees, settlement and exchange fees, regulatory levies or legal fees, which, by their nature cannot give rise to conflicts with the company’s duties to act honestly, fairly and professionally in accordance with the best interests of its clients.

	POLICY		CMR-P007-002	
	CONFLICT OF INTEREST POLICY		19.02.2024	Page 4 of 9

3. INTRODUCTION

KLEIS EU LTD (hereinafter referred to as the “Company”), a Cyprus Investment Firm licensed and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under license number 436/23 having granted authorisation to provide the Investment Services covered by this Agreement, through its electronic system via the Internet (hereinafter the “**Trading Platform**”) here under specify the procedures put in place by for identifying and managing and, where necessary, disclosing the conflicts of interests arising in relation to its business and to reduce the risk of client disadvantage and of legal liability, regulatory censure or damage to Company’s commercial interests and reputation and to ensure that it complies with legislative requirements, the departmental and general procedures.

Conflict of interest situations are defined as those in which a client's or potential client's interest conflicts or may conflict with the interest of another client and/or the company’s interests and as a result, there is a material risk that the interests of one or more clients could be harmed. For the purposes of this policy, the company’s interests include the interests of the company’s managers, employees and tied agents or other people directly or indirectly linked to it by control.

4. REGULATORY CONTEXT – LEGAL FRAMEWORK

This Conflict-of-Interest Policy is issued pursuant to, and in compliance with the requirements of:

- Directive 2014/65/EU of the European Parliament and of the Council on markets in financial instruments, as amended from time to time (“MiFID II”);
- the Law 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets and other related matters, as amended from time to time (the “Law”);
- the Commission Delegated Regulation (EU) 2017/565, supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive;
- Section 2 of the Questions and Answers of the European Securities and Markets Authority (“ESMA 35-36-794”) with respect to the provision of CFDs and other speculative products to retail investors under MiFID.

In accordance with the Commission Delegated Regulation (EU) 2017/565, The company is required to establish, implement and maintain an effective conflict of interest policy set out in writing and appropriate to the size and organisation of the company and the nature, scale and complexity of its business.

In addition, according to the Law, The company must take all appropriate steps to identify conflicts of interest between itself, including its managers and employees, tied agents (where applicable) or other relevant persons, as well as any person directly or indirectly linked to them by control, and their clients or between one client and another, that arise in the course of

	POLICY		CMR-P007-002	
	CONFLICT OF INTEREST POLICY		19.02.2024	Page 5 of 9

providing any investment and ancillary services, including those caused by the receipt of inducements from third parties or by The company's own remuneration and other incentive structures.

In this respect, the company must establish adequate policies and procedures sufficient to ensure compliance, including its managers, employees, tied agents (where applicable) and other relevant person(s), with its obligations pursuant to the Law and the directives issued pursuant to this Law, as well as appropriate rules governing personal transactions by such persons.

For the purpose of this Policy, "Personal Transaction" means a trade in financial instrument effected by or on behalf of Relevant Persons, where at least one of the following criteria are met:

- a. The Relevant Persons are acting outside the scope of the activities they carry out in their professional capacity;
- b. The trade is carried out for the account of any of the following persons:
 - i. the Relevant Persons;
 - ii. any person with whom they have a family relationship, or with whom they have close links;
 - iii. a person whose relationship with the Relevant Persons is such that the Relevant Persons have a direct or indirect material interest in the outcome of the trade, other than a fee or commission for the execution of the trade.

To prevent conflicts arising from the use of information obtained from clients, and market abuse in general, all employees are subject to personal account dealing rules. Employees are prohibited to keep investor accounts in other Investing Firms without Company's prior authorisation and are obliged to bring this to Company's attention. In case an employee has a brokerage account in other IF, the Company has a right to request transaction reports from other Investment Firms.

5. SCOPE

Following the Markets in Financial Instruments Directive ("MiFID") from the European Union, as amended from time to time, we are required to provide you with a summary of our Conflict-of-Interest Policy. Under the above regulatory framework, we are required to take all reasonable steps to identify any conflict of interest between:

- Us, including our management, employees, appointed representatives and/or tied agents where applicable (hereinafter "relevant Persons"), or any person directly or indirectly linked to them, and our clients; or
- You and another client.

	POLICY		CMR-P007-002	
	CONFLICT OF INTEREST POLICY		19.02.2024	Page 6 of 9

We are committed to act honestly, fairly and professionally, and in the best interest of our clients, and to abide by the principles set out in the above legislation when providing investment services to our clients.

This Policy is not intended to and does not create third-party rights or duties that would not already exist if the Policy had not been made available, nor does it form part of any contract between us and any client.

For your benefit and protection, please ensure you take sufficient time to read this and any other additional documentation and information available to you via our website, prior to opening an account and/or carrying out any activity with us. You should contact us for any further clarification or seek independent professional advice (if necessary).

6. IDENTIFICATION OF CONFLICTS

The Company takes adequate steps to properly identify Conflicts of Interest. For the purposes of identifying the types of conflict of interest that arise in the course of providing investment and ancillary services or a combination thereof and whose existence may damage the interests of a client, the Company takes into account the question of whether the Company or a relevant person, or a person directly or indirectly linked by control to the Company, is in any of the following situations, whether as a result of providing investment or ancillary services or investment activities or otherwise:

- Is likely to make a financial gain, or avoid a financial loss, at the expense of the 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 Clients interest in that outcome;
- Has a financial or other incentive to favour the interest of one Client over another;
- Carries on the same business as the Client;
- Receives from a person other than a client an inducement in relation to a service provided to a client, in the form of monies, goods or services, other than the standard commission or fee for that service;

7. MANAGEMENT AND AVOIDANCE OF CONFLICTS

We maintain and operate effective organisational and administrative procedures to manage and prevent any identified conflict of interest from constituting or giving rise to a risk of damage to the interests of our clients. We also undertake ongoing monitoring of business activities to ensure that these internal controls are appropriate. The measures adopted are designed to ensure that relevant persons engaged in different business activities involving a potential conflict of interest carry on those activities at a level of independence proportionate to the size and activities of the Company, and to the risk of damage to the interests of our clients.

	POLICY		CMR-P007-002	
	CONFLICT OF INTEREST POLICY		19.02.2024	Page 7 of 9

In general, the procedures and controls that we follow regarding conflicts of interest include the following measures to ensure the requisite degree of independence:

- Effective procedures to prevent or control the exchange of information between relevant persons engaged in activities involving a risk of a conflict of interest where the exchange of that information may harm the interests of one or more clients;
- The separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the company;
- The removal of any direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration of, or revenues generated by, different relevant persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities;
- Measures to prevent or limit any person from exercising inappropriate influence over the way in which a relevant person carries out investment or ancillary services or activities;
- Measures to prevent or control the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services or activities where such involvement may impair the proper management of conflicts of interest.

Some of the policies and procedures established to prevent and manage Conflicts of Interests are shown below:

- A 'need to know' policy governing the dissemination of confidential or inside information within the company;
- Chinese walls restricting the flow of confidential and inside information within the Company, and physical separation of departments;
- Procedures governing access to electronic data;
- Segregation of duties that may give rise to conflicts of interest if carried on by the same individual;
- Personal account dealing requirements applicable to relevant persons in relation to their own investments;
- A gifts and inducements log registering the solicitation, offer or receipt of certain benefits;
- The prohibition of external business interests conflicting with our interests as far as the company's officers and employees are concerned, unless board approval is provided;
- A policy designed to limit the conflict of interest arising from the giving and receiving of inducements;
- Establishment of the four-eyes principle in supervising the Company's activities.

8. DISCLOSURE

When the Company becomes aware of a situation where a conflict arises, the Company will disclose it to the Client in a durable medium prior to undertaking investment business from that particular Client, or if the Company does not believe that disclosure is appropriate to manage the

	POLICY		CMR-P007-002	
	CONFLICT OF INTEREST POLICY		19.02.2024	Page 8 of 9

conflict, the Company may opt not to proceed with the transaction or matter giving rise to the conflict.

This Policy is subject to review and change as we deem necessary. We reserve the right to make any amendments as appropriate. You will be able to find the latest version of this Policy on our website. The client consents and agrees that the latest versions of any of the Documentation and/or Policies published on the Company's official website shall prevail as this has been communication via a durable medium.

9. MARKETING COMMUNICATION

As a rule, the Company prior to distributing any marketing communication material to its clients and/or potential clients, ensures that it has been reviewed and approved by its Compliance Officer. On the above-mentioned basis, the Company shall ensure that any recommendation contains a clear and prominent statement that (or, in the case of an oral recommendation, to the effect that) it has been prepared in accordance with legal requirements designed to promote the independence of investment research and that it is not subject to any prohibition on dealing ahead of the dissemination of investment research.

10. ASSESSMENT – RESOLUTION – NOTIFICATION & RECORD KEEPING

The Compliance Department is responsible for assessing, managing and mitigating all conflicts of interest situations, including but not limited to, assessing the following:

1. Whether the situation represents an actual or potential conflict of interest for either the Client or the Company
2. Whether the situation identified is a perceived conflict for either the Client or the Company and the risk that it may become an actual conflict
3. How the conflict of interest can be appropriately managed and/or mitigated and the degree of materiality of the conflict of interest
4. Whether the conflict of interest identified requires immediate notification to Senior Management for further assessment, giving information on the seriousness of the risk and direction on the level of reporting/action required.

The Compliance Officer shall provide, at least annually, written reports on situations which may give rise to Conflicts of Interest to the Senior Management.

Further, the Company takes all the necessary actions to resolve conflicts of interest identified, including, but not limited to, the management and mitigation of the conflict(s) identified in such a way (i) as to prevent the conflict of interest arising in the future; (ii) as to ensure the interests of the Client, or the Company or the Company's Employee are not permitted to disadvantage or lead to a loss for the Client's and/or the Company's interests; and further (iii) communicate and

	POLICY		CMR-P007-002	
	CONFLICT OF INTEREST POLICY		19.02.2024	Page 9 of 9

notify the conflict of interest to the Client(s) in writing so that the Client(s) may decide upon a satisfactory course of action and make an informed decision about whether or not he/she wishes to proceed prior to engaging to a business relationship with the Company (new Client) and/or proceed with further services provided by the Company (existing Client).

Finally, the Compliance Department maintains a Conflicts of Interest Register of all circumstances in which a conflict of interest has been identified and/or arisen, containing the measures taken to mitigate or manage the conflict of interest identified and/or arisen, a description of the circumstances which constituted or may have constituted a conflict of interest, names of the persons involved, the name of the person responsible for the mitigation of the conflict, a description of the steps taken in order to mitigate the conflict - including client disclosures and subsequent resolutions. The Conflicts of Interest Register shall be updated any time a conflict of interest is identified and/or arisen or may have arisen and is kept for the durations of the business relationship with the client and for a minimum of five years after the conclusion of such business relationship.

11. FURTHER INFORMATION

Any questions regarding this Policy should be addresses, in first instance, to our Customer Support Department at support@keytotrading.com and by telephone at 25211994. You may also contact our Compliance Department at compliance@keytotrading.com.

12. PRIOR CONSENT

In order to execute transactions on Client's behalf, the Company will require the Client's prior consent to this Conflict-of-Interest Policy. The Client will be considered to have provided prior consent to this Conflicts of Interest Policy and upon signing the Company's terms and conditions.