

# Conflict of Interest Policy

*How we identify, prevent, manage and disclose conflicts of interest in our money broking activities.*

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## 1. Issuing Entity

This document is issued by Infinity Union Markets Ltd. (Company Registration No. LL18105), holder of Money Broker License No. MB/25/0135 issued by the Labuan Financial Services Authority ("Labuan FSA") under the Labuan Financial Services and Securities Act 2010 (LFSSA), Part VI – Money Broking.

Registered office: Unit Level 12F(1), Main Office Tower, Jalan Merdeka, Financial Park Labuan, 87000 Federal Territory of Labuan, Malaysia

Operating office: Office Suite 1359, Level 13(C), Block 4, Financial Park Complex Labuan, Jalan Merdeka, 87000 Labuan, Federal Territory of Labuan, Malaysia

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## 2. Policy Statement

Infinity Union Markets Ltd. acts as an agency money broker on a Straight-Through Processing basis. We do not engage in proprietary trading against our clients, do not act as a market maker, and do not operate a dealing desk. Where actual or potential conflicts of interest arise, they are identified, mitigated and where necessary disclosed in writing before the affected transaction is executed.

## 3. Potential Conflicts We Have Considered

We have specifically considered, among others, the following potential conflicts:

- Receipt of rebates, fees or other benefits from liquidity providers based on routed volume.
- Personal account dealing by directors, officers or employees.
- Gifts, hospitality and inducements from counterparties or service providers.
- Outside business interests of staff that may interfere with their duties.
- Marketing and introducing-broker arrangements creating an incentive to direct clients toward specific products.

## 4. Mitigation Measures

We implement, among others, the following measures:

- An order routing logic disclosed in the Best Execution Policy that prioritises execution quality over any commercial arrangement with liquidity providers.
- A personal-account dealing policy requiring pre-clearance and reporting.
- A gifts and inducements register maintained by the Compliance Officer.
- Outside-business-interest disclosure on hiring and at least annually thereafter.
- Information barriers between functions where appropriate.
- Training for all staff at induction and at least annually.

## 5. Disclosure

Where a conflict cannot be reasonably mitigated, we will disclose the nature and source of the conflict to the affected client in writing in sufficient time to allow the client to make an informed decision before proceeding.

## 6. Record-Keeping

All identified conflicts, mitigation steps and disclosures are documented in our Conflicts Register and retained for at least six (6) years.