



PRIMAVX

Conflicts of Interest Policy

This Conflicts of Interest Policy (hereinafter referred to as the “Policy”) is established to identify, disclose, and manage situations where potential conflicts may arise between the Company, its Clients, or among Clients themselves. The purpose of this Policy is to ensure that conflicts are addressed with transparency, fairness, and integrity, safeguarding the interests of all stakeholders.

By utilizing the Company’s services, you confirm that you have read, understood, and agreed to comply with this Policy and the Company’s T&C.

Article 1.1: Reporting Potential Conflicts

Procedure for Raising Concerns

Clients who suspect a conflict of interest must submit a detailed notification to the Company via the official email address. The notification should include:

- Full legal name
- Trading account identifier
- Registered email address
- A comprehensive description of the issue, including relevant supporting documentation

Upon receipt, the Company may request additional information to conduct a thorough investigation. The Company reserves the right to dismiss or decline concerns that are deemed unfounded or fall outside the scope of this Policy.

Article 1.2: Authority for Action

Suspension or Termination of Activities

If a conflict of interest is verified, the Company retains the right to suspend, restrict, or terminate any ongoing trades or activities within the affected account(s). In cases where



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multiple parties are involved, the Company may disclose the nature of the conflict to the relevant parties for the purpose of resolution.

Article 1.3: Identification of Potential Conflicts

Conflict Scenarios

The Company actively monitors and evaluates situations that could lead to conflicts of interest. Examples of such scenarios include, but are not limited to:

- Financial gain or avoidance of loss by the Company or its employees at the expense of a Client
- Profit or avoidance of loss by one Client at the expense of another Client
- Compensation or inducements received from third parties for services provided, beyond agreed fees or commissions

Article 1.4: Mitigation and Preventive Measures

Conflict Management Strategies

Upon identification of a potential conflict, the Company may implement one or more of the following measures:

- Segregating access to sensitive information among conflicting parties
- Monitoring third-party service providers to prevent conflicting interests
- Ensuring Client remuneration is independent of other Clients' performance
- Restricting any undue influence over services or investments
- Limiting access to confidential systems and data
- Establishing protocols for transparency in legitimate inducements

Article 1.5: Obligations of Clients and Disclosure Limitations

Client Responsibilities



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Clients are expected to fully cooperate in the investigation and resolution of conflicts. Clients agree not to disclose or publicly comment on unresolved conflicts. Premature disclosures may result in legal action.

The Company will:

- Review conflicts within 7-14 business days, with longer durations for complex issues
- Notify relevant parties as necessary for resolution
- Take legal action against any threats, harassment, or attempts to coerce Company personnel

Article 1.6: Final Provisions

Acknowledgment and Amendments

By continuing to access or use the Company's services, Clients acknowledge and accept the provisions of this Policy.

The Company reserves the right to amend, modify, or update this Policy at any time. Changes will take effect immediately upon posting on the Company's website.

Article 1.7: Record-Keeping

Documentation and Retention of Conflict Records

The Company shall maintain comprehensive records of all reported conflicts of interest, including:

- Details of the conflict reported
- Investigations conducted
- Actions taken to resolve or mitigate the conflict
- Communications with involved parties



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All records will be retained in accordance with applicable legal, regulatory, and internal retention requirements, and will be made available for auditing or regulatory review as necessary.

Article 1.8: Escalation Procedures

Hierarchy for Resolution of Complex Conflicts

In cases where a reported conflict of interest cannot be resolved at the initial review stage, the matter shall be escalated to senior management or the Compliance Department.

Escalation ensures:

- Independent assessment of the conflict
- Implementation of appropriate mitigation measures
- Transparent communication to affected parties where necessary

The Company reserves the right to involve external advisors or independent reviewers if required to resolve complex or high-risk conflicts.

Article 1.9: Client Communication Policy

Notification and Updates on Conflict Resolution

The Company will notify Clients involved in a conflict of interest in a timely and transparent manner, subject to confidentiality obligations. Notifications will include:

- Confirmation that a conflict has been identified and investigated
- Steps taken to mitigate or resolve the conflict
- Any actions required of the Client to assist in resolution

Clients are expected to cooperate and respond promptly to communications related to the resolution process.



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Article 1.10: Compliance Oversight

Monitoring and Enforcement of the Policy

The Compliance Department is responsible for overseeing the implementation, monitoring, and enforcement of this Policy. Responsibilities include:

- Conducting periodic reviews of conflict identification and mitigation procedures
- Ensuring all conflicts are appropriately documented and resolved
- Reporting to senior management and regulatory authorities as required
- Providing guidance to employees and Clients regarding compliance with this Policy

The Company may amend or update the oversight framework to reflect evolving regulatory requirements or operational changes.