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# CONFLICTS OF INTEREST POLICY

ABF Trade EU Limited

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**ABF Trade EU Limited**  
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CySEC Licence No. 171/12  
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## Document Control

Version	Date	Description	Approved By
v1.0	12 May 2026	Initial version for ABF Trade EU Limited	Board of Directors

### 1. Introduction

By accepting this Conflicts of Interest Policy ("the Policy"), you acknowledge and confirm that the official legally binding language of ABF Trade EU Limited is English. Where this Policy is made available in other languages for convenience, the English version shall prevail in the event of any discrepancy.

ABF Trade EU Limited ("the Company") is a Cyprus Investment Firm ("CIF") with business address at 162 Fragklinou Rousvelt, 1st & 2nd Floors, Limassol 3045, Cyprus, registered under Company Registration No. HE 291958 and authorised and regulated by the Cyprus Securities and Exchange Commission ("CySEC") under CIF Licence No. 171/12.

Following the implementation of the Markets in Financial Instruments Directive II (MiFID II, Directive 2014/65/EU) in the European Union and its transposition into Cypriot law through the Investment Services and Activities and Regulated Markets Law of 2017 (L.87(I)/2017) as amended (the "Law"), all Cyprus Investment Firms are required to identify and manage conflicts of interest and, where applicable, to disclose them to Clients.

### 2. Purpose

The purpose of this Policy is to set out the Company's approach in identifying, managing, and, where necessary, disclosing conflicts of interest that arise in the course of its business activities. This Policy is designed to protect the interests of the Company's Clients and to ensure that the Company acts in the best interests of each Client.

### 3. Scope

In accordance with the Law, the Company is required to take all appropriate steps to identify and to prevent or manage conflicts of interest between:

- The Company itself, including its managers, employees, and tied agents ("Relevant Persons"), and its Clients.
- One Client and another Client of the Company.

For the purposes of this Policy, a "Relevant Person" includes:

- A member of the board of directors, partner or equivalent, manager, or tied agent of the Company.
- A member of the board of directors, 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, as well as any other natural person whose services are placed at the disposal of, and under the control of, the Company or of a tied agent of the Company.
- A natural person who is directly involved in the provision of services to the Company or to its tied agent under an outsourcing arrangement.

The Company must establish adequate procedures to ensure compliance with the Law, including appropriate rules governing personal account dealings by Relevant Persons.

## 4. Identification of Conflicts of Interest

For the purposes of identifying the types of conflicts of interest that may arise in the course of providing investment and ancillary services, the Company considers, as a minimum, whether the Company or a Relevant Person:

- 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 that is distinct from the Client's interest in that outcome.
- Has a financial or other incentive to favour the interest of another Client or group of Clients over the interests of the Client.
- Receives or may receive goods, services, or other inducements in addition to standard commission or fees from a person other than the Client in relation to a service provided to the Client.
- Carries on the same business as the Client.

Taking into consideration the services the Company offers, potential sources of conflicts of interest may arise from:

- The investment services and/or ancillary services (or a combination thereof) provided by the Company to, for, and/or on behalf of one Client conflicting with those provided to another Client.
- The maximisation of trading volumes in order to increase receivable brokerage commissions, which may directly conflict with the interest of the Client in minimising costs.
- The selection of an execution venue (liquidity provider), including any related party, whilst ensuring that the principles of best execution are upheld.
- Any inducements received or granted by or to third parties in connection with investment services and/or ancillary services.

Potential conflicts of interest may also arise from:

- Performance-based remuneration and/or inducements granted or paid to employees of the Company, which may create an incentive to act against the interests of the Client.
- Remuneration and/or inducements granted or paid to third parties (affiliates or business introducers) based on referral fees or trading volumes.
- The Company acting as agent for the Client in relation to transactions in which a related company acts as a principal.
- A transaction being effected in financial instruments in respect of which the Company may benefit from a commission, fee, or other incentive.

It should be noted that the scenarios described above do not necessarily give rise to a conflict of interest or any material risk of damage to the interests of the Client. The Company will continuously evaluate all potential sources of conflicts of interest.

## 5. Management of Conflicts of Interest

The measures adopted by the Company are designed to ensure that Relevant Persons engaged in different business activities involving a conflict of interest carry out those activities at a level of independence appropriate to the size and activities of the Company. These measures include:

- Procedures to prevent or control the exchange of information between Relevant Persons engaged in activities involving a risk of conflict of interest where the exchange of that information may harm the interests of one or more Clients.
- Separate supervision of Relevant Persons whose principal functions involve carrying out activities on behalf of, or providing services to, Clients whose interests may conflict.

- Removal of any direct link between the remuneration of Relevant Persons principally engaged in one activity and the remuneration of, or revenues generated by, Relevant Persons principally engaged in another activity where a conflict of interest may arise.
- 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.
- Measures to prevent or control the simultaneous or sequential involvement of a Relevant Person in separate investment or ancillary services where such involvement may impair the proper management of conflicts of interest.

The Company maintains and operates effective organisational and administrative procedures to manage and prevent the identified conflicts of interest.

## 5.1 General Measures

The Company has adopted the following general measures to manage conflicts of interest:

- A 'need to know' policy on disseminating confidential and inside information within the Company.
- Information barriers ('Chinese walls') restricting the flow of confidential and inside information within the Company, and physical separation of departments where appropriate.
- Procedures governing access to electronic data and confidential information.
- Segregation of duties that may give rise to a conflict of interest if carried on by the same individual.
- Personal account dealing restrictions for Relevant Persons with respect to their own investments in financial instruments.
- A gifts and inducements register recording the solicitation, offer, or receipt of benefits exceeding defined thresholds.
- Policy designed to limit conflicts of interest arising from giving or receiving inducements.
- An in-house Compliance function to monitor and report on the above matters to the Board of Directors.
- Appointment of an Internal Auditor to ensure that appropriate systems and controls are maintained and to report to the Board of Directors.
- Prohibition on officers and employees of the Company having external business interests that conflict with the interests of the Company's Clients.
- Establishing the four-eye principle in supervising the Company's key activities.

## 5.2 Measures in Relation to Order Execution

Client Orders are executed in line with the Company's Best Interest and Order Execution Policy, which requires the Company to take all sufficient steps to achieve the best possible outcome for Clients. The Company does not provide any preferential treatment to any one Client or group of Clients. The Company's internal systems process Client Orders in the order in which they are received.

## 5.3 Measures in Relation to Inducements and Remuneration

**Employee Remuneration:** The Company does not remunerate or assess the performance of its staff in a way that conflicts with the Company's duty to act in the best interests of its Clients. In particular, the Company does not pay or receive any fee or commission, or provide or receive any non-monetary benefit, in connection with the provision of an investment service to a Client that does not enhance the quality of the relevant service provided to the Client and that would not be permitted under MiFID II inducement rules.

**Affiliate Remuneration:** The Company remunerates its affiliates and business introducers solely on a cost-per-acquisition (CPA) or cost-per-lead (CPL) basis. The Company does not pay and will not accept any remuneration structure based on Client trading volume, revenue share, or any arrangement that creates an incentive for the affiliate to encourage Clients to trade more than is in their interest. Affiliates are not given access to Clients' personal information and are prohibited from

directly contacting Clients of the Company without prior written authorisation. Affiliates are further prohibited from encouraging prospective Clients to place deposits or trade beyond their investment objectives or risk appetite. The Company monitors affiliate communications on an ongoing basis to ensure compliance with applicable regulatory requirements and the Company's standards.

The Company does not offer, solicit, or accept any inducements other than those outlined as fees or commissions in accordance with applicable MiFID II rules. The Company does not allow its employees to accept any gifts or monetary benefits of any kind that may cause a conflict of interest or impair their ability to act in the best interests of Clients.

#### **5.4 Measures in Relation to Third Parties and Outsourced Service Providers**

The Company has in place non-disclosure and confidentiality agreements with all related parties, outsourced service providers, and business associates. The Company controls the information communicated between the Company's entities, related parties, and outsourced service providers. The Company maintains a register of all related party and outsourced provider payments and assesses them in terms of inducement compliance.

The Compliance function has in place monitoring procedures for the services provided by related parties and outsourced service providers.

## **6. Disclosure of Conflicts of Interest**

When the measures taken by the Company to manage conflicts of interest are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of a Client will be prevented, the Company will clearly disclose to the Client the general nature and/or sources of the conflict of interest, and the steps taken to mitigate those risks, before undertaking business on the Client's behalf.

The disclosure will be made in good time, in a durable medium, and will include sufficient detail, taking into account the nature of the Client, to enable the Client to take an informed decision with respect to the investment service or transaction in the context of which the conflict of interest arises.

## **7. Client Consent**

By entering into a Client Agreement with the Company for the provision of investment services, the Client acknowledges and consents to this Policy and acknowledges that they have read and understood its contents.

In the event that the Company is unable to manage a conflict of interest situation through the measures described in this Policy, the Company shall disclose the conflict to the Client and, where necessary, refrain from acting.

## **8. Amendments and Additional Information**

8.1. The Company reserves the right to review and/or amend this Policy whenever it deems this appropriate or when required to do so by applicable law or regulatory requirements. Where any amendment materially affects Clients, the Company will notify Clients in advance in accordance with the Client Agreement.

8.2. An updated version of this Policy will always be available on the Company's website at [www.abftrade.com/eu](http://www.abftrade.com/eu).

8.3. Should you require any further information or have any questions about this Policy, please contact:

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