

J. Knobel Investor Services Limited is a tied agent (hereinafter (“the Company”) of MEGA EQUITY SECURITIES AND FINANCIAL SERVICES PUBLIC LTD (Registration No. HE107394) (hereinafter (“the Principle”) is an authorized investment firm supervised by the Cyprus Securities and Exchange Commission under license number HE107394 for the provision of financial and investment services.

Conflicts of Interest. A Conflict of Interest (“Conflict”) is a situation or arrangement where the Company, or a company with which it has an association, and/or any of its employees is subject to multiple influences, the competition of which might adversely affect decision-making or outcomes in the course of conducting business. A Conflict can be due to the competition of legitimate influences (such as acting for multiple clients), or the presence of harmful ones (such as personal gain).

Because the Company provides a wide range of services, the Company may from time to time have interests that conflict with its clients’ interests or with the duties that it owes to its clients. Conflicts can arise between:

1. one client and another (client versus client);
2. the Company and a client (the Company versus client);
3. an employee and a client (employee versus client);
4. an employee and the Company (employee versus the Company); and/or
5. one part of the Company and another (the Company versus the Company).

The Company has policies and procedures that are designed to identify and prevent or manage Conflicts. Conflicts policies are reviewed at least annually. These policies and procedures include arrangements to safeguard the interests of clients.

How the Company deals with Conflicts.

The Company organizational structures are designed so that behavior that could lead to Conflicts is not incentivized or rewarded. Where necessary, the Company restricts the flow of information to certain employees to protect its clients’ interests.

The Company has procedures in place to:

- Identify all types of potential Conflicts that could reasonably arise in the context of its activities;
- Maintain registers of all potential Conflicts identified;
- Prevent or manage Conflicts on an ongoing basis;
- Disclose Conflicts where appropriate; and
- Maintain evidence of all occurrences of Conflicts that cannot be managed.

Identifying Conflicts.

The Company is required to consider the types of potential Conflict relevant to the specific services and activities it will carry out.

For example, potential Conflicts are considered when:

- Developing a new product;
- Establishing or amending any cross-referral, revenue sharing or joint venture arrangements.

The Company has identified the following circumstances which may give rise to a conflict of interest:

- The Company, its employees and related persons may have, establish, change or cease to have positions in any financial instrument covered by an investment recommendation or advice;
- the Company may receive or pay inducements to or from third parties due to the referral of new clients or clients' trading;
- the Company may have an interest in maximizing trading volumes in order to increase its commission revenue, which is inconsistent with the client's personal objective of minimizing transaction costs;
- The Company or a related person carries on the same business as the client.

When potential Conflicts involve clients, the assessment also considers whether the Company and/or any employee:

- Is likely to make a financial gain or avoid a financial loss at the expense of any client;
- Has an interest in the outcome of a service provided to a client, or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
- Has a financial or other incentive to favor the interest of one client (or group of clients) over another;
- Carries on the same business as the client; and/or
- Receives or will receive an inducement in relation to a service provided to the client from a person other than the client.

The Company maintains internal registers, documenting and evaluating all identified potential Conflicts. These registers also record the controls in place to prevent or manage each type of Conflict and are subject to regular oversight and review by the Company's management.

Preventing or managing Conflicts.

The Company structures the remuneration, deployment, and management of employees in a way that minimizes Conflicts.

Conflicts clearing procedures ensure that, where necessary, potential Conflicts are escalated and managed before the Company is committed to a transaction.

In some cases, the Company will consider declining to act for one of more clients. For example, if:

- A Conflict is too great;
- Informed consent cannot be obtained or is an insufficient control to manage a Conflict.

Procedures and Controls to Managing Conflicts of Interests.

In general, the procedures and controls that the Company follows to manage the identified conflicts of interest include the following measures:

- I. 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.
- II. All employees are bound by professional secrecy and confidential information is only to be shared if essential for performing a job function.
- III. All employees receive instructions and guidance regarding managing of conflicts of interest.
- IV. The separate supervision by the Company's Principle of relevant persons whose functions involve carrying out regulated 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.

- V. Procedures governing access to electronic data.
- VI. Personal account dealing requirements applicable to relevant persons in relation to their own investments.
- VII. A gifts and inducements log registering the solicitation, offer or receipt of certain benefits.
- VIII. Appointment of external compliance consultant to ensure that appropriate systems and controls are maintained and report to the Company's management and the Company's Principal.

Disclosure.

The Company may make general disclosures to clients about certain types of potential Conflicts, explaining how such Conflicts are managed to mitigate the risk of damage to clients' interests. However, where the Company has used all reasonable efforts to prevent or manage a Conflict, but the risk of damage to a client interests remains, a specific disclosure about the presence of a Conflict will be made to the client. Specific disclosures will be made prior to the conclusion of a contract, in a durable medium, and include sufficient detail, considering the nature of the client, to enable that client to take an informed decision.