



**INVESTAIN**

Conflict Policy

## Conflict of Interest Policy – Introduction

As a financial institution, INVESTAin Ltd encounters actual and potential conflicts of interest. INVESTAin is committed to identifying and addressing these conflicts by establishing, implementing, and maintaining an effective conflict of interest policy. This policy aims to prevent any risks that may harm the interests of our customers.

This statement reveals the conflicts of interest that existing or potential customers may encounter when engaging with INVESTAin, the laws and regulations governing conflicts of interest that INVESTAin must adhere to, and the policy adopted by INVESTAin for preventing and managing conflicts of interest.

## Laws and Regulations

Conflicts of interest are inherent in the financial services industry. The Code of Business Conduct issued by the Financial Services Commission acknowledges the necessity of avoiding conflicts and, if they arise, ensuring fair treatment of customers. Additionally, as a licensee of the Financial Services Commission under the Securities Act 2005, Securities Rule 2007, and Financial Services Rules 2008, INVESTAin is obligated to manage conflicts to safeguard customer interests.

## Identification and Examples of Conflicts

Conflicts of interest may arise due to employees' superior knowledge and the range of products offered. These conflicts can occur between a firm and a customer or between customers. Situations leading to conflicts of interest include when a firm or relevant person:

- Stands to gain financially at the customer's expense.
- Has an interest in the outcome of a service or transaction different from the customer's.
- Possesses incentives to prioritize another customer's interests.
- Engages in the same business as the customer.
- Receives an inducement from someone other than the customer.

For INVESTAin, the main conflict of interest that may occur when providing services to customers is identified.

## INVESTAin Limited Policy

As mandated by law, INVESTAin implements and maintains an effective conflict of interest policy to prevent conflicts from posing material risks to customer interests. Records of business activities are kept to identify conflicts, and procedures and measures are in place to manage and control them. This includes segregating duties, separate supervision, Personal Account Trading policy,

Gifts and Inducement policy, preventing information exchange, acting in the best interest of customers, and, in some cases, declining to act for a customer.

## **INVESTAiN Global Policy**

INVESTAiN's global entity, INVESTAiN Global, also implements and maintains a conflict of interest policy in compliance with applicable law. Similar measures are taken to identify, manage, and control conflicts of interest.

## **Disclosure**

While INVESTAiN is dedicated to implementing and maintaining the conflict of interest policy, there may be instances where the policy is insufficient to prevent risks to a customer's interest. In such cases, INVESTAiN will disclose the general nature and sources of conflicts of interest to the customer, allowing them to make informed decisions.

## **Review**

INVESTAiN is committed to expanding its services and products to meet customer demand. Simultaneously, the conflict-of-interest policy is regularly reviewed and assessed to ensure its adequacy in compliance with applicable laws.