

CurrenC Group PTY LTD

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Conflict of Interest Policy

1. Introduction

CurrenC Forex Group (Pty) Ltd ("the Company") is committed to conducting its business with integrity, transparency, and in compliance with applicable regulations, including its obligations as a licensed Crypto Asset Service Provider (CASP) in South Africa. This Conflict of Interest Policy aims to ensure that the interests of the Company, its clients, and stakeholders are managed fairly and professionally.

2. Purpose

This policy establishes a framework for identifying, disclosing, managing, and mitigating conflicts of interest that may arise in the course of the Company's operations, particularly in relation to the provision of arbitrage trading and related crypto asset services.

3. Definition of Conflict of Interest

A conflict of interest arises when the interests of the Company, its employees, directors, or representatives interfere with or have the potential to interfere with the best interests of its clients. Such conflicts may occur when:

- The Company, or an employee, has a financial or other incentive that conflicts with a client's best interests.
- The Company's obligations to one client conflict with its obligations to another client.
- The Company engages in activities that give it an unfair advantage over clients or competitors.

4. Identification of Conflicts of Interest

The Company has identified the following potential areas of conflict of interest:

- Employees or directors engaging in personal crypto trading that could affect the Company's market position or clients' trades.
- Providing preferential treatment to certain clients in a manner that disadvantages others.
- The Company or its employees having a financial interest in crypto exchanges or service providers used in arbitrage transactions.
- Employees receiving gifts, benefits, or incentives from third parties that could influence decision-making.



5. Managing and Mitigating Conflicts of Interest

To manage conflicts of interest, the Company will implement the following measures:

- **Disclosure:** All actual or potential conflicts of interest must be disclosed to management and, where appropriate, to affected clients.
- **Fair Treatment of Clients:** The Company shall ensure that all clients receive equal access to arbitrage opportunities and fair treatment in execution and pricing.
- **Third-Party Relations:** Employees and directors must declare any interests in external crypto exchanges, liquidity providers, or counterparties.
- **Gifts and Benefits:** Employees must not accept gifts or incentives from third parties that could influence decision-making. Any gifts exceeding a nominal value must be disclosed and approved by management.
- **Compliance Monitoring:** The Company's compliance team will monitor transactions, employee activities, and trading practices to detect and prevent conflicts of interest.

6. Disclosure to Clients

Where a conflict of interest cannot be adequately mitigated, the Company will provide clients with full and transparent disclosure of the conflict and the measures taken to manage it. Clients may then make informed decisions regarding their engagements with the Company.

7. Employee Responsibilities

- Employees must report any actual or perceived conflicts of interest to their direct supervisor or the Compliance Officer.
- Employees must complete periodic training on conflict-of-interest policies and procedures.
- Employees are prohibited from engaging in any trading activities or business relationships that compete with or undermine the Company's operations.

8. Compliance and Review

- The Company's Compliance Officer will oversee the implementation and adherence to this policy.
- The policy will be reviewed annually or as required to ensure its continued effectiveness and compliance with regulatory requirements.

9. Consequences of Non-Compliance

Failure to comply with this policy may result in disciplinary action, including termination of employment and potential legal action, depending on the severity of the breach.



10. Policy Approval and Updates

This policy has been approved by the Company's management and will be updated periodically to reflect changes in business operations and regulatory requirements.
