

INFINOX

TRADING POWER

Conflicts of Interest Policy

INFINOX Capital Limited

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1. Introduction

INFINOX Capital Limited is a company registered in England and Wales (Company Number 06854853). The Company is authorised and regulated by the Financial Conduct Authority (FCA Reference Number 501057).

A conflict of interest is a situation in which competing professional or personal interests may impair the ability of a firm or its employees to act impartially and in the best interests of clients.

INFINOX Capital Limited ("INFINOX" or the "Company") is committed to identifying, managing and, where possible, preventing conflicts of interest that may arise in the course of providing services to its clients.

This policy outlines the approach taken by INFINOX to manage conflicts of interest in accordance with applicable regulatory requirements, including the Financial Conduct Authority (FCA) Systems and Controls (SYSC) rules and the FCA Principles for Businesses.

Principle 8 of the FCA Principles for Businesses states that a firm must manage conflicts of interest fairly, both between itself and its clients and between a client and another client.

2. Scope

This policy applies to INFINOX and to its directors, employees, and any other persons directly or indirectly involved in the provision of services on behalf of the Company. The objective of this policy is to ensure that conflicts of interest are identified, managed and disclosed where necessary so that clients are treated fairly and their interests are protected.

Conflicts of interest may arise between:

- INFINOX and its clients
- One client and another client
- INFINOX employees and clients
- The Company and its employees or associated persons

The Company maintains appropriate organisational and administrative arrangements designed to prevent conflicts of interest from adversely affecting the interests of clients.

3. Our Approach to Managing Conflicts

Managing conflicts by disclosure should be the last resort and that as far as possible, conflicts of interest should be avoided. Where they do arise, INFINOX recognises that conflicts of interest may be managed by:

- a) Controlling;
- b) Avoiding; and
- c) Disclosing the conflicts.

INFINOX is committed to avoiding conflicts of interest. We will take reasonable steps to detect conflicts of interest that could arise when a service is being provided, between ourselves, which includes its managers, employees and associated agents or any person directly or indirectly controlled by them, and its clients, or between its clients.

Where actual or potential conflict of interest could arise between us and a client, we ensure they are correctly identified, monitored and managed. We also keep a record of the kinds of activity undertaken in which a material conflict of interest has arisen or could arise.

We will keep an up-to-date list of the kinds of services, or investment activities, carried out by the Company or on its behalf, in which a conflict of interest has arisen, or which have posed a significant risk of harming the interests of one or more clients.

In the event of a conflict of interest arising and our identification that our actions to manage the conflicts of interest is not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of our client will be prevented, we will clearly disclose the general nature and/or sources of conflicts of interest to our client before undertaking business for the client.

Below is a summary of the principal conflicts (some inherent in this type of business) that can arise and the steps INFINOX takes to mitigate them.

4. Identifying Conflicts of Interest

INFINOX maintains systems and procedures designed to facilitate the timely identification of actual, potential or perceived conflicts of interest. Where a conflict is identified, appropriate steps are taken to assess and manage the conflict promptly and fairly.

When providing investment or ancillary services, the Company considers whether it or a relevant person:

- May make a financial gain or avoid a financial loss at the expense of a client;
- Has an interest in the outcome of a service provided to a client that differs from the client's interest;
- Has a financial or other incentive to favour the interests of one client or group of clients over another client;
- Carries out the same business as a client; or
- Receives an inducement from a third party in relation to a service provided to a client.

The Company also considers whether employees, associated persons or clients themselves may obtain a financial benefit or avoid a loss at the expense of another client.

Where such circumstances arise, they are assessed to determine whether they could give rise to a material conflict of interest.

5. Managing Conflicts of Interest

INFINOX maintains organisational and administrative arrangements designed to manage conflicts of interest effectively. These arrangements include:

- Policies and procedures to identify and manage potential conflicts;
- Appropriate supervision and oversight of employees;
- Measures to prevent or control the exchange of information where such exchange could harm client interests;
- Separation of duties where appropriate;
- Policies governing personal account dealing;
- Remuneration arrangements designed to promote fair treatment of clients; and
- Policies governing gifts, hospitality and inducements.
- Training provided to employees to ensure awareness of conflicts of interest and the importance of managing them appropriately.

The Company maintains records of conflicts of interest that have arisen or may arise in the course of its business activities. Employees are required to act honestly, fairly and professionally in accordance with the best interests of clients and must disclose any circumstances that may give rise to a conflict of interest.

6. Gifts and Inducements

INFINOX maintains policies and procedures governing the giving and receiving of gifts, hospitality and other inducements. These arrangements are designed to ensure that such benefits do not impair the duty of the Company or its employees to act in the best interests of clients.

7. Remuneration

The Company maintains remuneration practices that are designed to promote responsible business conduct and the fair treatment of clients. Remuneration arrangements are structured so as not to create incentives that could lead to behaviour which conflicts with the interests of clients.

8. Disclosure of Conflicts

Where the arrangements established by the Company to manage conflicts of interest are not sufficient to ensure, with reasonable confidence, that the risk of damage to client interests will be prevented, the Company will disclose the general nature and/or source of the conflict to the client before undertaking business.

Such disclosure will also describe the steps taken to mitigate or manage the conflict so that the client can make an informed decision regarding the service being provided.

Any such disclosure will provide sufficient detail to enable the client to make an informed decision in relation to the service being provided.

Where a conflict cannot be appropriately managed, the Company may decline to act for the client in relation to the relevant matter.

9. Monitoring and Review

INFINOX maintains appropriate oversight arrangements to ensure that conflicts of interest are effectively identified and managed. This policy is reviewed periodically to ensure it remains appropriate and consistent with regulatory requirements.