

CONFLICT OF INTEREST POLICY

VITTAVERSE LTD

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0. Introduction and Status of this Policy

0.1 This Conflict of Interest Policy (the “Policy”) explains how Vittaverse Ltd (the “Company”, “we”, “us”, “our”) identifies, prevents, manages, and (where appropriate) discloses conflicts of interest that may arise between:

- a) the Company and its Clients;
- b) one Client and another Client; and/or
- c) the Company and its staff, affiliates, or related parties.

0.2 This Policy is client-facing and may be incorporated by reference into the Company’s Client Services Agreement and/or other applicable terms. It applies to all Services and Financial Instruments offered by the Company.

0.3 The Company is committed to acting honestly, fairly, and professionally, and to managing conflicts of interest in line with Applicable Regulations and internal standards.

1. Definitions

1.1 “**Applicable Regulations**” means all applicable laws, regulations, rules, guidance and obligations relevant to the Company’s services, including any requirements relating to conflicts of interest.

1.2 “**Conflict of Interest**” means any situation where the interests of the Company, a Client, staff member, affiliate, or another party may conflict with the duty owed to the Client, or where one Client’s interests may conflict with another’s.

1.3 “**Financial Instruments**” means the instruments offered by the Company (including CFDs and other OTC leveraged products).

1.4 “**Services**” means the services provided by the Company to Clients, including order execution and related account services.

2. When Conflicts of Interest May Arise

Conflicts of interest may arise in situations including (without limitation):

2.1 Principal Trading / Counterparty Role:

The Company may act as principal and counterparty to Client transactions. This may create an inherent conflict because the Company may benefit when a Client loses and may lose when a Client profits.

2.2 Pricing, Spreads, and Execution Discretion:

The Company may set or source prices and may apply spreads, mark-ups, commissions, swaps, and other charges. Execution outcomes may be affected by volatility, liquidity, slippage, and operational constraints, which may create perceived or actual conflicts.

2.3 Order Handling and Risk Management:

The Company may hedge or offset its risk with liquidity providers or third parties. The timing and method of risk management may differ from Client order flow and may create conflicts.

2.4 Client Categorisation and Service Features:

Different Clients may receive different account types, leverage, spreads, margins, promotions, or services based on eligibility criteria or risk controls, potentially creating conflicts between Clients.

2.5 Introducers, Affiliates, and Third-Party Arrangements:

The Company may pay remuneration (including rebates or commissions) to introducing brokers, affiliates, or partners. Such payments may create incentives for those parties to promote the Company's services in a manner that may not be aligned with a Client's best interests.

2.6 Staff Incentives and Remuneration:

Staff compensation may include performance-related elements that could create incentives affecting the way services are offered or administered.

2.7 Gifts, Hospitality, and Outside Interests:

Conflicts may arise if employees receive gifts, hospitality, or have outside business interests that could influence decision-making.

2.8 Related Parties and Outsourcing:

The Company may outsource certain functions to third parties or use vendors with which it has commercial relationships that may create conflicts.

2.9 Corporate Actions and Business Transactions:

During mergers, acquisitions, restructurings, or other corporate events, conflicts may arise between the Company's business interests and Clients' interests.



3. Our Conflict Management Principles

3.1 The Company maintains organisational and administrative arrangements designed to identify, prevent, manage and monitor Conflicts of Interest to reduce the risk of harm to Clients.

3.2 Where a Conflict of Interest cannot be prevented, the Company will manage it fairly, and may disclose it to the Client where appropriate.

3.3 The Company will take reasonable steps to ensure that Clients are treated fairly and that the Company's conflicts do not adversely affect Clients' interests.

4. Measures We Use to Prevent and Manage Conflicts

The Company may use one or more of the following measures (as applicable):

4.1 Governance and Oversight: The Company maintains internal oversight through management and Compliance functions to monitor conflict risks.

4.2 Segregation of Duties: Where appropriate, the Company separates functions to limit undue influence, including separation between dealing/risk management, customer support, compliance, and finance functions.

4.3 Policies and Procedures: The Company maintains internal policies covering (without limitation) order handling, pricing, market conduct, abuse prevention, AML/CTF, gifts and hospitality, staff conduct, data protection, and information security.

4.4 Controls over Remuneration and Incentives: The Company seeks to design remuneration and incentive structures to reduce the risk of employees acting contrary to Clients' interests.

4.5 Gifts and Hospitality Controls: Employees may be subject to restrictions on receiving gifts and hospitality. In some cases, gifts may need to be declared and/or refused.

4.6 Monitoring and Surveillance: The Company may monitor trading, communications, and operational activity to detect market abuse, misconduct, unfair treatment, or improper behaviour.

4.7 Confidentiality and Information Barriers: The Company applies confidentiality obligations and may use information barriers where appropriate to prevent misuse of sensitive information.

4.8 Outsourcing and Vendor Due Diligence: Where services are outsourced, the Company performs due diligence and applies contractual and operational controls to manage risks, including conflict risks.



4.9 Client Categorisation and Fair Treatment: The Company may apply risk-based rules (including leverage limits, margin requirements, deposit/withdrawal rules, promotional rules, and execution controls) consistently in line with Applicable Regulations and internal controls.

5. Disclosure of Conflicts

5.1 Where the Company identifies a material Conflict of Interest that cannot be adequately managed to prevent potential harm, the Company may disclose the general nature and/or source of that conflict to the Client.

5.2 Disclosures may be made through the Company Website, the Trading Platform, the Client agreement documentation, or direct communication.

5.3 The Company does not guarantee that disclosure will be made in every instance, particularly where disclosure may be restricted by Applicable Regulations, confidentiality, or operational security considerations.

6. Client Consent and Understanding

6.1 By entering into a relationship with the Company and using the Services, the Client acknowledges that conflicts of interest may arise, including those described in this Policy.

6.2 The Client acknowledges that the Company may receive fees, spreads, commissions, swaps, or other income from the Services and that such income may create incentives for the Company and/or its partners.

7. Employee and Third-Party Conduct

7.1 Employees, agents, and relevant third parties are expected to comply with internal rules designed to prevent and manage conflicts.

7.2 Where the Company becomes aware of a potential conflict involving an employee or third party, it may take action including reassignment of tasks, increased supervision, removal of incentives, termination of relationships, or other appropriate steps.

8. Record Keeping and Review

8.1 The Company maintains internal records relating to identified conflicts and the steps taken to manage them, to the extent required by Applicable Regulations and internal standards.

8.2 This Policy is reviewed periodically and updated as necessary to reflect changes in the Company's services, structure, and Applicable Regulations.

9. Policy Updates

9.1 The Company may update this Policy from time to time. Updated versions will be made available on the Company Website and/or upon request.

10. Governing Language

If this Privacy Policy is translated, the **English version shall prevail** in case of any inconsistency.

11. Contact

10.1 If you have questions about this Policy, you may contact us at: support@vittaverse.com

Vittaverse Global Markets Ltd

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