

## CONFLICTS OF INTEREST POLICY

### 1. INTRODUCTION

1.1. Wealthway INC Limited operating under the trading name Wealthway is a Securities Service Provider Licensee regulated and authorised by the ..... (".....") in ..... under the Licence Number: ..... (Hereinafter called the "Company").

1.2. The Company takes all steps to detect and prevent conflict of interest. The Company commits to honesty, fairness and professionalism and in the interest of its clients, it complies to the principles set out in the aforementioned regulations when providing financial services and other supplementary services related to the same.

### 2. PURPOSE AND SCOPE

2.1. The agenda in this document is to clarify the Company's approach to identify and manage conflict of interest that may arise during the course of its business. If the Company has a material interest in a transaction to be entered for a client or relationships that will give rise to a conflict of interest in relation to the transaction, the Company shall not knowingly advise or deal in the exercise of discretion, in relation to the said transaction unless the Company has

2.2. The Policy aims to identify and prevent conflicts of interest that may arise between the Company and its clients or between one client and another. To prevent the same, a conflicts of interest policy which sets out the procedures, practices and controls in place has been adopted

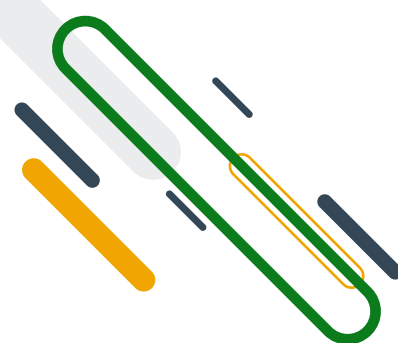
2.3. The Policy applies to the Company's directors, employees; any person directly or indirectly linked to the Company (hereinafter referred to as 'related persons') and refers to all interactions with clients.

### 3. IDENTIFICATION OF CONFLICT OF INTERESTS

3.1. For the purpose of identifying types of conflict of interest which may arise in the course of providing investment and additional service or a combination thereof and whose existence can damage the interest of the client, the Company takes into account if the Company or relevant person(s) is in any of the following situation:

3.1.1. The Company or pertinent individual(s) is likely to make a financial gain, or avoid a financial loss, at the expense of the client;

3.1.2. The Company or pertinent individual(s) has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, that is dissimilar to the client's interest in that outcome;



3.1.3. The Company or pertinent individual(s) has a financial or other incentive to favour the interest of another client or clients over the aforementioned client.

3.1.4. The Company or pertinent individual carries out the same business as the client;

3.1.5. The Company or pertinent individual receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of assessments, goods or services, other than the standard commission or fee for that service

#### **4. PROCEDURES AND CONTROLS TO MANAGING CONFLICTS OF INTERESTS**

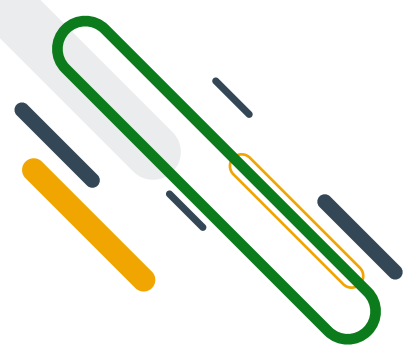
4.1. The procedures and controls that the Company follows to manage the identified conflicts of interest include, but are not limited to, the following measures:

4.1.1. Effective procedures to prevent or control the exchange of information between pertinent individual(s) 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;

4.1.2. Measures to prevent or control the simultaneous or consecutive involvement of a relevant person in separate investment or subordinate services. Such measures include, but are not limited to the following:

- a. A 'need to know' policy governing the dissemination of confidential or inside information within the Group.
- b. Chinese walls restricting the flow of confidential and inside information within the Company, and physical separation of departments.
- c. Procedures governing access to electronic data.
- d. Separation of duties that may give rise to conflicts of interest if carried on by the same individual.
- e. A gifts and inducements log registering the solicitation, offer or receipt of benefits.
- f. The prohibition of external business interests conflicting with our interests as far as the Company's officers and employees are concerned, unless board approval is provided.
- g. A policy designed to limit the conflict of interest arising from giving and receiving inducements.
- h. Monitoring and reporting the same to the Company's Board of Directors by the Compliance Department.

4.1.3. The Compliance Department shall be responsible for identifying and managing potential conflicts of interests. The latter will also update relevant internal procedures and ensure compliance with such procedures.



## 5. DISCLOSURE

5.1. Where a conflict arises and the Company is aware of it, it will disclose the conflict to the client prior to undertaking investment business for that client or, if it does not believe that disclosure is appropriate to manage the conflict, it may choose not to proceed with the transaction or matter giving rise to the conflict.

5.2. The Company reserves the right to review and/or amend its Policy and arrangements, at its sole discretion, whenever it deems fit or appropriate.

5.3. The Conflicts of Interest Policy is only a policy, it is not part of the Company's Terms and Conditions of Business and is not intended to be contractually binding or impose or seek to impose any obligations which the Company would not otherwise have, but for the Act and Applicable Regulations.

