

AC Capital Market Conflict of Interest Policy

AC Capital Market (S) Ltd

Securities Dealer licence no: SD198

1. Purpose

Conflicts of interest exist in all commercial and financial services organizations. The purpose of this policy is to specify the procedures established by the Company, in accordance with the size, organization, nature, and complexity of the Company's business for the identification and responsible management and control and, where necessary, disclosure of the conflicts of interests arising in relation to its business and to reduce the risk of client disadvantage and/or legal liability, regulatory censure, or damage to the Company's commercial interests and reputation.

Therefore, we have adopted relevant procedures and methods to identify, evaluate, manage, prevent and mitigate these conflicts of interest.

The policy also calls on participants to reveal the nature and value of any gifts received from parties that conduct business with the Company. Open communication among all levels of the organizational structure can prevent many of the issues that arise from conflicts of interest.

2. Legal framework

In accordance with the applicable laws, the Company is required to establish, implement, and maintain a policy on conflicts of interest and provide information regarding the adequate managing of any conflicts of interest between itself, including its managers and employees, tied agents, or other relevant persons, as well as any person directly or indirectly linked to them by control, and their clients or between one client and another that arise in the course of providing any investment and ancillary services.

We are aware that under certain circumstances, there may be conflicts between AC Capital Market, its directors and employees, and other related group companies and affiliates. In order to prevent and minimize the risk of such conflicts that may cause damage to the interests of our customers, we have adopted several internal systems, procedures and control measures as follows:

- On commencement of all employment agreement, they should read and fully understand this policy;
- Personal account transaction restrictions for all employees;
- The Company's employees are forbidden from trading in securities for which they have access to confidential or non-publicly available information;
- The Company does not pay or receive any monetary or non-monetary benefits to/from third parties in connection with the provision of services to the clients, other than minor non-monetary benefits. A fee, commission, or non-monetary benefit will not be considered acceptable if the provision of relevant services to the client is biased or distorted as a result of the fee, commission or non-monetary benefit.
- Internal disclosure requirements for all employees (as example all gifts, entertainment or other benefits given and received by any Employee to be reported to the Compliance Officer whilst any such gift, entertainment or other benefit may only be accepted with the prior approval of the Compliance Officer. The Compliance Officer shall maintain the Gift Register updated at all times);
- Internal procedures to prevent or control the exchange of information between relevant persons engaged in activities involving a risk of a conflict of interest;
- Separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Company;

- Restrictions on access to data stored in electronic or paper form;
- Except for disclosure required by law, our directors, managers and employees must keep all information entrusted to them confidential.

3. Disclosure of conflict of interest

The Company must adequately consider how to manage all conflicts of interest before resorting to disclosure. Disclosure will be a last resort after all appropriate steps have been taken.

When we believe that these measures are not sufficient to prevent the risk of damage to our customers from a particular conflict, we will make a general statement that allows our customers to consider their situation and decide whether to continue using our services.

Such general disclosures can be made in durable medium before or during the transaction, taking into account the nature of the client, to enable the Client to make an informed decision with respect to the services in the context of which the conflict of interest arises.

If a client decides not to go ahead with the service due to the conflict disclosed, the Company will have no choice but to decline the provision of services to the client if the conflict cannot be effectively managed.

4. Reporting conflicts of interest

In the case of identification of a possible conflict of interest, a staff member must refer it initially to his immediate supervisor to assist in the assessment of a material risk of damage and send a completed notification form together with full details to allow regulatory scrutiny of:

- Corrective and preventive actions;
- How these actions were considered appropriate;
- Any conditions imposed; and
- Whether there are still ongoing conflicts, how these are being managed and advised to the client

5. Conflict of interest policy register

The Company is required to keep and regularly update a record of the type of services and activities carried out by or on behalf of the Company, whereby a conflict of interest has arisen or may arise. This control register is maintained by the Compliance department and includes the details of the actual or potential conflicts, mitigating controls and responsibilities.

On a case-by-case basis, the Compliance department and/or senior management will decide whether to carry on with an activity if the conflict cannot be resolved by the Company. As a last resort, the Company may disclose the conflict to the client to enable him to take an informed decision whether he wants to proceed with the transaction or not allow the transaction to be executed.

6. Marketing communication

The Company shall ensure that any marketing communication and recommendation contains a clear and prominent statement that (or, in the case of an oral recommendation, to the effect that) it has been prepared in accordance with the applicable legal requirements designed to promote the independence of investment research and that it is not subject to any prohibition on dealing ahead of the dissemination of investment research.

The Company ensures that marketing communication is reviewed and approved by the Compliance Officer prior to distribution to the client. The Compliance Officer also ensures that such communication meets the relevant definition of marketing communication as well as having the appropriate disclosure statement.

7. Record-keeping

In accordance with the requirements of FSA, the Company maintains records for seven (7) years from the date from which the investment service, ancillary service, and/or other investment activity has been carried out and/or correspondence has been received and/or from the date on which the business relationship ceases, which records are regularly monitored and updated of the kinds of investments and ancillary services or investment activities carried out by the Company or on its behalf in which there is a risk for conflict of interest that may damage the interests of one or more clients has arisen.

Any conflict of interest shall be reported to the Compliance Officer, who shall be responsible for keeping records of conflicts of interest.

8. Policy update

The Company may update this policy from time to time and reserves the right to review and amend the terms of this policy and its arrangement whenever it deems appropriate as required by law. In the event that the Company materially changes this policy, the revised policy will be uploaded on the Company's website.

In this respect, the client hereby agrees to accept the posting of a revised policy electronically on the website as the actual notice of the Company to its clients. Any dispute over the Company's policy is subject to this notice and the client agreement.

If you have any questions or suggestions regarding this Policy, please contact us at cs@accapital.com.