

CONFLICT OF INTEREST POLICY

Conflict of interest policy

1. Introduction

- 1.1 This policy is not intended to establish any rights or obligations of third parties arising from the provision of this policy, nor will this policy constitute an integral part of any contract between Aisa Future Trading. (or any of its subsidiaries) and any customer or potential customer.
- 1.2 This policy is an addendum to the general obligation of Aisa Future Trading to treat customers and counterparties in good faith and fairly.
- 1.3 Aisa Future Trading. A copy of this policy will be provided as per the customer's request. Customers can also visit our website:

<https://afttmarkets.com/en>.

Aisa Future Trading reserves the right to modify or supplement this policy at any time.

2. Identification and disclosure of conflicts of interest

- 2.1 Aisa Future Trading. Hereby identify and disclose a series of circumstances that may constitute or give rise to conflicts of interest, and such conflicts may but do not necessarily pose significant risks to the interests of one or more customers. If Aisa Future Trading. Or any related party directly or indirectly under its control may gain financial benefits or avoid financial losses due to the losses of customers, it constitutes a significant risk.
- 2.2 The identified situations include but are not limited to:
 - a. Provide investment advice based on the interests of specific clients or customer groups;
 - b. Provide advice to third parties whose interests conflict or compete with those of other clients;
 - c. When clients trade in the market where Aisa Future Trading is a market maker, the company may have opposite interests;
 - d. Aisa Future Trading. And its employees or related parties may hold, change or sell the securities, foreign exchange or other financial instruments it recommends;
 - e. The tendency to increase trading volume in order to increase commission income is inconsistent with the goal that clients hope to reduce transaction costs;
 - f. White-label partners may have partnerships with Aisa Future Trading. And/or different interests of its customers;
 - g. Introduce that the broker may have a partnership with Aisa Future Trading. And/or different interests of its customers;

Conflict of interest policy

- h. The asset manager may have a relationship with Aisa Future Trading. And/or different interests of its customers;
- i. Representatives of Aisa Future Trading may be aware of the large trading instructions of clients and may buy or sell related financial products (including derivatives) in advance.

3. Registration of conflicts of interest

- 3.1 Aisa Future Trading. Maintain a register to record conflicts of interest that arise or may arise in the investment services or related activities performed by it or on its behalf and may cause damage to the interests of clients. This registration information is helpful for the company to manage known or potential conflicts of interest.

4. Management of Conflicts of Interest

- 4.1 To effectively manage potential conflicts of interest, Aisa Future Trading. There are relevant processes, systems and organizational arrangements.
- 4.2 The main arrangements include:
 - a. Employees are required to disclose all personal interests related to their duties;
 - b. Employees must abide by the relevant rules and procedures for personal account transactions;
 - c. All employees will receive guidance and training on how to handle conflicts of interest;
 - d. All employee trading activities will be subject to active supervision;
 - e. Employees are not allowed to engage in external business activities without the prior written approval of the senior management.
 - f. Aisa Future Trading. Trading is not allowed in its proprietary account;
 - g. The company will continuously monitor the effectiveness of the internal reporting mechanism and the conflict of interest management policy;
 - h. The research reports released to clients are for reference and educational purposes only and should not be regarded as having significant investment impact;
 - i. All research reports are released simultaneously with clients. Employees of the trading department are not allowed to review suggestions, target prices or valuation information before release, even if it is for verifying facts.
 - j. All customers will be treated fairly;
 - k. The company has information isolation measures in place (physical isolation if necessary) to prevent improper information flow among departments.