



LANDMARK CAPITAL MARKETS LTD

CONFLICT OF INTEREST POLICY

LATEST UPDATED IN NOVEMBER 2025



DISCLAIMER

This Conflict-of-Interest Policy (referred to as the “Policy”) is intended for internal use by Landmark Capital Markets Ltd. (hereinafter, “*Landmark Capital Markets*” or “*Company*”) and its staff, as well as to promote transparency with clients. It explains how Landmark Capital Markets identifies, handles, and reduces conflicts of interest to protect the interests of the Company, its clients, and other relevant stakeholders in an ethical and compliant way.

Although every reasonable effort is made to address and resolve conflicts appropriately, Landmark Capital Markets is not responsible for any negative outcomes arising from a conflict that has been properly disclosed, managed, or mitigated. Clients are encouraged to read this policy thoroughly and seek independent legal, financial, or regulatory advice if needed before entering into any investment or business engagement with the Company.

By continuing to use Landmark Capital Markets’ services, clients agree to the terms of this policy, acknowledge the possibility of conflicts arising in regular operations, and accept the Company’s commitment to addressing and disclosing such conflicts.

IMPORTANT NOTE: This policy is subject to periodic review and amendment. Clients are encouraged to regularly review the policy to stay informed of the Company's conflict management procedures.

1. Introduction

Landmark Capital Markets is committed to upholding the highest levels of integrity and professionalism by actively managing and minimizing conflicts of interest that may occur during business operations. Through our focus on ethical practices, regulatory compliance, and transparency, we aim to meet the standards expected by both regulators and clients while protecting the Company’s interests.

This policy explains the measures the Company takes to identify, prevent, and address potential conflicts of interest, with an emphasis on preserving our operational integrity, reputation, and legal compliance.

2. Definition of Conflict of Interest

A conflict of interest occurs when the Company or its employees, directors, agents, or associates (“relevant persons”) face personal, professional, or financial interests that may interfere with their duty to act in the best interests of clients. Such situations can create incentives for individuals or entities to favor their own interests or those of a third party instead of putting clients first.

3. Scope of the Policy

This policy is applicable to all employees, directors, officers, consultants, and anyone representing Landmark Capital Markets. It addresses potential conflicts that may occur between:

- a) The Company and its clients
- b) Relevant individuals and clients
- c) Multiple clients of the Company
- d) Clients and third-party service providers.

4. Objectives of the Policy

The Company has been established by the Company to fulfill the following goals:

- a) Safeguard the interests of Landmark Capital Markets, including its staff, operations, partnerships, and reputation.
- b) Detect, prevent, and handle conflicts of interest that could harm the Company or result in legal or regulatory complications.
- c) Ensure adherence to relevant laws and regulations while promoting transparency and fair client interactions.
- d) Uphold the highest ethical standards in all business activities, securing the interests of both the Company and its clients.

The policy applies to all types of products and services provided by the Company, including but not limited to investment services, advisory services, and ancillary services, and covers both internal and external conflicts of interest.

5. Identification of Conflicts of Interest

The Company will actively assess and identify potential conflicts of interest by evaluating the following scenarios:

- a) **Financial Advantage or Avoiding Loss:** The Company or a relevant individual could benefit financially or avoid a loss at the client's expense.
- b) **Conflicting Interests:** The Company or a relevant person has a personal or financial stake in a transaction or service outcome that may not align with the client's best interests.
- c) **Business Competition:** The Company or a relevant individual is engaged in a business that directly competes with a client's interests.

- d) **External Incentives:** The Company or a relevant person receives, or expects to receive, gifts, benefits, or incentives from third parties that could compromise the impartiality of client services.
- e) **Personal or Proprietary Trading:** Employees or directors conduct personal or proprietary trading that may conflict with client trades or negatively impact client interests.

6. Conflict Management Procedures

I. General Procedures to Manage Conflicts of Interest

To ensure independence and avoid conflicts of interest, the Company adheres to the following procedures:

- a) **Information Barriers:** The Company has established robust measures to restrict or manage the flow of information between individuals or teams engaged in activities where a conflict of interest may arise. These controls help ensure that no information is shared in a way that could negatively impact any client's interests.
- b) **Independent Oversight:** Individuals engaged in activities that could lead to a conflict of interest—such as serving competing clients or representing differing interests—will be overseen separately. This approach promotes unbiased decision-making and fair service delivery.
- c) **Separate Compensation Policies:** The Company maintains independent remuneration structures to avoid any direct connection between the earnings of employees in different roles. This ensures that staff involved in one area are not compensated based on the income or performance of those engaged in potentially conflicting activities.
- d) **Safeguarding Against Undue Influence:** The Company has established controls to ensure that no individual can improperly influence how a relevant person carries out their responsibilities, especially concerning investment or related services, in order to prevent conflicts of interest.
- e) **Oversight of Dual Roles:** The Company has established procedures to manage or restrict situations where individuals are involved in multiple services or activities—either at the same time or consecutively—to minimize the risk of potential conflicts.

II. Specific Procedures and Measures

To further manage and reduce conflicts of interest, the Company has implemented the following specific measures:

- a) **Adherence to Legal and Ethical Standards:** All employees must comply with relevant laws, regulatory requirements, authoritative directives, and the Company's Code of Ethics.
- b) **Division of Responsibilities:** Tasks that could lead to conflicts if handled by the same individual are assigned separately to avoid such situations.

- c) **Gifts and Incentives Record:** A dedicated log is maintained to document any requests, offers, or acceptance of gifts or benefits that could influence business decisions or pose potential conflicts.
- d) **Employee Trading Controls:** Employees are not allowed to trade for personal gain on the Company's platform or any external platform without prior management approval. All employee accounts must be clearly identified as such.
- e) **Conflict Disclosure:** Employees are required to notify their supervisor of any potential conflicts related to a transaction and disclose any personal ties with involved parties that could affect their objectivity.
- f) **Commission and Market Impact Review:** Employees must evaluate commission rates and aim to maintain anonymity in trades to limit any adverse market impact.
- g) **Insider Trading Restrictions:** Trading based on material non-public information is strictly prohibited. Employees in possession of such information must report it to their supervisor or the Compliance Officer, and the related asset will be added to a restricted or watch list.
- h) **Compliance Oversight:** The Compliance Officer is responsible for documenting, investigating, and addressing any violations. They are authorized to take disciplinary action independently and escalate unresolved matters to senior management, the Board, or legal counsel as needed. Reports on violations and conflict procedures are regularly submitted to the Board or the appropriate authority.
- i) **Departmental & Information Segregation:** Physical separation of departments and strict information barriers are in place to prevent unauthorized access or sharing of sensitive or confidential data.
- j) **Controlled Access to Data:** Only employees with a legitimate need-to-know basis have access to sensitive information, ensuring it is managed with confidentiality and responsibility.

7. Disclosure Of Conflicts Of Interest

If a conflict of interest cannot be effectively avoided or managed, the Company will inform the client before proceeding with any related transactions or services.

The disclosure will include:

- a) The nature and origin of the conflict.
- b) The measures taken by the Company to reduce its impact.
- c) How the conflict could potentially affect the client's interests.
- d) The client's right to either continue or decline the service with full awareness of the situation.

Clients will be fully informed and given the opportunity to make an informed decision before moving forward.

8. Recording of Conflicts of Interest

The Company will keep a comprehensive and up-to-date log of all instances where a conflict of interest has occurred or could potentially occur. This record will be routinely reviewed by



the Compliance Department and provided to regulatory authorities upon request.

9. Consequences of Violating the Policy

Non-compliance with this policy may lead to disciplinary measures, which can include warnings, suspension, or even termination of employment. The Company is committed to preventing breaches and will ensure that any suspected violations are promptly investigated and handled by the Compliance Department.

10. Staff Understanding

This policy is shared with all employees to underscore the importance of recognizing and effectively managing conflicts of interest.

11. Act of Decline

The Company reserves the right to refuse representation if it determines that a conflict of interest cannot be appropriately managed by any other means.

12. Review and Amendments to the Policy

The Company reviews this policy regularly, and at a minimum, once a year. However, it retains the right to update or modify the policy and its procedures at any time, without prior notice to the client, if deemed necessary.

13. Contact Information

If you have any questions or concerns about this Conflict-of-Interest Policy, please reach out to our Compliance Department at info@landmarkmarkets.com.