

## Conflict of Interest Disclosure Statement

### Introduction

This Conflict of Interest Disclosure Statement (hereinafter the “Statement”), has been prepared by BCM Begin Capital Markets CY Ltd (hereinafter the “Company”) in accordance to the Investment Services and Activities and Regulated Markets Law 87(I)2017, which transposes the Directive 2014/65/EU on markets in financial Instruments (“MIFID II”).

The Company takes all appropriate and sufficient steps to identify and/or prevent and/or manage all kind of Conflicts of Interest. However, if during the course of a business relationship with a Client or group of Clients, the organizational or administrative arrangements/measures in place are not sufficient to avoid or manage a conflict of interest relating to that Client or group of Clients, the Company will disclose the conflict of interest before undertaking further business with the Client or group of Clients. This will be a last resort after all appropriate steps have been taken. The aforesaid disclosure is being communicated to our clients since the Company has taken all the sufficient measures to prevent and manage all the identified conflicts of interest.

### Disclosure

The Company has identified the following Conflicts of Interest which are not easily prevented and/or managed:

Conflict of Interest	Description	The Company’s measures to manage the Conflict of Interest	Risks Involved
Inducements Received	<p>Commissions Received by the Company’s Execution venues.</p> <p>Commission from the London Prime LTD = 40% of net spreads paid by the client + 40% of the swaps paid by the client + 40% of the commissions paid by the client</p> <p>Black Pearl Securities Ltd = 50% of the swaps paid by the client</p> <p>Le Morne Capital LTD = 50% of net spreads paid by the client + 50% of the swaps paid by the client + 75% of the commissions paid by the client</p> <p>Golden Brokers LTD = 40% of net spreads paid by the client + 40% of the swaps paid by the client +</p>	<p>The selection of the Company’s execution venue is not based on gainful terms and best execution can be ensured.</p> <p>The Company has contract with its Execution Venues and therefore the terms will remain the same.</p> <p>The Company has implemented an Inducements policy to minimize any Conflicts of Interest that may occur, in respect to Inducements, paid or received.</p> <p>The Company has effective procedures in respect to the Best Execution. It has created reporting lines to ensure that all practices are in the best interest of its clients and they do not rise any conflict of interest.</p>	<p>The Company shall not receive any remuneration, discount or non-monetary benefit for routing client orders to specific execution venue.</p>

	40% of the commissions paid by the client		
Personal Transactions of its Employees	Personal Transactions of its Employees	The Company has adopted measures in respect to personal transaction of its Employees. It is prohibited pursuant to Law 166(I)/2005, for any employee to enter into a transaction and misuse or cause improper disclosure of confidential information.	The employees of the Company shall not enter into a transaction or disclose any confidential information to third parties.
Marketing Communication	Information provided to Clients and/or potential Clients by the Company	The Company has procedures in place in respect to the marketing communication. The said communication shall contain clear, honest and non-misleading information and it shall be prepared in accordance with Law requirements. The marketing communication is being reviewed by the Company prior distribution.	The Marketing communication of the Company shall be clear, honest and non-misleading.
Staff Communication with Clients or potential clients	Information provided to Clients and/or potential Clients by the Company	<p>Effective procedures to prevent or control the exchange of information between the relevant persons 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.</p> <p>The Company has segregated the duties of the relevant persons that may give rise to conflicts of Interest, if carried out on by the same individual (e.g. Compliance Officer and Internal Audit)</p> <p>The Company has implemented an effective Monitoring program. It is an on-going procedure to ensure that internal controls are appropriate and compliant. The Company remains responsible for the Company's Tied Agents.</p>	The information provided by the Company to clients and/or potential clients shall be clear, honest and non-misleading.
Remuneration Practices	Remuneration packages to Employees, Tied-Agents and/or third parties (if applicable).	The Company has taken remedial actions, in respect to its remuneration policy. The Company reformed the Remuneration policy in a way so as not to create a conflict of	The Company shall remunerate its employees, Tied-Agents and any other third parties in a fair

		<p>interest or incentive for staff to favor their own, or the Company's interests to the potential detriment of any Client. The Company removed any direct or indirect link between the remuneration of the relevant person and their target goals.</p> <p>The Company has set out different evaluation procedures for its employees. The procedures have been designed to prevent any conflicts of interest, in respect to their work assessment. The said evaluation is based on the information provided to the clients and the quality of their service.</p>	<p>and not discriminatory way.</p>
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Extensive information can be provided in relation to the above, upon Client's request.

Date of last review: July 2022