



**EuroTime
Bank**

CONFLICTS OF INTEREST

PROFESSIONAL CLIENTS AND ELIGIBLE COUNTERPARTIES

CONFLICTS OF INTEREST

Conflict of Interest refers to a scenario where EuroTime Bank or a company, or employees are faced with competing interests that may compromise their ability to make impartial decisions or act in the best interests of their clients or the organisation as a whole.

A Conflict can arise from either legitimate or harmful influences, such as competing priorities, conflicting obligations, or personal interests, which may impact decision-making, compromise professional judgment, or create a perception of impropriety.

As EuroTime Bank offers diverse services, conflicts may emerge between the institution's interests and the interests of its clients, or between the institution's obligations and its clients' obligations. Conflicts may occur in various situations, including: One client and another, ETB and a client, an employee and a client, an employee and ETB and one part of ETB and another.

EuroTime Bank has implemented policies and procedures that aim to detect, prevent, and address Conflicts of Interest. These policies are subject to annual review to ensure their effectiveness. Additionally, these measures include provisions that protect the interests of clients and mitigate the potential impact of Conflicts.

Inability to recognise and effectively address real, potential, or perceived Conflicts of Interest in accordance with relevant laws and regulations may lead to penalties, liabilities, and harm to EuroTime Bank's reputation.

INDIVIDUAL CONFLICTS OF INTEREST

An Individual conflicts of Interest is a situation when a team member or a person connected/related to the team has personal financial interests, investments, relationships, or external activities that could potentially interfere with their ability to perform their duties or obligations to EuroTime Bank in a responsible, objective manner or act in the best interest of EuroTime Bank and its clients, this creates a personal conflict of interest.

This may include, amongst others:

- Granting a team member (or a Connected/Related Person) an undue

advantage or benefit due to their position within EuroTime Bank, thereby creating an unfair or improper advantage.

- The inappropriate use of EuroTime Bank's resources or influence, or the unauthorized use of a team member's time that should be dedicated to EuroTime Bank's work, can be considered as an infringement on EuroTime Bank's resources or influence.
- The use of confidential information, including material non-public information, for personal financial gain or to avoid financial loss, constitutes insider trading or any other form of financial advantage through privileged access or use of such information.
- The team member may be faced with a situation where they must choose between their personal interests and the interests of EuroTime Bank or a client, placing them in a position of conflict where their decision could impact the outcome of the situation."

To determine if a personal conflict of interest exists, the team member should consider asking the following questions:

- When making a decision, the team member should evaluate whether the outcome is in the best interest of EuroTime Bank and its clients, or if it primarily benefits the team member or a Connected/Related Person of the team member.
- Would a neutral third party, when presented with the situation, believe that the decision was made with ethical considerations and in the best interests of EuroTime Bank and its clients?

CORPORATE CONFLICTS OF INTEREST

A corporate conflict of interest can arise in various situations, including but not limited to the following examples:

- EuroTime Bank may have a vested interest in a particular outcome that could result in a financial gain or avoidance of loss, but which could potentially harm the interests of its clients. This highlights the potential conflict of interest and

the need for the bank to prioritize the interests of its clients over its own financial gain.

- EuroTime Bank may have a personal interest in the outcome of a service provided to a client or a transaction carried out on behalf of a client, which conflicts with the client's interests in that outcome. This situation creates a potential conflict of interest that requires careful management to ensure that the client's interests are not compromised in any way.
- When there is a potential conflict between the interests of one client and the interests of another client, it is important for the bank to manage the situation carefully to ensure that the interests of both clients are protected and that no one client is given preference over the other. This is essential to maintain the integrity of the service provider and to build trust and confidence among all clients.
- There may be a situation where EuroTime Bank has a financial or other incentive to prioritize the interests of a specific client or group of clients, which could potentially conflict with the interests of another client or group of clients. It is important for the bank to manage this situation carefully and ensure that all clients are treated fairly and that no one client is given preferential treatment. Upholding fairness and impartiality is critical for maintaining trust and integrity in the financial services industry.
- EuroTime Bank provides a service to a client, and in connection with that service, receives a benefit (either monetary or non-monetary) from a third party that is separate from the commission or fee typically charged for such a service. This creates a potential conflict of interest because the bank may be incentivised to favor the interests of the third party over the interests of the client. It is important for the bank to manage this situation carefully and ensure that the client's interests are always prioritized above those of any third party. This is necessary to maintain the integrity of the service provided and build trust with clients.
- EuroTime Bank or one of its team members operates a business that is similar to that of the client. This creates a potential conflict of interest because the

bank may be tempted to favor its own business interests over those of the client. It is important for the bank to manage this situation carefully and ensure that the client's interests are always prioritized above its own. This is essential to maintain the trust and confidence of the client and to uphold the bank's reputation for impartiality and fairness.

To determine if there is a potential conflict of interest, a team member at EuroTime Bank should consider the following questions:

- Is the decision that has been made or will be made in the best interest of the client or group of clients involved?
- Does the decision benefit one client over another client?
- Would an impartial observer, assessing the situation objectively, conclude that the decision was made in a manner consistent with ethical principles and in the best interests of EuroTime Bank's clients?

RECOGNIZING CONFLICTS

Every Global Business within Euro Time Bank must take into account the potential types of conflicts relevant to the specific services and activities they undertake. For example, potential Conflicts are considered when:

- Creating a product.
- Instituting or modifying cross-referral, revenue-sharing, or joint venture agreements; or
- Relocating businesses, activities, or operations (or their components) to a different segment of the Group.

When potential conflicts pertain to clients, the assessment also considers whether the Group and/or any employee.

- Receives or is expected to receive an incentive related to a service provided to the client from a party other than the client.
- Possesses a financial or alternative motivation to prioritize the interests of one client (or a specific group of clients) over others.

- Engages in the identical line of business as the client.
- Is anticipated to achieve a financial profit or evade a financial loss to the detriment of any client;
- Possesses a stake in the result of a service provided to a client or a transaction conducted on behalf of the client, which differs from the client's vested interest in that result;

OUR APPROACH TO CONFLICT RESOLUTION

Euro Time Bank employs a comprehensive approach to manage and resolve conflicts within the organization. This approach is rooted in transparency, communication, and fairness, aiming to foster a harmonious work environment and maintain strong relationships with clients and stakeholders. Here's how Euro Time Bank deals with conflicts:

- Keep records of all instances of conflicts that cannot be effectively resolved.
- Identify all possible conflict types that may reasonably emerge within the scope of its operations.
- Keep records of all the potential conflicts that have been identified.
- Reveal conflicts when it's relevant or suitable to do so.
- Continuously prevent or address conflicts as they arise.

CONFLICT PREVENTION OR RESOLUTION

Euro Time Bank designs its employee compensation, deployment, and management strategies to minimize conflicts. Clear conflict resolution procedures are in place to escalate and address potential conflicts before Euro Time Bank commits to a transaction.

In certain situations, Euro Time Bank may consider declining to represent one or more clients. For Example, if:

- The conflict is overwhelming.
- Confidentiality commitments hinder sufficient disclosure.

Annual written reports detailing the services and activities listed in the Conflict Registers are submitted to the senior management of the Group.

EMPLOYEES

Euro Time Bank mandates its employees to exercise sound judgment and uphold integrity, while also taking all necessary measures to:

- Promptly raise any personal conflicts that may arise. Employees are not allowed to provide advice to a client when they have a personal stake in the matter, nor make commercial decisions on behalf of the Group that relate to their personal or external business interests until adequate measures have been taken to effectively address the conflict.
- Prevent personal conflicts, such as those related to their personal account transactions.

DISCLOSURE

Euro Time Bank can provide clients with broad notifications regarding specific types of potential conflicts, elucidating the methods used to handle these conflicts (e.g., separating business units or implementing measures to prevent unauthorized sharing of confidential information) to minimize harm to clients' interests. Detailed disclosures will be furnished before the contract's finalization, in a lasting format, and will contain adequate information, considering the client's profile, to empower them to make an informed choice.

DISCLAIMER

Trading foreign currencies, as well as involvement with financial commodities and securities, can present a challenging and potentially profitable opportunity for investors. However, before deciding to participate in the Forex market, it is crucial to carefully consider your investment objectives, level of experience, and risk appetite. Most importantly, do not invest money you cannot afford to lose.

There is a significant exposure to risk in any foreign exchange transaction. Any transaction involving currencies carries risks, including but not limited to the potential for changing political and/or economic conditions that may substantially affect the price or liquidity of a currency. Investments in foreign exchange speculation may also be susceptible to sharp rises and falls as the relevant market values fluctuate.

The leveraged nature of Forex trading means that any market movement will have an equally proportional effect on your deposited funds. This can work both for and against you. Not only may investors get back less than they invested, but in the case of higher risk strategies, investors may lose the entirety of their investment. For this reason, when speculating in such markets, it is advisable to always seek guidance from our available online administrators for assistance with these trades.

