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Conflicts of Interest Policy

1. Introduction

This Conflicts of Interest Policy ("Policy") outlines the procedures and measures implemented by BROKR Ltd. ("BROKR") to identify, manage, and disclose conflicts of interest that may arise in the course of providing financial services. This Policy is designed to ensure that BROKR fulfills its obligations under applicable laws and regulations, including those set forth by the European Union (EU), and to safeguard the interests of our clients.

2. Scope

This Policy applies to all employees, agents, and representatives of BROKR involved in the provision of financial services. It covers conflicts of interest that may arise between BROKR, its employees, and clients, as well as conflicts related to the sharing of client fees with platform partners.

3. Identification of Conflicts of Interest

BROKR will regularly assess and identify circumstances that may give rise to conflicts of interest. The key areas where conflicts of interest may occur include, but are not limited to:

a. BROKR's financial interest, or that of its employees, in the outcome of services provided to clients.
b. The sharing of client fees with platform partners.
c. Any relationships or arrangements with platform partners that could compromise BROKR's duty to act in the best interests of clients.
d. Personal relationships that could impair the objectivity of employees in the performance of their duties.

4. Management of Conflicts of Interest

BROKR will employ the following measures to manage identified conflicts of interest:

a. Segregation of duties: Ensure that the functions of providing financial services and sharing client fees with platform partners are segregated to prevent conflicts.
b. Transparent disclosure: Provide clear and comprehensive disclosure to clients about the nature and extent of any conflicts of interest that may arise, including the sharing of client fees with platform partners.
c. Internal controls: Implement and maintain internal controls to mitigate the risks associated with conflicts of interest.

d. Training and awareness: Conduct regular training sessions to educate employees about the importance of identifying and managing conflicts of interest.

5. Sharing Client Fees with Platform Partners

When sharing client fees with platform partners, BROKR will:

a. Establish clear agreements with platform partners outlining the terms and conditions of the fee-sharing arrangement.
b. Ensure that the fee-sharing arrangement does not compromise BROKR's duty to act in the best interests of clients.
c. Disclose the fee-sharing arrangement to clients in a transparent and easily understandable manner.

6. Reporting and Review

BROKR will regularly review its conflicts of interest procedures and update them as necessary. Additionally, any material conflicts of interest or changes to existing conflicts will be promptly reported to the relevant regulatory authorities.

7. Compliance

All employees and representatives of BROKR are required to comply with this Policy. Non-compliance may result in disciplinary action, including termination of employment.

This Conflicts of Interest Policy will be reviewed and updated as necessary to ensure its effectiveness and compliance with applicable laws and regulations.