

Conflict of Interest Policy Statement

Introduction:

At CoinMENA FZE, we are committed to upholding the highest standards of integrity and transparency. This Conflict of Interest Policy is designed to safeguard the interests of our organization. Within the routine course of business, individuals associated with CoinMENA FZE (referred to as the "company") may encounter opportunities where personal interests intersect with those of CoinMENA FZE. Any action that compromises CoinMENA FZE's best interests is deemed unacceptable, and parties acting outside these interests may face disciplinary action.

Effective Date and Periodic Review:

This policy, along with its documented procedures, becomes effective with approval by the CoinMENA FZE board and will be periodically reviewed to align with regulatory changes.

Scope of the Policy:

Applicable to all individuals (employees, vendors, and/or directors) making decisions on behalf of the company, providing recommendations, or conducting work for the organization.

Policy Statement:

This policy governs situations where key individuals may have actual or potential interests that could influence the objective performance of their obligations to clients or the company. A conflict of interest arises when personal interests interfere with the ability to act in the best interests of clients or the company. The company defines and manages such conflicts through disclosure, avoidance, mitigation, and monitoring.

Disclosure Requirements:

All employees must disclose potential conflicts in writing, including outside business activities, financial relationships, or personal interests affecting their ability to act in the best interests of clients or the company. Disclosures are submitted to the compliance officer with a copy to the Managing Director.

Monitored Activities:

Identified activities susceptible to conflicts include Personal Trading, Insider Trading, Preferential Treatment, Outside Business Activities, and extending Credit or Overdrafts to clients.

Managing the Conflict of Interest:

The company manages conflicts through disclosure, avoidance where possible, mitigation steps, and regular monitoring by the Compliance Officer and Financial Controller. Violations or concerns are brought to the Board for deliberation and guidance.

Training:

All employees undergo training on identifying and managing conflicts of interest through virtual sessions or self-learning via this policy.

Implementation & Enforcement:

Implementation is the responsibility of the Managing Director, monitored by the Compliance Officer, Financial Controller, and Internal Auditors. Non-compliance may result in disciplinary action, including termination of employment.

By adhering to this Conflict of Interest Policy, CoinMENA FZE reinforces its commitment to transparency and accountability, ensuring that all employees prioritize the best interests of clients and the organization.

CoinMENA FZE Conflict of Interest Policy [30th November 2023]