# CONFLICTS OF INTEREST POLICY

## VG MARKETS LIMITED

How the Company identifies, manages and discloses conflicts of interest

September 2026

VGM-LEG-COI-001 | Version 1.0

PO Box 1212, Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of Comoros

**Company No. 16087**
**Licence No. L16087/VGM — Anjouan Offshore Finance Authority**

**CONTRACTS FOR DIFFERENCE AND ROLLING SPOT FOREIGN EXCHANGE ARE COMPLEX LEVERAGED INSTRUMENTS THAT CARRY A HIGH RISK OF RAPID LOSS. YOU CAN LOSE ALL OF THE FUNDS YOU DEPOSIT. THESE PRODUCTS ARE NOT SUITABLE FOR EVERY INVESTOR. YOU SHOULD CONSIDER WHETHER YOU UNDERSTAND HOW THEY WORK AND WHETHER YOU CAN AFFORD THE HIGH RISK OF LOSING YOUR MONEY.**

VG MARKETS LIMITED | COMPANY NO. 16087 | LICENCE NO. L16087/VGM | ANJOUAN OFFSHORE FINANCE AUTHORITY

| Document title | Conflicts of Interest Policy |
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| Document reference | VGM-LEG-COI-001 |
| Version | 1.0 |
| Issuing entity | VG Markets Limited (Company No. 16087) |
| Licence | International Brokerage and Clearing House Licence No. L16087/VGM, issued by the Anjouan Offshore Finance Authority under Government Notice No. 005 of 2005 |
| Owner | Head of Compliance |
| Approved by | Board of Directors |
| Effective date | 1 September 2026 |
| Next scheduled review | 31 August 2027 |
| Classification | Public — published on the Company website |

## 1. PURPOSE

VG Markets Limited (**"VG Markets"**, **"the Company"**, **"we"**, **"our"** or **"us"**) is committed to acting honestly, fairly and professionally in the conduct of its business and in its dealings with clients.

This Policy explains the nature of conflicts of interest that may arise in connection with our business activities and the measures we take to identify, manage, mitigate and, where appropriate, disclose such conflicts.

A conflict of interest may arise whenever the interests of VG Markets, one of its directors, employees, contractors, affiliates or business partners differ from, or compete with, the interests of a client.

The objective of this Policy is to ensure that conflicts are managed in a manner that promotes fair treatment of clients and protects the integrity of our business operations.

## 2. SCOPE

This Policy applies to all services and products offered by VG Markets and covers actual, potential and perceived conflicts of interest that may arise:

- between VG Markets and its clients;
- between one client and another client;
- between VG Markets personnel and clients; or
- between VG Markets and its affiliates, suppliers, service providers or business partners.

## 3. OUR APPROACH TO CONFLICTS MANAGEMENT

VG Markets follows the following principles when managing conflicts of interest:

- We seek to identify conflicts of interest before they result in harm to clients.
- Where reasonably practicable, we seek to avoid conflicts.
- Where conflicts cannot be avoided, we implement controls designed to manage and mitigate the associated risks.
- Where we consider that our controls alone are insufficient to adequately protect a client's interests, we will provide appropriate disclosure.
- We regularly review our business activities and arrangements to identify new or emerging conflicts.

## 4. PRINCIPAL DEALING AND COUNTERPARTY RISK

The products offered by VG Markets are over-the-counter contracts. This means that when you open a position, your contract is with the Company itself rather than with an exchange or another market participant. In these transactions VG Markets acts as principal and is your counterparty.

We think it is helpful for clients to understand what this means in practice. Because the Company is the other party to your contract, our commercial interest in the outcome of a transaction differs from yours. This is an inherent and ordinary feature of over-the-counter financial products, including contracts for difference (CFDs) and rolling spot foreign exchange transactions, and it is common to firms offering these products.

VG Markets takes this responsibility seriously. We manage this conflict through operational controls, governance arrangements, compliance oversight and clear disclosure to clients, and we seek to ensure that it does not operate to the detriment of the fair treatment of our clients.

Further information regarding our execution arrangements is available in the Client Agreement and other applicable disclosure documents. If you have any questions about this section, we would be glad to hear from you — please contact us using the details set out in Section 10.

## 5. OTHER CONFLICTS THAT MAY ARISE

Conflicts of interest may arise in a variety of circumstances, including:

***Introducing brokers and business partners***

VG Markets may engage introducing brokers, affiliates or other business partners who refer clients to the Company. These parties may receive remuneration from VG Markets in connection with such referrals.

***Marketing and promotional activities***

Promotional campaigns, incentives or referral arrangements may create incentives that are not aligned with the interests of clients.

***Employee and personal interests***

Employees, directors or contractors may have personal, financial or business interests that could conflict with their duties to clients or the Company.

***Gifts and hospitality***

The receipt or provision of gifts, entertainment or other benefits may create actual or perceived conflicts of interest.

***Related-party and affiliate relationships***

VG Markets may enter into arrangements with affiliated companies, service providers or other related parties. Such arrangements are subject to review and oversight designed to ensure that they are conducted on appropriate commercial terms.

## 6. HOW WE MANAGE CONFLICTS

VG Markets maintains policies, procedures and internal controls designed to identify and manage conflicts of interest. These measures may include:

- governance and compliance oversight;
- segregation of duties and responsibilities;
- restrictions on the use and disclosure of confidential information;
- monitoring and review of business activities;
- controls over gifts, hospitality and inducements;
- management of personal account dealing by relevant personnel;
- review of third-party relationships and remuneration arrangements; and
- escalation and reporting procedures for identified conflicts.

Where necessary, VG Markets may decline to act, refuse a transaction, restrict an activity or terminate a business arrangement if a conflict cannot be managed appropriately.

## 7. DISCLOSURE OF CONFLICTS

Where VG Markets determines that a conflict of interest cannot be adequately managed through organisational or administrative controls alone, we may disclose the conflict to the affected client before the relevant service is provided.

Such disclosure may include:

- the nature of the conflict;
- the source of the conflict;
- the risks arising from the conflict; and
- the measures taken by VG Markets to manage the conflict.

Disclosure does not replace our obligation to maintain appropriate controls and governance arrangements.

## 8. CLIENT INTERESTS

VG Markets is committed to treating clients fairly and to maintaining arrangements designed to prevent conflicts of interest from adversely affecting client outcomes.

Clients are encouraged to contact the Company if they have questions regarding this Policy or believe that a conflict of interest has not been appropriately managed. Concerns may also be raised under the Complaint Handling Policy (VGM-LEG-CHP-001) published on the Company website.

## 9. REVIEW OF THIS POLICY

VG Markets reviews this Policy periodically and may amend it from time to time to reflect changes in business activities, regulatory requirements or industry practice. The next scheduled review date is **31 August 2027**.

The most current version of this Policy will be available on the Company's website.

## 10. CONTACT DETAILS

Questions regarding this Policy may be directed to:

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| Compliance Department | compliance@vgmarkets.com |
| VG Markets Limited | PO Box 1212, Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of Comoros |
| Website | www.vgmarkets.com |

*Approved by the Board of Directors of VG Markets Limited. Effective 1 September 2026.*