

**JUST GLOBAL MARKETS (PTY) LTD  
CONFLICTS OF INTERESTS  
POLICY**

# 1. INTRODUCTION

The BN 80 of 2003 (i.e., General Code of Conduct for Authorised Financial Services Providers and Representatives (as amended by GN 706 of 2020) requires that when a provider renders a financial service, the provider and any representative must avoid, and where this is not possible, mitigate any Conflicts of Interest between the provider and a Client or the representative and a Client.

Just Global Markets (Pty) Ltd is an authorized Financial Services Provider (**the “FSP”**), authorized and regulated by the Financial Services Conduct Authority (“FSCA”) under the FSP number 51114 and provides intermediary services in connection with derivative products and operates under the Financial Advisory and Intermediary Services Act, 2002 (“FAIS Act”).

In accordance with the FAIS Act the FSP is responsible for taking all appropriate steps to identify and manage any Conflicts of Interest in its business that might arise. This document identifies the potential Conflicts of Interest that might arise and summarizes the controls implemented by the FSP to manage any such Conflicts of Interest. The FSP is committed to maintaining the highest ethical standards and fully complying with its regulatory and legal obligations. Compliance with this Conflicts of Interests Policy (**the “Policy”**) is a requirement of the employment contract of every employee and any breach may lead to disciplinary proceedings, up to, and including, dismissal.

Just Global Markets (Pty) Ltd acts as an intermediary for Just Global Markets Ltd. (**the “Product Supplier”**), which is a Securities Dealer authorized and regulated by the Seychelles Financial Services Authority (“FSA”) with license number SD088. References to “**Client(s)**” mean persons having a direct agreement with the Product Supplier and who have been introduced by the FSP.

## 2. PURPOSE

This Policy’s purpose is to set out FSP’s approach in identifying the circumstances which may give rise to a Conflict of Interest, the FSP’s measures for preventing the rise of such Conflicts of Interest as well as managing Conflicts of Interest which may arise during the course of its normal business activities.

## 3. IDENTIFICATION OF POTENTIAL OR ACTUAL CONFLICTS OF INTERESTS

“**Conflict of Interest**” means any situation in which the FSP or its Representative(s) has an actual or potential interest that may, in rendering services to a Client:

- a. influence the objective or performance of the Client or the FSP’s obligations to that Client; or
- b. prevent the FSP or the Representative(s) from rendering an unbiased and fair services to that Client, or from acting in the interests of that Client, including, but not limited to:
  - a financial interest;
  - an ownership interest;
  - any relationship with a third party.

For example, a Conflict of Interest may arise where the FSP, or one of its employees, is providing services to

the Clients or engaging in activities on their own account which may entail a material risk of damage to the Clients' interests, for example where the FSP:

- could make a financial gain, or avoid a financial loss, at the expense of the Client;
- has an interest in the outcome of a service provided to the Client or of a transaction carried out on behalf of the Client which is distinct from Clients' interest in that outcome;
- has a financial incentive to favor the interest of another Client, or group of Clients, over the interest of the Client;
- receives, will receive or will pay a person other than the Client, an inducement in relation to a service provided to the Client, in the form of monies or commission, other than the standard fee for that service.

## **4. MANAGING CONFLICTS OF INTERESTS**

### **4.1. Need-to-know policy**

It is the policy of the FSP that all non-public information obtained from a Client or potential Client or other source which has been provided in the expectation that it will be kept confidential shall be treated as confidential and shall not be unlawfully shared with any other company or individual. The FSP's employees may not disclose any such confidential information to any person who is not an employee unless required by the terms of a transaction or relevant law or regulation. The dissemination of confidential information within the FSP is at all-time subject to established information barriers. The FSP also operates a "need to know" policy. Under the terms of this Policy, confidential information may only be disclosed to those persons who need it to serve the legitimate interests of the FSP and the Clients and who can be expected to keep it in confidence in accordance with the policy regarding information barriers.

### **4.2. Independence**

It is the policy of the FSP that where it and/or its employees are carrying on investment business the FSP will disregard any material interest which it or any of its subsidiaries or affiliates may have when providing intermediary services. This Policy ensures that in providing intermediary services, the employees of the FSP act independently of any interest that may conflict with the duties owed to different Clients or between the FSP and potential Clients. This means that all employees must disregard any of the following interests and must not allow the existence of such interests to influence them when dealing with Clients or potential Clients:

- a. any personal interests which they or members of their family may have;
- b. any existing, proposed, or prospective business relationships between the FSP and any third party;
- c. any agreement or transaction which has been, will or maybe entered into by the FSP; or
- d. the holding by, interest or position of the FSP in any investments issued by the Client or any third party.

### **4.3. Inducements**

The FSP only receives remuneration from the Product Supplier in connection with the provision of intermediary services (i.e., online and offline general marketing and Client referrals). The FSP has mechanisms and processes in place to ensure that in all cases, the Clients are treated fairly and professionally, in accordance with their best interests and ensures that the said remuneration does not impair the FSP's duty to

act in the best interest of the Client.

#### **4.4. Disclosure**

The FSP shall use all appropriate efforts to manage or otherwise prevent any Conflict of Interest, but if those efforts are not appropriate to ensure, with appropriate confidence, that the risk of damage to the interest of a Client will be prevented. The FSP shall, where appropriate, disclose the general nature and/or source of the Conflict of Interest in writing to the Client at the earliest reasonable opportunity. When considering whether it is appropriate to disclose a Conflict of Interest to a Client, the FSP shall take into account the status of a particular Client and whether they are likely to understand the risks involved if they continue to deal with the FSP. Any disclosure shall contain appropriate information to allow the Client to make an informed decision.

#### **4.5. Other measures**

The FSP's internal procedures and measures for the management of potential and/or actual Conflicts of Interest include, but are not limited to, the following:

- a. the FSP has a dedicated Compliance Officer, who is responsible, among other, to monitor any possible deviation from the FSP's internal policies and procedures as well as identifying and managing any possible Conflicts of Interest and report these to the FSP's Board of Directors;
- b. prohibition on officers and employees of the Company having external business interests conflicting with the interests of the Company without the prior approval of the Company's Board of Directors;
- c. segregation of employees' duties;
- d. the FSP ensures that marketing communication is reviewed and approved by the Compliance Officer prior to distribution to potential Clients. The Compliance Officer also ensures that such communication meets the relevant definition of marketing communication as well as having the appropriate disclosure statement;
- e. the FSP ensures the regular review of the terms and conditions of the relationship between the FSP and the Product Supplier in order to identify potential, apparent or actual Conflicts of Interest and the regular review of the procedures adopted to prevent such Conflicts in compliance with this Policy;
- f. the FSP ensures that all employees of its are adequately exposed to this Policy and concept of Conflicts of Interest and shall provide appropriate training to employees and ensure adherence of employees to this Policy; and
- g. the FSP continuously monitors compliance with this Conflicts of Interest Policy and shall, on an annual basis, conduct a review of this Policy.

### **5. RECORD KEEPING**

Under the FAIS Act, the FSP is required to keep and regularly update a written record of any Conflict of Interest that has arisen or may arise during the course of conducting its business which entails material risk of damage to the interests of one or more Clients.

### **6. FURTHER INFORMATION**

For further information regarding the FSP's Conflicts of Interest Policy, you may contact [support@justmarkets.co.za](mailto:support@justmarkets.co.za).