

Conflict of Interest Policy

Altara Markets Ltd. | Saint Lucia | Version 1.0 | Effective 16 August 2026

This policy describes how Altara Markets Ltd. identifies, prevents, manages and discloses material conflicts of interest.

COMPANY	Altara Markets Ltd.
REGISTERED / OPERATING LOCATION	Rodney Bay, Saint Lucia
WEBSITE	altaramarkets.com

IMPORTANT This document forms part of the contractual and/or policy framework applicable to clients and users of Altara Markets Ltd. services, subject to applicable law.

1. Objective

The Company seeks to act fairly and to maintain arrangements designed to identify circumstances where the interests of the Company, its personnel, affiliates, introducing parties, counterparties or one Client may conflict with another Client's interests.

2. Potential Conflicts

- The Company may earn spreads, commissions, financing charges or other disclosed revenue from Client activity.
- Execution and risk management may involve internalization of exposure and/or hedging with liquidity providers, creating an economic interest that can differ from the Client's trading outcome.
- Introducing brokers or partners may receive remuneration linked to Client activity.
- Employees or related persons may have personal or commercial interests in products, counterparties or service providers.
- Different clients may compete for liquidity or execution during volatile conditions.

3. Execution / A-Book and B-Book Risk Management

The Company may determine whether and how to hedge aggregate or individual exposure with external liquidity providers. Internal risk-management decisions must not be used to falsify prices, manipulate Client positions or deny legitimate withdrawals. Pricing and execution controls should be based on documented market, liquidity and risk parameters.

4. Management Measures

- Segregation of duties and role-based access where appropriate.
- Documented pricing, execution and risk parameters.
- Monitoring of employee conduct and sensitive access.
- Due diligence and oversight of introducing brokers and material service providers.
- Disclosure of material remuneration or conflicts where required.
- Escalation or recusal where an employee has a personal conflict.

- Ground Floor, The Sotheby Building,
Rodney Village, Rodney Bay,
Gros-Islet, Saint Lucia
- **Registration No.:** 2026-00505
- **Office:** +44 20 3097 1344
- **WhatsApp:** +20 104 139 3876
- **Email:** info@altaramarkets.com
- **Website:** www.altaramarkets.com

5. Gifts and Inducements

Personnel should not accept gifts, payments or benefits that could improperly influence Client treatment, execution decisions, onboarding, complaints or vendor selection.

6. Personal Dealing

Where relevant, the Company may impose restrictions or monitoring on employee personal trading to reduce misuse of confidential information or conflicts with Client activity.

7. Disclosure

Where organizational controls are not sufficient to ensure with reasonable confidence that a material conflict will not adversely affect a Client, the Company should provide a clear disclosure of the nature and source of the conflict before proceeding, where required and appropriate.

8. Review

The Company should periodically review this Policy and the effectiveness of conflict controls, particularly after changes to execution models, liquidity providers, introducing arrangements, remuneration or products.

Legal review note: This document is designed as an operational legal draft for CRM deployment. It should be reviewed by qualified counsel for Altara Markets Ltd. before final public/client use, particularly for cross-border solicitation, licensing, consumer protection, privacy, tax and dispute-resolution requirements.

DOCUMENT APPROVAL / ELECTRONIC SIGNATURE

AUTHORIZED SIGNATORY	
DATE	

AUTHORIZED SIGNATURE / COMPANY SEAL



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