

Conflicts of Interest

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1. Introduction

As part of our commitment to adhere to the highest ethical standards and to be as transparent as we can about how we do business, we have established systems and processes that allow us to identify, prevent or manage any conflicts of interest which may arise when we provide services to our customers.

2. What Do We Mean by Conflicts of Interest?

Conflicts of interest can arise where our interests or the interests of our staff might conflict with our customers' interests. They can also happen where our staff's interests come into potential conflict with Altify's interests.

Some examples of potential conflicts that could occur would be where we could:

- try to make a financial gain (or avoid a financial loss) at the expense of our customers,
- receive a benefit from a third party / intermediary, whether financial or non-financial, to use that third party / intermediary for execution of customer orders or otherwise providing services to our customers,
- have a financial, or other incentive to favour the interest of one customer, or group of customers, over the interests of another.

3. How Do We Prevent or Manage Conflicts of Interest?

Firstly, by design. We're building Altify for our customers and that remains our priority. That's why we always try our very best to design and develop our product and operations in such a way that conflicts of interest are avoided.

Secondly, we establish policies and procedures to ensure conflicts of interest are identified, managed and mitigated. We strive to address conflicts in a fair, equitable and transparent manner, consistent with the best interests of our customers. We deal with and manage relevant conflicts as follows:

- We will avoid conflicts that are prohibited by law, as well as conflicts that cannot be effectively addressed.

- We will manage acceptable conflicts by applying internal controls and review processes.
- Where relevant, we will provide customers with information regarding certain conflicts, so that they are able to independently assess their significance when evaluating our products and services.

We keep a record of all identified conflicts of interest and monitor these to ensure that they are managed correctly. Where we are unable to put in place controls that are sufficient to mitigate the material risk or damage to a customer's interests, we will disclose this conflict to the customer before carrying out any business on their behalf.

4. Order Execution

We execute your orders in accordance with our [Order Handling & Best Execution Policy Summary](#). We do not receive financial or non-financial benefit from any trade execution venues or counterparties in return for sending our customers' orders to them (sometimes known as 'payment for order flow').

5. Investments Offered

We offer crypto assets, stablecoins, tokenised securities, and related investments, some of which are traded on trading venues.

We do not receive any financial or non-financial benefit from the issuer of crypto assets or stablecoins, or anyone acting on the issuer's behalf, for offering or promoting products.

We may receive a financial benefit from the issuer of tokenised investment options and related investments, or a party acting on the issuer's behalf, for offering or promoting products.

6. Gifts & Hospitality

Employees are not permitted to accept gifts, hospitality or other benefits that might be in conflict with our obligation to act in the best interests of our customers.

7. Personal Account Dealing

We have policies and procedures in place to monitor personal trading of all employees.