



Financial Trading and Investment

Conflict of Interest Policy

1. Introduction

This document sets out the policy of Direkt Prime Liquidity, a trading name of MMCD Resources Ltd, hereafter (the “**Company**”), to effectively manage the conflicts of interest that may arise where it provides services to its clients (the “**Client**” or “**Clients**”) in the course of carrying on regulated activities. This document is not intended to create third party rights or duties or form part of any contractual agreement between the firm and any Client.

2. Explanation

(a) The circumstances which should be treated as giving rise to conflicts of interest include all cases where there is:

1. a conflict between the interests of the Company, its Directors or staff, certain persons directly or indirectly connected to the Company or an Affiliate of the Company and the duty that the Company owes to a Client; or
2. a conflict between the differing interests of two or more Clients, as the Company owes a separate duty to each of them.

(b) Conflicts may arise, and all staff must take into account, whether any of the persons described above:

1. is likely to make a financial gain, or avoid a financial loss, at the expense of the Client
2. 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 the Client’s interest in that outcome
3. has a financial or other incentive to favour the interest of another Client, or group of Clients over the interests of the Client
4. carries on the same business as the Client; or
5. receives, or will receive, funds, goods or services outside standard commissions, fees or other remunerations for that service

3. Employee Personal Accounts

Employees may only undertake personal investment activities that do not breach applicable law or regulation, do not unduly distract from their employment responsibilities and do not create an unacceptable risk to the Company’s reputation. Transactions should also be free from business and ethical conflicts of interest. Employees must never misuse proprietary or Client confidential information in their personal dealings and must ensure that Clients are never disadvantaged as a result of their dealings.

4. Managing Conflicts of Interest

At times it may not be possible to prevent conflicts of interest from arising. In that case, the Company will endeavor to manage the conflict of interests by:

1. **Disclosure to the Client**
The Company will clearly disclose the general nature and source of the conflict of interest to the Client before undertaking business for the Client. The disclosure will be made in writing and include sufficient detail to enable the Client to take an informed decision about the service in the context of which the conflict of interest has arisen.
2. **Establishing an information barrier (Chinese wall)**
The Company will require information held by one part of the business to be withheld from, or not used by, persons in another part of the business.
3. **Declining to provide the service**
If it is not possible to avoid or manage a conflict of interest the Company may have no choice but to decline to provide the service requested.
4. **Annual checks will be conducted to ensure that appropriate systems and controls are maintained and are reported to the Company's Board of Directors.**
5. **Prohibition of external business interests conflicting with the Company's interests as far as the Company's officers and employees are concerned, unless Board of Directors approval is provided.**

6. Whistleblowing Policy

If any employee believes the Company is acting wrongly and incorrectly with regards to any regulatory procedures, they should inform the Compliance Officer at the earliest.

5. Record Keeping and Recording

Conflicts of interest or potential conflicts should be reported immediately to Compliance Officer.