Conflicts of Interest Policy

Identifying and Managing Conflicts

Milele Prime Ltd · Effective: August 2026

1. Purpose and Scope

This Conflicts of Interest Policy is issued by Milele Prime Ltd (the "Company") and forms part of the Client Agreement. It describes the principal circumstances in which conflicts of interest may arise between the Company (including its owners, directors, employees, affiliates and introducers) and its clients, or between one client and another, and the arrangements the Company maintains to identify and manage them. It applies to all services provided by the Company.

This Policy is a description of the Company's approach; it does not create duties, warranties or liabilities beyond those in the Client Agreement, and it does not guarantee that every conflict will be prevented or eliminated.

2. Where Conflicts May Arise

Conflicts inherent in the Company's business model include, without limitation:

- principal dealing: the Company is the counterparty to client trades, sets its own prices, and its financial outcome may be affected by client trading results, spreads, mark-ups, swaps and fees;
- hedging decisions: the Company decides in its own interest whether, when and how to hedge client exposure, and may profit from unhedged exposure;
- remuneration: staff, affiliates and introducing brokers may be remunerated by reference to client volumes, deposits or revenues, which may create incentives to encourage trading;
- promotions and partnerships: bonuses, rebates, contests and partner arrangements may influence client behavior;
- information: the Company holds aggregate information about client orders and positioning that clients do not have; and
- personal dealing: personnel may trade instruments similar to those traded by clients.

3. Management Arrangements

The Company maintains arrangements it considers proportionate to its size and business, including: organizational separation of functions where practicable; restrictions and reporting obligations for personal account dealing by staff; a gifts and inducements policy; oversight of remuneration structures; approval and monitoring of introducer and marketing arrangements; systems-based pricing and execution designed to apply consistent rules to clients; restrictions on the use of confidential and aggregate order information; and management review of new products, promotions and partnerships for conflict impact.

4. Disclosure and Consent

Where the Company considers that its arrangements cannot reasonably prevent a material risk of damage to client interests, it will disclose the general nature or source of the conflict, which may be by way of this Policy, the Client Agreement or the Website. By opening an account and trading, you acknowledge the conflicts described in this Policy, consent to the Company acting as principal and otherwise providing services notwithstanding such conflicts, and agree that such disclosure and consent satisfy the Company's obligations to you in respect of conflicts to the fullest extent permitted by applicable law.

5. Introducing Brokers and Third Parties

Introducing brokers, affiliates and other partners are independent third parties, may receive ongoing remuneration calculated by reference to your trading, and are not authorized to provide advice or make representations on the Company's behalf. Any advice, signal or recommendation you receive from them is theirs alone, and the Company accepts no responsibility for it. Details of remuneration arrangements relevant to you are available on request to the extent required by applicable law.

6. Review

The Company reviews this Policy periodically and upon material change. The current version published on the Website applies, and continued use of the services after publication constitutes acceptance.