TACTOFX CONFLICT OF INTEREST POLICY]

1. INTRODUCTION

1.1 Purpose of This Conflict of Interest Policy

This Conflict of Interest Policy outlines the procedures, controls, principles, and standards implemented by TactoFX to identify, manage, monitor, mitigate, disclose, and where necessary prevent conflicts of interest that may arise during the course of providing financial services, trading services, brokerage operations, technology services, and related activities.

The purpose of this Policy is to ensure that TactoFX conducts its business activities honestly, fairly, professionally, transparently, and in the best interests of its Clients.

This Policy applies to:

employees;
directors;
shareholders;
contractors;
introducing brokers;
affiliates;
agents;
service providers;
compliance personnel;
and any individual or entity acting on behalf of TactoFX.

TactoFX recognizes that conflicts of interest may arise naturally in the course of conducting brokerage and financial market activities. The Company is committed to implementing operational and compliance procedures designed to reduce the risk that such conflicts negatively affect Clients.

1.2 Commitment to Fair Treatment

TactoFX is committed to:

- treating Clients fairly and professionally;
- maintaining market integrity;
- operating transparently;
- implementing internal controls;
- protecting confidential information;
- avoiding improper incentives;
- and minimizing circumstances that may disadvantage Clients.

The Company seeks to maintain systems and procedures designed to ensure that no Client is unfairly treated due to internal business interests, employee incentives, commercial relationships, or operational structures.

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2. DEFINITIONS

2.1 Conflict of Interest

A "Conflict of Interest" refers to any situation in which:

- TactoFX;
- its employees;
- directors;
- affiliates;
- partners;
- or associated persons

have competing professional, financial, commercial, or personal interests that could potentially interfere with their duty to act fairly and honestly toward Clients.

Conflicts may arise between:

the Company and Clients;
one Client and another Client;
employees and Clients;
affiliates and Clients;
service providers and Clients;
or internal departments within the Company.

2.2 Material Conflict

A “Material Conflict” refers to a conflict that may reasonably create a risk of:

financial harm to a Client;
unfair treatment;
biased decision-making;
misuse of confidential information;
compromised execution quality;
or improper commercial advantage.

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3. TYPES OF CONFLICTS OF INTEREST

3.1 Conflicts Between TactoFX and Clients

Conflicts may arise where the Company’s commercial interests differ from the interests of Clients.

Examples may include:

compensation structures linked to trading activity;
operational incentives;
spread-related revenues;
liquidity arrangements;
execution models;
or risk management activities.

TactoFX seeks to manage such conflicts through:

- internal supervision;
- compliance monitoring;
- operational transparency;
- and fair execution standards.

3.2 Conflicts Between Clients

Conflicts may arise where:

- multiple Clients trade in the same markets;
- order priorities overlap;
- market liquidity is limited;
- or competing trading interests exist.

The Company seeks to process orders fairly and consistently according to its execution procedures and operational policies.

3.3 Employee-Related Conflicts

Employees may face conflicts where:

- personal interests influence professional judgment;
- employees access confidential information;
- personal trading activities create competing interests;
- gifts or incentives influence behaviour;
- or external relationships impact impartiality.

TactoFX maintains policies intended to reduce improper employee conduct and ensure professional integrity.

3.4 Affiliate and Third-Party Conflicts

Conflicts may arise through relationships involving:

- introducing brokers;
- affiliates;
- payment providers;
- liquidity providers;
- marketing partners;
- technology vendors;
- or external contractors.

The Company seeks to monitor such relationships to reduce risks associated with biased referrals, unfair commercial arrangements, or improper incentives.

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4. IDENTIFICATION OF CONFLICTS

4.1 Internal Monitoring Procedures

TactoFX maintains internal procedures designed to identify potential conflicts of interest across business operations.

This may include monitoring:

- employee activities;
- commercial arrangements;
- trading operations;
- remuneration structures;
- marketing practices;
- execution procedures;
- and operational relationships.

4.2 Compliance Oversight

The Company may appoint compliance personnel or internal supervisory teams responsible for:

- reviewing operational risks;
- identifying conflict situations;
- evaluating business practices;
- monitoring employee conduct;
- and maintaining internal compliance controls.

4.3 Periodic Risk Assessments

TactoFX may conduct periodic reviews and assessments to evaluate:

- emerging operational risks;
- changes in business models;
- compensation structures;
- regulatory developments;
- and third-party relationships.

These assessments are intended to identify circumstances that may create potential conflicts affecting Clients.

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5. MANAGEMENT OF CONFLICTS OF INTEREST

5.1 Organizational Controls

TactoFX may implement organizational measures designed to reduce conflicts of interest.

Such measures may include:

- segregation of duties;

independent oversight;
restricted information access;
operational supervision;
compliance reporting;
and internal review procedures.

5.2 Segregation of Responsibilities

Where reasonably applicable, the Company may separate operational responsibilities between departments including:

compliance;
customer support;
finance;
risk management;
trading operations;
and marketing.

The purpose of segregation is to reduce inappropriate influence, conflicts, or misuse of information.

5.3 Employee Conduct Standards

Employees are expected to:

act honestly and professionally;
prioritize fair treatment of Clients;
avoid improper behaviour;
protect confidential information;
disclose potential conflicts;
and comply with Company policies.

Employees may be prohibited from:

exploiting confidential information;

engaging in abusive conduct;
front-running client trades;
using insider information;
or benefiting improperly from Client activity.

5.4 Restrictions on Personal Trading

TactoFX may impose restrictions on employee trading activities where necessary to:

reduce conflicts;
prevent misuse of information;
maintain market integrity;
and protect Clients.

Employees may be required to:

disclose trading accounts;
comply with holding periods;
obtain approvals;
or avoid trading during restricted periods.

5.5 Confidential Information Controls

The Company maintains procedures intended to protect confidential and sensitive information.

Access to confidential information may be limited to authorized individuals with legitimate operational needs.

Employees and associated persons may be prohibited from:

sharing confidential data;
using information improperly;
or disclosing Client information without authorization.

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6. REMUNERATION AND INCENTIVE MANAGEMENT

6.1 Compensation Structures

TactoFX seeks to design compensation structures that do not encourage:

- unethical conduct;
- excessive risk-taking;
- unfair treatment of Clients;
- or abusive sales practices.

The Company may periodically review remuneration policies to reduce incentives that could create conflicts of interest.

6.2 Sales and Marketing Incentives

The Company seeks to ensure that marketing and sales activities are conducted fairly and responsibly.

Employees, affiliates, or partners may be prohibited from:

- making misleading statements;
- guaranteeing profits;
- misrepresenting risks;
- or using deceptive promotional tactics.

6.3 Affiliate and Introducing Broker Arrangements

TactoFX may compensate affiliates or introducing brokers for referrals or marketing activities.

The Company seeks to monitor such arrangements to reduce risks that:

Clients receive misleading information;
referrals prioritize compensation over suitability;
or marketing practices become unfair or deceptive.

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7. ORDER EXECUTION AND TRADING FAIRNESS

7.1 Fair Order Handling

TactoFX seeks to handle Client orders fairly, efficiently, and consistently according to operational procedures and market conditions.

The Company aims to:

process orders impartially;
reduce discriminatory treatment;
and maintain transparent execution practices.

7.2 Best Execution Principles

Where reasonably applicable, TactoFX may consider factors including:

price;
speed;
liquidity;
execution quality;
and market conditions

when processing Client orders.

Execution outcomes may depend on:

market volatility;

liquidity;
technological infrastructure;
and external market conditions.

7.3 Slippage and Market Conditions

The Client acknowledges that:

slippage may occur;
spreads may widen;
prices may fluctuate rapidly;
and execution may differ from requested prices.

Such conditions may result from:

volatility;
liquidity shortages;
economic announcements;
or extraordinary market events.

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8. DISCLOSURE OF CONFLICTS

8.1 Disclosure Principles

Where TactoFX determines that a conflict cannot reasonably be avoided or effectively managed, the Company may disclose the nature of the conflict to affected Clients.

Disclosures may include information regarding:

commercial relationships;
compensation arrangements;
affiliate relationships;
execution models;
or operational interests.

8.2 Method of Disclosure

Conflict disclosures may be provided through:

- website notices;
- legal agreements;
- policy documents;
- account documentation;
- emails;
- platform notices;
- or other communication channels.

9. TRAINING AND INTERNAL AWARENESS

9.1 Employee Training

TactoFX may provide employees with training relating to:

- ethics;
- compliance obligations;
- confidentiality;
- market conduct;
- anti-fraud procedures;
- and conflict management responsibilities.

9.2 Ongoing Awareness

The Company may periodically update employees regarding:

policy changes;
regulatory developments;
operational procedures;
and emerging conflict risks.

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10. THIRD-PARTY RELATIONSHIPS

10.1 Due Diligence Procedures

TactoFX may conduct reasonable reviews of third-party relationships involving:

service providers;
affiliates;
technology vendors;
payment institutions;
and introducing brokers.

The purpose of such reviews is to reduce operational, reputational, and compliance risks.

10.2 Monitoring External Relationships

The Company may periodically monitor external relationships to evaluate:

performance standards;
compliance practices;
commercial fairness;
and potential conflicts affecting Clients.

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11. RECORD KEEPING

11.1 Maintenance of Records

TactoFX may maintain records relating to:

- identified conflicts;
- internal reviews;
- disclosures;
- compliance assessments;
- employee declarations;
- and conflict management procedures.

11.2 Retention of Documentation

Records may be retained for periods considered reasonably necessary for:

- regulatory compliance;
- operational administration;
- dispute resolution;
- legal obligations;
- and risk management purposes.

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12. CLIENT RESPONSIBILITIES

12.1 Independent Decision-Making

Clients remain responsible for their own trading and investment decisions.

TactoFX does not guarantee:

- profitability;
- investment success;
- or protection from losses.

12.2 Reporting Concerns

Clients are encouraged to report concerns regarding:

- unfair treatment;
- suspicious behaviour;
- conflicts of interest;
- or unethical conduct.

Reports may be submitted through official Company support or compliance channels.

13. REGULATORY COMPLIANCE

13.1 Commitment to Compliance

TactoFX seeks to operate in accordance with applicable laws, regulations, industry standards, and compliance obligations relating to:

- fair treatment of Clients;
- market conduct;
- anti-fraud measures;
- confidentiality;
- and operational integrity.

13.2 Policy Reviews

This Policy may be reviewed periodically to reflect:

- regulatory changes;
- operational developments;
- business restructuring;

technological advancements;
and evolving industry standards.

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14. LIMITATIONS

While TactoFX implements procedures designed to identify and manage conflicts of interest, the Company cannot guarantee that all potential conflicts will always be completely eliminated.

Clients acknowledge that:

financial markets involve complex operational relationships;
conflicts may arise unexpectedly;
and market conditions may create circumstances beyond reasonable control.

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15. AMENDMENTS TO THIS POLICY

TactoFX reserves the right to modify, amend, update, or replace this Conflict of Interest Policy at any time.

Updated versions become effective upon publication on the official website.

Continued use of TactoFX services constitutes acceptance of revised terms.

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16. CONTACT INFORMATION

For questions regarding this Policy or conflict-related concerns, Clients may contact:

TactoFX Compliance Department

Email: compliance@tactofx.com
Website: www.tactofx.com

FINAL STATEMENT

TactoFX is committed to maintaining operational integrity, transparency, fairness, and professional standards in all business activities.

The Company seeks to implement reasonable procedures and internal controls designed to identify, manage, disclose, and mitigate conflicts of interest in order to support fair treatment for all Clients and maintain confidence in its services and operations.