CONFLICTS OF INTEREST POLICY

HOGG CAPITAL INVESTMENTS LTD

July 2026

Contents

1. INTRODUCTION

Hogg Capital Investments Ltd (the "Company", "HCI"), is a limited liability company, with a principal place of business located in Nu Bis Centre, Mosta Road, Lija LJA 9012, Malta, licensed under the Investment Services Act (Chapter 370 of the Laws of Malta) as an investment firm having License Number 18954 and regulated by the Malta Financial Services Authority. The Company has a Class 2 Investment Firm in terms of the Investment Firms Regulation[1] .

HCI is authorised to provide Investment Advice, Individual Portfolio Management, Reception and Transmission of Orders, Dealing on Own Account, Placing of Instruments without a Firm Commitment Basis, Execution of Orders and Trustee, Custodian and Nominee Services, to Retail Clients, Professional Clients and to Eligible Counterparties in relation to a number of financial instruments as set out in the Company's licence, accessible through the following link: Financial Services Register - MFSA

The Company has traditionally provided (a) direct securities' placement, (b) advisory and portfolio management services, (c) execution services (including reception and transmission of orders) and (d) nominee services (collectively referred to as the "Client Advisory Services") primarily to its Retail Client base domiciled and/or resident in Malta. Since 2014, it has additionally provided non-advisory online brokerage services through its Tier1FX branded offering, which is aimed primarily at Retail Clients, Professional Clients and Eligible Counterparties located outside of Malta and principally within the European Union (the "Online Brokerage Services"). The Company has also very recently started to provide the service of portfolio management (through the discretionary execution of third party trading signals i.e. copy trading services) under the Tier1FX, New Traders Lab and Blue Invest brands (the latter two being brands of the Company as well).

2. MISSION STATEMENT

The Company is guided by the principles of fairness, trust, and integrity. Our core values centre on placing our clients at the heart of our business model and supporting them throughout their entire trading journey. We believe this foundation is crucial for fostering strong, enduring relationships that ultimately enhance the Company's reputation. As a reliable firm committed to acting in its clients' best interests, the Company is concomitantly committed to exercise its services in adherence with the various legislative requirements incumbent upon it.

Reflective of its size and internal organisation as well as the nature, scope and the complexity of its business activities, the Company aims to take all reasonable steps to prevent conflicts of interest that can adversely affect the interests of its clients. In this regard, and as mandated by law, the Company maintains and operates effective organizational and administrative arrangements that allow it to identify and

[1] Regulation (EU) 2019/2033 of the European Parliament and of the Council of 27 November 2019 on the prudential requirements of investment firms and amending Regulations (EU) No 1093/2010, (EU) No 575/2013, (EU) No 600/2014 and (EU) No 806/2014.

manage conflicts of interest that may arise in the course of business between the Company's Relevant Persons (as defined in the 'Definitions' section of this Policy) and the Company's clients, or between one client and another.

3. DEFINITIONS

'Relevant Person[2]' in relation to an investment firm, means any of the following:

a. a director, partner or equivalent, manager or tied agent of the firm.
b. a director, partner or equivalent, or manager of any tied agent of the firm.
c. an employee of the firm or of a tied agent of the firm, as well as any other natural person whose services are placed at the disposal and under the control of the firm or a tied agent of the firm and who is involved in the provision by the firm of investment services and activities.
d. a natural person who is directly involved in the provision of services to the investment firm or to its tied agent under an outsourcing arrangement for the purpose of the provision by the firm of investment services and activities.

4. BACKGROUND and APPLICABILITY

In line with the services and instruments offered by the Company it is considered as an investment firm in line with Article 4 of Directive 2014/65/EU ("MiFID II), therefore subject to the requirements of the said Directive and supplementary Regulation and Level 2 Measures, as issued from time to time. This encompasses the conflicts of interest rules set out under MiFID II, which are designed to manage conflicts of interest that may arise in the course of the Company's exercise of its activities. Conflicts may be actual, potential, or perceived.

The main legal instruments referred to in this policy are the following:

- DIRECTIVE 2014/65/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU.
- COMMISSION DELEGATED REGULATION (EU) 2017/565 of 25 April 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organizational

[2] This includes '*all persons who could have an impact on the service provided or corporate behaviour of the firm, including persons who are front-office staff, sales force staff or other staff indirectly involved in the provision of investment or ancillary services. Persons overseeing the sales forces, such as line managers, who may be incentivised to pressure sales staff, or financial analysts whose literature may be used by sales staff to entice clients to make investment decisions or persons involved in complaints-handling or in product design and development should also be included in the scope of relevant persons concerned by remuneration rules'.*

requirements and operating conditions for investment firms and defined terms for the purposes of that Directive.
- Relevant Sections of the MFSA Conduct of Business Rulebook.
- Relevant Sections of Part BI of the Investment Services Rules for Investment Services Providers.

5. INTERNAL PROCESS

5.1 Incidents of Conflicts of Interest

Conflicts of interest arise where the Company or any Relevant Person have an interest of their own that is in conflict with the interest of a client or clients (independently of the classification of the client so that the protection benefits retail clients, professional clients and eligible counterparties in the same way). Examples of such cases include:

- The Company or any Relevant Person is likely to make a financial gain, or avoid a financial loss at the expense of the client.
- The Company or any Relevant Person 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.
- The Company or any Relevant Person has a financial interest or other incentive to favour the interest of another client or group of clients over the interests of the client.
- The Company or any Relevant Person carries on the same business as the client.
- The Company or any Relevant Person receives, or will receive, from a person other than the client, an inducement in relation to a service provided to the client, in the form of monetary or non-monetary benefits or services.
- Any Relevant Person is aiming at outcomes that are influenced by remuneration, referral fees or commission structures.
- Any Relevant Person may have personal or commercial relationships that could bias client introductions; or
- Introducers may provide information in a manner that misleads clients or unduly influences their decision-making.

It should be noted that it is not enough that the Company may gain a benefit if there is not also a possible disadvantage to a client, or that one client to whom the Company owes a duty may make a gain or avoid a loss without there being a concomitant possible loss to another such client.

5.2 Management of Conflicts of Interest

The Company must establish, maintain, and periodically review an effective Conflicts of Interest Policy, supported by additional policies and procedures that govern specific business areas, all designed to identify and manage potential conflicts of interest.

As part of this process, the Company, on an ongoing basis:

- monitors its offerings (products and/or services) for potential conflicts of interest
- assesses whether its policies are effective and adequate for resolving any such issues, were they to arise.

While it is not possible to create an exhaustive list of all possible conflicts of interest that may arise, the following are specific areas of potential conflict, as they may impact the Company's provision of services:

5.2.1 Remuneration

The Company has established a Remuneration Policy which sets out its remuneration framework, designed to address and reduce conflicts of interest arising between Relevant Persons and clients (whatever the categorisation of such clients may be), specifically in connection with the structure and allocation of remuneration. Where staff are remunerated by reference to business volumes, there is potential for conflict between the relevant staff members' interests and clients' interests, as such remuneration schemes may provide an incentive to maximise revenues at the expense of clients' interests. In order to mitigate this risk, the Company applies a balanced combination of fixed (salary) and variable (performance related bonus) components, with fixed remuneration representing the main component of remuneration. Variable remuneration is never guaranteed . Further detail is found in the Remuneration Policy of the Company.

5.2.2 Staff Personal Dealing

All members of staff are required to exercise caution in the management of their finances and not to undertake transactions that by their nature or purpose might affect the reputation of the Company. The above prohibitions should at all times be kept in mind by the Employees. The Company does not allow its employees to actively trade financial instruments. It will however allow its employees (subject to receipt of prior permission from senior management to proceed) to create investment portfolios as a means towards activating personal savings within a generally passive, long-term (i.e. exceeding 5 years') investment strategy. Further detail on this point is found in the Company's 'Prevention of Market Abuse' Policy.

5.2.3 External Business Interests

Staff may not accept any employment or business interest outside the Company without the prior approval of the Company's Board of Directors.

5.2.4 Inducements

The Company will not accept any monetary and/or non-monetary benefits other than those considered minor benefits; designed to enhance the quality of the relevant service to the client; and does not impair compliance with the Company's duty to act honestly, fairly and professionally in accordance with the best interests of its clients.

As at the time of review of this Policy the Company does not receive any inducement from third parties, including any remuneration, discount or non-monetary benefit for routing client orders to a particular trading venue or execution venue.

Further detail on this subject is found in the Company's 'Inducements Policy'.

5.2.5 Client Classification

A potential conflict exists with respect to client categorization, where the Company might benefit from a professional categorization of a client, rather than a retail classification. This would reduce the level of investor protection enjoyed by clients, as reflected in lighter regulatory requirements incumbent upon the Company. In order to counter this risk and in the spirit of keeping clients' best interest at the heart of the Company's provision of service, all clients are automatically classified as retail clients, except for licensed legal entities satisfying the per se professional client definition and where clients request a different categorisation, in which case the Company will follow the process outlined in its 'Client Classification Policy'. Furthermore, the Compliance Officer oversees such classification, ensuring that only clients who fully satisfy the relevant criteria are classified as professional clients or eligible counterparties, as the case may be.

5.2.6 Referral Agents / Asset Managers / Copied Traders

The Company may enter into agreements with Referral Agents, Asset Managers and other partners who direct clients to it and may pay a rebate or commission to such partners for the referral. The amount of such payment depends on a variety of factors and may be built into the total trading fees being charged to the client's account, which are disclosed on the relevant statements available to the client. The Company also contracts with copied traders/signal providers in order to be able to provide its copy trading service.

Referral Agents

For Referral Agents specifically, conflicts may arise where:

- Referral fees or commissions incentivise introductions for reasons not aligned with the client's best interests.
- Compensation is volume-based or tied to client activity, creating sales-driven rather than needs-driven introductions.
- The introducer has commercial ties to the Company or its representatives.
- The introducer risks giving unauthorised investment advice to secure referral remuneration.

<u>Management and Mitigation of Conflicts</u>

To comply with MiFID II obligations, the Company applies the following measures:

- The Referral Agent is subject to the on-boarding process, including sanctions screening.
- All clients referred to the Company are subject to the Company's on-boarding process, including the appropriateness assessment and the suitability assessment, as applicable.
- The Company will never rely on the onboarding process or appropriateness/suitability assessment of the referral agent, if offered.
- The Company contractually obliges the Referral Agent to:
    - Be fully transparent in relation to the fees, which are notified to the relevant clients prior to the provision of service.
    - Desist from undertaking any aggressive marketing techniques, or downplay the risks associated with the type of service.
    - Avoid providing any type of investment service such as investment advice or portfolio management services.
- Reference to referral agents is made in the Customer Agreement, where a dedicated section is included containing detailed information on relationships involving referral agents.
- Immediately upon the onboarding of a client who has been referred to by a referral agent, the Company sends out a notification to such clients containing the main features governing the relationship between the Company and the referral agent, as well as between the referral agent and the client. Specifically, the Company emphasizes the

limited role of the referral agent in such relationships, as well as of the importance of contacting the Company, as opposed to the referral agent, in case of difficulties relating to the trading account held with the Company. This information contains an extract of the relevant section of the Customer Agreement dealing with Referral Agents.

- The Company will:
    - Periodically review introducer activity and referral patterns.
    - Assess whether remunerated arrangements create undue influence.
    - Maintain records of all conflicts identified and actions taken.
    - Suspend or terminate introducer relationships where conflicts cannot be effectively managed.
    - Monitor the withdrawal frequency of fees by referral agent/s and escalate incidents, including the imposition of deterrents against payment, where referral agents are withdrawing their fees on a frequent basis, notwithstanding the relevant client is making a loss.

Asset Managers

With respect to Asset Managers, the fees charged by the Asset Managers, as well as the fees charged by the Company to accounts managed by Asset Managers, are fully disclosed to the client in the Limited Power of Attorney (LPOA) provided prior to the provision of the investment service. The said LPOA is to be signed by the clients before joining the Managed Program of the Asset Manager and any conflict between the Asset Manager's interest and the interest of the client, is clearly stated therein.

Copied Traders

The Company acknowledges the following possible conflicts of interest when it comes to the copy trading service:

i. Copied traders profit from revenues which might create an incentive to:

    a. take excessive risk to appear high-return and attract more copiers

    b. Trade more frequently to generate higher fees

    The above may not always align with the client/s' risk tolerance or long-term profitability.

ii. Liquidity and Slippage Differences -

When a trade is copied, the subsequent trade execution may reflect differing market conditions. This may impact the transaction(s) both in terms of both price and fill.

Management and Mitigation of Conflicts

Employees and copied traders must promptly report suspected conflicts to the compliance department. To manage conflicts, the Company implements the following measures:

i. Transparent Disclosures

a. Clear explanation of fee structures to clients.

b. Disclosure of commercial relationships with copied traders.

c. Presentation of full risk metrics (e.g., drawdown, volatility, leverage usage, risk-adjusted performance metrics and duration of winning streaks vs. losing periods).

d. Visibility of complete performance history.

ii. Restrictions on Trader Behavior

a. Prohibition on deceptive or high-risk behavior intended solely to attract followers.

b. Independent risk controls to monitor signal provider behavior. In fact the Company not only retains ultimate control over the signals provided (as further explained in the next point 'd'), but additionally applies risk mitigating measures in order to protect clients from incurring significance losses.

c. Restricting high-risk strategies when inconsistent with client profiles. In fact the Company retains full control on a pre-trade and post-trade basis, in the most granular way possible up to the single strategy provider level as well as up to each signal issued by each respective strategy provider. On a pre-trade basis, this allows the Company to reject each single signal before converting it into an actual trade. The Company is also able to utilize the signal provider dashboard, which is a part of the copy-trading back office general system, in order to monitor the copy trader in real-time. Additionally, through the system journal, the Company is able to obtain print-outs of real-time logs in short forms for a quick view. This is done at pre-trade stage and in real-time.

With respect to post-trade monitoring, the copy-trading back office system populates full detailed; long form, logs, concerning the full range of details related with each signal provider and related trading signals, which is kept by the Company in a specific Windows folder.

A separate excel file (register) is manually populated in case the division detects, by the back-office, some anomalies in trading behaviours. So far, there has never been any population of this register.

d. The strategy provider is remunerated on the basis of the positive performance of the client/s' portfolio within a reasonable timeframe, thereby aligning the strategy provider's interests with that of the Company's client/s.

iii. Execution Fairness

a. Disclosure of execution limitations

b. Clear communication when follower positions cannot be replicated exactly.

Monitoring

The Compliance Officer will undertake periodic reviews of copied traders, in the process of which consideration will be given to any abnormal activity or unethical strategies. Any identification of misconduct or suspicious trades made by copied traders will result in the suspension and/or closure of the copied trader's accounts held with the Company. The compliance review will also consider the fee and rebate arrangements, as well as any complaints or feedback received from clients of the copy trading service. In line with the Company's internal audit framework, the Board of Directors may also decide to engage an internal audit firm to review the copy trading service. Such reviews would be conducted on a risk-based basis and, in any case, carried out every few years.

5.2.7 Research

The Company, any Relevant Person or members of their families, may have interests in the securities of financial instruments referred to in the Company's research prepared for a particular client, provided in the course of the provision of investment advice. In the circumstances, the Company will disregard any such relationship, arrangement or interest, which might influence the advice or recommendation. Moreover, in such circumstances, the potential or actual conflict, will be disclosed to the client prior to any advice, recommendations or related research being released.

5.3 Reporting

The Company, its directors and its members of staff are collectively responsible for identifying and reporting potential and actual conflicts of interest to the Compliance Officer, based upon their respective assessments of such situations as they may arise. In this respect, the burden is not being transferred to the members of staff, but rather being shared, by way of obliging all members of staff to discuss with the Compliance Officer, should they suspect that a conflict of interest might arise or has already arisen.

The senior management, through the Executive Committee, is responsible for ensuring on an ongoing basis that its systems, controls and procedures are adequate to identify, manage and monitor conflicts. Senior management is also responsible for ensuring that staff is aware of the aspects of the Policies relevant to them. Failure of a member of staff to adhere to the Company's Policy on conflicts of interest may be viewed as a breach of that member's contract of employment. Moreover, the failure of a member of staff to declare an interest will be regarded as misconduct and may lead to disciplinary action being taken against that individual.

The Compliance Officer will keep record of instances of conflicts of interest in a register kept for the purpose. Any update to the Register will be notified to the Board of Directors through the relevant quarterly compliance reports.

5.4 Governance

- The Company shall ensure the segregation of duties that may give rise to conflict of interest if performed by the same person.
- The independent Compliance Department shall monitor and report on any conflicts of interest to the Company's Board of Directors.
- A "need-to-know" process shall be established and maintained, governing the dissemination of confidential information within the Company.
- The Company shall create and maintain areas of confidentiality. To this effect, among other measures, Chinese walls are built and individual areas within the Company are spatially separated with the scope of preventing the sharing of information or Relevant Persons from exercising inappropriate influence.

Board of Directors

The Company shall also ensure that controls are in place to prevent conflicts of interests among directors. If during Board Meetings a director considers that they have or may have a conflict of interest, the following procedures should be followed:

i. The relevant director should declare such interest to the other directors either at the Meeting at which the issue arose, or if the director was not present at the date of the Meeting when the issue was discussed, at the next Board Meeting held after the issue came to their attention.

ii. Unless otherwise agreed to by the other directors, a director shall avoid entering into discussions in respect of any contract or arrangement in which they are interested and should withdraw from the meeting while the matter in which they have an interest is being discussed.

iii. Likewise, the interested director should not participate in the voting at a Board Meeting in respect of any contract or arrangement in which they are interested, and if they shall do so, their vote shall not be counted in the quorum present at the Meeting. The Board minutes should accurately and clearly record the sequence of such events.

Directors are asked whether they have any conflicts to declare during each board meeting, as part of a standard agenda item.

5.5 Disclosure

Where a conflict of interest cannot be avoided, this shall be duly disclosed to the client prior to the commencement of business.

The Company can currently declare that it has no general conflicts of interest that are not appropriately prevented or managed, or that would require disclosure in accordance with the applicable requirements. In the event of such disclosure however, the Company shall clearly state in a durable medium:

- That the preventive policies adopted by the Company to avoid that conflict are not sufficient to reasonably ensure that there will be no damage to the interests of the client as a result.
- The disclosure will contain the following:
    - Description of the conflict of interest.
    - The general nature and sources of said conflict.
    - The risks that may arise, or may have arisen, to the client.
    - Steps that were subsequently undertaken to mitigate the risk of damage to the client's interests.

This disclosure must be rendered in sufficient detail to enable the client in question to take an informed decision regarding this issue.

The Company treats such disclosure as a measure of last resort after determining that its internal arrangements are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of the client are prevented. Over reliance on such disclosure over the implementation of adequate internal measures to manage, mitigate and prevent a conflict will be considered as a breach of this Policy.

A summarized version of this Policy is found in the following websites:

- Advisory Division - https://hoggcapital.com/wp-content/uploads/2021/04/CONFLICTS-OF-INTEREST-POLICY.pdf
- Online Brokerage Division - https://www.tier1fx.com/wp-content/uploads/2019/11/Conflictofinterest_Policy_TIER1FX_Malta_2019V01.pdf
- BlueInvest - Legal and regulation
- NTL - Legal and Regulation - NewTraderLab

6. REVIEW OF POLICY

The Company will review the Policy as the need arises, but in any case at least on an annual basis. Any such review will be followed by an official Board approval. The below Version Control Table will be updated upon each and every review of this Policy.

Version Control

Version:	Created By:	Approved By:	Description of Change:	Review Date:	Approval Date:
0.1	Compliance Department	Board of Directors	No Changes / Original Document	2022	2022
0.2	Compliance Department	Board of Directors	Replacement of the Policy.	23rd March 2026	10th July 2026