



## **SUMMARY OF CONFLICT OF INTEREST POLICY**

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## **1. Introduction**

This document provides a summary of the Conflicts of Interest Policy of DPRG IM Ltd (Registration Number: HE433850) (the “Company”), a Cyprus Investment Firm (CIF) authorised and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under License Number 454/25.

The purpose of this Summary is to inform clients about the Company’s approach to identifying, managing, and disclosing conflicts of interest that could arise in the course of providing investment services and ancillary services. The full version of the Conflicts of Interest Policy is available to clients upon request.

The Company is committed to protecting the interests of its clients, maintaining the highest standards of integrity and fairness, and ensuring compliance with its legal and regulatory obligations, including MiFID II (Directive 2014/65/EU), the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017), and relevant CySEC rules and circulars.

## **2. Purpose**

The primary purpose of this Policy is to ensure that conflicts of interest do not compromise the fairness of the services provided by DPRG IM Ltd. The Company recognizes that situations may arise where the interests of the Company, its employees, or its affiliates may diverge from those of its clients. This Policy aims to mitigate these risks and ensures transparency and fairness in all dealings.

The Policy also ensures compliance with regulatory requirements, including MiFID II (Directive 2014/65/EU), CySEC’s applicable circulars, and other relevant local and international laws.

## **3. Scope**

This Policy applies to all employees, agents, and affiliates of DPRG IM Ltd. It covers all aspects of the Company’s operations, including but not limited to the provision of investment services, execution of client orders, portfolio management, and advisory services.

It specifically addresses potential conflicts that could arise from:

- The Company’s relationships with clients
- The Company’s relationships with other entities, including group companies and affiliates
- The personal interests of employees and key personnel

- The provision of services to both retail and professional clients

The Company is committed to ensuring that conflicts are handled in a manner that prevents any material detriment to its clients.

#### **4. Identification of Conflicts**

Conflicts of interest may arise in various circumstances, including but not limited to the following:

- **Proprietary Interests:** The Company or its employees may have a financial interest in an investment that conflicts with the interests of a client.
- **Personal Relationships:** Employees may have personal relationships with clients or other stakeholders that could influence their professional judgment.
- **Competing Interests:** The Company may provide services to competing clients or have interests in transactions that affect multiple clients differently.
- **Remuneration Structures:** Bonuses or commissions tied to specific sales or transactions could lead to conflicts between what is best for the client and what benefits the employee or the Company.

These conflicts must be identified early, and measures must be put in place to manage them.

#### **5. Managing Conflicts**

The Company implements several measures to manage and mitigate conflicts of interest:

- **Information Barriers:** The Company employs strict procedures and policies, including “Chinese Walls,” to prevent the improper exchange of information between departments or employees who may have conflicting interests.
- **Segregation of Duties:** Responsibilities are divided to avoid the concentration of power in areas where conflicts may arise. Employees are assigned specific roles to ensure that no single individual has control over conflicting processes.
- **Transparency:** Where appropriate, the Company will disclose conflicts to clients, ensuring that they are aware of any potential impact on their interests.

- Independent Oversight: Conflicts are monitored by the Compliance Officer, who ensures that appropriate procedures are followed to minimize risk.

## **6. Record Keeping**

The Company maintains detailed records of all situations where conflicts of interest may arise, including the nature of the conflict, the steps taken to manage it, and any disclosures made to clients. This is essential to ensure compliance with regulatory requirements and for audit purposes. The records are kept in a secure and accessible manner for at least five years, in accordance with applicable regulations.

## **7. Disclosure to Clients**

Whenever a conflict of interest cannot be effectively managed, the Company will disclose the nature of the conflict to the client in a clear and comprehensive manner. The disclosure will include:

- The specific conflict identified
- The steps taken to mitigate or manage the conflict
- Any potential effects on the client's interests

This disclosure will be made prior to providing the relevant service or transaction, ensuring clients can make informed decisions. The Company will not proceed with a transaction that could compromise the client's interests without their explicit understanding of the conflict.

## **8. Client's Consent**

In situations where a conflict cannot be entirely avoided or mitigated, and disclosure is not sufficient, the Company will obtain explicit consent from the client to proceed with the transaction. This consent will be documented and retained, ensuring that the client is fully aware of any potential risk and agrees to proceed in light of the conflict.

## **9. Training and Monitoring**

Employees are regularly trained on the identification, management, and disclosure of conflicts of interest. The training includes:

- Understanding the Company's policies and procedures regarding conflicts

- Recognizing situations where conflicts may arise
- Knowing how to manage conflicts and escalate issues when necessary

Regular monitoring and auditing of the Company's operations help ensure ongoing compliance with the conflict management procedures. The Compliance Officer is responsible for ensuring that all staff are properly trained and that the Policy is adhered to.

## **10. Review and Updates**

This Policy will be reviewed at least annually to ensure it remains effective and compliant with regulatory requirements. Any changes to the Company's operations, regulatory environment, or services provided will be reflected in updates to the Policy.

In the event of significant regulatory changes or internal changes that affect conflict management, the Policy will be updated promptly, and clients will be informed of any significant updates that may affect their interests.

## **11. Contact Information**

If you have any questions about this Summary of Conflicts of Interest Policy or require further information, please contact:

Compliance Department

Email: [compliance@dprginvestment.com](mailto:compliance@dprginvestment.com)

Telephone: +357 22 220010

## **12. Version Control**

- Version: 1.0
- Prepared by: Compliance Department
- Approved by: Board of Directors
- Date of Approval: 14/04/2025

### **13. Disclaimer**

This Summary of the Conflict of Interest Policy ("Summary") is provided for information purposes only and forms part of the Client Agreement between DPRG IM Ltd (the "Company") and its clients. It does not constitute the full Conflicts of Interest Policy of the Company.

The full Conflicts of Interest Policy is available to clients upon request.

This Summary is subject to change and may be amended at any time to reflect changes in applicable laws, regulations, regulatory guidance, or the Company's business practices. The Company reserves the right to update the Summary without prior notice, where necessary.

In the event of any inconsistency between this Summary and the Client Agreement, the terms of the Client Agreement shall prevail, unless otherwise specifically stated.