

**INFORMATION REGARDING  
THE CONFLICTS OF INTEREST POLICY  
OF TRIPLE A EXPERTS INVESTMENT SERVICES S.A.  
(FX and CFD products)**

## **1. GENERAL INFORMATION**

### **1.1. Purpose of this document**

By this document, TRIPLE A EXPERTS INVESTMENT SERVICES S.A. (“AAAFX”) provides to you information regarding the policy that it has implemented in order to comply with the requirements to have appropriate procedures and policies in order to avoid and/or manage situation of conflicts of interests that may occur during the provision of investment and ancillary services to its clients, in accordance with the applicable legal and regulatory framework.

### **1.2. Regulatory Framework**

For the above purpose, AAAFX has established and applies a number of measures and procedures for the avoidance and management of conflicts of interests (hereinafter the “Conflicts of Interests Policy” or the “Policy”) pursuant to, and in compliance with the requirements of 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 (“MiFID II”), the Greek Law no 4514/2018 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets which transposed MiFID II into Greek legislation and Delegated Regulation (EU) 2017/565 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive. The said Policy complies as well with Section 9 of the Questions and Answers Document of the European Securities and Markets Authority (“ESMA”) issued on 11 October 2016 with reference ESMA/2016/1454 with respect to the provision of CFDs and other speculative products to retail investors. In this document, we collectively refer to all the above legislations, regulations and guidelines as “Regulations”.

### **1.3. Scope and function of the Conflicts of Interest Policy**

AAAFX applies measures and policies appropriate to its size and organization and to the nature, extent and complexity of its activities, in order to avoid or manage conflicts of interest situations and to ensure that (a) its members of the Board of Directors, partners or equivalent, managers or tied agents (if any), (b) the members of the Board of Directors, partners or equivalent or managers of tied agent (if any) (c) AAAFX’s employees or the employees of AAAFX’s tied agents (if any), as well as any other natural person, whose services are placed at the disposal and under the control of AAAFX or a tied agent thereof who is involved in the provision by AAAFX of investment services or/and the performance of investment activities (d) any natural person who is directly involved in the provision of services to AAAFX or its tied agents under an outsourcing arrangement for the purpose of the provision by AAAFX of investment services or/and the performance of investment activities (hereinafter: “*Relevant Persons*”) handle the clients with a fair and objective manner and that they behave with the required impartiality.

The information provided through this document focuses on the prevention of conflicts of interests in the context of the provision of services related to the execution of orders in FX and CFD products outside regulated markets, MTFs or OTFs.

## **2. CONTENT OF THE CONFLICTS OF INTEREST POLICY**

### **2.1. Definition of conflict of interest**

AAAFX defines a conflict of interest as any situation where there is a conflict between the interests of AAAFX or certain persons connected to AAAFX and the duty we owe to a client or between the

differing interests of two or more of our clients, to whom AAAFX owes in each case a duty, with a potential result to ensure a gain or benefit to AAAFX, or any connected person or any particular client at the detriment of another client.

## 2.2. Potential situations of conflicts of interests

### (a) Persons whose interests may be in conflict

Conflicts may arise either during the provision of investment and/or ancillary services or a combination thereof or with any other manner between:

- (i) the interests of AAAFX or any Relevant Person or as well as any person connected directly or indirectly with them with a relation of control and the interests of one or more of its clients or
- (ii) the interests of different clients of AAAFX

### (b) Potential sources of conflicts

Such situations may occur when AAAFX (or any other Relevant Person) may have a financial benefit or avoid a financial loss, to the detriment of one or more clients or to favor the interests of one client or group of clients against those of another client. This may happen if AAAFX:

- Has, in relation to the result of a service provided to the client or a transaction carried out on behalf of the client, an interest different than the interest of the client.
- Has a financial or other motive to favor the interests of another client or another group of clients to the detriment of the client.
- Carries out the same business activity with the client.
- Receives or will receive from the client or from a third party a benefit in relation to the service, in the form of money, goods or services, which exceeds the level of the usual commission or remuneration for such a service.

## 2.3. Examples of potential situations of conflict and relevant measures

Conflicts of interest may arise in several situations during the provision of services. AAAFX has identified a number of such potential situations in advance and has taken appropriate steps to assess the risk of their occurrence and, when such risk exists, to avoid them proactively.

In some cases, the way in which AAAFX is organized and provides its services to clients (provided that all relevant internal procedures are applied), may sufficient to prevent the appearance of situations of conflict that would otherwise be considered possible. In other cases, AAAFX has adopted ad hoc arrangements to make sure that specific kinds of situations will not occur or will be identified and addressed in due time.

In particular, AAAFX has adopted effective procedures (including remuneration policies) to prevent or control the exchange of information between relevant persons engaged in activities involving a risk of a conflict of interest, to ensure the separate supervision of activities bearing a risk of material conflicts of interests, to remove direct links between the remuneration of Relevant Persons principally engaged with one activity and the remuneration of different Relevant Persons principally engaged in another activity, to avoid incentives that may lead Relevant Persons to favor their own interests or the company's interests to the potential detriment of any client and to ensure the fair treatment of clients, to prevent or limit any cases of inappropriate influence over the exercise of any particular activity and to control the simultaneous or sequential involvement of any person in separate investment or ancillary services.

Taking into account the activities currently exercised by AAAFX in the context of services that may be provided to you, you may find below some indicative examples of situations that could potentially give rise to conflicts of interest, as well as the relevant measures taken by AAAFX for the avoidance of such situations:

Examples of potential situations of conflict	General arrangements or ad hoc measures
AAAFX or a Relevant Person may have an interest in executing its/his personal orders or orders of a client	AAAFX has implemented policies and procedures for the monitoring and (when necessary) restriction of personal transactions of the Relevant Persons.

<p>in more favorable conditions than the orders of another client, or in maximizing the client's losses (e.g. if the client is a competitor of AAAFX or of the Relevant Person)</p>	<p>Transactions are processed through automated means, based on the time priority of the reception of such order, thus ensuring that the relevant employees will not be allowed to intervene in your transactions.</p> <p>Conflicts related to the personal capacity of the Client are reported to the compliance function as soon as they are identified.</p>
<p>A Relevant Person may have an interest in recommending to a client a particular transaction, in respect of which AAAFX or the said Relevant Person may receive a benefit from a third party or taking into account the interests of another client.</p> <p>A Relevant Person may recommend to the client a transaction based exclusively on the remunerations to be received by AAAFX or by the employee.</p>	<p>AAAFX does not provide investment advice with respect to FX and CFDs transactions and thus cannot recommend you any particular transactions.</p> <p>When AAAFX provides the investment service of portfolio management through our autotrading platform, all transactions are initiated based on automated systems developed by third parties (signal providers) and their operation is not subject to interventions by persons within AAAFX.</p> <p>Where the third parties developing the automated systems (signal providers) are remunerated based on transaction volumes, such remunerations depend also on the generation of profits, in a way that a signal provider may not be remunerated if his system generates losses during a determined period of time. In addition, AAAFX's auto-trading platform provides to its customers tools that allow them to set parameters and limits to the trading activity generated by automated signals.</p>
<p>AAAFX may be regarded as having an interest in maximizing your trading volumes or in maximizing your losses in order to achieve higher remunerations.</p>	<p>The remuneration that AAAFX receives for the execution of your transactions depends on the volume of your transactions (i.e. a Liquidity Provider remunerates AAAFX by providing a percentage of the spread of your trades or AAAFX charges a fixed percentage commission on your trade).</p> <p>However:</p> <ul style="list-style-type: none"> <li>- AAAFX does not provide investment advice to you with respect to your trades and, thus, cannot recommend you any particular transactions.</li> <li>- To this moment AAAFX does not trade as your counterparty and does not receive remunerations from Liquidity Providers based on your losses.</li> <li>- AAAFX does not have a way to influence the outcome of your transactions and the persons in charge of the supervision of the processing of your orders are not remunerated based on your trading volumes or losses.</li> <li>- AAAFX monitors regularly the operation of the systems used for the processing of clients' orders in a way to exclude any human intervention that is not necessary for the normal operation of such systems.</li> <li>- AAAFX does not have any interests in the profits realized by Liquidity Providers where such Liquidity Providers trade against AAAFX's positions.</li> <li>- In accordance with the applicable best execution policy, AAAFX is prohibited from directing your transactions to an Execution Venue based on the remunerations to be received by AAAFX.</li> </ul>

In addition to all the above measures, AAAFX has an internal audit function and a compliance function which are in charge of controlling the application of AAAFX's legal and/or regulatory obligations and internal procedures, including the above measures and the satisfaction of the requirement to avoid situations of conflicts of interest.

### **3. DISCLOSURES AND RECORDS**

#### **3.1. Disclosure of conflict of interest**

When the measures taken by AAAFX to avoid or manage situations of conflicts of interest are not sufficient to ensure, with reasonable confidence, that the risk of damage to clients' interests will be prevented, AAAFX will disclose to the client the specific conflict of interest and the steps taken to mitigate the risks associated thereto, with a durable medium, before providing the service affected by the situation of conflict.

#### **3.2. Record keeping**

AAAFX maintains a record, which is regularly updated, of the kinds of investments and ancillary services or investment activities carried out by AAAFX or on its behalf in which a conflict of interest entailing a material risk of damage to the interests of one or more clients has arisen.

#### **3.3. Review**

AAAFX carries out regular internal review of the measures and procedures applied to ensure that they remain appropriate, effective, comprehensive and proportionate to the nature, scale and complexity of its business activities, especially in terms of the nature and the range of the investment services and activities it undertakes in terms of its business activities, and that appropriate measures for the correction of any deficiencies will be taken without undue delay.