

NEOMAAA

Conflicts of Interest Policy

The Anjouan Offshore Finance Authority of the Union of Comoros with an Investment Dealer license 15968, having its registered office at Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of Comoros.

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Conflicts of Interest Policy

Version v.1.0 — 1 March 2026

Neomaaa Ltd

Registered as International Business Company No. 15968

Licensed under International Brokerage License Number L15968/N

Licensed and authorized by the Anjouan Offshore Finance Authority (AOFA), Union of Comoros
Hamchako, Mutsamudu, The Autonomous Island of Anjouan, Union of Comoros

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1. INTRODUCTION AND SCOPE

1.1 Purpose

This Conflicts of Interest Policy (the “Policy”) establishes the framework by which Neomaaa Ltd (the “Company”) identifies, manages, mitigates, and, where necessary, discloses conflicts of interest that may arise in the course of conducting its business activities and providing services to clients.

1.2 Scope

This Policy applies to all activities of the Company, including the provision of execution services for Contracts for Difference (CFDs) on foreign exchange (Forex), commodities, indices, metals, energies, and cryptocurrencies, as well as all ancillary services and business operations.

This Policy applies to all directors, officers, employees, contractors, agents, and any other persons connected with the Company who are involved in the provision of services to clients (collectively, “Relevant Persons”).

1.3 Regulatory Framework

Neomaaa Ltd is authorized and regulated by the Anjouan Offshore Finance Authority (AOFA) of the Union of Comoros under International Brokerage License Number L15968/N. This Policy is maintained in accordance with the Company’s regulatory obligations, applicable law, and industry best practice.

1.4 Related Documents

This Policy should be read in conjunction with:

- Client Agreement
- Order Execution Policy
- Terms and Conditions

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- Risk Disclosure Statement
- AML/KYC Policy
- Code of Conduct (internal)

2. DEFINITIONS

3. IDENTIFICATION OF CONFLICTS OF INTEREST

3.1 General Principle

The Company takes all reasonable steps to identify conflicts of interest that may arise between the Company, its Relevant Persons, and its clients, or between one client and another, in the course of providing services.

3.2 Situations Giving Rise to Conflicts

A conflict of interest may arise where the Company or a Relevant Person:

- is likely to make a financial gain, or avoid a financial loss, at the expense of a client;
- has an interest in the outcome of a service provided to the client which is distinct from the client's own interest in that outcome;
- has a financial or other incentive to favour the interests of one client or group of clients over the interests of another client;
- carries on, or may carry on, the same or a similar business as the client;
- receives or will receive from a person other than the client an inducement in relation to a service provided to the client.

3.3 Primary Circumstances Giving Rise to Conflicts

The primary circumstances in which conflicts of interest may arise in the Company's business include:

4. EXECUTION MODEL TRANSPARENCY

4.1 Principal Execution Capacity

The Company provides execution services for all client CFD transactions in its capacity as principal. This means the Company is the counterparty to every client trade. This execution model is standard across the OTC derivatives industry and is not inherently detrimental to clients.

As principal, the Company's financial position may be affected by client trading outcomes. This structural feature creates a potential conflict of interest which the Company manages through the measures described in this Policy and the Order Execution Policy.

4.2 Risk Model and Exposure Management

The Company operates a risk-managed execution model in which client orders are processed through automated systems and aggregated exposure is managed at the portfolio level.

Exposure arising from client transactions is dynamically managed through a combination of:

- internal position netting across the client base;
- external liquidity hedging with institutional counterparties;
- exposure aggregation and portfolio-level risk balancing;
- automated risk management systems operating independently of client-facing execution.

The Company's business model is based on providing execution services, maintaining execution infrastructure, and supporting long-term client engagement. The Company's revenue is primarily derived from transactional income including spreads, commissions, and related fees.

4.3 Execution Infrastructure and Neutrality

The Company operates proprietary execution infrastructure incorporating automated execution technology, multi-source pricing, and integrated liquidity systems. This infrastructure is designed to ensure:

- consistent execution handling across all clients and account types;
- automated order processing without manual dealer intervention;
- execution-neutral slippage treatment under all market conditions;
- transparent pricing derived from multiple liquidity sources;
- system-based execution independent of individual client outcomes.

The Company does not selectively alter execution parameters, reject orders, or manipulate pricing based on individual client positions, profitability, or trading patterns. Execution outcomes are determined by market conditions, available liquidity, and system execution parameters.

Execution systems are optimized for stability, consistency, execution reliability, and market connectivity. The Company does not selectively disadvantage clients based on their individual trading performance or strategy type.

4.4 Core Execution Principle

The Company's long-term business sustainability depends on providing fair, reliable, and consistent execution to clients. The Company's objective is to operate a stable execution environment that supports diverse legitimate trading strategies and long-term client engagement.

The execution infrastructure and conflict management framework described in this Policy are designed to align the Company's commercial interests with the provision of high-quality execution services to all clients.

4.5 Hedging and Risk Offsetting

The Company may hedge its exposure arising from client positions through internal matching, external hedging arrangements, or other risk management techniques. Any financial outcomes arising from risk management activities are retained by the Company as part of its operational risk management framework.

Risk management outcomes do not influence the execution parameters applied to individual client transactions. Hedging and risk management decisions are made independently of client-facing execution operations.

4.6 Liquidity and Pricing Integration

The Company utilizes multi-source liquidity aggregation technology to ensure consistent pricing and execution. Full details of the Company's pricing architecture, liquidity environment, and execution methodology are set out in the Order Execution Policy, available on the Company's website at neomaaa.com.

5. CONFLICT MANAGEMENT AND PREVENTION MEASURES

5.1 Overview

The Company has established, implements, and maintains organizational and administrative arrangements to prevent and manage conflicts of interest. These arrangements are designed to ensure that clients are treated fairly and that the Company's operations are conducted with integrity.

5.2 Organizational Measures

5.3 Procedural Measures

- Automated execution systems that process all client orders without manual interference or selective treatment;
- Execution-neutral slippage treatment applied consistently to all clients under equivalent market conditions;
- Transparent pricing derived from the Company's multi-source pricing architecture;
- Internal compliance monitoring, periodic audit procedures, and independent review;
- Anti-bribery, anti-corruption, and whistleblowing procedures;
- Mandatory disclosure by Relevant Persons of any personal interests, outside business activities, or relationships that may give rise to conflicts;
- Prohibitions on certain activities by Relevant Persons, including restrictions on personal account dealing in circumstances that could create conflicts;

- Regular training programs for Relevant Persons on the identification, management, and prevention of conflicts of interest;
- Record-keeping of all identified conflicts and the measures taken to manage them.

5.4 Monitoring and Surveillance

The Company's Compliance Department conducts ongoing monitoring to detect potential conflicts of interest, including:

- surveillance of execution quality metrics (slippage distribution, rejection rates, execution speed);
- monitoring of personal account dealing by Relevant Persons;
- review of third-party remuneration arrangements and inducements;
- periodic assessment of organizational arrangements and information barriers;
- audit of pricing integrity and spread consistency.

6. REMUNERATION AND INDUCEMENTS

6.1 Third-Party Remuneration

The Company may pay to or receive from third parties (including Introducing Brokers, affiliates, payment service providers, and technology vendors) fees, commissions, rebates, or other benefits in connection with services provided to clients. Such arrangements are entered into in the ordinary course of business and are subject to the Company's conflict management procedures.

6.2 Introducing Broker Commissions

The Company pays commissions or revenue-sharing arrangements to Introducing Brokers (IBs) who refer clients to the Company. These commissions are derived from spreads or commissions charged on client transactions. The existence of IB remuneration arrangements does not alter the execution parameters, pricing, or service quality provided to the referred client.

6.3 Employee Remuneration

Employee remuneration structures are designed to avoid creating incentives that could lead to conflicts with client interests. Remuneration is not directly linked to individual client transaction outcomes in a manner that would incentivize behaviour detrimental to clients.

6.4 Disclosure

The Company will disclose, upon request, the general nature of remuneration arrangements with third parties. The specific commercial terms of such arrangements are proprietary and confidential.

7. OBLIGATIONS OF RELEVANT PERSONS

7.1 General Duties

All Relevant Persons are required to:

- act in the best interests of clients at all times when carrying out their duties;
- identify and report any actual or potential conflicts of interest to the Compliance Department;
- comply with all internal policies, procedures, and codes of conduct relating to conflicts of interest;
- maintain the confidentiality of client information and not use such information for personal gain;
- not engage in any activity that could reasonably be expected to create a conflict with the interests of the Company's clients.

7.2 Personal Account Dealing

Relevant Persons who wish to engage in personal trading must comply with the Company's Personal Account Dealing Policy. This includes:

- obtaining prior approval from the Compliance Department before engaging in personal trading;
- disclosing all personal trading accounts to the Company;
- not trading on the basis of confidential client information, order flow data, or material non-public information;
- not front-running or trading ahead of client orders;
- reporting all personal trades to the Compliance Department as required.

7.3 Outside Business Activities

Relevant Persons must disclose to the Compliance Department any outside business activities, directorships, or other engagements that could give rise to conflicts of interest. The Compliance Department will assess whether such activities are compatible with the Relevant Person's duties and may impose conditions or prohibitions as appropriate.

7.4 Gifts and Entertainment

Relevant Persons must not accept or offer gifts, entertainment, or other benefits that could reasonably be perceived as creating a conflict of interest or as an inducement to act contrary to clients' interests. Any gifts or entertainment above de minimis thresholds established by the Company must be reported to and approved by the Compliance Department.

8. DISCLOSURE AND TRANSPARENCY

8.1 General Disclosure Obligation

Where the Company determines that its organizational and administrative arrangements are not sufficient to ensure, with reasonable confidence, that a particular conflict of interest will not

adversely affect the interests of a client, the Company will disclose the general nature and source of the conflict to the client before undertaking the relevant business on the client's behalf.

8.2 Method of Disclosure

Disclosure of conflicts of interest will be made in a clear, fair, and not misleading manner, providing sufficient detail for the client to make an informed decision about whether to proceed with the relevant service or transaction.

8.3 Standing Disclosures

The following conflicts of interest are disclosed as standing items:

- The Company acts as principal and counterparty to all client CFD transactions, and the Company's financial position may be affected by client trading outcomes;
- The Company derives revenue from spreads, commissions, and markups on client transactions;
- The Company may pay commissions or revenue-sharing arrangements to Introducing Brokers and affiliates;
- The Company may hedge its exposure arising from client positions, and profits from hedging are retained by the Company;
- The Company's Associated Companies or Relevant Persons may deal in instruments related to client transactions as principal for their own account;
- The Company may provide services to other clients whose interests may differ from or conflict with those of a particular client.

8.4 Non-Obligation to Disclose Specific Transactions

Other than the general standing disclosures set out above, the Company is not under an obligation to disclose that the Company, its Associated Companies, or Relevant Persons have a material interest in a particular transaction with or for a client, except where the Company determines that its conflict management arrangements are insufficient to manage the specific conflict.

9. CLIENT CONSENT

9.1 Acknowledgement and Consent

By entering into the Client Agreement with the Company, the Client acknowledges that:

- conflicts of interest as described in this Policy may arise in the course of the Company's business;
- the Company has established organizational and administrative arrangements to identify, manage, and mitigate such conflicts;
- the Client consents to the Company acting notwithstanding such conflicts, provided the Company continues to manage them in accordance with this Policy.

9.2 Right to Decline

Clients who are not satisfied with the Company's conflict management arrangements retain the right to decline to proceed with any particular transaction or to terminate their relationship with the Company in accordance with the Client Agreement.

10. RECORD-KEEPING AND REPORTING

10.1 Conflicts Register

The Company maintains a register of all identified conflicts of interest, including the nature of the conflict, the persons or departments involved, and the measures taken to manage or mitigate the conflict. The Conflicts Register is maintained by the Compliance Department and is subject to periodic review.

10.2 Reporting

The Compliance Department reports to senior management on a regular basis regarding the status of identified conflicts, the effectiveness of conflict management arrangements, and any incidents or breaches requiring attention.

10.3 Retention

Records relating to conflicts of interest, including the Conflicts Register, disclosure records, and personal account dealing records, are retained for a minimum period of five (5) years from the date of creation, or such longer period as may be required by applicable law or regulation.

11. REVIEW AND AMENDMENTS

11.1 Policy Review

This Policy is reviewed at least annually by the Compliance Department and updated as necessary to reflect changes in the Company's business activities, organizational structure, regulatory requirements, or industry best practice.

11.2 Material Changes

Material changes to this Policy will be published on the Company's website. Continued use of the Company's services after publication constitutes acceptance of the updated Policy. The Company will make reasonable efforts to notify clients of significant changes through email or platform notification.

12. GOVERNING LAW AND COMPLAINTS

12.1 Governing Law

This Policy shall be governed by and construed in accordance with the laws of the Union of Comoros.

12.2 Complaints

Clients who believe that a conflict of interest has not been adequately managed or that they have been adversely affected by a conflict may submit a complaint to the Company's Compliance Department at compliance@neomaaa.com. Complaints will be handled in accordance with the Company's Complaint Handling Procedure.

12.3 Contact Details

Compliance Department: compliance@neomaaa.com

General Support: support@neomaaa.com

Website: neomaaa.com

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Acknowledgement

By using the Company's services, the Client acknowledges having read, understood and accepted the Conflicts of Interest Policy.

Neomaaa Ltd

Trading as NEOMAAA

International Business Company No. 15968

Regulated by the Anjouan Offshore Finance Authority (AOFA), Union of Comoros

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