



DB Invest Ltd

CONFLICT OF INTEREST POLICY

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Introduction:

At DB Investing, our commitment to fairness and transparency is paramount. This Conflict of Interest Policy is designed to identify, disclose, and manage conflicts that may arise between DB Investing, its employees, and its clients, ensuring that all clients are treated fairly and that our decisions are made in their best interests.

Purpose:

The purpose of this policy is to SAFELY AND REGULATED ·

1. Identify potential conflicts of interest.
2. Implement measures to prevent or manage conflicts of interest.
3. Ensure compliance with applicable regulatory standards.

Scope:

This policy applies to:

- All directors, officers, employees, and agents of DB Investing.
- Any individual or entity acting on behalf of DB Investing.

Identifying Conflicts of Interest:

Conflicts of interest may arise when DB Investing or an employee:

- Has a financial interest in the outcome of a client transaction that differs from the client's interest.
- Receives incentives, financial or otherwise, that could influence the decision-making process.
- Is involved in activities that compromise DB Investing's ability to act in the best interest of the client.

Examples of conflicts include:

- Recommending products or services where DB Investing has a financial stake.
- Executing trades for a client that benefit DB Investing's own account.

Managing Conflicts of Interest:

To manage conflicts of interest, DB Investing has implemented the following measures:

1. Disclosure: All potential conflicts will be disclosed to clients before any transactions or services are provided.
2. Internal Policies: We have established internal policies that restrict employees from engaging in activities that could lead to conflicts.
3. Segregation of Duties: Responsibilities are divided among staff to ensure that conflicting activities are handled independently.
4. Training: Regular training is provided to all employees to help identify and mitigate conflicts of interest.

Client Consent:

When a conflict is identified and disclosed, the client's informed consent will be obtained before proceeding with any transaction.

Review and Monitoring:

DB Investing regularly reviews its business practices and policies to identify potential conflicts of interest. Monitoring systems are in place to ensure compliance with this policy, and corrective actions are taken as necessary.

Record-Keeping:

All conflicts of interest, along with the measures taken to manage them, will be documented and retained for a period of at least five years. These records will be reviewed regularly to ensure that conflicts are being properly managed.

Conclusion:

DB Investing is committed to maintaining the highest standards of ethics and transparency. This policy is a key component of that commitment, ensuring that conflicts of interest are identified and managed in a manner that protects our client's interests.

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