CONFLICTS OF INTEREST POLICY

Last Updated: July 2026

Purpose

This Conflicts of Interest Policy explains how PERPETUAL LIQUIDITY LIMITED identifies and manages conflicts that may arise in connection with its services.

Possible conflicts

Conflicts may arise in a number of ways, including where:

- The Company acts as principal to client transactions.
- The Company may benefit from spreads, commissions, markups, financing charges or client trading losses.
- The Company may hedge or not hedge client exposure.
- Employees, affiliates, partners or introducing brokers may receive remuneration linked to client activity.
- The Company may provide market commentary or education while also offering trading services.
- The Company may receive services or incentives from liquidity providers, platform providers, payment providers or other third parties.
- The interests of one client, partner, employee or third party may conflict with another.

How conflicts are managed

The Company uses measures designed to manage conflicts fairly and protect clients from material disadvantage where reasonably possible. These measures may include:

- Segregation of duties where appropriate.
- Access controls and confidentiality obligations.
- Rules for employee conduct and personal account dealing.
- Review of partner and affiliate remuneration.
- Disclosure of conflicts where appropriate.
- Order handling and pricing controls.
- Escalation of material conflicts to senior management.
- Declining to provide a service where a conflict cannot be managed adequately.

Disclosure

Where the Company considers that its arrangements are not sufficient to ensure, with reasonable confidence, that a client is not materially disadvantaged, the Company may disclose the general nature or source of the conflict before providing the relevant service.

Client acknowledgement

By using our services, you acknowledge that conflicts may exist and that the Company may earn revenue from spreads, commissions, markups, financing charges and other fees.

Review

This Policy is reviewed periodically and updated where required by changes in business model, products, remuneration, partnerships or applicable law.