

# **POLICY FOR THE MANAGEMENT OF CONFLICTS OF INTEREST**

This Document on Refer a Friend Terms and Conditions is effective from May 2025 and shall remain effective until a more recent version is released. DEDA CAPITAL MARKETS (PTY) LTD. reserves the right to amend or supplement this Document at any time. This Document does not replace our Investment Services Agreement (Terms and Conditions of Trading) which we ask that you read carefully before you enter into any trading. The prevailing version of this Document is always available on our website [www.hotrades.com](http://www.hotrades.com).

Note: The English version of this agreement is the governing version and shall prevail whenever there is any discrepancy between the English version and the other versions.

The hotrades.com website is operated by DEDA CAPITAL MARKETS (PTY) LTD. ("DEDA CAPITAL MARKETS (PTY) LTD.") an investment firm regulated by the Financial Sector Conduct Authority under licence number 50640. DEDA CAPITAL MARKETS (PTY) LTD. is required to provide information on the Company's policy on conflicts of interest and its approach to managing any conflicts of interest fairly: both between Hotrades.com our directors, employees and our clients, and between your interests and those of other clients.

## **DEFINITION OF CONFLICT OF INTEREST**

DEDA CAPITAL MARKETS (PTY) LTD. defines a conflict of interest as any situation where either DEDA CAPITAL MARKETS (PTY) LTD. or an individual is in a position to exploit a professional or official capacity in some way for either corporate or personal benefit.

## **CONFLICT OF INTEREST MEASURES**

Extensive measures have been adopted by DEDA CAPITAL MARKETS (PTY) LTD. to prevent, control and manage the exchange of information between relevant persons engaged in activities involving a risk of a conflict of interest. For example, DEDA CAPITAL MARKETS (PTY) LTD. has removed any direct link between the remuneration of relevant persons principally engaged with one activity and the remuneration of different relevant persons principally engaged in another activity.

## **DISCLOSURE OF CONFLICT OF INTEREST**

When the measures taken by DEDA CAPITAL MARKETS (PTY) LTD. to manage conflicts of interest are not sufficient to ensure, with reasonable confidence, that the risk of damage to clients' interests will be prevented, DEDA CAPITAL MARKETS (PTY) LTD. will disclose the conflicts of interest to the client in order to prevent a risk of damage to clients' interests. Prior to carrying out a transaction or providing an investment or an ancillary service to a client, the Company must disclose any actual or potential conflict of interest. The disclosure will be in sufficient time, in a durable means.

## **RECORD KEEPING**

DEDA CAPITAL MARKETS (PTY) LTD. maintains a record, which is regularly updated, of the kinds of investments and ancillary services or investment activities carried out by DEDA CAPITAL MARKETS (PTY) LTD. 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.