

## MY MAA MARKETS LTD

### Conflict of Interest Policy

#### DOCUMENT CONTROL

Item	Details
Company Name	My Maa Markets LTD
Document Title	Conflict Interest Policy
Jurisdiction	Republic Of Mauritius
Regulatory Authority	Financial service Commisiion
Effective Date	
Approved By	Board Of Directors
Review Frequency	Annual as required

#### INTRODUCTION

**My Maa Markets Ltd** (“the Company”) is committed to conducting its business in a transparent, ethical, and professional manner and in full compliance with the laws of the Republic of Mauritius and the regulatory requirements of the Financial Services Commission (“FSC”).

Conflicts of interest may arise in the ordinary course of business; however, if not appropriately identified and managed, such conflicts may compromise the Company’s ability to act in the best interests of its clients and may undermine market integrity.

This Conflict of Interest Policy (“Policy”) establishes a comprehensive framework for the identification, assessment, management, mitigation, and disclosure of conflicts of interest, ensuring that the Company and its Personnel act honestly, fairly, and professionally at all times.

This Policy forms part of the Company’s corporate governance and compliance framework and must be read in conjunction with other internal policies, procedures, and codes of conduct adopted by the Company.

### 1. PURPOSE AND OBJECTIVES

The purpose of this Policy is to:

- Identify actual, potential, and perceived conflicts of interest
- Establish procedures for disclosure and escalation
- Define mitigation and management measures

- Protect clients' interests
- Ensure compliance with FSC and Mauritius legal requirements



## 2. SCOPE AND APPLICABILITY

This Policy applies to all directors, alternate directors, senior management, employees, consultants, contractors, agents, and representatives of the Company (“Personnel”). The Policy covers all activities conducted by the Company, including regulated and non-regulated activities, whether conducted locally or cross-border.

## 3. REGULATORY AND LEGAL FRAMEWORK

### Applicable Legislation and Regulations

- Financial Services Act 2007
- Companies Act 2001
- FSC Code of Business Conduct
- FSC Licensing Conditions and Rules
- FSC Circulars, Guidance Notes, and Codes
- Any other applicable Mauritius laws

## 4. DEFINITIONS AND INTERPRETATION

TERM	DEFINITION
Conflict of interest	A situation where the interests of the Company or its Personnel conflict, or appear to conflict, with the interests of a client or the Company’s regulatory obligations.
Actual Conflict	A conflict that presently exists and affects decision-making.
Potential Conflict	A conflict that may reasonably arise in the future.
Perceived Conflict	A situation that may be perceived by a reasonable third party as a conflict.
Client	Any person or entity receiving services from the company.
Personnel	Directors, officers, employees, agents, contractors and representatives of a company



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Compliance Officer

The person responsible for monitoring regulatory compliance and implementation of this Policy.  
Board



Board	he Board of Directors of My Maa Markets Ltd. The Company shall act honestly, fairly, and professionally in accordance with the best interests of its clients.
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## 5. GENERAL PRINCIPLES

The Company shall act honestly, fairly, and professionally in accordance with the best interests of its clients.

Conflicts of interest must be avoided wherever possible.

Where avoidance is not possible, conflicts must be disclosed, managed, and mitigated appropriately.

The Company shall maintain independence of judgment and decision- making.

## 6. SOURCES AND TYPES OF CONFLICTS

### *6.1-Client –Related Conflicts*

- Conflicts between different clients
- Preferential treatment of one client over another
- Allocation of limited resources

### *6.2-Company Vs. Client*

- Financial gain at the expense of clients
- Incentive structures influencing advice or execution.

### *6.3-Personal Conflicts*

- Outside employment or directorships
- Personal investments
- Family or close personal relationships.

### *6.4-Related Party Conflicts*

- Transactions with related parties
- Preferential contracting arrangements

## 7. IDENTIFICATION AND ASSESSMENT OF CONFLICTS

Personnel must remain vigilant and assess whether their actions or relationships may give rise to conflicts of interest.

The Compliance Officer shall assess disclosed conflicts and determine their materiality and risk impact.



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## **8. DISCLOSURE OBLIGATION**

All conflicts must be disclosed promptly in writing to the Compliance Officer.

Directors must disclose interests to the Board in accordance with the Companies Act 2001.

Where required, material conflicts shall be disclosed to clients in a clear and timely manner.

## **9. CONFLICT OF INTEREST REGISTER**

The Company shall maintain a Conflict of Interest Register capturing:

- Nature and category of conflict
- Persons involved
- Date of disclosure
- Risk assessment
- Mitigation actions
- Approval authority

## **10. MANAGEMENT AND MITIGATION MEASURES**

### *10.1. Organizational Control*

- Segregation of duties
- Information barriers
- Independent oversight

### *10.2. Individual Control*

- Recusal from decisions
- Reassignment of responsibilities
- Divestment of conflicting interests

## **11. GIFTS, BENEFITS AND HOSPITALITY**

Personnel shall not accept or offer gifts or hospitality that may compromise independence or create an appearance of undue influence.

All gifts and hospitality must be declared and recorded in the Gifts Register.



## **12.DIRECTORS AND SENIOR MANAGEMENT RESPONSIBILITIES**

Directors and senior management shall lead by example and ensure compliance with this Policy.

They must disclose all material interests and abstain from conflicted decision-making.

## **13.TRAINING AND AWARENESS**

The Company shall provide periodic training to Personnel to ensure understanding and effective implementation of this Policy.

## **14.RECORD KEEPING DOCUMENT RETENTION**

Records relating to conflicts shall be retained in accordance with FSC requirements and internal record retention policies.

## **15.BREACHES AND DISCIPLINARY ACTION**

Breaches of this Policy may result in disciplinary action, including termination of employment or contract, and regulatory reporting where required.

## **16.MONITORING AND REVIEW**

The Compliance Officer shall monitor compliance with this Policy. The Policy shall be reviewed annually or upon regulatory changes.

## **17.APPROVAL AND ADAPTATION**

<b>Name</b>	<b>Title</b>	<b>Signature</b>	<b>Date</b>
	Chairman		
	Compliance Officer		



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