



eToro Singapore Pte Ltd

Conflicts of Interest Notice

June 2025

INTRODUCTION

This Conflicts of Interest Policy ("Policy") is a summary of the organisational and administrative arrangements which eToro Singapore Pte. Ltd. ("eToro SG"), employees, appointed representatives, tied agents, contractors, and where relevant our group companies, or any person directly or indirectly linked to them by control (together, "ESG", "eToro", "we", "us", and "our") have implemented to manage conflicts of interest. . The Policy does not form part of any contract between eToro Singapore PTE Ltd. (or any of its affiliates) or any Client or prospective Client

A 'conflict of interest' is a situation where the interest of two or more parties may be incompatible, meaning that it is possible for one to benefit at the expense of another. This includes:

- (a) conflicts between eToro and our clients; and
- (b) conflicts between one client and another client.

We are responsible to take all appropriate steps to identify, and manage or prevent conflicts of interest, and where necessary as a last resort disclose such conflicts to our clients. CFD (Cryptoasset) are non-regulated, and therefore our CFD cryptoassets trading service is an unregulated service. This means that the rules relating to best execution are not applicable to CFD cryptoasset trades, although we will endeavour to provide such benefits to you.

Where the conflicts of interest rules apply to our relationship with you, this Policy will form part of our Agreement with you (as defined in the eToro SG Client Terms and Conditions).

We reserves the right to review and/or amend its Notice whenever it deems this necessary/ appropriate.

OUR APPROACH TO MANAGING CONFLICTS

Our approach to conflicts has three key stages:

- identifying conflicts of interest;
- managing or preventing conflicts of interest; and
- disclosing conflicts of interest.

IDENTIFYING CONFLICTS OF INTEREST

Client's perspective

We identify conflicts of interest that may have a negative impact on the client. These include (not exhaustive):

- ESG or staff members are likely to make a financial gain, or avoid a financial loss, at the expense of the client; or
- ESG or staff members have an interest in the outcome of the service or of a transaction carried out on behalf of a client, which is distinct from the client's interest in that outcome;
- ESG or staff members have a financial or other incentive to favour the interest of a client, or a group of clients, over the interest of other clients; or
- ESG or staff members receive or will receive from a person other than the client, an inducement, in relation to a service provided to the client, in the form of monies, goods or services, other than the standard fee for that service; or
- One of ESG's clients is likely to make financial gain or avoid a financial loss at the expense of another client.

Obligations

- All staff members are expected to recognise and avoid or manage conflicts of interest. They need to identify and deal with any conflicts of interest which may arise either between a Client and ESG or between two or more Clients.
- There is a duty to that the interests of ESG are not unfairly placed above those of its clients where a properly informed client would reasonably expect that ESG would place the client's interests above its own.
- Also, staff must not put themselves in a position in which their personal interests, financial or otherwise, might influence or give the appearance of influencing any action they take, judgement they make or advice they give on behalf of ESG (if any).

MEASURES TO ADDRESS CONFLICTS OF INTEREST

Key measures that ESG adopts to manage or prevent the conflicts of interest. These include (but are not limited to):

- Separating the duties of staff members engaged in different business activities where the duties, if shared, would amount to a potential conflict.
 - Examples: The operation of information barriers, physical separation of staff, and the segregation of duties and responsibilities;
- Checking that preferential treatment will not be provided over another client when executing an order, or vice versa;
- Not disclosing the details of client's trades to other clients and/or to third parties without the client's consent;
- Implementing clear and transparent communications amongst staff members;
- Implementing controls with regards to dealing on personal accounts for all staff members and their associates, regardless of the seniority level;
- Implementing policies and procedures to monitor and, if necessary, limit or refuse gifts and personal benefits;
- Adopting policies and procedures to prevent insider trading, market manipulation and the misuse of market or price-related information;
- Requiring all our directors who are not directly employed by us to declare any outside business interests;
- Requiring all staff members to declare any potential gainful employment, business interest and/or assume directorships of external organisations;
- Training our staff on managing and preventing conflicts of interest.

DISCLOSING CONFLICTS OF INTEREST

Client's Perspective

- Where a conflict of interest arises, ESG will, if made aware of it, disclose it to a client or potential client prior to undertaking investment business for that client. If ESG does not believe that disclosure is appropriate to manage the conflict, it may choose not to proceed with the transaction or matter giving rise to the conflict.
- Where ESG cannot ensure with reasonable confidence that the arrangements which we have in place will prevent risk of damage to your interests, we will disclose the nature and/or source of the conflict and explain the risks that arise to you, to enable you to take an informed decision with respect to whether you wish to trade or continue trading on our platform.
- Before ESG decides to disclose a conflict, we will take reasonable steps to prevent or manage it. We consider disclosing a conflict to be the least preferable option. In some circumstances, we may decline to act for a client or potential client.
- We disclose potential conflicts of interest in the eToro SG Terms and Conditions and in the section on "Potential conflicts of interest" (Appendix 1). The conflicts disclosed include those which may arise in relation to our business generally, and, where relevant, specific conflicts associated with a specific eToro service. We may not notify you if we update the particular conflicts of interest listed in these documents.

RECORD KEEPING

In accordance with the local requirements, ESG must keep all relevant trading records for as long as necessary but no less than 5 years from the date of event.

Appendix 1: Potential Conflicts of Interest

Examples of general conflicts of interests (non exhaustive):

- ESG may enter into arrangements with third parties, or with other clients, where ESG provides payments to them or receives payments from them based on the client's trading activity. These payments may include rebates, commissions, widened spreads and profit sharing;
- ESG may provide, pay or receive fees, commissions or non-monetary benefits where such payments are permitted by Applicable Law;
- ESG may share dealing charges with affiliate companies or receive remuneration from them in respect of transactions carried out on behalf of the client;
- ESG is responsible for setting the price of instruments and products which can be traded and invested in on the eToro platform. This means that the prices on the eToro platform could be different from the prices provided by other brokers and the market price, as well as the current prices on any exchanges or trading platforms.
- When the client enters into a CFD transaction, ESG, or an affiliate company ("AFFCO") (collectively known as "ESG/AFFCO" for the purposes of this paragraph) may or may not purchase or sell the underlying product.
 - If ESG/AFFCO buys the underlying product, ESG/AFFCO may have rights, for example voting rights if we are a shareholder, which we can exercise without notifying you.