

# ARGUS

## CONFLICT OF INTEREST POLICY

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Regulated by the Cyprus Securities & Exchange Commission

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## CONFLICTS OF INTEREST POLICY

This is the **Conflicts of Interest Policy** of ARGUS STOCKBROKERS LTD, in accordance with the demands of the “Investment Services and Activities and Regulated Markets Law of 2007”, pursuant to the European Directive MiFID – Market in Financial Instruments Directive. MiFID is the European Parliament and Council’s Directive 2004/393 EC, for financial markets.

The philosophy and practice of the **Conflicts of Interest Policy** have always been the ARGUS way of conducting business, which always operates bearing in mind the investors’ interests and takes every necessary measure to ensure their protection. Our Company shall not endanger its clients due to conflicts of interest.

For this reason, ARGUS takes every measure possible in order to identify any potential conflicts between it (including administrative staff and personnel, associated representatives or other official parties, as well as any person related with them directly or indirectly in relation to control) and its clients, during the provision of any investment and ancillary service or a combination of these services.

ARGUS has the necessary organizational and administrative regulations to identify, avoid, manage and/or disclose the conflicts of interest during the provision of any investment and ancillary service or a combination of these services.

In case ARGUS management deems fit that the existing procedures are not adequate to ensure the conflicts of interest between the company and/or between its clients, the company shall notify the clients regarding this case, so that the client decides on how to handle it.

The procedures are revised in regular intervals and whenever it is deemed necessary. The company is comprised of a properly certified staff and the staff knows how to identify cases of conflicts of interest and disclose them to the management. Furthermore, the administrative staff of the company knows how to handle these cases.

The company handles every case with clarity. The ARGUS department of compliance takes every necessary step in order to apply the infrastructure and systems to ensure the natural and electronic separation of the staff of the various departments and information records, in order to avoid access to information that may cause conflicts of interest (“Chinese Walls”).

Moreover, the remuneration of the ARGUS Administrative Staff is not associated with the commission received by clients. Further, employees are required to disclose any relationship with a client that could lead to preferential client treatment.

Every revision of this policy shall be posted on our Company website ([www.argus.com.cy](http://www.argus.com.cy)). For any questions please call +357 22 717000.

We are at your disposal for any clarification or information needed.