



---

# Policy on Conflicts of Interests

For investors, investing partners, partners and affiliates of Sky Curve **Bank** – Sky Curve **Finance**

---

## Sky Curve Bank – Sky Curve Finance Limited

Registered in the UK, Sky Curve **Bank** – Sky Curve **Finance** is one of the largest digital and decentralized banking and financial services organizations in the world. Sky Curve's international network comprises offices in countries and territories in Europe, the Asia-Pacific region, the Americas, the Middle East, Africa and Turkey.

### Conflict of interest

A conflict of Interest or herein referred to as conflict is a situation or arrangement where Sky Curve Bank or Sky Curve Finance herein referred to as **the bank**, or a company with which it has an association, or any of its employees is subject to multiple influences, the competition of which might adversely affect decision-making or outcomes in the course of conducting business.

A Conflict can be due to the competition of legitimate influences such as acting for multiple clients, or the presence of harmful ones such as personal gain. Because it provides a wide range of services, the bank may from time to time have interests that conflict with its clients interests or with the duties that it owes to its clients.

Conflicts can arise between:

- one client and another – client versus client;
- the bank and a client – the bank versus client;
- an employee and a client – employee versus client;
- an employee and the bank – employee versus the bank; or
- one part of the bank and another.

Sky Curve Bank – Sky Curve Finance has established policies and procedures that are designed to identify, and prevent or manage conflicts. Conflicts policies are reviewed at least annually. These policies and procedures include arrangements to safeguard the interests of clients.

### How we deal with conflicts

Sky Curve organizational structures are designed so that behavior that could lead to conflicts is not incentivized or rewarded. Where necessary, the bank restricts the flow of information to certain employees in order to protect its clients interests.

The bank has procedures in place to:

- identify all types of potential conflicts that could reasonably arise in the context of its activities;
- maintain registers of all potential conflicts identified;
- prevent or manage conflicts on an ongoing basis;
- disclose conflicts where appropriate; and
- maintain evidence of all occurrences of conflicts that cannot be managed.

### Identifying conflicts

Each of the bank's global businesses is required to consider the types of potential conflict relevant to the specific services and activities they carry out.

---

**For example, potential conflicts are considered when:**

- developing a new product;
- establishing or amending any cross-referral, revenue sharing or joint venture arrangements; or
- transferring businesses, activities, operations, or parts thereof, to another part of the bank.

**When potential conflicts involve clients, the assessment also takes into account whether the bank or any employee:**

- Is likely to make a financial gain or avoid a financial loss at the expense of any client;
- Has an interest in the outcome of a service provided to a client, or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
- Has a financial or other incentive to favour the interest of one client or group of clients, over another;
- Carries on the same business as the client; or
- Receives or will receive an inducement in relation to a service provided to the client from a person other than the client.

Sky Curve Bank – Sky Curve Finance maintains internal registers, documenting and evaluating all identified potential conflicts. These registers also record the controls in place to prevent or manage each type of conflict, and are subject to regular oversight and review by the senior management of the bank.

## **Preventing or managing conflicts**

The bank structures the remuneration, deployment and management of employees in a way that minimizes conflicts.

**Conflicts clearing procedures ensure that, where necessary, potential conflicts are escalated and managed before the bank is committed to a transaction.**

In some cases, the bank will consider declining to act for one or more clients for example if:

- a conflict is too great or confidentiality obligations prevent adequate disclosure; or
- informed consent cannot be obtained, or is an insufficient control to manage a conflict.

A dedicated conflicts management office, reporting to the regulatory compliance department, is the point of escalation for significant conflicts, and resolution of cross-business conflicts brought to its attention. Written reports on the services and activities reflected in the registers of conflicts are presented to senior management of the bank at least annually.

## **Disclosure**

The bank may make general disclosures to clients about certain types of potential conflicts, explaining how such conflicts are managed; for example, through separation of businesses or measures to prevent unauthorised sharing of confidential information to mitigate the risk of damage to clients' interests.

---

However, where the bank has used all reasonable efforts to prevent or manage a conflict, but the risk of damage to a client interests remains, a specific disclosure about the presence of a conflict will be made to the client.

Specific disclosures will be made prior to the conclusion of a contract, in a durable medium, and include sufficient detail, taking into account the nature of the client, to enable that client to take an informed decision.

At times, a duty of confidentiality to one client might limit the disclosures that can be made to another.

## Employees

The bank requires its employees to apply good judgement and act with integrity, taking all appropriate steps to:

- avoid personal conflicts for example, in their personal account dealings; and
- proactively escalate personal conflicts that do arise.

No employee is permitted to advise a client on any matter in which they have a personal interest, nor take commercial decisions on behalf of the bank if those decisions are connected to their personal or external business affairs until steps have been taken to satisfactorily manage the conflict.

---

Sky Curve **Bank** is able to provide literature in alternative formats. The formats available are – large print, braille and audio CD

---

Sky Curve **Bank**

Sky Curve **Finance Limited**

The Colmore Building, 20 Colmore Circus Queensway, Birmingham B4 6AT, United Kingdom