Conflict of Interest Policy

This Conflict of Interest Policy explains how Investing Space LTD resolves conflicts of interest that arise within Investing Space LTD, between Investing Space LTD and its clients, and between Investing Space LTD clients. This Policy is periodically amended to take into account changes in the Company's activities or methods of operation, as well as to ensure its compliance with changes in legislation, technology and the business situation in general. This policy applies to all activities carried out by Investing Space LTD and its employees.

1. Investing Space LTD carries out all transactions with clients as a principal, hedges its net risk with counterparties; that is, the clients' goals are more coordinated with her own goals, despite the fact that she is the principal in all transactions. Since Investing Space LTD does not provide investment advice, no conflict of interest may arise in this regard. Investing Space LTD offers only CFD contracts, which eliminates the possibility of conflicts between different types of products.

2. Investing Space LTD is responsible for identifying and resolving other conflicts of interest that arise in its activities and may entail a significant risk of harm to the interests of clients. In particular, Investing Space LTD considered potential conflicts of interest arising when executing transactions for its clients.

3. To resolve other conflicts of interest, the following measures have been taken:

(a) When Investing Space LTD executes a client's application, it does not favor that client to the detriment of other clients and does not disclose information about one client's application to other clients.

(b) Investing Space LTD executes all orders electronically, in accordance with policies that ensure compliance with applicable rules and regulations regarding transactions executed on behalf of clients. The procedures adopted by Investing Space LTD ensure that clients' applications are executed promptly, fairly and efficiently compared to other applications. These procedures ensure that otherwise comparable orders are executed when they are received.

(c) Investing Space LTD has established a procedure whereby the execution of orders on behalf of clients is promptly and accurately recorded, and otherwise comparable orders are processed consistently and promptly, unless due to the characteristics of the order or current market conditions such action is impractical, or is otherwise required in the interests of the client.

(d) In accordance with Investing Space LTD's procedures, Investing Space LTD, its employees and affiliates may not misuse information about pending client orders.

(e) All employees of Investing Space LTD are prohibited from conducting trading transactions using personal accounts in order to avoid an actual or suspected conflict of interest.

(f) All employees of Investing Space LTD are prohibited from accepting gifts or other forms of inducement from any person with a material interest that is likely to be substantially inconsistent with the responsibilities of Investing Space LTD and/or its employees in relation to the fair treatment policy. clients or the responsibilities of such recipient towards clients.

4. Investing Space LTD is committed to developing an effective and appropriate compliance culture to resolve any potential conflicts of interest that may arise in the future. Consequently, Investing Space LTD employees are obliged to monitor any new circumstances that may lead to conflicts and implement measures necessary to resolve them.

5. In rare cases where Investing Space LTD's procedures for resolving conflicts of interest do not provide a high probability of guaranteeing the prevention of risks of harm to the client, Investing Space LTD must clearly explain to the client the general nature and/or sources of conflicts of interest before carrying out any transactions for clients.