Conflict of Interest Policy

Version: May 2026

Support: support@axfx.com

Complaints: complaints@axfx.com

ApogeeX - Conflict of Interest Policy

This Conflict of Interest Policy is issued by **ApogeeX Capital LLC** ("ApogeeX", "we", "us" or "our"), a limited liability company registered in Saint Vincent and the Grenadines under company number **4536 LLC 2026**, with its registered office at Suite 305, Griffith Corporate Centre, Beachmont, Kingstown, St. Vincent and the Grenadines.

1. Introduction

A conflict of interest is a situation in which a person in a position of trust has competing professional or personal interests, which can make it difficult to act impartially. A conflict of interest may exist even if no improper act results from it. This Policy explains how ApogeeX identifies and manages conflicts of interest in providing its services to clients.

2. Responsibility

ApogeeX's compliance function is responsible for overseeing this Policy. For the purposes of this Policy, our interests include those of our directors, employees, introducing brokers and other persons acting under our direct or indirect control.

3. Overview

ApogeeX is committed to avoiding conflicts of interest. We take reasonable steps to identify conflicts that may arise between ApogeeX and its clients, or between one client and another, and manage them by:

- avoiding them where possible;
- controlling them through appropriate internal arrangements; and
- disclosing them to clients where necessary.

ApogeeX acts as principal and is the counterparty to its clients' contracts for difference and foreign exchange contracts. ApogeeX's interests may therefore conflict with those of its clients, including where ApogeeX gains when a client incurs a loss, in setting prices, spreads and margin requirements, and in handling orders. ApogeeX manages these conflicts through the arrangements in this Policy and the Client Service Agreement, and discloses them in its Risk Disclosure.

4. Gifts and Inducements

Our staff must not give or accept gifts, entertainment or other benefits that could improperly influence how they deal with clients or service providers. Gifts and entertainment above the threshold set in our internal gifts register policy require prior approval and are recorded.

5. Remuneration

Staff remuneration is structured so that it does not encourage staff to act against clients' interests. Where clients are referred by introducing brokers, the introducing broker may receive compensation from ApogeeX. Details of any such arrangement are provided to the client on request, in accordance with the Client Service Agreement. Introducing brokers are not permitted to set client pricing. Any spread mark-up or commission paid to an introducing broker forms part of the pricing set by ApogeeX.

6. Personal Dealing and Outside Interests

Staff must not use client or order information for their own benefit or for the benefit of others. Personal trading and outside business interests of staff that may conflict with clients' interests must be disclosed and approved.

7. Controlling Conflicts of Interest

Our arrangements for managing conflicts include:

- controlling the flow of confidential client and order information;
- separating duties and supervision where activities may conflict;
- restricting personal dealing by staff; and
- reviewing gifts, benefits and outside business interests.

8. Disclosure

If our arrangements are not sufficient to manage a conflict, we will disclose the general nature or source of the conflict to the client before providing the relevant service.

9. Record Keeping and Review

We keep records of conflicts of interest that have arisen or may arise and of how they are managed. This Policy is reviewed periodically and the current version is published at axfx.com.

10. Contact

Questions about this Policy may be sent to support@axfx.com. Complaints may be sent to complaints@axfx.com.