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CONFLICT OF INTEREST POLICY

1 DEFINITIONS

1.1 "**CFD/s**" means Contract/s for Difference;

1.2 "**Conflict of Interest**" for the purposes of this document, refers to a situation or potential situation by which the objectives of QuickTrade SA, its associates or counterparties and the interests of the clients may be incompatible;

1.3 "**FAIS**" means the Financial Advisory and Intermediaries Services Act (Act 37 of 2002);

1.4 "**Financial product**" shall have the meaning given to that term in FAIS, and includes without limitation, OTC derivatives;

1.5 "**FSP**" means an authorised Financial Services Provider as defined in FAIS;

1.6 "**Foreign Product Supplier**" means a supplier of financial products and services that is located outside of South Africa.

1.7 "**OTC derivative**" means an unlisted derivative instrument that is executed, whether confirmed or not confirmed, excluding:

1.7.1 foreign exchange spot contracts; and

1.7.2 physically-settled commodity derivatives;

1.8 "**QuickTrade SA**" means QuickTrade Proprietary Limited, a limited liability private company incorporated in accordance with the company laws of the Republic of South Africa with company registration number 2014/062267/07 and with registered address at 345 Rivonia Road, Edenburg, Johannesburg, 2196;

1.9 "**QuickTrade Botswana**" means QuickTrade.World (Pty) Ltd, a limited liability private company duly incorporated in accordance with the company laws of the Republic of Botswana, with company registration number BW00000404456 and registered address at Plot 54368, Western Commercial Road, Ground & First Floor, The Hub, iTowers, CBD, Gaborone, Republic of Botswana.

2 INTRODUCTION

2.1 QuickTrade (Pty) Ltd (QuickTrade SA) is currently a registered FSP holding a Category I FAIS license, under license number 45262 and in terms of FAIS, needs to disclose actual or potential Conflicts of Interest.

2.2 QuickTrade is licensed to (amongst other things) refer clients to third party product suppliers located within or outside of South Africa, including without limitation to other companies within the QuickTrade group of companies.

2.3 QuickTrade SA currently refers clients to QuickTrade Botswana. QuickTrade Botswana is an Internet Trading Services Provider.

2.4 As such, QuickTrade SA acts as an intermediary for QuickTrade Botswana. Therefore, the clients' principal relationship is with QuickTrade Botswana. QuickTrade SA may act as an intermediary for other third-party product suppliers located within or outside of South Africa, as may be disclosed to clients via the QuickTrade SA website from time to time.

2.5 This document aims to ensure that QuickTrade SA's directors, employees and affiliates are aware of their obligations in ensuring that QuickTrade SA avoids, and where this is not possible, mitigates any Conflict of Interest in the rendering of any financial service as defined in FAIS and as represented by the published General Code of Conduct for Authorised Financial Services Providers and Representatives under Board Notice 80 in Government Gazette 25299 of 8 August 2003, and amended.

3 CONFLICTS IDENTIFIED

3.1 Association with Product Supplier

3.1.1 QuickTrade Botswana is a Foreign Product Supplier that enters into over-the-counter CFDs with clients via their online trading platform.

3.1.2 QuickTrade SA will refer you to our sister company, QuickTrade Botswana. QuickTrade Botswana will offer to trade over-the-counter CFDs with you on a principal-to-principal and cross-border basis.

3.1.3 This is a potential conflict because QuickTrade SA and QuickTrade Botswana have a business relationship.

3.2 Association with Training Providers

3.2.1 The secondary conflict, which we classify as a potential conflict and not an outright conflict, concerns the relationship between QuickTrade SA, QuickTrade Botswana, and Stock Market College (SMC). SMC is a training and education company that provides education to the clients of QuickTrade SA and QuickTrade Botswana.

3.2.2 SMC offers courses in CFD instruments and/or other similar instruments. QuickTrade SA and QuickTrade Botswana facilitated the demand for students who needed to move from an academic environment into a more practical space. We believe that QuickTrade SA and QuickTrade Botswana allow SMC students to experience the same culture of integrity and enthusiasm they experienced during their training.

3.3 External Introducing Brokers

3.3.1 Whilst not in direct conflict with our business, QuickTrade Botswana does work with non-FAIS regulated independent Introducing Brokers who enter into an Introducing Broker Agreement with QuickTrade Botswana on a pure "introduction only" basis ("Introducing Brokers"). We feel that Introducing Brokers may, due to the referral fees paid to them if they are successful in referring clients to QuickTrade Botswana, could pose a potential conflict of interest between the Introducing Broker and the client.

4 MITIGATION OF CONFLICTS

4.1 Mitigation of Risk of Association with Product Supplier

4.1.1 It is vital for QuickTrade SA to ensure that conflicts of interest are mitigated. Below is the way we mitigate conflicts of interest at present:

4.1.1.1 Currently QuickTrade SA only refers clients to QuickTrade Botswana. Neither QuickTrade SA nor the employees and representatives of QuickTrade SA are remunerated or paid incentives related to the volume or value of trades executed by the clients referred to QuickTrade Botswana. Therefore the risk of conflicts of interest are inherently low for QuickTrade SA;

4.1.1.2 QuickTrade SA is not a discretionary investment manager and does not exercise any discretion with respect to the clients' investments with QuickTrade Botswana, and clients make all their own investment decisions;

4.1.1.3 QuickTrade SA will ensure neutrality in their dealings with clients;

4.1.1.4 Clients with a very poor likelihood of success (such as highly unsophisticated clients) or highly unsuitable clients will be warned against trading in CFD's. In extreme cases, QuickTrade SA and its associates or counterparties may decline a business relationship with any potential clients. This is in line with our business on-boarding processes;

4.1.1.5 The foreign product supplier (QuickTrade Botswana) provides demo trading platforms, where clients can safely learn how to trade in a sandbox environment before they go live with the foreign product supplier (QuickTrade Botswana). QuickTrade SA will neither assist nor hinder clients in this venture;

4.1.1.6 QuickTrade SA fully discloses all conflicts of interest to clients, to ensure clients fully appreciate our business model, including without limitation, our relationship with QuickTrade Botswana. This allows clients to make an informed decision prior to engaging with QuickTrade SA, QuickTrade Botswana, our associates or counter parties.

4.1.1.7 The disclosure of conflicts of interest is explained in this policy, in the other legal policies published on our website and in our Statutory Disclosure documents.

4.2 Association with Training Providers

4.2.1 To mitigate the risk of having clients referred to us by our Training Provider, SMC, we have processes in place to ensure:

4.2.1.1 The separation of staff within the two companies;

4.2.1.2 That clients are only referred to QuickTrade Botswana if they ask for assistance;

4.2.1.3 That SMC may not provide any advice, recommendation, guidance or proposal in any format, nor give clients the impression that any financial product will be suitable or profitable for them;

4.2.1.4 That all clients referred to QuickTrade Botswana will be screened using our on-boarding process – non-suitable clients will be discouraged from applying for a trading account with QuickTrade Botswana;

4.2.1.5 That during our onboarding process, the client will be asked to disclose if any advice was given to them by any staff members affiliated with SMC, to invest in products offered by QuickTrade Botswana. This is to ensure that clients are not unduly influenced;

4.2.1.6 QuickTrade SA will disclose and unpack the relationship between the Training Provider, QuickTrade SA and QuickTrade Botswana in its statutory disclosures;

4.2.1.7 Audits will be done by our Compliance Officer on the manner of training to further ensure that SMC performs within the appropriate parameters; and

4.2.1.8 A Service Level Agreement between the SMC and QuickTrade Botswana will be put in place to capture the individual responsibilities and clarify restrictions to ensure that this control is legally enforceable.

4.3 External Introducing Brokers

4.3.1 To mitigate the risk of Introducing Brokers unduly influencing clients to secure the referral fee, the following processes will be put in place to ensure that:

4.3.1.1 Introducing Brokers may not provide any advice, recommendation, guidance or proposal in any format, nor give clients the impression that any financial product will be suitable or profitable for them;

4.3.1.2 Introducing Brokers may not actively and consciously market any specific financial products;

4.3.1.3 We perform due diligence on all Introducing Brokers (for reputational risk reasons), however, additionally to ensure that they have the appropriate operational ability to maintain the parameters which we have restricted them to operate within;

4.3.1.4 All clients referred to QuickTrade Botswana will be screened using our onboarding process. Non-suitable clients will be discouraged from applying for a trading account with QuickTrade Botswana;

4.3.1.5 During our onboarding process, the client will be asked to disclose if any advice was given to them by the Introducing Broker to invest in a financial product. This is to ensure no breach of the above requirement occurs;

4.3.1.6 QuickTrade SA will disclose on its website, its arrangements with Introducing Brokers and that they may be paid a referral fee for client referrals;

4.3.1.7 Random audits will be done by our Compliance Officer on the operations of the Introducing Brokers to further ensure that the Introducing Broker performs within the appropriate parameters; and

4.3.1.8 An Introducing Broker Agreement has been entered into between QuickTrade Botswana and its approved Introducing Brokers so as to capture the individual responsibilities, restrictions, and rights to ensure that this control is legally enforceable (including our right to audit). A copy of the Introducing Broker Agreement is available on the website of QuickTrade Botswana.

5 DISCLOSURE OF CONFLICTS TO CLIENTS

5.1 All possible conflicts as identified are disclosed in this Conflict of Interest policy, which will be available on the QuickTrade SA website for clients to download. By opening an account and/or continuing to trade with QuickTrade Botswana you acknowledge and agree that you have read and understood this policy and each of the conflicts of interest disclosed in this policy.

6 MANNER OF IDENTIFICATION OF CONFLICTS

6.1 For the purposes of this policy, conflicts are situations that may place QuickTrade SA, its associates, counterparties, and their interests – at odds with the interests of the client.

7 POLICY TRAINING, BREACHES AND UPDATES

7.1 To further mitigate the risks of actual or potential Conflicts of Interest arising, QuickTrade SA provides Conflict of Interest training to all employees and representatives upon joining QuickTrade SA and annually thereafter. All employees and representatives are made aware of this policy and of the potential or actual Conflicts of Interest identified herein.

7.2 Employees and representatives are required to report any actual or suspected breach of this policy, whether committed by themselves or by any other employee or representative to our Compliance Officer. This policy will be reviewed and updated at least annually, or when any material changes are made to our business operations or the applicable regulations.