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APPROVED BY THE BOARD OF DIRECTORS

PURPOSE

The **Conflicts of Interest Policy** (the “**Policy**”) has been approved by the **Board of Directors**, following a favorable report of the **Audit and Compliance Committee**. Such Policy intertwines with the ethical values of the ORBIT TRADERS (hereinafter, “ORBIT TRADER”, the “**Company**” or the “**Firm**”). Actual or potential, direct or indirect conflicts of interest may arise at The Orbit, between its employees and the Company. This Policy seeks to supplement and implement the provisions of E-Finance’s Code of Conduct on conflicts of interest, defining the appropriate measures aimed at preventing, detecting, disclosing and managing such conflicts of interest which may affect employees in the performance of their job.

SCOPE OF APPLICATION

This Policy shall apply to the Orbit Traders. It shall be binding for the entire staff, regardless of their job and position. For such purposes, Orbit traders (the “Firm”) shall mean any company in which Orbit traders owns, whether directly or indirectly, at least a 50 Percent stake of the share capital or 50 Percent of the voting rights.

The enforcement of this Policy, in full or in part, may extend to any natural and - or legal person associated with Orbit traders on any terms other than an employment relationship, where this is practicable on account of the nature of the relationship and may be appropriate to meet its purpose.

Under this Policy, Orbit traders may develop a number of procedures and instructions to implement and enforce the obligations undertaken, and to bring it into line with the different local laws and regulations applicable to the Firm.

OVERARCHING PRINCIPLES

This policy shall be implemented pursuant to the following principles:

- Honesty, accuracy and transparency of the information relating to conflicts of interest to be disclosed to the Committee of Ethics.
- Objectivity, professionalism and independence of mind regarding any conducts that may result in conflicts of interest and confidentiality upon resolution of proceedings by the Committee of Ethics.
- Taking actions aimed at preventing any situations which may result in conflicts of interest.
- Equal treatment to all employees who are in the same situation regarding which a conflict of interest is declared and compliance with applicable laws and regulations and with the highest ethical standards, in line with the provisions of the Code of Conduct.

CONCEPT OF CONFLICT OF INTEREST

For the purposes of the Policy, **Conflict of Interest** shall be understood as any situation where an employee's personal interest (direct conflict of interest) or the interest of any related party thereto (indirect conflict of interest) contradicts (actual conflict of interest) or may contradict (potential conflict of interest) the Company's interest, jeopardizing the requisite objectivity or professionalism of such employee at the workplace.

The following cases shall be deemed to be conflicts of interest, without limitation:

- The conduct by any employee or by any person related to him or her, either directly or indirectly, of any business which is the same, similar or supplementary to the business conducted by Orbit Traders.
- The conduct by any employee or by any person related to him or her, either directly or indirectly, of any business which involves an exchange of goods and - or services with Orbit Traders, regardless of the remuneration system agreed.
- The hiring of any individual directly coming from public service, pursuant to the definition of public servant provided in the **National Policy on Dealings with Public Servants**, as well as the termination of any employee to become a public servant immediately after, might be considered, as the case may be, a potential conflict of interest.

For the purposes of the Policy, related parties to Orbit Traders employees are understood as being:

- Their spouse or domestic partner.
- Their ascendants, descendants or siblings.
- The ascendants, descendants or siblings of their spouse or domestic partner.
- Any company in which any of the above is a director or an officer, or has, either individually or jointly with the employee and their remaining related parties, a significant shareholding, understanding as such, as regards listed companies on any official secondary market, whether domestic or foreign, those covered in the applicable regulations.

OBLIGATIONS OF E-FINANCE EMPLOYEES IN CASE OF CONFLICTS OF INTEREST

Orbit Traders employees shall avoid, where possible, being in any situations which may entail a direct or indirect, actual or potential conflict of interest, pursuant to the definition of the section above. Namely, by way of an example, employees shall refrain from:

- Acting on behalf of the Company or taking part or affecting any decision-making on behalf of Orbit Traders, where they might have a personal interest, either directly or indirectly, whether for themselves or for any of their related parties, in such decisions.

- Availing of their position in the Company to obtain from Orbit Traders or from third parties any economic or personal benefit or remunerations, for themselves or for their related parties, except for gifts or business courtesies allowed.
- Availing of their position in the Company to obtain any business opportunity for them or for their related parties.
- Using the name of Orbit Traders to exercise undue influence upon conducting private transactions.
- Using the assets of the company, including confidential information, for private purposes.

Where despite the foregoing, an apparent or real conflict of interest situation arises, employees are bound to disclose it forthwith to the **Committee of Ethics**.

If an employee is not sure whether a specific situation, either of their own or of others, qualifies as conflict of interest, they are also bound to disclose it to the **Committee of Ethics**. Failure to comply with the provisions of the Policy will entail the application of disciplinary measures provided in the employment laws and in the Firm's internal regulations.

COMMITTEE OF ETHICS

The Orbit **Committee of Ethics** is responsible for enforcing and following-up on this Policy, and this includes:

- promoting and ensuring its implementation;
- determining the strategy to prevent and manage conflicts of interest and managing communication channels with the **Committee of Ethics** for all employees;
- reviewing the Policy and, if appropriate, raising motions to update it; and,
- apprising the Audit and Compliance Committee on a regular basis, of the enforcement and compliance with this Policy, and the main conflicts of interest detected.

Likewise, the **Committee of Ethics** shall be responsible for addressing the conflicts of interest situations which may arise between the Company and its employees.

Upon managing and resolving conflicts of interest, the interest of the Company shall prevail at all times over the interest of the employees or their related parties. Notwithstanding this, any possible alternative that ensures the least possible disturbance to the employee or their related parties upon resolving the conflict of interest raised shall be assessed and considered.

In this regard, upon addressing the conflict, the Committee shall respect the privacy of the employees and the private scope of its decisions.

In its address of conflicts of interest, the **Committee of Ethics** may:

- Declare that no conflict of interest exists.

- Establish preventive control or safeguard measures to avoid materialization of the conflict of interest, or if materialized, to reduce it and establish corrective measures to remove any materialized conflict of interest or to mitigate its effects.
- Declare that a given activity is incompatible and authorize the employee or their related parties to carry out a given activity, to the extent that such authorization or activity is not incompatible with the applicable regulations.

At any rate, the Policy shall be construed within the framework of the local laws applicable to employees. ~~Where the hiring or termination of any employee at Orbit Traders – namely, those coming from or going to public service – might give rise to a conflict of interest situation, the~~ **Committee of Ethics** may propose that such measures that best safeguard the Company's interest be agreed with the employee.

DISCLOSURE OF THE POLICY

This Policy will be available to all employees registered on Orbit traders website: www.orbittraders.com and shall be made available to all stakeholders of the Company. Likewise, the Policy shall be subject to the appropriate disclosure, training and awareness-raising action, aimed at its full understanding and enforcement.

IMPLEMENTATION, UPDATE AND REVIEW OF THE POLICY

Orbit traders undertakes to allocate specific assets to ensure the effective implementation of the Policy. The Policy will be reviewed and updated, where applicable, to bring it into line with any changes that the business model may undergo, or that may occur in the context where the Group operates, ensuring at all times the effective implementation thereof.