

## INFORMATION CONCERNING CONFLICTS OF INTEREST MANAGEMENT GENERAL RULES AT XTB S.A.

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XTB conducts brokerage activity in a reliable and professional manner, respecting the best interests of its Clients and in compliance with honest trading principles. Having on mind the Client's best interests, as well as the fact that in relation to brokerage service of purchase and sale of financial instruments on its own account, there is a conflict of interest between XTB and the Client, consisting of the fact that XTB is always in such a case the other side of the Client's transaction, XTB within its brokerage activity has developed an internal regulation - Conflict of interest management policy in X-Trade Brokers, setting out the principles and methods of management and prevention of conflicts of interest. The bullet points below present basic measures developed to prevent the effects of conflicts of interest in XTB S.A.

1. For the purpose of counteracting the conflict of interests Trading Department is separated from these departments which are directly cooperated with the Clients, i.e. Sales and Customer Support Departments through the so called "Chinese Walls", so as to assure full autonomy to the departments which are offering XTB financial products and which evaluate the adequacy of the products for certain Clients. The above-mentioned separation is incorporated in order to avoid any association between the selection of the Financial Instrument which is being offered to the Clients and an Open Position currently hold by XTB. Trading Department is also separated from the direct contact with XTB Clients.
2. Sales Department, Customer Support Department and Trading Department's employees incentives scheme shall be devised in the manner which guarantees that it shall not be associated to the outcome on XTB own portfolio of Financial Instruments, created for the purpose of concluding Transactions with the Clients.
3. Organizational structure of XTB provides for lack of dependency between departments which have direct contact with the Client and the departments which are in the conflict of interests with XTB Clients.
4. Trading Department employees shall refrain from giving public commentaries concerning current macroeconomic situation and from taking part in preparation of reports and commentaries published by XTB
5. Trading Department employees shall never know the intention of the Client on the direction of the Transaction. Trading Department employees in every situation shall be obliged to present to the Client both bid and ask price of a given Financial Instrument, taking into account spread in accordance with Financial Instruments Specification Table and "Regulations on the provision of services consisting in the execution of orders to buy or sell property rights, keeping property rights accounts and cash accounts by XTB S.A." which may be used by the Client at his own will to open new or close old position.
6. Employees of XTB shall be forbidden to accept from the Clients, potential Clients or from third parties any gifts in the form of benefits in cash or benefits in kind. Acceptance of minor gifts or courtesy gestures in a generally accepted manner shall not be deemed a prohibition mention in preceding sentence, provided that such acceptance is accordance with Conflicts of Interest Management Policy of XTB. A minor gifts or courtesy gestures mentioned above shall be understood as benefits in kind which value do not exceed amount of EUR 160 or its equivalent in other currency.

Whether the Client is interested to acquire detailed information concerning the principles and methods of management and prevention of conflicts of interest, XTB provides such information upon Client's request through its website or by using durable medium. XTB updates and adjusts as appropriate the measures developed to prevent the effects of conflicts of interest according to recent needs in this matter.