



CENTRINO CAPITAL LTD

CONFLICT OF INTEREST POLICY

LATEST UPDATED IN OCTOBER 2025



Client Advisory on Conflict-of-Interest Policy

This Conflict-of-Interest Policy (“Policy”) outlines how Centrino Capital Ltd. (“Centrino Capital” or “the Company”) identifies, manages, and reduces potential conflicts of interest. While primarily designed for internal use, it is also shared with clients to promote transparency and trust.

Our goal is to act ethically and in full compliance with applicable regulations, ensuring that the interests of our clients, the Company, and other stakeholders are protected. We take proactive steps to recognize and address any situations where personal, professional, or financial interests could interfere with fair and impartial service.

While we make every reasonable effort to manage conflicts responsibly, Centrino Capital cannot be held liable for any adverse outcomes resulting from conflicts that have been properly disclosed and handled. We encourage clients to review this Policy carefully and seek independent legal, financial, or regulatory advice before entering into any investment or business relationship with us.

By continuing to engage with Centrino Capital’s services, clients acknowledge the possibility of conflicts arising in the normal course of business and accept our commitment to managing and disclosing such situations transparently.

Please Note: This Policy is reviewed and updated regularly. We recommend that clients revisit it periodically to stay informed about how Centrino Capital handles conflict-of-interest matters.

1. Introduction

At Centrino Capital Ltd., we prioritize integrity, professionalism, and transparency in everything we do. We understand that conflicts of interest can arise during business operations, and we are committed to identifying and minimizing them proactively.

This policy outlines the steps we take to recognize, prevent, and manage potential conflicts, ensuring that our operations remain compliant with regulatory standards and aligned with ethical business practices. Our goal is to protect the interests of our clients, uphold our reputation, and maintain trust through responsible and transparent conflict management.

2. What is Conflict of Interest?

A conflict of interest arises when Centrino Capital Ltd. or any of its employees, directors, agents, or associates (“relevant persons”) have personal, professional, or financial interests that could interfere with their responsibility to act in the best interests of our clients.

These situations may create a risk where someone might prioritize their own interests or those of a third party, over the interests of the client. Our policy is designed to recognize and



manage such scenarios to ensure fair, unbiased, and transparent service at all times.

3. Who This Policy Applies To

This policy applies to everyone who represents Centrino Capital Ltd., including employees, directors, officers, consultants, and other affiliated individuals.

It covers situations where conflicts of interest may arise between:

- i. Centrino Capital and its clients
- ii. Individuals within the Company and clients
- iii. Different clients of the Company
- iv. Clients and third-party service providers

By clearly defining these relationships, the policy helps ensure that all parties are treated fairly and that any potential conflicts are managed with transparency and care.

4. Why This Policy Matters

This policy is designed to help Centrino Capital Ltd. achieve the following key objectives:

- i. Protect the Company's interests, including its people, operations, partnerships, and reputation.
- ii. Identify, prevent, and manage conflicts of interest that could cause harm or lead to legal or regulatory issues.
- iii. Ensure full compliance with applicable laws and regulations, while promoting transparency and fairness in all client interactions.
- iv. Maintain the highest ethical standards across all business activities, safeguarding the interests of both the Company and its clients.

This policy applies to all services offered by Centrino Capital, including investment services, advisory services, and ancillary services and covers both internal and external conflicts of interest.

5. How Centrino Capital Identify Conflicts of Interest

Centrino Capital Ltd. actively monitors and evaluates situations that may lead to conflicts of interest. We assess the following scenarios to ensure that client interests are protected:

- i. **Financial Advantage or Avoiding Loss:** When the Company or a relevant individual could gain financially or avoid a loss at the client's expense.
- ii. **Conflicting Interests:** When a relevant person has a personal or financial interest in a transaction or service that may not align with the client's best interests.
- iii. **Business Competition:** When the Company or a relevant individual is involved in a business that directly competes with a client's interests.

- iv. **External Incentives:** When gifts, benefits, or incentives from third parties could influence the impartiality of services provided to clients.
- v. **Personal or Proprietary Trading:** When employees or directors engage in trading activities that may conflict with client transactions or negatively affect client outcomes.

These scenarios are carefully reviewed to ensure that any potential conflicts are identified early and managed responsibly.

6. How Centrino Capital Manage Conflicts of Interest

To ensure fair and impartial service, Centrino Capital Ltd. has implemented a comprehensive framework to identify, manage, and reduce potential conflicts of interest. This includes both general procedures and specific measures designed to protect client interests and maintain regulatory compliance.

I. General Procedures

We follow these core practices to maintain independence and avoid conflicts:

- i. **Information Barriers:** We restrict the flow of sensitive information between teams or individuals working on potentially conflicting matters. This helps prevent any misuse of information that could affect client outcomes.
- ii. **Independent Oversight:** Individuals handling matters that may involve competing interests, such as serving different clients with conflicting goals are supervised separately to ensure objective decision-making.
- iii. **Separate Compensation Policies:** Our remuneration structures are designed to prevent cross-influence. Employees are not rewarded based on the performance of teams or roles that could create a conflict.
- iv. **Safeguarding Against Undue Influence:** We have controls in place to ensure that no one can improperly influence how others carry out their responsibilities, especially in investment-related services.
- v. **Oversight of Dual Roles:** We monitor and manage situations where individuals may be involved in multiple roles or services, either simultaneously or consecutively, to reduce the risk of bias or conflict.

II. Specific Measures

To further strengthen our conflict management approach, Centrino Capital enforces the following measures:

- i. **Legal and Ethical Compliance:** All employees must follow applicable laws, regulatory requirements, and the Company's Code of Ethics.
- ii. **Clear Division of Responsibilities:** Tasks that could lead to conflicts are assigned to different individuals to maintain objectivity.
- iii. **Gifts and Incentives Log:** We maintain a dedicated record of any gifts, benefits, or incentives offered or received, to ensure transparency and prevent undue influence.
- iv. **Employee Trading Controls:** Employees must obtain prior approval before trading on any platform, including the Company's. All employee accounts are clearly marked to ensure oversight.
- v. **Conflict Disclosure:** Employees must report any potential conflicts related to transactions, including personal ties that could affect their impartiality.
- vi. **Commission and Market Impact Review:** Employees are required to assess commission structures and maintain anonymity in trades to minimize market disruption.
- vii. **Insider Trading Restrictions:** Trading based on material non-public information is strictly prohibited. Any employee with access to such information must report it, and the relevant asset will be placed on a restricted or watch list.
- viii. **Compliance Oversight:** Our Compliance Officer monitors, investigates, and addresses any violations. They have the authority to take disciplinary action and escalate issues to senior management, the Board, or legal counsel. Regular reports are submitted to the appropriate authority.
- ix. **Departmental & Information Segregation:** We maintain physical separation between departments and enforce strict information barriers to prevent unauthorized access to confidential data.
- x. **Controlled Access to Data:** Only employees with a legitimate need-to-know have access to sensitive information, ensuring it is handled responsibly and securely.

7. Disclosure Of Conflicts of Interest

If a conflict of interest cannot be fully avoided or effectively managed, Centrino Capital Ltd. will inform the client before proceeding with any related transaction or service.

Our disclosure will include:

- i. The nature and origin of the conflict
- ii. Steps taken by the Company to reduce its impact
- iii. How the conflict may affect the client's interests
- iv. The client's right to either proceed or decline the service with full understanding of the situation



We are committed to ensuring that clients are fully informed and empowered to make confident, well-informed decisions before moving forward.

8. Keeping a Record of Conflicts of Interest

Centrino Capital Ltd. maintains a detailed and up-to-date log of all actual or potential conflicts of interest. This record is regularly reviewed by our Compliance Department to ensure accountability and transparency.

Where required, this log will be made available to regulatory authorities upon request.

9. What Happens If the Policy Is Violated

Centrino Capital Ltd. takes compliance with this policy seriously. Any failure to follow the guidelines outlined may result in disciplinary action, which could include formal warnings, suspension, or termination of employment.

The Company is committed to preventing breaches and will ensure that any suspected violations are promptly investigated and addressed by the Compliance Department.

10. Staff Understanding

This policy is shared with all employees to underscore the importance of recognizing and effectively managing conflicts of interest.

11. Act of Decline

The Company reserves the right to refuse representation if it determines that a conflict of interest cannot be appropriately managed by any other means.

12. Policy Review and Updates

Centrino Capital Ltd. reviews this policy regularly, at least once every year, to ensure it remains effective and aligned with current regulations and business practices. The Company also reserves the right to update or modify the policy and its procedures at any time, without prior notice, if necessary.

We encourage clients to revisit this policy periodically to stay informed about how Centrino Capital manages conflicts of interest.

13. Contact Information

If you have any questions or concerns about this Conflict-of-Interest Policy, please reach out to our Compliance Department at infodesk@centrinocapital.com.