

SKY LINKS CAPITAL LLC

Conflict of Interest Policy

(SCA License No. 20200000235 – Category 5 Introducer)

Last updated: 23 October 2025

Office#208, BB03, Bay Square, Business Bay, Dubai, UAE. **Dubai Economic Department** Registration No:
1385407

Sky Links Capital L.L.C is licensed and regulated by the **Securities and Commodities Authority (SCA)**, UAE as on
Introductory to Financial Services entity. The firm does not provide investment advice, hold client funds, or
execute traders on behalf of clients

1. Purpose and Regulatory Basis

This Policy sets out how Sky Links Capital LLC (“the Company”) identifies, manages, and mitigates potential or actual **conflicts of interest** arising from its *introducing activities*.

It is issued under:

- **Federal Decree-Law No. 4 of 2000** establishing the Securities and Commodities Authority (SCA);
- **SCA Decision No. 13/R.M of 2021** (“Rulebook for Financial Activities” – Category 5 Introducing);
- The **SCA Code of Business Conduct** and **Fit and Proper Standards** for licensed firms.

Sky Links Capital LLC is committed to acting with honesty, integrity, and transparency in all introductions it arranges between potential clients and licensed counterparties, ensuring that no conflict compromises the interests of any party or the integrity of the UAE capital markets.

2. Scope of Application

This Policy applies to all:

- Directors, officers, employees, and any contracted representatives of the Company;
- Activities involving the *introduction of potential clients* to authorized financial institutions;
- Interactions with counterparties, service providers, or affiliates where remuneration or relationships could create a conflict.

The Policy complements our **Code of Conduct**, **AML/CFT Framework**, and **Compliance Manual**.

3. Definition of Conflict of Interest

A *conflict of interest* occurs where personal or corporate interests could improperly influence the Company’s duty to act fairly and transparently in its introducing role.

Examples include:

- Accepting or offering referral commissions that could bias introductions;
- Having personal or family relationships with a client or counterparty that impair impartiality;
- Receiving gifts, hospitality, or incentives likely to influence business referrals;
- Introducing a client to a counterparty in which the Company or an employee holds a financial interest;
- Using confidential client information for personal gain.

4. Identification and Disclosure

All staff must proactively identify and disclose any situation that could give rise to a conflict.

The **Compliance Officer / MLRO** maintains a *Conflicts Register* and reviews each disclosure.

Where a potential or actual conflict exists:

- It will be evaluated by Compliance;
- Appropriate mitigating measures (e.g., disclosure, re-assignment, or refusal of engagement) will be implemented; and

- Disclosure will be made to affected clients or counterparties before proceeding.

5. Management and Mitigation Measures

a) Independence and Objectivity

Introductions must be based solely on objective suitability of the counterparty for the client, **not** on financial incentives or relationships.

b) Referral Commissions

- All referral or introduction fees must be documented in formal written agreements approved by senior management and Compliance.
- The basis of remuneration must be transparent and disclosed to clients when required by SCA rules.
- Employees are prohibited from receiving personal commissions or gifts from introduced counterparties.

c) Gifts and Hospitality

- Any gift or hospitality exceeding the Company's approved threshold must be recorded in the **Gifts and Entertainment Register** and pre-cleared by Compliance.
- Repeated or excessive hospitality from counterparties is prohibited.

d) Information Barriers

Although the Company does not provide investment advice or handle transactions, staff must still maintain confidentiality and avoid sharing client details outside authorized channels.

No confidential information received during an introduction may be used for any purpose other than the intended referral.

e) Outside Interests

Employees must declare all outside business activities, directorships, or affiliations that might conflict with the Company's introducing role. Written approval from senior management is required before accepting any such position.

6. Record-Keeping and Monitoring

- The **Conflicts Register** documents all identified conflicts, disclosures, and actions taken.
- Records are maintained for at least **five (5) years** in accordance with SCA record-keeping requirements.
- The Compliance Officer conducts periodic reviews to verify adherence and reports significant issues to senior management and, where necessary, to the SCA.

7. Training and Awareness

All employees receive **annual training** on conflict-of-interest principles, SCA conduct standards, and practical scenarios relevant to introducer activities.

Training completion is tracked as part of compliance KPIs.

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8. Breaches and Disciplinary Action

Failure to disclose or manage a conflict constitutes a **serious compliance breach**. Disciplinary measures may include:

- Formal warning and retraining;
- Suspension or termination; and
- Notification to the SCA in line with reporting obligations under Article 13 of the Rulebook.

9. Review and Approval

This Policy is reviewed **annually** or whenever there are material regulatory or business changes.

Updates are approved by the Board of Directors and the Compliance Officer to ensure ongoing alignment with SCA requirements for Category 5 firms.

10. Contact Information

Compliance Department – Sky Links Capital LLC

Office 208, BB03 Bay Square, Business Bay, Dubai, UAE

compliance@skylinkscapital.com ☎ 04-495-7009

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