



Conflict of Interest Disclosure Statement

Introduction

This Conflict of Interest Disclosure Statement (hereinafter the "Statement"), has been prepared by Goldenburg Group Ltd (hereinafter the "Company") in accordance to the Investment Services and Activities and Regulated Markets Law 87(I)2017, which transposes the Directive 2014/65/EU on markets in financial Instruments ("MIFID II").

The Company takes all appropriate and sufficient steps to identify and/or prevent and/or manage all kind of Conflicts of Interest. However, if during the course of a business relationship with a Client or group of Clients, the organizational or administrative arrangements/measures in place are not sufficient to avoid or manage a conflict of interest relating to that Client or group of Clients, the Company will disclose the conflict of interest before undertaking further business with the Client or group of Clients. This will be a last resort after all appropriate steps have been taken. The aforesaid disclosure is being communicated to our clients since the Company has taken all the sufficient measures to prevent and manage all the identified conflicts of interest.

Disclosure

The Company has identified the following Conflicts of Interest which are not easily prevented and/or managed:

Conflict of Interest	Description	The Company's measures to manage the Conflict of Interest	Risks Involved
Inducements Received	Commissions Received by the Company's Execution venues.	The selection of the Company's execution venue is not based on gainful terms and best execution can be ensured. The Company has contract with its Execution Venues and therefore the terms will remain the same.	The Company shall not receive any remuneration, discount or non-monetary benefit for routing client orders to specific execution venue.
Inducements Paid	Commissions Paid to the third parties that the	The Company has in place robust monitoring plan so that there is	The Conflict of interest identified is



	Company has contractual agreement with, i.e. Marketing Agencies.	continuous check of the activities of the counterparties. The Company pays for the rendered services a fixed fee on the per hour basis, thus it does not take into account the amount of provided potential clients, i.e. Leads.	related to the third party's provision of Leads. There is a possible business misconduct if the company would remunerate the third party based on the volume of provided Leads.
Tied Agents operation	The Company's Tied Agents are collaborating with other third party companies in respect of provision of potential clients, i.e. Leads, as well.	The Company has provided all necessary guidelines to its Tied Agents in regard to their operation.	The Conflict of interest identified is related to the third party's provision of Leads. There is a possible business misconduct as the best interest of clients might be jeopardized.

More information can be provided in relation to the above, upon Client's request.

Date of the last review: November 2020