

## 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)2017-2021, 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	<p>Commissions Received by the Company’s Execution venues.</p> <p>Commission from the AFK Capital (PTY) LTD (GV Markets) = 50 % of net spreads paid by the client +50 % of the swaps paid by the client + 50 % of the commissions paid by the client</p>	<p>The selection of the Company’s execution venue is not based on gainful terms and best execution can be ensured.</p> <p>The Company has contract with its Execution Venues and therefore the terms will remain the same.</p>	<p>The Company shall not receive any remuneration, discount or non-monetary benefit for routing client orders to specific execution venue.</p>

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

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T.T. TOPTRADER TRADING (hereinafter, "TOPTRADER") is a registered brand name of Goldenburg Group Ltd, a Cyprus Investment Firm (CIF) supervised and regulated by the Cyprus Securities and Exchange Commission (CySEC) with CIF Licence No 242/14.



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