North Pacific (Pty) Ltd

Conflict of interest management policy

A summary of how North Pacific (Pty) Ltd identifies, avoids and manages conflicts of interest, as required by Section 3A of the FAIS General Code of Conduct. The full policy is available on request.

Version 1.0. Effective 4 January 2026.

What a conflict of interest is

A conflict of interest is any situation in which North Pacific or one of our people has an actual or potential interest that may influence the objective performance of our obligations to a client, or stop us from acting in the client's interests.

Conflicts we have identified and how we manage them

We act as principal on the OTC desk	We sell to and buy from clients for our own account and earn a margin. We quote one all-in rate, confirm every trade in writing, and never change a rate after you have accepted it.
We manage our own position	We hedge our position with market participants such as Luno after client trades. We do not trade ahead of a client order we know about, and we do not use client information for our own trading.
We hold client balances	Client rand is held in segregated client bank accounts, separate from North Pacific's own money, and client USDT is recorded separately in our ledger. Client money is not used for our own trading.
Staff interests	Staff may not trade crypto assets in a way that conflicts with client orders, and must declare their personal crypto holdings and outside business interests to the compliance officer.
Gifts and hospitality	Staff may not accept gifts or hospitality that could influence their service. Anything over R1 000 in value must be declared and recorded in the gifts register.
Ownership and associates	North Pacific has no associated companies, and no ownership interest in or relationship with any product supplier or exchange that could influence our service. If that changes, we will disclose it.

Our approach

- Avoid conflicts where we can; where we cannot, manage them and tell clients about them before we provide the service.
- Never offer or accept financial interests, other than those the FAIS General Code allows.

- Train staff on this policy when they join and each year after.
- The compliance officer monitors this policy, keeps the conflicts and gifts registers, and reviews the policy at least once a year.

Questions

Ask us for the full policy, or raise a concern, at admin@northpacific.co.za.