

Conflicts of Interest Policy

General

We are required to take all reasonable steps to identify and manage any conflicts of interest that may arise between us and any of our clients or between our clients. Some of these conflicts will be more relevant to your particular circumstances than others. We aim to identify and prevent any conflicts of interest which may occur between us and our clients, or between one client and another, to avoid possible adverse effects which may arise. This policy applies from 1 July 2014.

Regulatory Requirements

Our requirements include:

- Establishing, implementing and managing an effective written conflicts of interest policy,
- taking all reasonable steps to identify conflicts of interest that could potentially affect our clients,
- maintaining and updating records of our products and services, that might involve a conflict of interest resulting in a material risk of damage to the interests of our clients.

Types

The types of conflicts that may occur and which carry a material risk of damage to the interests of a client include, but are not limited to, when we or any person directly or indirectly linked to us:

- has an interest in the outcome of a service or product provided to, or of a transaction carried out on behalf of our client, which is distinct from our clients' interest in that outcome.
- are likely to make a financial gain or reduce/avoid a financial loss at the expense of our client.
- receive or will receive from a person other than our client an inducement in relation to the service provided to our client in the form of monies, goods or services, other than the standard commission or fee for that service.
- has a financial or other incentive to favour the interests of another client or group of clients over the interests of our client.
- Where we carry out the same business as our client (more applicable to certain professional clients or eligible counterparties)

Operations

These systems and procedures referred to in this document have been implemented, to reduce the potential sources of any conflicts of interest, and to manage them and avoid them. We consider our internal policies and procedures, systems and controls, will generally alleviate conflicts of interest arising, either between us and our client or between two or more of our clients.

- **Personal Account Dealing** All our employees and consultants are bound by the requirements of our Personal Account Dealing Procedures. All transactions undertaken are monitored on a regular basis.
 - **Information Release** Personnel may not release and or disclose information to another party without the customers express permission other than those mentioned in our Terms and Conditions including disclosures that we are legally obliged to provide.
 - **Segregation of duties** Employment duties are designed to limit the potential for conflicts of interest. Given the nature of our business there can be occasions which could give rise to a conflict. In these circumstances additional controls are in place to identify inappropriate behaviour. All Personnel are regularly assessed for competency in their roles and are required to follow the internal procedures detailed in our Compliance Manual.
 - **Training** Personnel are provided with regular training on the identification, prevention and managing conflicts of interest.
 - **Independence Policy** Situations may arise where it is appropriate to manage conflicts of interest by requiring personnel to adhere to and observe a policy of independence.
 - **Large client exposures** In the unlikely event that a client has an exceptionally large exposure in a particular market, we maintain a restricted instrument list which the firm its agents, consultants and its employees at forbidden from trading.
 - **Dealing with potential or actual conflicts of interest** If we identify an actual or potential conflict of interest we may take any of the following courses of action:
 - a) decline to act or cease engaging in the activity that gives rise to the conflict;
 - b) accept the conflict of interest but take steps to protect our client's interests; or
 - c) where we are unable to manage a conflict of interest satisfactorily by declining to act or protecting our client's interests, we will fully disclose the conflict to them or not proceed with the transaction. This will enable our clients to assess the conflict, discuss with our customer services team and consider if they wish to continue with the service.
 - **Gifts and hospitality** Our employees are not allowed to solicit or accept any gift of inducement that is likely to influence their independence that might create a conflict with any duty owed to us or our clients. Our employees are permitted to receive small gifts and minor hospitality from other parties with which we do business, but only where our board considers it to be proportional and a level that is not lavish or excessive. Any gift or hospitality must not prejudice our duty to act in the best interests of our clients.
 - **Monitoring and identification of conflicts** Our Internal Audit and Compliance Department will carry out regular reviews of all areas of the business, including the roles undertaken by the individuals within that department and the segregation of his or her duties.
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Inducements from Liquidity Providers.

The Company may enter into arrangements whereby its Liquidity Providers shall pay the Company fees or commissions based on revenue generated from Client's Transactions, which may potentially give rise to conflicts of interest situations. In order to mitigate the possibility of conflict of interest situations the Company is committed to the following:

- The Company and its Affiliates will not provide Investment Advice to Clients.
 - The Company and its Affiliates will not provide Clients with misleading or unclear information tempting Clients to place Orders.
 - The criteria for selecting a Liquidity Provider are always aligned with the Company's policy for obtaining the best possible result for Clients on a consistent basis.
 - The Company is committed to treating Clients fairly and in a non-discriminatory manner.
 - The Company shall disclose more detailed information to its Clients regarding the fees received by such Liquidity Providers upon request.
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