

## Conflicts of Interest Policy Summary

### General

Capital Index (UK) Limited ("*Capital Index/us/we*") is required to take all appropriate steps to identify and to prevent or manage any conflicts of interest that may arise between us (including our employees and directors) 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 document provides a Summary of our Conflicts of Interests Policy.

### Regulatory Requirements

Our requirements include:

- Establishing, implementing and managing a comprehensive written conflicts of interest policy;
- taking all appropriate steps to identify conflicts of interest (actual or potential) that could affect our clients;
- maintaining and updating records of our products and services, that might involve a conflict of interest resulting in actual or potential risk of damage to the interests of our clients.

Our policies must specify procedures to be followed and measures to be adopted in order to manage such conflicts.

### Types of Conflicts

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

- is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
- has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;
- carries on the same business as the client;
- receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service.

For a conflict to arise, Capital Index or any person directly or indirectly linked to us must benefit and there must be possible disadvantage to a client.

---

### **Operations**

We have implemented systems and procedures to reduce the potential sources of any conflicts of interest, and to avoid or manage them. This includes procedures to maintain appropriate independence between members of our staff who are involved in different activities, for example, through the operation of information barriers, the segregation of duties and responsibilities and maintenance of a policy of independence which requires our staff, when providing services to a client, to act in the best interests of the client. In some circumstances this could mean we or our employees may decline to act for a particular client. We keep a record of the different types of activity which could lead to actual or potential conflicts of interests, and of any mitigating controls around them. The conflicts policy and register are reviewed by the Board of Directors on at least an annual basis.

### **Disclosure of Conflicts**

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. However, if we are unable to ensure, with reasonable confidence, that risks of damage to the interests of a client will be prevented, we will disclose the conflict and the following information to you, before undertaking business for you:

- the general nature or sources of conflicts of interest, or both; and
- the steps taken to mitigate those risks.

### **Group Structure**

We draw your attention to the fact that we share the same ultimate beneficial owner as Learn to Trade Limited (a provider of forex training services) (“Learn to Trade”) and Smart Charts Limited (the official trading software that Learn to Trade utilises to train aspiring traders) (“Smart Charts”). Learn to Trade and Smart Charts each refer potential clients to us. We do not believe that your referral to us by Learn to Trade or Smart Charts (if you have come to us via either of those companies) disadvantages you or creates a specific conflict of interest (and naturally you are not bound to do business with us as a result of any relationship you have with either Learn to Trade or Smart Charts and are free to use other trading platforms), rather we bring this to your attention to aid transparency.

***October 2018***

---