



FxPro Global Markets Ltd

Conflict of Interest Policy

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1. INTRODUCTION

- 1.1 This Conflict of Interest Policy (the '**Policy**') outlines the manner in which FxPro Global Markets Ltd. (referred to as '**FxPro**', the '**Firm**', '**Us**', '**We**'), where applicable, identifies, manages, mitigates or controls any possible conflicts of interest which may arise, during the course of your business relationship with FxPro.
- 1.2 **For your benefit and protection, please ensure that you take sufficient time to read this and any other additional documentation and information available to you via our Website, prior to opening an account and/or carrying out any activity with us. You should contact us for any further clarification, or seek independent professional advice (if necessary).**

2. SCOPE OF THE POLICY

- 2.1 According to applicable legislation we must take reasonable steps to ensure that conflicts and potential conflicts of interest between FxPro and its Clients and between one Client and another are identified and then prevented or managed in such a way that the interests of a Client are not adversely affected and to ensure that all our Clients are fairly treated and not prejudiced by any such conflicts of interest. Our aim is to take all reasonable steps to implement or maintain any arrangements, which will identify and manage such conflicts. The Policy applies to all its directors, employees, any persons directly or indirectly linked to the Firm (hereinafter called '**related persons**') and refers to all interactions with all clients.
- 2.2 We are committed to act honestly, fairly and professionally, and in the best interest of our Clients and to abide by the principles set out in applicable legislation, when providing investment services to our Clients.
- 2.3 For any capitalised term, which has not been defined herein, please refer to Schedule A ('Glossary') of the 'Client Agreement'.

3. IDENTIFICATION OF CONFLICTS OF INTEREST

- 3.1 For the purposes of identifying the types of conflict of interest that may arise during the course of the business relationship between us. It is the obligation of the Firm to take into account (as a minimum) whether:

- (a) the Firm and/or relevant person is likely to make a financial gain, or avoid a financial loss, at the expense of the Client;
- (b) the Firm and/or relevant person 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;
- (c) the Firm and/or relevant person has a financial or other incentive to favour the interest of another Client or group of Clients over the interests of the Client;
- (d) the Firm and/or relevant person receives and/or pays 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.

4. MANAGING CONFLICTS OF INTEREST

4.1 We maintain and operate effective organisational and administrative procedures to manage and prevent any identified conflict of interest from constituting or giving rise to a material risk of damage to the interests of our clients. We also undertake ongoing monitoring of business activities to ensure that these internal controls are appropriate. The measures adopted are designed to ensure that relevant persons engaged in different business activities involving a potential conflict of interest carry on those activities at a level of independence proportionate to the size and activities of the Firm, and to the materiality of the risk of damage to the interests of our clients.

4.2 In general, the procedures and controls that the Firm follows regarding conflicts of interest include the following measures:

- a) effective procedures to prevent or control the exchange of information, or restrict the communication of the relevant information between relevant persons engaged in activities involving a risk of a conflict of interest where the exchange of that information may harm the interests of one or more clients;
- b) the separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, Clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Firm;
- c) the removal of any direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration of, or revenues generated by, different relevant persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities;

- d) measures to prevent or limit any person from exercising inappropriate influence over the way in which a relevant person carries out investment or ancillary services or activities;
- e) measures to prevent or control the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services or activities where such involvement may impair the proper management of conflicts of interest;

4.4 Some of the policies and procedures established to prevent conflicts of interests are shown below:

- a) Best Execution policies and procedures to ensure that clients are getting the best possible trading conditions across all instruments offered
- b) A 'need to know' procedure governing the dissemination of confidential or inside information within the FxPro group of companies;
- c) Chinese walls restricting the flow of confidential and inside information within our Firm, and physical separation of departments;
- d) Procedures governing access to electronic data;
- e) A remuneration structure that ensures remuneration methodologies do not compromise the Firms' duty to act in the best interest of Clients and the various control mechanisms' independence and objectivity;
- f) Segregation of duties that may give rise to conflicts of interest if carried on by the same individual;
- g) Personal account dealing requirements applicable to relevant persons in relation to their own investments;
- h) A gifts and inducements log registering the solicitation, offer or receipt of certain benefits;
- i) A policy designed to limit the conflict of interest arising from the giving and receiving of inducements;
- j) Establishment of the four-eyes principle in supervising the Firm's activities.

5. DISCLOSURE

5.1 Where arrangements made by us are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of our clients will be prevented, we will, to the best of our knowledge and with duty of care, disclose the general nature and/or sources of conflicts of interest to a client prior to undertaking investment business for that client. The disclosure will be made by way of a written notice and will include sufficient detail to enable the client to take an informed decision with respect to the service in the context of which the conflict of interest

arises. Details of potential conflicts of interest identified by the Firm are contained in the Annex to this Policy, which may be amended from time to time.

- 5.2 Where we do not believe that disclosure is appropriate to manage the conflict, we may choose not to proceed with the transaction or matter giving rise to the conflict.
- 5.3 This Policy is subject to review and change as we deem necessary. We reserve the right to make any amendments as appropriate.
- 5.4 You will be able to find the latest version of this Policy on our website.

6. CONTACT INFORMATION

- 6.1 Any questions relating to this Policy should be addressed, in first instance, to our Customer Support Department at support@fxpro.com and by telephone at +44 (0) 203 151 5550.
- 6.2 You may also contact our Compliance Department at compliance@fxpro.global.

FxPro Global Markets Ltd.

Incorporated in The Bahamas (Registration no. 198285 B)

Authorised and regulated by the Securities Commission of The Bahamas (Licence no. SIA-F184)

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October 2021