



FxPro Financial Services Ltd

Conflicts of Interest Policy

Effective from 1 April 2022

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1. Introduction and scope

- 1.1 This Conflicts of Interest Policy (the **Policy**) is provided to you alongside our Terms and Conditions, and contains information on how we identify, manage and where possible, mitigate, or where applicable, disclose any conflict of interest which may arise during the course of your business relationship with FxPro Financial Services Ltd (**we, us or FxPro**).
- 1.2 We must take all reasonable steps to identify any conflict of interest between:
- a) Us, including our management, employees, appointed representatives and/or tied agents where applicable (the **Relevant Persons**), or any person directly or indirectly linked to them, and our clients; or
 - b) You and another client.
- We are committed to act honestly, fairly and professionally, in the best interest of our clients, and in line with applicable legislation when providing investment services to our clients.
- 1.3 This Policy is not intended to and does not create third party rights or duties that would not already exist if the Policy had not been made available, nor does it form part of any contract between us and any client.
- 1.4 **For your benefit and protection, please ensure you take sufficient time to read this and any other additional documents 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).**
- 1.5 Unless otherwise defined here, capitalised terms have the same meaning as in the 'FxPro Financial Services Ltd Terms and Conditions'.

2. Identification of conflicts of interest

- 2.1 A conflict of interest may arise where FxPro and/or any Relevant Person is in any of the following situations:
- a) FxPro and/or any Relevant Person is likely to make a financial gain, or avoid a financial loss at the expense of a client;
 - b) FxPro and/or any Relevant Person has an interest in the outcome of a service provided, or of a transaction carried out on behalf of a client, which is distinct from that client's interest in the same outcome;
 - c) FxPro and/or any Relevant Person has a financial or other incentive to favour the interest of a particular client, or group of clients, over the interests of another client or group of clients;

- d) FxPro and/or any Relevant Person receives or will receive from a person other than a client, an inducement in relation to a service provided to that client, in the form of monies, goods or services, other than the standard commission or fee for that service.

3. Managing conflicts of interest

3.1 We maintain and operate effective organisational and administrative procedures to manage and prevent any identified conflict of interest from giving rise to a material risk of damage to the interests of our clients. We also monitor business activities on an ongoing basis 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 our size and activities, and to the materiality of the risk of damage to the interests of our clients.

3.2 In general, the procedures and controls that we follow in this regard include the following measures:

- a) Effective procedures to prevent or control the exchange of information between Relevant Persons 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 ours;
- 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 where such involvement may impair the proper management of conflicts of interest.

3.3 Some of the policies and procedures established to prevent and manage 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' policy governing the distribution of confidential or inside information within FxPro;
- c) Chinese walls restricting the flow of confidential and inside information within our company, and physical separation of departments;

- d) Procedures governing access to electronic data;
- e) A remuneration structure that ensures remuneration methodologies do not compromise our duty to act in the best interest of clients and the various control mechanisms' independence and objectivity;
- f) Separation 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 our activities.

4. Disclosure

- 4.1 We will disclose the general nature and/or sources of conflicts of interest to you prior to undertaking investment business for you if we take the view that the arrangements in place are insufficient to ascertain that any damage to your interests will be prevented. The disclosure will be made in writing and will include sufficient detail to enable you to take an informed decision with respect to the service in the context of which the conflict of interest arises.
- 4.2 Where we do not believe that a disclosure is sufficient to manage a conflict, we may choose not to proceed with the transaction or matter giving rise to the conflict.
- 4.3 We may review and/or amend this Policy as we consider necessary or appropriate.
- 4.4 You will be able to find the latest version of this Policy on our website.