



Conflicts of Interest Policy

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Broker Group Ltd. (**'Broker Group' 'the Company', 'we', 'us', 'our'**) provides you with the Conflicts of Interest Policy (the **'Policy'**) to help Clients understand the risks that may arise from trading Contracts for Difference.

1. Introduction

1.1 Broker Group is committed to taking all necessary steps to identify, manage and resolve conflicts of interest between any of our clients or between us and our clients. Whilst it is not possible to eliminate all sources of potential conflict, we have a duty to act honestly, fairly and professionally in accordance with the best interests of our clients and to comply with the principles set out in the applicable legislation.

1.2 A conflict of interest may arise either:

- a. between us (including our employees, managers or any person directly linked to the Company by control) and you; or
- b. between yourself and another customer where your interests are materially affected by one another.

2. Disclosure

2.1 There are a number of areas where potential conflicts may arise. They include, but are not limited to:

- a. offering services in different capacities at the same time;
- b. acting for more than one client in a transaction;
- c. holding information on other clients that would affect you or them if it was disclosed;
- d. receiving gifts or entertainment which could conflict with our duties to you;
- e. relevant parties pursuing activities or personal relationships potentially detrimental to you;
- f. issuing financial promotions that might not be fair and clear;
- g. paying remuneration that might incentivise an employee at the detriment of a client or group of clients;
- h. computer systems that are designed to charge the client unnecessarily or excessively.

3. Procedures and Controls

- 3.1** In order to prevent and to minimise the risk of conflicts of interest, Broker Group has adopted a number of systems, procedures and controls which include the following:
- a. Personal account dealing requirements for all employees, including directors, associates, consultants and their immediate family in relation to their own investments.
 - a. Restrictions on the flow of information between the different business units of the Company.
 - b. Restrictions in regard to accessing data stored electronically or in hard-copy form.
 - c. Restrictions in the dissemination of trading information.
 - d. Restrictions on accepting gifts and inducements and receipt of certain benefits applicable to all employees, including directors, associates, consultants and their immediate family.
 - e. The application of segregation of functions that, if performed by the same individual, would increase the risk of a conflict of interest.
 - f. The application of a "fit and proper test" before accepting new employees, associates and consultants.
 - g. Reviews by the board of potential conflicts of interest between external associates of the Company.
 - h. Promotion of "whistleblowing" (disclosure of potential conflicting activities) by our employees.
 - i. Provision of "awareness campaigns" to alert our employees of the risk of conflicts of interest.
 - j. Immediate disclosure to our clients of potential conflicts of interest, if we become aware of any.