

Conflicts of Interest Policy

(Summary)

EC Markets Group Ltd
(trading as “EC Markets”)

Conflicts of Interest Policy Summary

General

EC Markets Group Ltd, trading under the name “EC Markets”, is a UK Investment Firm (registered number 07601714), regulated by the Financial Conduct Authority (“FCA”) under license number 571881 (hereinafter the “Company or” we”, “us” and “our”, as appropriate). The Company’s trading address is 3rd Floor, 30 City Road, London, EC1Y 2AY, United Kingdom.

Under Article 23 of (MiFID II) FCA’s Senior Management Arrangements, Systems and Controls (SYSC), the Company is required to provide its clients and potential clients with a summary of its Conflicts of Interest Policy (hereinafter the “Policy”).

Purpose of the Policy

The Policy is provided to you in accordance with the FCA on the basis that you are proposing to trade with the Company in contracts of difference (‘CFDs’) which are leverage products, incur a high level of risk and can result in the loss of all your invested capital.

Under the above requirements, EC Markets Group LTD (“*EC Markets/us/we*”) is required to take all appropriate steps to identify and to prevent or effectively manage conflicts of interest that may arise, when it provides a service or services to clients in the course of carrying on regulated activities, between us, its Directors or staff, persons directly or indirectly connected to us and any of our clients, or between two or more of our clients, where we owe a separate duty to each of our client. 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 client, to avoid or minimise the 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 EC Markets 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, EC Markets or any person directly or indirectly linked to us must benefit and there must be possible disadvantage to a client.

Employee Personal Trading Accounts

All Employees personal accounts and activities are approved by the compliance officer or Director/ senior manager. Employees may only undertake personal investment activities that comply to applicable law or regulation, do not unduly distract from their employment responsibilities and do not create an unacceptable risk to our reputation. Transactions should also be free from business and ethical conflicts of interest. Employees must never misuse proprietary or client confidential information in their personal dealings and must ensure that clients are never disadvantaged as a result of their dealings.

Managing Conflicts of Interest

We have implemented systems and procedures to reduce the potential sources of any conflicts of interest, and to avoid or manage them. It may not be always possible to prevent conflicts of interest from arising. In that case, we will endeavour to manage or avoid the conflict of interests by:

- Employee Signoff - all employees are required to sign off and adhere to the company employment handbook, compliance manual and policies;
- Disclosure to the Client - We will clearly disclose the general nature and source of the conflict of interest to the client before undertaking business on behalf of the client. The disclosure will be made in writing and include sufficient detail to enable the client to take an informed decision about the service in the context of which the conflict of interest has arisen, its nature and including the steps taken by us to mitigate these conflicts;
- Declining to provide the service - If it is not possible to avoid or manage a conflict of interest, we may have no choice but to decline to provide the service requested;
- Annual checks to ensure that appropriate systems and controls are maintained and are reported to EC Markets Board of Directors;
- Prohibition of external business interests conflicting with EC Markets interests where EC Markets officers and employees are concerned, unless Board of Directors approval is provided;
- Gifts and Hospitality Policy – we shall only allow gifts to be received by EC Markets employees in accordance with our Gifts and Hospitality Policy; and
- Whistleblowing Policy - If any employee believes EC Markets is acting wrongly and incorrectly with regards to any regulatory procedures, they may act by following our whistleblowing policy.

Record Keeping

We keep a record of the different types of activity which could lead to actual or potential conflicts of interest, 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.

Conflict of interest should be reported as soon as possible to the Compliance Officer - compliance@ecmarkets.co.uk