

Conflicts of Interest Policy

Conflicts of interest exist in all businesses and in all financial services organizations. We live in a complicated world and this is reflected everywhere, nevertheless, we recognize that our business is above all based on a bond of trust between us and our clients and we are duty bound to identify and manage those conflicts.

Accordingly we have put in place a number of policies, procedures and processes designed to identify, evaluate and manage these conflicts of interest. The purpose of this disclosure statement is to identify in a summary form those conflicts which we experience as an organization and to describe how we address the challenges such conflicts impose on us.

Conflicts of Duty and Interest

We recognize that, in certain circumstances, conflicts can arise between Afree Markets Ltd, its directors and employees and other related group companies and associates. To prevent and minimize the risk of such conflicts giving rise to a risk of damage to the interests of our clients we have adopted a number of internal systems, procedures and controls, as follows:

1. Personal account dealing restrictions for all employees and associates
2. Internal disclosure requirements which cover the giving and accepting of gifts or other inducements relating to our business for all employees and associates
3. Internal segregation of functions where their performance by the same person would increase the risk of conflict
4. The maintenance of a Policy of Independence requiring our directors and employees to act in the best interests of our clients and disregard any conflicts arising
5. Restrictions of access to data stored electronically or in hard-copy form
6. Our directors, officers and employees are required to maintain confidentiality of all information entrusted to them, except where disclosure is required by law. Further, employees are not permitted to use such information for their personal gain.



Where we do not consider that these arrangements will be sufficient to prevent the risk of damage to clients as a result of a particular conflict, then we will make a general disclosure to allow the client to consider their position, and to decide whether to continue with the service. In particular, we will do so where:

We provide investment advice or recommendations to a client who also receives dealing services through a related group company or associate We arrange transactions or make arrangements for the provision of dealing services by a third party where we or an associate receive a fee or commission for making such arrangements This type of general disclosure may be made verbally or in writing before or at the time of dealing. Specific disclosure regarding any other conflicts we identify which give rise to a risk of damage will be made verbally or in writing when we become aware of them.

Status of this Policy

This policy does not form part of our Customer Agreement, is not intended to be contractually binding or impose or seek to impose any obligations on us which we would not otherwise have whether under our Customer Agreement had this policy not been disclosed to you.