

## CONFLICTS OF INTEREST POLICY

### INTRODUCTION

1. iCFD Limited, formerly known as “iFOREX Cyprus Limited”, operating under the brand name ‘iFOREX’ (the “**Company**”) is an Investment Firm regulated by the Cyprus Securities and Exchange Commission (license number 143/11).
2. This summarized Conflicts of Interest Policy is provided to you in accordance the provisions of the Investment Services and Activities and Regulated Markets law number 144(I) of 2007 and in accordance with the Markets in Financial Instrument Directive (MiFID) of the European Parliament and Council pursuant to which the Company is required to take all reasonable steps to detect and avoid conflicts of interest.
3. The Company is committed to act honestly, fairly and professionally and in the best interests of its clients and to comply, in particular, with the principles set out in the above legislation when providing investment services and other ancillary services related to such investment services.

### SCOPE OF THIS POLICY

4. The purpose of this document is to set out the Company’s approach in identifying and managing conflicts of interest which may arise during the course of its normal business activities. In addition, this document identifies circumstances which may give rise to a conflict of interest.
5. The Policy applies to all the company’s directors, officers, employees and agents (“**Related Persons**”) and refers to all interactions with all clients.

### THE IDENTIFICATION OF CONFLICTS OF INTEREST

6. When the Company deals with the Client, the Company, an associate or some other person connected with the Company, may have an interest, relationship or arrangement that is material in relation to the Transaction concerned or that conflicts with the Client’s interest. The Company has identified the following circumstances which may give rise to a conflict of interest:
  - a. When the Company deals with a Transaction for or on behalf of the Client, the Company may be:
    - i. dealing in the Financial Instrument concerned as principal for the Company’s account by selling to or buying the Instrument from the Client;
    - ii. matching the Client’s Transaction with that of another Client by acting on such other Client’s behalf as well as on the Client’s behalf.

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- b. The Company may have an interest in maximizing trading volumes in order to increase its income revenue, which is inconsistent with the client's personal objective of minimizing transaction cost
  - c. The Company's bonus scheme may award its employees based on the trading volume etc.
  - d. The Company may receive or pay inducements to or from third parties due to the referral of new clients or clients' trading.
  - e. The Company may use entities which are members of its group as counterparties to certain transactions on an ad hoc basis.
7. The Client consents to and authorizes the Company to deal with the Client in any manner which the Company considers appropriate, notwithstanding any conflict of interest or the existence of any material interest in a Transaction, without prior reference to the Client. The Company's employees are required to comply with a policy of independence and to disregard any such material interest or conflict of interest while offering services to the Client.
8. For the purposes of identifying the types of conflict of interest that arise in the course of providing investment and ancillary services or a combination thereof and whose existence may affect the interests of a client, the Company takes into account whether the Company or a Related Person is in any of the following situations, whether as a result of providing investment or ancillary services, investment activities or otherwise:
  - a. The Company or a Related Person is likely to make a financial gain, or avoid a financial loss, at the expense of the client.
  - b. The Company or a Related 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 Company or a Related Person has a financial or other incentive to favor the interest of another client or group of clients over the interests of the client for which the investment or ancillary service is provided.
  - d. The Company or a Related Person participates in the same business as the client.
  - e. The Company or a Related Person 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.

#### **PROCEDURES AND CONTROLS TO MANAGING CONFLICTS OF INTEREST**

9. The Company has introduced various procedures and controls in order for the Company to identify, manage and control conflicts of interest, including:
  - a. Effective procedures to prevent or control the exchange of information between Related 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.

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- b. Employees of the Company are not permitted to trade in financial instruments offered by the Company or similar to those offered by the Company, whether with the Company or with any third party.
  - c. 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 Company.
  - 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. A 'need to know' policy governing the dissemination of confidential or inside information within the Company.
  - f. Chinese walls restricting the flow of confidential and inside information within the Company.
  - g. Limits on the access of different departments to IT systems that could: (i) contain information that could lead to conflict of interest; (ii) lead to the alteration of information by unauthorized persons; and (iii) restrict the possibility of the improper use of privileged or confidential information concerning clients.
  - h. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual.
  - i. Prohibition on officers and employees of the Company having external business interests conflicting with the interests of the Company without the prior approval of the Company's board of directors.
  - j. A policy designed to limit the conflict of interest arising from the giving and receiving of inducements.
  - k. Establishment of in-house compliance department to monitor and report on the above to the Company's board of directors.
  - l. Appointment of Internal Auditor to ensure that appropriate systems and controls are maintained and report to the Company's board of directors.
  - m. Establishment of the four-eyes principle in supervising the Company's activities.
  - n. The Company also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate.
10. The Client should direct any question he/she may have or request for more information about conflicts of interest to: [cs-eu@iforex.com.cy](mailto:cs-eu@iforex.com.cy).