



# Conflict of Interest Policy

## LEGAL INFORMATION

Instant Trading EU Ltd (hereinafter referred to as 'Instant Trading EU' or the 'Company' is an investment firm that operates globally.

Instant Trading EU is incorporated in the Republic of Cyprus with Certificate of Incorporation No. HE 266937. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission ('CySEC'), with licence No. 266/15, and operates under the Provision of Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets and Other Related Matters Law 87(I)/2007, as subsequently amended from time to time (the Law). The Company's registered office is located at Anastasi Sioukri & Olympion, Themis Tower, 6th Floor, 3035, Limassol, Cyprus.

The Customer acknowledges that the Company's official language is English.

## INTRODUCTION

As required under the Markets in Financial Instruments Directive, the Company shall provide all of its Clients, prior to the provision of any investment and/or ancillary services or any combination thereof, with a "Conflicts of Interest Policy". This can be found published at [www.forexmart.com/legal\\_docs/conflicts\\_of\\_interest](http://www.forexmart.com/legal_docs/conflicts_of_interest) and Clients have the right to request more information about this Policy.

Despite the best efforts of the Company, please note that, some "Conflicts of Interest" can not be eradicated all together, and in such instances, the Company has adopted a transparent and fair approach of disclosing such instances as soon as they become apparent.

The Company provides herein the Policy it maintains in order to manage conflicts of interest in respect of the duties it owes to its Customers. The Conflicts of Interest Policy:

- Identifies the circumstances which constitute or may give rise to a "Conflict of Interest" entailing a market risk of damage to the interests of one or more Clients; and
- Specifies procedures to be followed and measures to be adopted in order to manage such "Conflicts of Interest"

This Policy sets out the Company's approach to identify and manage "Conflicts of Interest" which may arise during the course of its business activities.

## SCOPE OF THE POLICY

The Policy applies to its directors, employees and any persons directly or indirectly linked to

the Company (hereinafter called 'related persons') and refers to all interactions with all Customers.

## IDENTIFICATION OF CONFLICTS OF INTEREST

For the purpose of identifying the types of conflict of interest that may arise in the course of providing investment and ancillary services or a combination thereof, and whose existence may damage the interests of a Customer, the Company takes into account, whether the Company or a relevant person is in any of the following situations - whether as a result of providing investment or ancillary services or investment activities or otherwise:

- The Company or a relevant person receives or will receive from a person other than the Customer, an inducement in relation to a service provided to the Customer, in the form of monies, goods or services, other than the standard commission or fee for that service.
- The Company or a relevant person has a financial or other incentive to favour the interest of another Customer or group of Customers over and above the interests of the Customer.
- The Company or a relevant person is likely to make a financial gain, or avoid a financial loss, at the expense of the Customer.
- The Company or a relevant person participates in the same business as the Customer.
- The Company or a relevant person has an interest in the outcome of a service provided to the Customer or of a transaction carried out on behalf of the Customer, which is different and distinct from the Customer's interest in that outcome.

## PROCEDURES AND CONTROLS TO MANAGE CONFLICTS OF INTEREST

In general, the procedures and controls that the Company follows to manage conflicts of interest include the following measures:

- Effective procedures to prevent or control the exchange of information between relevant persons engaged in activities involving the risk of a conflict of interest where the exchange of that information may harm the interests of one or more Customers.
- The separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of or providing services to, Customers whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Company.
- The appointment of a Compliance Department to monitor and report on the above to the Company's Board of Directors.
- 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.
- Segregation of those duties that may give rise to conflicts of interest if carried out by the same individual.
- 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.

- A policy designed to limit the conflict of interest arising from the giving and receiving of inducements.
- Procedures governing access to electronic data.
- A 'need to know' policy governing the dissemination of confidential or inside information within the Company.
- The appointment of an Internal Auditor to ensure that appropriate systems and controls are maintained and reports are made to the Company's Board of Directors.
- Chinese walls restricting the flow of confidential and inside information within the Company, and physical separation of departments.
- A gifts and inducements log registering the solicitation, offer or receipt of certain benefits. The prohibition of any external business interests of the Company's officers and employees conflicting with the Company interests, unless the Board of Directors approval is given.
- Personal account dealing requirements applicable to relevant persons in relation to their own investments.
- The establishment of the four-eye principle in supervising the Company's activities.
- The Company also undertakes the ongoing monitoring of business activities to ensure that internal controls are appropriate.

## DISCLOSURE

When the Company becomes aware of a situation where a conflict arises, the Company will disclose it to the Customer prior to undertaking investment business with that particular Customer, or if the Company does not believe that disclosure is appropriate to manage the conflict, the Company may opt not to proceed with the transaction or matter giving rise to the conflict.

The Company reserves the right to review and/or amend its Policy and arrangements whenever deemed appropriate.