

CONFLICTS OF INTEREST POLICY

Admiral Markets Cyprus Ltd is incorporated (Certificate of Incorporation No. HE 310328) in the Republic of Cyprus through the Department of Registrar of Companies and Official Receiver (<http://www.mcit.gov.cy>). Admiral Markets Cyprus Ltd is authorised and regulated by the Cyprus Securities and Exchange Commission (<http://www.cysec.gov.cy>) (License No. 201/13) and operates under the Markets in Financial Instruments Directive (EU Directive 2004/39/EC).

1. Scope of the policy

1.1. In order to fulfil its regulatory duty, Admiral Markets Cyprus Ltd shall take measures to identify, manage, prevent and/or disclose any conflicts of interests within its organisation, with its clients and between its clients, to prevent conflicts of interest from adversely affecting the clients' interest.

1.2. Admiral Markets Cyprus Ltd shall regularly define, measure and manage (incl. control, prevent or disclose) any risks of a conflict of interests in connection with investment and non-core activities. The aforementioned function shall be performed by the Board and the Compliance officer in cooperation with the managers and employees of various business units.

2. Identification of Conflicts of interest.

2.1. When defining actions, which may entail a conflict of interest, the existence of the following circumstances during the performance of a service provision function shall be assessed:

- Admiral Markets Cyprus Ltd or a relevant person makes or is likely to make a financial gain or avoid a financial loss on account of a client;
- Admiral Markets Cyprus Ltd or relevant 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;
- Admiral Markets Cyprus Ltd or a relevant person has a financial or other incentive to favour the interests of one client over the interests of another client;
- Admiral Markets Cyprus Ltd or a relevant person has business interests or is involved in the same area of business as the client;
- Admiral Markets Cyprus Ltd or a relevant person receives, in connection with the service provided to a client, inducements from a third party which are not part of the standard commission or fee for that service.

3. Managing Conflicts of Interest

3.1. Admiral Markets Cyprus Ltd has established internal policies and an independent Compliance Department that are responsible for the identification and management of conflict of interest.

3.2. For the purpose of managing conflict of interest, a framework of rules, policies and controls have been developed, which in general include the following measures:

- To prevent and control improper exchange of confidential information between linked persons engaged in activities that may involve risk of conflict of interest
- Establish a separate line of supervision in different business areas in which there is or may be a conflict of interest
- 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;
- 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;
- To prevent or control the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services or activities where such involvement may impair the proper management of the conflicts of interest.

3.3. Such measures include the following procedures:

- The confidential or inside information handled by each business area is governed by a need-to-know policy to ensure that the information is not improperly communicated.
- Chinese walls restricting the flow of confidential and inside information within the company, and physical separation of departments.
- Restrictions of access to electronic data
- Segregation of duties that may give rise to conflicts of interest if carried out by the same individual.
- Establishment of the four- eyes principle in supervising the company's activities
- Appointment of Internal Auditor to ensure that appropriate systems and controls are maintained and report to Company's Board of Directors.

3.4. Admiral Markets Cyprus Ltd undergoes ongoing monitoring of business activities to ensure that all internal controls are effective and appropriate.

4. Disclosure

4.1. Once Admiral Markets Cyprus Ltd becomes aware of a conflict of interest, it will disclose it to the client prior to the undertaking of any transactions or action in respect of that client. If Admiral Markets Cyprus Ltd does not believe that disclosure is appropriate to manage the conflict, it retains the right not to disclose it to the client and in effect, Admiral Markets Cyprus Ltd may choose not to proceed with the transaction or any other action giving rise to the conflict.