



FxPro UK Limited

Conflicts of Interest Policy

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1. INTRODUCTION AND SCOPE

- 1.1 This Conflicts of Interest Policy (the 'Policy') is provided to you alongside the FxPro Client Agreement, and contains information on how we identify, manage and where possible, mitigate, or where applicable, disclose any conflict of interest which may arise during the course of your business relationship with FxPro UK Ltd ('FxPro').
- 1.2 Following the Markets in Financial Instruments Directive ('MiFID') from the European Union, and in accordance with Section 10 of the Financial Conduct Authority's ('FCA') Senior Management Arrangements, Systems and Controls, we are required to provide you with a summary of our Conflicts of Interest Policy. Under the above regulatory framework, we are required to take all reasonable steps to identify any conflict of interest between:
- a) Us, including our management, employees, appointed representatives and/or tied agents where applicable (hereinafter 'relevant persons'), or any person directly or indirectly linked to them, and our clients; or
 - b) You and another client.

We are committed to act honestly, fairly and professionally, and in the best interest of our clients, and to abide by the principles set out in the above legislation when providing investment services to our clients.

- 1.3 This Policy is not intended to, and does not create third party rights or duties that would not already exist if the Policy had not been made available, nor does it form part of any contract between us and any client.
- 1.4 **For your benefit and protection, please ensure you take sufficient time to read this and any other additional documentation and information available to you via our Website, prior to opening an account and/or carrying out any activity with us. You should contact us for any further clarification, or seek independent professional advice (if necessary).**

2. IDENTIFICATION OF CONFLICTS OF INTEREST

- 2.1 A conflict of interest may arise where FxPro and/or any relevant person is in any of the following situations:
- a) FxPro and/or any relevant person is likely to make a financial gain, or avoid a financial loss at the expense of the client;

- b) FxPro and/or any relevant person has an interest in the outcome of a service provided to a client, or of a transaction carried out on behalf of the client, which is distinct from that client's interest in the same outcome;
- c) FxPro and/or any relevant person has a financial or other incentive to favour the interest of another client, or group of clients, over the interests of a particular client or group of clients;
- d) FxPro and/or any relevant person receives or will receive from a person other than a client, an inducement in relation to a service provided to that client, in the form of monies, goods or services, other than the standard commission or fee for that service.

3. MANAGING CONFLICTS OF INTEREST

3.1 We maintain and operate effective organisational and administrative procedures to manage and prevent any identified conflict of interest from constituting or giving rise to a material risk of damage to the interests of our clients. We also undertake ongoing monitoring of business activities to ensure that these internal controls are appropriate. The measures adopted are designed to ensure that relevant persons engaged in different business activities involving a potential conflict of interest carry on those activities at a level of independence proportionate to the size and activities of the Firm, and to the materiality of the risk of damage to the interests of our clients.

3.2 In general, the procedures and controls that we follow regarding conflicts of interest include the following measures to ensure the requisite degree of independence:

- a) Effective procedures to prevent or control the exchange of information between relevant 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;
- b) 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 FxPro;
- c) 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;
- 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) Measures 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 conflicts of interest.

3.3 Some of the policies and procedures established to prevent and manage Conflicts of Interests are shown below:

- a) Best Execution policies and procedures to ensure that clients are getting the best possible trading conditions across all instruments offered;
- b) A 'need to know' policy governing the dissemination of confidential or inside information within FxPro;
- c) Chinese walls restricting the flow of confidential and inside information within our company, and physical separation of departments;
- d) Procedures governing access to electronic data;
- e) Segregation of duties that may give rise to conflicts of interest if carried on by the same individual;
- f) Personal account dealing requirements applicable to relevant persons in relation to their own investments;
- g) A gifts and inducements log registering the solicitation, offer or receipt of certain benefits;
- h) The prohibition of external business interests conflicting with our interests as far as FxPro's officers and employees are concerned, unless board approval is provided;
- i) A policy designed to limit the conflict of interest arising from the giving and receiving of inducements;
- j) Establishment of the four-eyes principle in supervising the Company's activities.

4. DISCLOSURE

4.1 Where arrangements made by us are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of our clients will be prevented, we will, to the best of our knowledge and with duty of care, disclose the general nature and/or sources of conflicts of interest to a client prior to undertaking investment business for that client. The disclosure will be made by way of a written notice and will include sufficient detail to enable the client to take an informed decision with respect to the service in the context of which the conflict of interest arises. Details of potential conflicts of interest identified by the Firm are contained in the Annex to this Policy, which may be amended from time to time.

4.2 Where we do not believe that a disclosure is sufficient to manage a conflict, we may choose not to proceed with the transaction or matter giving rise to the conflict.

4.3 This Policy is subject to review and change as we deem necessary. We reserve the right to make any amendments as appropriate.

4.4 You will be able to find the latest version of this Policy on our website.

5. CONTACT INFORMATION

- 5.1 Any questions regarding this Policy should be addressed, in first instance, to our Customer Support Department at support@fxpro.co.uk | +44 (0) 203 151 5550
- 5.2 You may also contact our Compliance Department at compliance@fxpro.co.uk.

APPENDIX I

Conflict	Description	Mitigation
<p>Dealing as Matched-Principal</p>	<p>We enter into all trades with our clients as Matched-Principal, which means that we match all clients' trades with our counterparty (FxPro Financial Services Limited), who may profit from clients' losses. FxPro is therefore clients' sole counterparty and/or Execution Venue.</p>	<p>Our counterparty, FxPro Financial Services Limited operates under a 'Non-Dealing Desk Intervention' model that ensures Best Execution, which means they are able to internally match a great deal of the order flow. Best Execution is achieved by:</p> <ol style="list-style-type: none"> 1. aggregating prices from various liquidity sources so that trades are executed at the best available price across all instruments; 2. minimising trading costs by internalising the order flow and placing limits on the spreads to protect clients from receiving the maximum spreads from the wholesale FX market; 3. increasing speed by offering fully automated execution, subject to our Order Execution Policy; 4. enhancing the likelihood of execution across all instruments offered by having multiple liquidity sources connected to our price aggregation engine, so that the best available Bid and Ask are quoted in any market condition; <p>Furthermore, FxPro UK Limited has access to all systems necessary to analyse and monitor the quality of the execution given to our clients, including, but not limited to, slippage and requotes.</p>
<p>Introducing Brokers (IBs)</p>	<p>FxPro may use Introducing Brokers from time to time as a distribution channel. These IBs may be remunerated in accordance with an Introducer Agreement between FxPro and the IBs, which may be under a volume-based commission structure.</p>	<p>We ensure that no IB remuneration affects the quality of execution offered to our clients by rejecting any introducer whose business model involves charging mark-ups or any additional costs. Any remuneration is paid directly from FxPro revenue and not from clients' deposits. In addition, no Introducing Broker of FxPro will provide regulated investment advice to any of our clients unless the IB is duly authorised to do so. Furthermore, we review all IB applications and activity to ensure that no misleading information is being provided to clients.</p>

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FxPro UK Ltd is authorised and regulated by the Financial Conduct Authority

Conflicts of Interest Policy | April 2018