

# Summary of conflicts of interest policy

CMC Markets' conflicts of interest policy ("Policy") sets out the procedures and controls which help us identify, prevent and appropriately deal with conflicts of interest, whether actual, apparent or potential, in respect of our obligations to clients.

## Objective

The objective of the Policy is to ensure that conflicts of interest within CMC Markets Investments ("CMC Invest") are identified, prevented and managed appropriately and, where necessary, disclosed in order to ensure the fair treatment of clients and compliance with the rules and principles of the Financial Conduct Authority ("FCA").

## Application

This Policy applies to all of CMC Invest's FCA regulated activities and activities in connection with or for the purposes of such regulated activities, including outsourced activities provided by a third party.

## Identifying Conflicts of Interest

In assessing whether a conflict of interest has arisen, CMC Invest will consider, amongst other things, whether:

- CMC Invest is likely to make a financial gain, or avoid a financial loss, at the expense of the client; or
- an employee of CMC Invest is likely to make a financial gain, or avoid a financial loss, at the expense of the client; or
- a client of CMC Invest is likely to make financial gain or avoid a financial loss at the expense of another client.
- Managing Conflicts of Interest
- A non-exhaustive list of some of the arrangements CMC Invest adopts in order to manage conflicts of interest are:
  - Segregation of duties and supervision for persons engaged in different business activities including procedures for ensuring appropriate communication between business units;
  - Personal account dealing restrictions applicable to all staff and their associates, regardless of seniority;
  - Controls over sources of remuneration for staff, including the maintenance of a remuneration strategy and input on the structuring of the bonus scheme;
  - Protocols to ensure that no improper inducements are given or received and proper inducements are disclosed appropriately;
  - Gifts and personal benefits procedures including a gift register recording the solicitation, offer or receipt of certain benefits;
  - External directorship policy, including the requirement for all external directorships and outside business interests to be declared; and
  - The provision of training to directors and employees of CMC Invest on conflicts of interest management.

## Conflicts Disclosure

If arrangements made by CMC Invest are not or cannot be sufficient to ensure, with reasonable confidence, that risks of damage to the interests of a client will be prevented, CMC Invest will

disclose the general nature and/or source of conflicts of interest and the steps taken to mitigate those risk before undertaking business for/with the client.

Further information on CMC Invest's conflicts of interest policy, including a full version, can be provided upon request. Alternatively, please address any questions to your usual CMC Invest contact.