

Summary Conflicts of Interest Policy

1. INTRODUCTION

Capital Com (UK) Limited's ("CCUK", "the Firm") Summary Conflicts of Interest Policy (this "Policy"), sets out how CCUK complies with its obligations to **establish, implement and maintain effective and transparent systems and controls to have oversight over the identification, prevention, management and monitoring of conflicts of interest**, both between itself and its customers and between a two customers, and compliance with the rules and principles of the Financial Conduct Authority ("FCA").

Changes of the Policy will be communicated to Customers in advance. Customers should notify CCUK immediately in case they do not agree with any changes to the Policy. The Firm reserves the right to terminate a business relationship pursuant to the Firms Terms and Conditions.

2. OUR APPROACH

A conflict of interest is a situation in which a person or organisation is involved in multiple interests, financial or otherwise, and serving one interest could involve working against another.

CCUK has systems and controls in place as it may encounter conflicts of interest in relation to providing a service or activity to its clients.

2.1. Identifying conflicts

A conflict may arise at any time between the interests of the Firm (including managers, employees or any persons directly or indirectly linked to the Firm) and a client or between two or more clients. These may include, but are not limited to:

- the Firm making a financial gain or avoiding financial loss at the expense of the Firm's client;
- an employee of the Firm making a financial gain, or avoiding a financial loss, at the expense of the client; or
- a customer of the Firm is making a financial gain or avoiding a financial loss at the expense of another client.

2.2. Managing conflicts

The Firm has various types of arrangements in place to mitigate conflicts of interest. The below is a non-exhaustive list:

- All employees must disclose any existing and proposed outside business interests, with or without compensation.
- Functional or physical segregation of duties and supervision to prevent the simultaneous involvement of an employee in separate services or activities where such involvement may impair the proper management of conflicts.
- The Firm's Inducements, Gifts and Hospitality Policy ensures that the Firm does not pay to, or accept from, a third party any benefit in relation to business undertaken for a client that would impair the Firm's duty to act in the client's best interest and that does not meet certain strict criteria.
- Remuneration is part of a transparent process that is overseen by the Board designed to avoid conflicts of interest between the Firm, its employees and clients and takes place according to the Remuneration Policy.
- Employees are prohibited from engaging in activities using information inappropriately or that may give rise to a conflict of interest. The Firm is required to adhere to confidentiality rules contained in the Privacy Policy.
- Conflicts may arise between an employee and the Firm. Conflicts between employees are assessed periodically, on at least an annual basis, and are subject to the Firm's Compliance Monitoring Programme.

2.3. Disclosing conflicts

The Firm takes all reasonable steps to prevent conflicts of interest from adversely affecting the interests of its clients, but if those efforts are not sufficient to ensure, that the risks of damage to the interests of a client will be prevented, CCUK must clearly disclose the general nature and/or source of the conflict of interest in writing to the client before undertaking business for the client.

2.4. Monitoring conflicts

The Firm undertakes periodic monitoring of conflicts of interest cases and related records through a number of tests aimed at detecting and reviewing such conflicts.