

## **CONFLICT OF INTEREST MANAGEMENT POLICY**

ICE-FX MARKETS LIMITED, registered at U0064, 3rd Floor, Jalan OKK Awang Besar, 87000 Labuan FT, Malaysia, with registration number LL12180 (hereinafter referred to as the "Company"), has developed this Conflict of Interest Management Policy (hereinafter referred to as "Policy"). The Policy is designed to take all necessary measures on identifying all possible conflicts of interest between the Company (including its employees, brokers or other persons that are related to the Company in any way) and clients, or between clients, which may arise in connection with the services provided or investments carried out.

### **RECOGNITION OF POTENTIAL CONFLICTS OF INTERESTS**

The Company takes into account all the issues when the Company, or a person associated with it, may fall in any of the following situations:

- a. The Company or a person associated with it may receive financial profit, or avoid a financial loss at the expense of the client.
- b. The Company or a person associated with it may be interested in a certain result of the service provided to the client, or a transaction performed in the client's interest that is different from that which the client would like to receive.
- c. The Company or a person associated with it may have financial or other benefits in favor of the interests of other persons, which is different from the client's interests.
- d. The Company or a person associated with it is involved in the same business as the client.
- e. The Company or a person associated with it receives or will receive from another person a reward different from that described in the Contract Details (fees and charges).

### **DEALING WITH CONFLICTS OF INTEREST WHEN THEY ARISE**

Clients' interests are paramount to the Company. Every effort will be made to ensure conscientious and professional relationship with each client. The Company, its employees and related persons should not benefit directly from any conflict of interest. In the Company's structure, there is a designated person who monitors compliance with legal regulations, and also controls and monitors possible deviation from the principles of the Policy adopted by the Company. The Company also engages an external auditor to confirm strict observance of the rules described in the legal documents posted on the Company's website. As part of implementation of this Policy and to achieve the necessary level of its effectiveness, the Company carries out the following measures:

- a. Adheres to its own developed procedures aimed at preventing or controlling the exchange of information between associated persons involved in transactions with a high degree of risk of conflict of interest, when such exchange of information may harm clients' interests.
- b. Monitors the actions of related persons whose functions are to perform operations or services on behalf of clients, whose interests may conflict with each other.
- c. Avoids direct connection of the reward amount for some associated persons performing certain services or activities with the reward amount for other associated persons performing other services or activities, if a conflict of interests may arise directly between the results of providing the services or performing the activities.
- d. Limits or prevents the possibility of any associated person from gaining too much influence or control over execution of investment or other transactions, which may be used by that person to obtain illegal benefit or to obtain benefits that are contrary to the interests of other clients.

To implement the above measures, the Company adheres to the following principles in her activities:

- a. Prevents the use of insider information by associated persons, which may affect trading results.
- b. Cross-checks transactions performed to prevent abuse by any associated person with excessive powers in any area of the Company's business.
- c. Imposes restrictions on the actions of an associated person when executing client's instructions on trading transactions on a Client Account.

If the client has additional questions on other situations related to the Policy, he can seek clarification from the Company's designated official, who monitors compliance, at email address [compliance@ice-fx.com](mailto:compliance@ice-fx.com) or through the Personal Area.