

exness

# Summary of Conflicts Of Interest Policy



## 1. Scope

1.1. EXNESS (the “**Company**”) has established, implements and maintains a conflicts of interest policy for the identification, management and disclosure of conflicts that may arise in the course of conducting business.

1.2. This Summary of Conflicts of Interest Policy (the “**Policy**”) provides a summary of the policy we maintain in order to manage conflicts of interest in respect of the duties we owe to our clients. A complete version of the Conflict of Interest Policy can be provided upon request.

## 2. Situations that can give rise to a conflict

2.1. A conflict of interest may arise where the Company or a relevant person (for example, an employee):

- Is likely to make a financial gain or avoid a financial loss at the expense of the client;
- has an interest in the outcome of a service provided to the client which is distinct from the client's interest in that outcome;
- has an incentive to favour the interests of a client or group of clients over the interest of another client;
- carries on the same business as the client;
- receives/pays or will receive/pay an inducement in relation to a service provided to the client.

2.2. The primary circumstances which may give rise to a conflict of interest are:

- The Company effects or arranges for the effecting of clients' positions with which the Company or affiliated or relevant persons may have direct or indirect material interests;
- The Company utilises the services of affiliated entities;
- The Company pays to and/or accepts from third parties benefits, commissions or remunerations which are paid or received as a result of clients' positions.

## 3. General procedures & controls for preventing and managing conflicts

3.1. The primary measures established by the Company for the purposes of preventing and managing conflicts of interest include but are not limited to:

- Implementing procedures to prevent or control the exchange of information;
- Establishing Chinese walls to restrict the flow of confidential information;
- Segregating duties among relevant persons;
- Requiring relevant persons to disclose any potential conflicts of interest;
- Organizing training sessions concerning conflicts of interest;
- Implementing automation across a wide array of activities;
- Establishing quality controls, monitoring, security reviews, and similar measures;
- Enforcing anti-bribery, anti-corruption, and whistleblowing procedures;
- Defining prohibitions on certain activities that apply to relevant persons;
- Disclosing the conflicts of interest that may not be entirely prevented or managed.

## 4. Client's Consent

4.1. By entering into the Client Agreement with the Company, the client is acknowledging that they are aware of the possibility that the conflicts disclosed in the present Policy may arise and/or exist and consent to the Company to act notwithstanding such conflict.