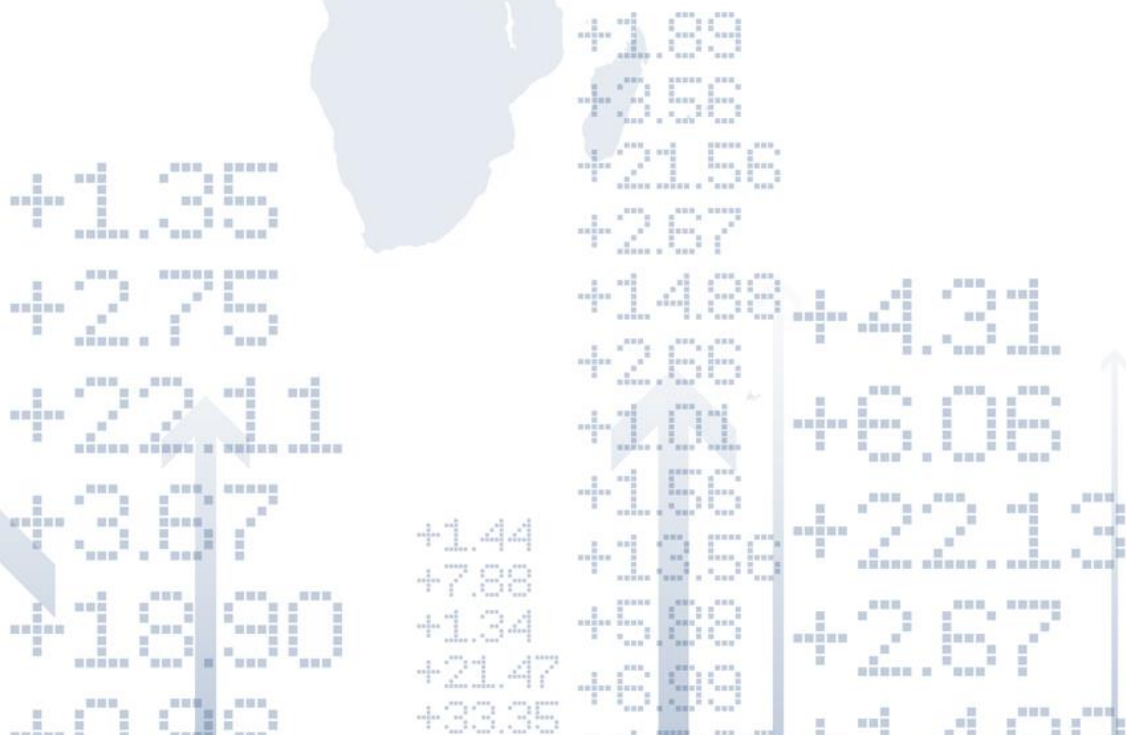


Plus500

World's Trading Machine



Summary Conflicts of Interest Policy





Summary

Conflicts of Interest Policy

1. Introduction

1.1. This is a summary of the policy that we maintain in order to identify and manage conflicts of interest in respect of the duties we owe to our clients.

2. Our Policy

2.1. We aim to establish and maintain and operate effective organisational and administrative arrangements with a view to taking all reasonable steps to prevent conflicts of interest from constituting or giving rise to a material risk of damage to the interests of our clients.

2.2. We endeavour to maintain a record of the types of activity we carry on in which a material conflict could arise or has arisen, and, in doing so, we take account of the activities of other members of our group of companies.

2.3. We also maintain procedures to manage actual or potential conflicts, as outlined in Sections 3 and 4 of this Policy.

3. Types of Conflicts

3.1. A conflict of interest may arise when we (Plus500UK Ltd.), or one of our employees, in the course of providing a client with a service as part of our business:

- i. are likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- ii. have an interest in the outcome of the service or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
- iii. have a financial (or other) incentive to favour the interest of one client, or group of clients, over the interests of another client;
- iv. carry on the same business as the client; or
- v. receive, or will receive, from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service.



4. Managing Conflicts

- 4.1. We maintain appropriate independence between members of our staff who are involved in different activities, for example, through the operation of information barriers, physical separation of staff, the segregation of duties and responsibilities.
- 4.2. The trading terms for each individual client are identical and, as such, the interests of one client are not favoured over another.
- 4.3. We have enhanced procedures and monitoring in place to identify and manage any conflicts that may affect a client's ability to obtain the best prices, speed and additional costs offered on our financial instruments. More information on our pricing and trade execution is detailed in the Summary Order Execution Policy.
- 4.4. Employees are required to adhere to numerous internal policies to prevent insider trading, market manipulation and the misuse of market- or price-related information. Members of our staff will only be given access to such information when required in order to discharge their responsibilities and duties.
- 4.5. No employee may engage in any other employment, outside directorships or provide services to any other person unless specifically approved in writing in advance by senior management. It is strictly forbidden for an employee to participate in any outside business interests which may interfere with the employee's work, or which may give rise to conflicts with the firm or its clients.
- 4.6. We do not prohibit our staff from receiving small gifts and/or minor hospitality from other parties with which we do business. Such gifts and hospitality will only be permitted where, in the opinion of a director or senior manager, it is at a level that is not lavish or excessive and only where it will not impair our duty to act in the best interests of our clients, or other legal (such as Bribery Act 2010) or regulatory obligations.

5. Disclosing Conflicts

- 5.1. Where our arrangements to manage conflicts are not or cannot be sufficient to be reasonably confident that risks of damage to a client's interest will be prevented, we aim to disclose the general nature and/or sources of conflicts before carrying on business for the client.
- 5.2. The disclosure would be to allow the client to consider whether to ask for more information and whether to continue with the service; we do not aim to provide detailed, highly specific or comprehensive information.
- 5.3. Where we consider that there is no means to manage a particular conflict, we may decline to act for the client(s) in question.



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