

## SUMMARY OF CONFLICTS OF INTEREST POLICY

### EQUITI GLOBAL MARKETS LTD

Effective: October 2023

#### 1. Overview

Equiti Global Markets Ltd (“we” or “Equiti”) is a private limited company incorporated in Cyprus with Company Number HE 415535.

Our address is as follows:

Kolonakiou 39,  
FREMA PLAZA, 2nd Floor,  
Ayios Athanasios, 4103,  
Limassol, Cyprus

We are authorised and regulated by the CySEC and are subject to the CySEC regulatory framework. Our CySEC licence number is 415/22.

This constitutes a summary of the Conflicts of Interest Policy that we maintain in order to identify, prevent and manage conflicts of interest in respect of our business and the duties we owe to our clients (this “Summary Conflicts of Interest Policy”).

#### 2. Our Conflicts of Interest Policy

Providing excellent service is at the heart of our business model. In order to achieve this, we take any potential or actual conflict of interest very seriously. We have established organisational and administrative arrangements so that we are able to take all reasonable steps needed to identify, prevent and manage conflicts of interest from constituting – or otherwise giving rise to – a material risk of damage to our clients’ interests.

We continually maintain and update the aforementioned organisational and administrative arrangements, including by reference to regulatory requirements, industry best practices and our ongoing experiences from transacting with our clients and our counterparties.

We maintain a record of the types of activities we carry on in which a material conflict could arise or has in fact arisen. In doing so, we take account of the activities of our group members. Furthermore, we maintain procedures to identify, prevent and manage actual or potential conflicts, as outlined in Section 3 (Examples of Conflicts) and 4 (Managing and preventing Conflicts) of this Summary Conflicts of Interest Policy.

#### 3. Examples of Conflicts

A conflict of interest may arise when we, or one of our employees, associates or group members, in the course of transacting with a client or otherwise providing a service to it. A conflict of interest may arise between Equiti (including its managers, employees and any appointed representatives, or any person directly or indirectly linked to them by control) and a client of the firm, or between one client

with another client of Equiti UK. The following are key examples which we have identified:

- a) Where we take an opposite position to our client (e.g. where a client enters a “buy” order with respect to a CFD and where we engage in a “sell”).
- b) Where we make a financial gain, or avoid a financial loss, resulting from transacting with a client. Such gain or avoidance of loss invariably comes at the expense of the client (e.g. where a client makes a loss on trading a CFD and we make a resulting gain).
- c) Where we have an interest in the outcome of a transaction (or a series of transactions) or the provision of one or more services (e.g. where we generate income from increased trading activities from a client).
- d) Where we have a financial or any other incentive to favour the interest of one client, or group of clients, over the interests of another client, or group of clients.
- e) Where we carry on the same business as the client (e.g. where a client is an investment firm and we compete with it for the same underlying clients).
- f) Where we receive, or where we 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 in accordance with applicable regulations, other than the standard commission or fee for that service.

#### 4. Managing and preventing Conflicts

The following are the methods by which we manage conflicts of interest or, where possible, prevent them arising at all:

- a) Trading on a principal-to-principal only. We always trade as an agent and on an STP basis with our clients. We are careful to maintain this consistent behaviour and aim to match our clients with best fitted counterparties based on their profile.
- b) Identical contractual terms. We have the same contractual terms (such as terms of business) between our professional clients. This means that no specific client is placed in a better contractual position than other client.
- c) No investment advice. We have deliberately based our business model on the basis of not providing investment advice to our clients. Indeed, we are not authorised to do so. As a result, there is no scope for conflicts to arise in this regard.

- d) Specific products only. We only transact in specific products such as CFDs and forex. Our traded products are specified on our website (as updated from time to time.) This ensures that we are not exposing our clients to conflicts arising from products not specifically available for trading. Furthermore, we have policies and procedures in place on product governance to ensure that our products are manufactured and distributed in accordance with the intended target market.
- e) Order execution. Please refer to our Summary Order Execution Policy regarding the manner by which we execute our clients' trades and the safeguards we have established in respect of key criteria.
- a) Internal policies. All of our staff is directly employed by Equiti and only work for us. Any outside interests or roles are strictly monitored and require prior internal approval. Our staff members receive ongoing training in respect of conflicts identification, prevention and management. We have various policies in place (e.g. Market Abuse Prevention, Order Execution, Gifts and Hospitality, Personal Account Dealing, Anti Bribery and Corruption Policy, etc.). We focus heavily on our trading activities to ensure all regulatory requirements are satisfied. There will be separate supervision for staff whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of Equiti.
- b) Inducements. Whilst we do not prohibit our staff from receiving small gifts and/or minor hospitality from other parties, 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 or regulatory obligations.

## 5. Disclosing Conflicts

Where our arrangements to manage conflicts are insufficient to ensure, with reasonable confidence, that risks of damage to a client's interests will be prevented, we will disclose the general nature and/or sources of conflicts and the steps taken to mitigate those risks before carrying on business for, or otherwise transacting with, the client.

The disclosure will explain the risks to the client that arise as a result of the conflicts of interest and include sufficient detail to enable that the client to take an informed decision with respect to the service in the context of which the conflict of interest arises. The disclosure will allow the client to consider whether to ask for more information and whether to continue with the service;

Where we consider that there is no means to manage a particular conflict, we may decline to act for the client(s) in question.

## 6. Contact Information

If you have any queries about this Summary Conflicts of Interest Policy, please email us ([compliance@equiti.com](mailto:compliance@equiti.com)) or write to the following address:

Compliance Department  
Kolonakiou 39,  
FREMA PLAZA, 2nd Floor,  
Ayios Athanasios, 4103,  
Limassol, Cyprus