

London **FX**



www.londonfx.com

Conflict of Interest Policy

LondonFX is a brand name owned and operated by K-DNA Financial Services LTD (hereinafter called the “Company” or “K-DNA Financial Services LTD”), regulated company by the Cyprus Securities and Exchange Commission license 273/15, incorporated and registered under the laws of the Republic of Cyprus, registration No. 335683, registered office at 56 Griva Digeni Avenue, Anna tower, First floor, 3063, Limassol, Cyprus. Following the implementation of the Markets in Financial Instruments Directive (MiFID) in the European Union and in accordance with the Investment Services and Activities and Regulated Markets Law of 2007 in Cyprus, the Company is required to provide its clients and potential clients information regarding potential or existing Conflict of Interest Policy.

The Company is required to take all reasonable steps to detect and avoid conflicts of interest. The Company is committed to acting honestly, fairly and professionally and in the best interests of its clients and to complying, in particular, with the principles set out in the above legislation when providing investment services and other ancillary services related to such services.

This policy forms part of the Client’s agreement with the Company and therefore by entering into an agreement with the Company you also agree to the terms of this Policy, as set out in this document.

This Policy is not intended to, and does not create third party rights or duties that would not already exist if the Policy had not been made available.

Conflict of interest purpose

The purpose of this document is to identify, prevent and manage conflict of interest, which may arise during the course of the company’s activities between the company and its clients or between one client and another. Accordingly, the Company has adopted a conflicts of interest policy setting out the procedures, practices and controls in place to achieve this

Scope

The Policy applies to all its directors, employees, any persons directly or indirectly linked to the Company (hereinafter called “related persons”) and refers to all interactions with all clients.

Identification of Conflict of Interest situations

For the purposes of identifying the types of conflict of interest that arise in the course of providing investment and ancillary services or a combination thereof and whose existence may damage the interests of a client, the Company takes into account, whether the Company or a relevant person,

is in any of the following situations, whether as a result of providing investment or ancillary services or investment activities or otherwise:

- The company or relevant person is possible to make a financial gain, or avoid financial loss at the expense of the client.
- The company or a relevant person carries the same business with the client.
- Conflict of interest which may arise between the company clients and the company and/or between the clients themselves.
- The Company or relevant person has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;
- The Company or relevant person has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
- The Company or relevant person receives 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.
- Performance – related remuneration of employees and agents.

Management of Conflict of Interest situations

The company maintains internal policies and procedures in order to prevent conflict of interest, the company compliance department is responsible and monitoring to ensure the implementation and execution of the policies and the procedures.

In general, the procedures and controls that the Company follows regarding conflict of interest include the following measures:

- Policies and procedures to prevent or control the exchange of information between relevant persons engaged in activities involving a risk of a conflict of interest where the exchange of that information may harm the interests of one or more clients;
- The separate supervision of relevant persons 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 the Company;
- The removal of any direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration of, or revenues generated by, different relevant persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities;
- Measures to prevent or limit any person from exercising inappropriate influence over the way in which a relevant person carries out investment or ancillary services or activities;
- Measures to prevent or control the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services or activities where such involvement may impair the proper management of conflicts of interest. Such measures include the following:

The following internal policies and procedures should prevent conflict of interest:

- “Need to know” – that applies to the dissemination of confidential or inside information within the group.
- Chinese walls – restricting the flow of confidential and/or internal information within the company and this includes the physical separation of various departments of the company.
- Personal account dealing requirements applicable to relevant persons in relation to their own investments.
- Separation of duties that may give rise to conflicts of interest if carried on by the same individual.
- A gifts and inducements register, recording the solicitation, offer or receipt of certain benefits.
- The prohibition of external business interests conflicting with our interests as far as the Company’s officers and employees are concerned, unless board approval is provided.
- Procedures governing access to electronic data
- Establishment of the four-eye principle in supervising the Company’s activities
- Appointment of Internal auditor to ensure that appropriate systems and controls are maintained and report to the Company’s Board of Directors
- Establishment of in-house Compliance Department to monitor and report on the above to the Company’s Board of Directors
- Establishing the compliance department, which should monitor the company activity, directors’ activity, implement procedures according to CySEC directives and to monitor the employees’ activity.

Where a conflict arises and the Company is aware of it, it will disclose the conflict to the client prior to undertaking investment business for that client or, if it does not believe that disclosure is appropriate to manage the conflict, we may choose not to proceed with the transaction or matter giving rise to the conflict.

The company reserves the right to change its policy whenever this is deemed to be appropriated. The updated conflict of interest policy will be posted on LondonFX website: www.LondonFX.com (hereinafter the “website”), the client accepts posting update conflict of interest policy as official notice to the client. K-DNA Financial Services LTD encourage the client to check and to be updated regarding the conflict of interest policy agreement and other agreements in the legal documentation section.

Conflict of interest updates

K-DNA Financial Services LTD reserves the right to update the conflict of interest policy whenever this is deemed to be appropriated.

The update will be posted in LondonFX website, the client accepts posting updated conflict of interest policy as official notice to the client. K-DNA Financial Services LTD encourage the client to check and to be updated regarding the conflict of interest policy agreement and other agreement under the legal documentation section.

In case of further questions of information do not hesitate to contact us compliance@LondonFX.com.

Review date: April 2017