## **Conflicts of Interest Policy**

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PURE DMA TRADING
GUARANTEED
STP EXECUTION







## Tier1FX (Bermuda) Limited

## **Conflicts of Interest Policy**

Tier1FX (Bermuda) Limited ("Tier1FX") maintains and operates effective organizational and administrative arrangements with a view to taking all reasonable steps designed to prevent conflicts of interest that can adversely affect the interest of our clients.

In this regard, Tier1FX takes all steps to identify conflicts of interest within the firm and any person directly or indirectly linked to us by control or between our client and another that arise in the course of business.

In compliance with the above, Tier1FX established its Conflicts of Interest policy which is detailed in the Customer Agreement. The above policy outlines the instances when conflicts of interest could arise and how such situations can be managed in the best effective manner in the interest of our clients. Where a conflict of interest cannot be avoided, this shall be duly disclosed on before the undertaking of business with prospective clients.

As part of its efforts to manage conflicts of interest, Tier1FX management has undertaken the following measures, which include but not limited to:

- a) Keeping an insider list for controlling sensitive information as well as for 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:
- b) Implementing rules governing the acceptance and granting of benefits as well as their disclosure;
- c) Keeping a black list to address possible conflicts of interest, among other things, by means of prohibitions to conclude business as well as by a prohibition of financial analysis;
- d) Prohibiting employees of Tier1FX from having their own trading account with the firm or from using or disclosing client data for purposes other than for the benefit of the client in line with our procedures;
- e) Preventing the use of promotional, research and trading data to the disadvantage of any client;
- f) Preventing dealing unfairly with any client in any matter affecting the welfare of the client.

If conflicts of interest cannot be avoided, Tier1FX will disclose them to the client concerned before carrying out of an order.