

# Conflicts of Interest Policy

November 2023



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.

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Tier1FX International is the branded offering of Tier1FX (Bermuda) Limited, a company incorporated and registered in Bermuda with registration number 53475 and registered address Clarendon House, 2 Church Street, Hamilton, HM 11, Bermuda.

**Risk Disclaimer:** OTC leveraged products, including CFDs, are complex investments, which come with a high risk of losing money rapidly due to leverage. You acknowledge that trading derivative financial instruments, including foreign exchange, futures, options, contracts for differences and commodities carry a substantial potential risk of loss and you understand the risks involved and that you are willing to undertake this risk. You further confirm your understanding that the value of these financial instruments is influenced by the price changes of their underlying reference instruments, that these prices may fluctuate both rapidly and widely, that such factors can be neither predicted nor controlled by any party, and that leverage, or "gearing" will disproportionately impact the results of any such transactions. Losses can therefore quickly compound. You will be responsible to ensure your account has sufficient margin to sustain your trading activity. You should consider carefully whether you understand how CFDs work and whether you can afford to take the high risk of losing your money.