

# **Conflict of Interest Policy**



## **1. INTRODUCTION**

- 1.1 Concorde Investments (Cyprus) Ltd hereinafter referred to as the ‘Company’, with registered office at 4, Pavlou Nirvana Street, Alpha Tower, Office 13, 3021 Limassol, Cyprus, is authorised and regulated by the Cyprus Securities and Exchange Commission (‘CySec’), with a licence No. 189/13.
- 1.2 Under the Law 87 (I) the Company is required to take all reasonable steps to detect and avoid conflicts of interest. The Company is committed to act honestly, fairly and professionally and in the best interests of its Customers and to comply, in particular, with the principles set out in the above legislation when providing investment services and other ancillary services related to such investment services.
- 1.3 The Company provides herein a summary of the policy it maintains in order to manage conflicts of interest in respect of the duties it owes to its Customers.

## **2. SCOPE OF THE POLICY**

- 2.1 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 Customers.

## **3. IDENTIFICATION OF CONFLICTS OF INTEREST**

- 3.1 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 Customer, 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:
  1. The Company or a relevant person is likely to make a financial gain, or avoid a financial loss, at the expense of the Customer;
  2. The Company or a relevant person has an interest in the outcome of a service provided to the Customer or of a transaction carried out on behalf of the Customer, which is distinct from the Customer's interest in that outcome;
  3. The Company or a relevant person has a financial or other incentive to favour the interest of another Customer or group of Customers over the interests of the Customer;
  4. The Company or a relevant person participates in the same business as the Customer;
  5. The Company or a relevant person receives or will receive from a person other than the Customer an inducement in relation to a service provided to the Customer, in the form of monies, goods or services, other than the standard commission or fee for that service.

## **4. PROCEDURES AND CONTROLS TO MANAGING CONFLICTS OF INTEREST**

- 4.1. In general, the procedures and controls that the Company follows to manage the identified conflicts of interest include the following measures:
1. Effective 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 Customers;
  2. The separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, Customers whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Company;
  3. 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;
  4. 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;
  5. A 'need to know' policy governing the dissemination of confidential or inside information within the Company;
  6. Chinese walls restricting the flow of confidential and inside information within the Company, and physical separation of departments;
  7. Procedures governing access to electronic data;
  8. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual;
  9. Personal account dealing requirements applicable to relevant persons in relation to their own investments;
  10. A gifts and inducements log registering the solicitation, offer or receipt of certain benefits. Prohibition of external business interests conflicting with the Company interests as far as the Company's officers and employees are concerned, unless Board of Directors approval is provided;
  11. A policy designed to limit the conflict of interest arising from the giving and receiving of inducements;
  12. Appointment of Compliance Department to monitor and report on the above to the Company's Board of Directors;
  13. Appointment of Internal auditor to ensure that appropriate systems and controls are maintained and report to the Company's Board of Directors;
  14. Establishment of the four-eye principle in supervising the Company's activities;
  15. The Company also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate.

**16. DISCLOSURE**

- 5.1 When the Company becomes aware of a situation where a conflict arises, the Company will disclose it to the Customer prior to undertaking investment business from that particular Customer, or if the Company does not believe that disclosure is appropriate to manage the conflict, the Company may opt not to proceed with the transaction or matter giving rise to the conflict.
- 5.2 The Company reserves the right to review and/or amend its Policy and arrangements whenever deemed appropriate.