

Conflicts of Interest Policy

SpreadMarket.com is a trading name of ayondo markets Limited. ayondo markets Limited is a company registered in England and Wales under register number 03148972. ayondo markets Limited is authorised and regulated by the Financial Conduct Authority, FCA Register number 184333.

Introduction

We owe a certain duty to our clients in respect of managing any conflicts of interest which may arise. Outlined below is a detailed plan of our Policy.

Explanation

Conflicts of interest can arise between us, our directors, staff and any of our associates and you, the client. Client-to-client conflicts may also arise. It is the scope of this policy to prevent and deal with these conflicts should they arise. We aim to maintain effective procedural and operational policies in order to deal with, and prevent any such situations.

Potential Conflicts

Conflicts of interest may take many forms but they can all be defined as causing material risk of damage to the interests of a client. Such situations include, but are not limited to, where we or any person or entity directly associated with us:

- is likely to benefit financially at the expense of a client
- is likely to limit or avoid financial loss at the expense of a client
- has a particular leaning towards the interest of one client over that of another which could potentially result in financial gain
- designs, markets or recommends a product or service without considering the interests of the client
- receives monies, goods or services outside of the standard commission or other fee/remuneration for that service

Safeguards

We enforce several methods and procedures to ensure compliance with our Conflicts of Interest Policy. A summary of these is detailed below.

- Maintenance of appropriate independence between members of staff who are involved in different activities
- Physical separation of staff through 'Chinese Walls' – restriction of personal or sensitive information
- We insist that all employees sign and adhere to a Personal Account Dealing Notice. This document applies to ALL employees and directors and a record of receipt and signature is maintained by the Compliance Officer. The Personal Account Dealing notice applies to employees in relation to their own investments.

- We employ a gifts and inducements policy to log and control the receipt of certain gifts by employees and directors of the company. It is reasonable to allow our employees to receive small gifts and minor hospitality. However, if in the opinion of a director or the Compliance Officer, the gift is sufficiently lavish or large as to be viewed as a compromise to the best interests of the client, the gift must be reported to/noted by the Compliance Officer and such benefits of the gift may be denied.
- Employees may not give advice to clients (unless part of a dedicated research/advisory group). Any such research/advisory would, in all circumstances, be physically segregated from any standard execution-only client dealing function.
- We operate a 'Whistle Blowing' policy. If any employee believes the company is acting wrongly and incorrectly with regards to any regulatory procedures, they may act by contacting, in confidence, the Financial Conduct Authority (FCA).

If a conflict does arise, we will disclose this to the client prior to carrying out any business for that client. If we do not believe the disclosure is appropriate to manage the conflict, we may opt not to proceed with the transaction or matter giving rise to the conflict.

For more information, please contact our Customer Services department.