



Lykke Vanuatu Ltd

Conflict of Interest Policy

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1. Introduction

- 1.1. Lykke Vanuatu Ltd. (hereinafter referred to as Lykke Vanuatu Ltd. or the 'Firm') is incorporated (Certificate Firm No. 17909) in the Republic of Vanuatu. Our registered office is S.I.P Building, P.O. Box 3010, Rue Pasteur, Port Vila, Vanuatu. Lykke Vanuatu Ltd. is authorised and regulated by the Vanuatu Financial Services Commission ('VFSC'). VFSC number is 17909.
- 1.2. The Firm is required to provide its clients and potential clients with a summary of its Conflicts of Interest Policy (hereinafter the "Policy").
- 1.3. Under the above legislation, the Firm is required to take all reasonable steps to detect and avoid conflicts of interest between:
 - the Firm, including its managers, employees, appointed representatives, or any person directly or indirectly linked to them by control, and a client of the Firm; or
 - one client of the Firm and another client.

The Firm is committed to act honestly, fairly and professionally and in the best interests of its clients 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 services.

- 1.4. We provide here a summary of the policy we maintain in order to manage conflicts of interest in respect of the duties we owe to our clients.
- 1.5. 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, nor does it form part of any contract between the Firm and any client.

2. Scope of the Policy

- 2.1. The Policy is provided to you in accordance with the VFSC on the basis that you are proposing to trade with Lykke Vanuatu Ltd in contracts for difference ('CFDs') which are leveraged products, incur a high level of risk and can result in the loss of all your invested capital.
- 2.2. The purpose of this document is to set out the Firm's approach to identifying and managing conflicts of interest which may arise during the course of its business activities. The Policy applies to all its directors, employees, any persons directly or indirectly linked to the Firm (hereinafter called "related persons") and refers to all interactions with all clients.
- 2.3. The aim of our Policy is to identify and prevent conflicts of interest which may arise between the Firm and its clients or between one client and another. Accordingly, we have adopted a conflicts of interest policy setting out the procedures, practices and controls in place to achieve this.

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 client, the Firm takes into account, whether the Firm or a relevant person or a person directly or indirectly linked by control to the Firm, is in any of the following situations, whether as a result of providing investment or ancillary services or investment activities or otherwise:

- The Firm or relevant person is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- The Firm 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 Firm 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 Firm or relevant person carries on the same business as the client;
- The Firm 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.

4. Managing Conflicts of Interest

4.1. The Firm has set up internal policies and has an in-house Compliance Department that is responsible for identifying and managing potential conflicts of interests. The above will also update the relevant internal procedures and ensure compliance with such procedures.

4.2. The Firm maintains and operates effective organisational and administrative procedures to manage and prevent the identified conflicts of interest from constituting or giving rise to a material risk of damage to the interests of its clients. The Firm also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate.

4.3. The measures adopted are designed to ensure that relevant persons engaged in different business activities involving a conflict of interest carry on those activities at a level of independence at a level of independence appropriate to the size and activities of the firm and its Group, and to the materiality of the risk of damage to the interests of the client.

In general, the procedures and controls that the Firm follows regarding conflicts of interest include the following measures to ensure the requisite degree of independence:

- 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 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 Firm;
- 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.

4.4. Some of these policies and procedures established to prevent Conflicts of Interests are shown below:

- A 'need to know' policy governing the dissemination of confidential or inside information within the Group;
- Chinese walls restricting the flow of confidential and inside information within our Firm, and physical separation of departments;
- Procedures governing access to electronic data;
- Segregation of duties that may give rise to conflicts of interest if carried on by the same individual;
- Personal account dealing requirements applicable to relevant persons in relation to their own investments;
- A gifts and inducements log registering the solicitation, offer or receipt of certain benefits;
- The prohibition of external business interests conflicting with our interests as far as the Group's officers and employees are concerned, unless board approval is provided;
- A policy designed to limit the conflict of interest arising from the giving and receiving of inducements;
- Establishment of in-house Compliance Department to monitor and report on the above to the Firm's Board of Directors;

- Appointment of Internal auditor to ensure that appropriate systems and controls are maintained and report to the Firm's Board of Directors;
- Establishment of the four-eyes principle in supervising the Firm's activities.

5. Disclosure

5.1. Where arrangements made by the Firm are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of the client will be prevented, the Firm will, if it is aware of it, disclose the general nature and/or sources of conflicts of interest to a client prior to undertaking investment business for that client. The disclosure will be made by way of a written notice and will include sufficient detail to enable the client to take an informed decision with respect to the service in the context of which the conflict of interest arises.

If the Firm 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.

5.2. The Firm reserves the right to review and/or amend its Policy and arrangements whenever it deems this appropriate. Further information about the Policy is available upon request.

6. FAQs

Questions regarding the Conflicts of Interest Policy should be addressed, in the first instance, to the Customer Support Department.

7. Contacts

Customer Support Department E-mail: support@lykke.vu

Compliance Department E-mail: compliance@lykke.vu