

## INFORMATION ON Conflicts Policy

# Introduction

The purpose of this document is to provide information on Spread Co Limited's (Spread Co) policy on conflicts of interest and its approach to managing any conflicts of interest fairly: both between Spread Co, our directors, employees, group companies and associates (the Spread Co Group) and our clients, and between your interests and those of other clients. It is required under the EU Markets in Financial Instruments Directive (MiFID) and will apply from 1 November 2007.

## 1 Spread Co's Conflicts Policy

Spread Co aims to establish and maintain effective systems, controls and procedures which are designed to identify and manage actual and potential conflicts of interest in the course of its business that pose a material risk to clients' interests.

Spread Co keeps a record of potential conflicts of interest which could arise during its activities and takes into account, among other things, whether the Spread Co Group:

- (a) is likely to make a financial gain, or avoid a loss, at the expense of a client
- (b) has an interest in the outcome of a service or transaction provided to a client, which is distinct from the client's own interest in that outcome
- (c) has a financial or other incentive to favour the interest of a client or group of clients over the interests of another client
- (d) carries on the same business as the client
- (e) receives 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.

Dealing in contracts for differences as principal, personal account dealing, inducements and gifts and entertainment are all examples of situations in which potential conflicts of interest may arise.

## 2 Management of Conflicts

Having identified potential conflicts of interest, Spread Co has procedures in place to manage conflicts promptly and fairly. The following minimum systems, controls and procedures are in place:

- (a) procedures to ensure that the compliance function operates with appropriate independence
- (b) procedures to prevent or control the exchange of information between relevant persons engaged in activities involving a conflict of interest, where exchange of that information may harm one or more clients
- (c) supervisory arrangements providing for the separate supervision of employees, where this is necessary for the fair management of conflicts of interest
- (d) controls to monitor outside business interests
- (e) procedures to ensure that disclosures are fair, clear and not misleading, so that clients can make an informed decisions
- (f) rules on personal account transactions to which relevant persons are subject
- (g) periodic reviews of the effectiveness and continued relevance of Spread Co's systems and controls
- (h) Spread Co's execution policy, which aims to ensure the best possible outcome on client orders
- (i) rules on inducements, gifts and entertainment which apply to the Spread Co Group

## 3 Disclosure

When there is no effective way of managing a conflict, this will be disclosed in outline in Spread Co's Terms of Business. You may request further information from Spread Co in relation to such conflicts in order to enable you to make an informed decision about whether to deal with Spread Co in particular circumstances. In addition, Spread Co may decline to act for you if the conflict of interest cannot otherwise be effectively managed.

## 4 Further Details

For further details of how Spread Co manages conflicts of interest, please contact [info@spreadco.com](mailto:info@spreadco.com).

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