

# CONFLICTS OF INTEREST POLICY



## Summary description of the Conflict of Interest Policy

FXGrow offers financial services to various groups of customers (private and commercial customers). These services relate to financial derivatives, in particular spot Foreign Exchange and Precious Metals Contracts and Contracts for Differences (CFDs). Conflicts of interest may result from the fact that FXGrow does not perform its services exclusively for the Customer, but also for third parties the interests of which may collide with the ones of the Customer and that FXGrow has a commercial interest in concluding business with the Customer. Such conflicts of interest cannot always be excluded in advance. In accordance with the requirements of law, we therefore inform you below of these possible conflicts and our measures for dealing with such conflicts of interest.

### ► Conflicts of Interest

Conflicts of interest may arise between FXGrow (hereinafter also referred to as "FXGrow"), our management, our employees, Introducing Brokers bound by contract or other persons affiliated with our company and our customers or between our customers. Conflicts of interest may arise in particular:

1. On account of the fact that FXGROW does not provide its services exclusively to the Customer, FXGROW interest with third parties may collide with the customers' interests. Although FXGROW uses its best efforts to avoid such conflicts, it cannot be excluded that this might fail in the individual case. If such conflicts occur, the risk that they are settled at the customer's expense cannot be excluded.
2. On account of the interest of FXGROW and its agents in high transaction volumes in the financial instruments chosen and traded in by customer's and on account of the remunerations for FXGROW and its agents resulting from these transactions.
3. On account of profit-related remuneration of employees and agents or the granting of additional remuneration to these persons or by these persons.
4. On account of the interest in obtaining distribution commissions.
5. When preparing financial analyses on currencies and precious metals and financial instrument offered by FXGROW.
6. On account of the interest of FXGROW, its sales units and the agents acting for FXGROW in the sale of financial services provided by FXGROW on account of internal incentives, success-related remuneration schemes and the granting of additional remuneration
7. On account of personal relationships of the FXGROW employees or the management or the affiliated persons or the participation of these persons in supervisory or advisory boards.  
Furthermore, contracting parties of FXGROW (e.g. tied agents, introducer, etc.) may be subject to conflicts of interest themselves. These conflicts may result from the fact that FXGROW may give to the contracting parties up to 70% of the fees payable to FXGROW by clients for their services depending on the financial products to be sold.  
FXGROW would like to point in particular to the following points:

If a third agreement on performance-related remuneration is concluded between FXGROW and an investment manager, another conflict of interest may arise consisting in the fact that the manager takes unreasonable risks for achieving a performance as high as possible and the associated increased remuneration. This risk is reduced through an internal observation of the investment decisions made and the combination with other fixed components of remuneration. We pay in part success-related commissions and fixed fees to agents and Introducing Brokers bound by contract who refer clients to us with or without reference to an actual transaction or individual transactions. Furthermore, Introducing Brokers may also receive benefits directly from third parties, in particular investment companies and security issuers, in addition to agent commissions paid by us. On request, FXGROW will provide the client with further details on these principles.



## ► Measures for Avoiding Conflict of Interest

FXGROW itself and its employees have set high standards in order to avoid the influence of inappropriate interests on the carrying out of clients' orders. These standards include the observation of market rules in continuous consideration of the clients' interests as well as legal and professional action. As a matter of principle, the client's interest has priority.

An independent compliance department is responsible for the permanent observation of possible conflicts of interests. To this effect, the following measures have been taken in particular:

1. Keep an insider list for controlling sensitive information as well as for preventing abuse of insider knowledge.
2. Rules governing the acceptance and granting of benefits as well as their disclosure.
3. Keep 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.
4. Employees are subject to FXGrow Conflicts of Interest Policy whereby they are obliged to disclose their own financial transactions in relation to Foreign Exchange and Precious Metal trading to FXGrow Compliance Department.
5. Detailed staff training about management of conflicts of interests.
6. Creation of new and maintenance of existing areas of confidentiality. To this effect, among other measures, Chinese walls are built and individual areas within FXGrow are spatially separated with the scope of preventing the sharing of information or relevant persons from exercising inappropriate influence.
7. Removal of any direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration or revenues generated by different relevant persons principally engaged in another activity where a conflict of interest may arise in relation to such activities.
8. If conflicts of interest cannot be avoided, we will disclose them to the client concerned before the carrying out of an Order.
9. Furthermore, we will permanently improve the internal controls and measures for avoiding conflicts of interest. If the measures described above are not enough to avoid the risk of a negative effect, FXGrow will explain to you the general type and source of the conflict of interest before carrying out of an order.

On request, we will provide you with further details on the dealing with conflicts of interest

## ► Rollovers

- In the absence of an offsetting or closing liquidation trade executed prior to the relevant cut-off time on any Business Day, FXGrow is irrevocably authorized (which mandate is given by way of security to FXGrow which declares to have an interest therein) to rollover all or any portion of the Open Positions in Customer's Account at FXGrow's absolute and sole discretion and at Customer's risk to the next settlement date and to perform such acts as may be required for the rollover to be effected.

- Rollovers will be executed at rates determined by FXGrow and at FXGrow's absolute and sole discretion. Rollover debits or credits will be reflected in the Customer's Account at a time after the normal close of the Business Day.

- All fees and charges are due and payable immediately. Any sum due to us pursuant to this Agreement may be deducted by us from the proceeds of any transactions or debited from your account with us.

- FXGrow reserves the right to change at its sole and absolute discretion, any rollover debits or credits (Swap rates) at any time if FXGrow, at its absolute and sole discretion, deems that the amount debited or credited was in error. FXGrow will display the rollover debits or credits (Swap rates) for the respective Spot Foreign Exchange/ CFD/ Precious Metals on its website and/or on its Trading Platform and automatically update Customer reports to reflect the cash flow. FXGrow reserves the right to charge backdated and/or change the credits or debits at its sole discretion if the original amounts are in wrong due to an error or omission.

Risk Warning

*Trading leveraged products such as Forex and CFDs involves substantial risk of loss and may not be suitable for all investors, since leverage can work both to your advantage and disadvantage. As a result, trading such products is risky and you may lose all of your invested capital. Therefore, you should not risk more than you are prepared to lose. Before deciding to trade, you need to ensure that you understand the risks involved taking into account your investment objectives and level of experience. Seek independent advice, if necessary. Please read FxGrow's full Risk Disclosure Statement.*

