



FINANCIAL TRADING DIMENSIONS

CONFLICT OF INTEREST POLICY

IMPORTANT

please read this information before you complete the form



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1. INTRODUCTION

Under the rules of the BVI Financial Services Commission, this policy provides information on the Conflict of Interest for FTD Limited (together referred as “FTD”, “we”, “our” or “us”) (the “Conflict of Interest Policy”).

2. GENERAL INFORMATION

This Conflict of Interest Policy (hereinafter, the “Policy”) is provided to you pursuant to which the Company is required to take all appropriate 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 fulfill all the requirements of the relevant applicable law when providing investment services and other additional services related to such investment services.

This document’s purpose is to demonstrate the Company’s approach to the identification and management of conflicts of interest that may occur during the course of its regular business operations. This document also identifies circumstances that can result in a conflict of interest.

The Company shall take all reasonable measures for the identification, management, prevention and/or disclosure any conflict of interest within its organization, with its Customers and between its Customers, to avoid conflicts of interest from adversely affecting the Customers’ interests.

3. SCOPE

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.

4. IDENTIFICATION OF CONFLICTS OF INTEREST

When the Company deals with the Customer, the Company or Related Persons may have an interest, relationship or arrangement that is material in relation to the Transaction concerned or that it conflicts with the Customer’s interest. While it is not possible to define precisely or create an exhaustive list of all relevant conflicts of interest that may arise, as per the current nature, scale and complexity of the Company’s business, the following list includes circumstances which constitute or may give rise to a conflict of interest entailing a material risk of damage to the interests of one or more Customers, as a result of providing investment services:

- a. The Company or a Related Person has a financial gain or is likely to make a financial gain or avoid a financial loss on account of a Customer;
- b. The Company or a Related 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 outcome in that outcome;
- c. The Company or a Related Person has a financial or other inducement to favour the interests of one Customer over the interests of another Customer;
- d. The Company or a Related Person has business interests or is involved in the same area of business as the Customer;
- e. The Company or a Related Person receives, in connection to the service provided to a Customer, incentives from a third party which are not part of the standard commission or fee for that service.



5. PROCEDURES AND CONTROLS FOR MANAGING CONFLICTS OF INTERESTS

In general, the procedures and controls that the Company follows to manage the identified conflicts of interest include, but are not limited to, following measures:

- a. 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;
- b. The separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, Customers whose interest may conflict, or who otherwise represent different interests that may conflict, include those of the Company;
- c. 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;
- d. 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;
- e. A policy designed to limit the conflict of interest arising from the giving and receiving of inducements;
- f. Chinese walls restricting the flow of confidential and inside information within the Company;
- g. Procedures governing access to electronic data;
- h. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual;
- i. Prohibition of external business interests conflicting with our interests as far as the Company's officers and employees are concerned, unless Board of Directors approval is provided;
- j. A "need-to-know" policy governing the dissemination of confidential or inside information within the Company;
- k. Establishment of the "four-eye" principle in supervising the Company's activities;
- l. Measures to prevent or control the simultaneous or sequential involvement of a Related Person in separate investment services where such involvement may impair the proper management of conflicts of interest;
- m. On-going monitoring of business activities to ensure that internal controls are appropriate;
- n. Requirement of staff members to immediately notify the Company in case they perceive that a conflict of interest may be created due to the undertaking of a specific task/work;
- o. Advises/recommendations on transactions are prohibited;
- p. Forbiddance for staff members to accept gifts, promotions, discounts or any other monetary benefit in kind from Customers or third parties, which may create conflicts of interest. (Gifts of low value may be accepted after approval from the Company);
- q. In circumstances not covered by the points above and given the nature of a conflict of interest situation, the Company shall decide whether to allow a transaction by notifying the Customer, or not allow the transaction at all;



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6. CONSENT OF THE CUSTOMER

By sealing a Customer Agreement with the Company, the Customer consents to the application of this Policy. Additionally the Customer consents to and authorizes the Company to deal with the Customer in any manner which the Company considers appropriate, notwithstanding any conflict of interest or the existence of any material interest in a Transaction, without prior reference to the Customer.

7. DISCLOSURE OF CONFLICT OF INTEREST

When the measures taken by the Company to manage conflicts of interest are not sufficient to ensure, with reasonable confidence, that the risk of damage to customer's interest will be prevented, the Company will disclose the Conflicts of Interest to the customer in order to prevent a Risk of Damage to Customer's Interest. Prior to carrying out a transaction or providing an investment or an ancillary service to a customer, the Company must disclose any Actual or Potential Conflict of Interest. The disclosure will be in sufficient time, in a durable fashion.

8. RECORD KEEPING

For record keeping purposes, the Company maintains an accurate log which will be updated regularly of all types of investments and ancillary services or investment activities carried out by the Company or on its behalf; in which a conflict of interest entailing a material risk of damage to the interests of one or more customers has arisen.

9. AMENDMENT/REVIEW OF THE POLICY

The Company reserves the right to review and/or amend its Policy and arrangements whenever it deems this appropriate without notice to the Customer.

FTD LIMITED

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FTD Limited is incorporated under the laws of the British Virgin Islands as a BVI BUSINESS COMPANY with registration number 1944994, licensed and regulated by the **BVI Financial Services Commission (FSC)** under **Investment Business License number SIBA/L/19/1123.**