

Conflict of Interest Policy

FOREX CLUB INTERNATIONAL LLC

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1. INTRODUCTION

- 1.1. This Conflict of Interest Policy (the 'Policy') outlines the manner in which FOREX CLUB INTERNATIONAL LLC (referred to as the "Company", "Us", "We"), where applicable, identifies, manages, mitigates or controls any possible conflicts of interest which may arise during the course of your business relationship with us.
- 1.2. The Company is committed to acting honestly, fairly and professionally and in the best interests of its Clients.
- 1.3. The purpose of this document is to set out the Company's approach to identifying and managing conflicts of interest that may arise during the course of its normal business activities. In addition, this document identifies circumstances that may give rise to a conflict of interest.

2. SCOPE OF THE POLICY

- 2.1. The Policy applies to all its directors, employees and any persons directly or indirectly linked to the Company (hereinafter called "Related Persons") and refers to all interactions with all Clients.

3. CRITERIA FOR IDENTIFYING CONFLICTS OF INTEREST

- 3.1. When the Company deals/transacts with the Client, the Company (or an associate or some other person connected with the Company) may have a material interest, relationship or arrangement in relation to the Transaction concerned or that conflicts with the Client's interest. The Company hereby identifies and discloses a range of situations and circumstances that may give rise to a conflict of interest and potentially but not necessarily be detrimental to the interests of one or more Clients.
- 3.2. For the purposes of identifying the types of conflicts of interest that may arise in the course of providing services and whose existence may damage the interest of a Client, the Company takes into account, as minimum criteria, the question of whether the Company, a Related Person or a person directly or indirectly linked by control to the Company is in any of the following discordant situations, whether as a result of providing services or investment activities or otherwise:
 - 3.2.1. The Company or a Related 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.
 - 3.2.2. The Company or a Related Person has a financial or other incentive to favour the interest of another Client or group of Clients over the interests of the Client in question.
 - 3.2.3. The Company or a Related Person carries on the same business as the Client.

- 3.2.4. The Company or a Related Person receives or will receive from a person other than the Client an inducement in relation to a service provided to the Client in question in the form of monies, goods or services other than the standard commission or fee for that service.

4. IDENTIFICATION OF CONFLICTS OF INTEREST

- 4.1. While it is not feasible to define precisely or create an exhaustive list of all relevant conflicts of interest that may arise given the current nature, scale and complexity of the Company's business, the following list includes circumstances that constitute or may give rise to a conflict of interest entailing a material risk of damage to the interests of one or more Clients as a result of providing services:
- 4.1.1. The Company may have an interest in maximising trading volumes in order to increase its commission revenue, which is inconsistent with the Client's personal objective of minimising transaction costs
- 4.1.2. The Company may be providing other services to associates or other Clients of the Company who may have interests in Financial Instruments or Underlying Assets that are in conflict or in competition with the Client's interests
- 4.1.3. The Company is likely to make a financial gain or avoid a financial loss at the expense of the Client
- 4.1.4. The Company's bonus scheme may award its employees based on the Client's trading volume, etc.
- 4.1.5. The Company may receive or pay inducements to or from third parties due to the referral of new Clients or Clients' trading
- 4.1.6. Any market information, training and discussions regarding possible market trends should not be construed as trading/investment advice. It is the Client's responsibility to perform his/her own market research before entering into any position.

5. PROCEDURES AND CONTROLS FOR MANAGING CONFLICTS OF INTERESTS

- 5.1. In general, the procedures and controls that the Company follows to manage the identified conflicts of interest include the following measures (this list is not exhaustive):
- 5.1.1. Ongoing monitoring by the Company of business activities to ensure that internal controls are appropriate.
- 5.1.2. Effective procedures by the Company to prevent or control the exchange of information between Related 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.
- 5.1.3. The separate supervision of Related Persons whose principal functions involve providing services to Clients whose interests may conflict or who

otherwise represent different interests that may conflict, including those of the Company.

- 5.1.4. Measures to prevent or limit any person from exercising inappropriate influence over the way in which the Related Person carries out investment services or ancillary services or activities.
- 5.1.5. 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.
- 5.1.6. A policy designed to limit the conflict of interest arising from the giving and receiving of inducements.
- 5.1.7. Chinese walls restricting the flow of confidential and inside information within the Company and the physical separation of departments.
- 5.1.8. Procedures governing access to electronic data.
- 5.1.9. The segregation of duties that may give rise to conflicts of interest if carried out by the same individual.
- 5.1.10. Personal account dealing requirements applicable to Related Persons in relation to their own investments.
- 5.1.11. The prohibition on officers and employees of the Company from having external business interests conflicting with the interests of the Company without the prior approval of the Company.
- 5.1.12. A "need-to-know" policy governing the dissemination of confidential or inside information within the Company.

6. CLIENT'S CONSENT

- 6.1. By entering into the Client Agreement with the Company, the Client consents to this Policy's application to him/her. Furthermore, the Client consents to and authorises the Company to deal with the Client in any manner that the Company considers appropriate, notwithstanding any conflict of interest or the existence of any material interest in a Trading Operation, without prior reference to the Client.
- 6.2. In the event that the Company is unable to deal with a conflict of interest situation, it shall inform the Client.

7. DISCLOSURE OF INFORMATION

- 7.1. If during the course of a business relationship with a Client or group of Clients, the organisational or administrative arrangements/measures in place are not sufficient to avoid or manage a conflict of interest relating to that Client or group of Clients, the Company will disclose the conflict of interest before undertaking further business with the Client or group of Clients.

8. AMENDMENT OF THE POLICY AND ADDITIONAL INFORMATION

- 8.1. The Company reserves the right to review and/or amend its Policy and arrangements whenever it deems this appropriate according to the terms of the Client Agreement between the Company and the Client.