



CONFLICTS OF INTEREST POLICY

This document on Conflicts of Interest is effective from September 2024 and shall remain effective until a more recent version is released. Finalto Trading Limited reserves the right to amend or supplement this document at any time. This document does not replace our Terms of Business (Client Agreement) which we ask that you read carefully before you enter any trading activity. The prevailing version of this document is always available on our website.

CFDs are complex instruments and come with a high risk of losing money rapidly due to leverage. You should consider whether you understand how CFDs work and whether you can afford to take the high risk of losing your money. Our offering includes products that are traded on margin and carry a high degree of risk to your capital. By trading, you may sustain a loss of some or all of your invested capital, therefore, you should not speculate with capital that you cannot afford to lose. It is possible to incur losses that exceed your initial investment. You should ensure you fully understand the risks involved and seek independent advice if necessary. Services are provided by Finalto Trading Limited on an execution only basis; we do not provide any advice nor should any communication with us, either written or oral, be construed as such.

Finalto Trading Limited is authorised and regulated by the Financial Conduct Authority (FCA), registration number 607305. Finalto Trading Limited is incorporated in England and Wales under company number 08663212. Registered address is 11th Floor Broadgate Tower, Primrose Street, London, England, EC2A 2EW.

SUMMARY CONFLICTS OF INTEREST POLICY

1. Introduction

This document summarises the key elements of Finalto's (the "Firm") Conflicts of Interest policy, outlining how we manage actual and potential conflicts of interest throughout the client/firm relationship and lifecycle. A full copy of the policy is available upon request of our clients.

2. Identification of conflicts

Conflicts are regarded as situations in which a client, or a potential client and their interests' conflict with the interests of other clients, the Firm or with relevant persons relating to the Firm, such as its employees or agents. To protect our clients' interests, we take reasonable steps to identify conflicts of interest that may arise throughout the provision of our services to clients on an ongoing basis. Employees are required remain alert of any potential personal, client facing, or firm facing conflicts of interest and must ensure that all actual or potential conflicts are appropriately escalated to the Compliance Department.

Appendix A outlines some examples of our identified conflicts and management controls.

3. Conflicts prevention and management

We take appropriate steps to operationally manage actual and potential conflicts across the business, including:

- i. physical and electronic information sharing controls which are designed to provide a barrier in the exchange of information which may contribute to a conflict, or where the individuals concerned are subject to a policy of independence;
- ii. implementation of additional control measures specific to the conflict concerned, e.g. system access limitations and regular reporting mechanisms to those implicated to a conflict;
- iii. compliance controls, such as the ongoing maintenance of a Conflicts Register, yearly attestations, firmwide conflicts of interest training, policies and procedures in place for relevant persons of the Firm to follow in relation to conflicts arising from inducements, remuneration structures, personal account dealing, gifts/hospitality and general business interests;
- iv. reviews of products and services prelaunch to ensure any inherent conflicts of interest are properly managed from the outset;
- v. declining to act for the Client concerned;
- vi. disclosing the conflict to the parties concerned and seeking their consent to continue with the transaction.

SUMMARY CONFLICTS OF INTEREST POLICY**4. Disclosure**

Where our efforts to prevent or manage a conflict are restricted, Finalto will, as a last resort, consider whether disclosure of a conflict to any Client(s) that are impacted is necessary. If it is, we will disclose the conflict to the relevant Client(s), in writing, and as soon as possible. It will cover sufficient details of the conflict, so that the Client can assess the details to make an informed decision as to whether they continue with a transaction and/or contractual relationship with us.

5. Compliance and ongoing management of conflicts

All employees are required to comply with our Conflicts of Interest policy, which is reviewed on at least a yearly basis by Compliance. The Board is responsible for conflicts register and policy sign off, and Senior Management is responsible for ensuring that appropriate systems and controls to manage conflicts are in place on an ongoing basis.

SUMMARY CONFLICTS OF INTEREST POLICY**Appendix A****Identified conflicts of interest (not exhaustive list)**

- i. **Scenario:** The Company or Relevant Person may know someone or have an account with one of the Company's liquidity providers which may influence behaviour in a way that conflicts with the interests of the Company's Clients.
Control: Employees are required to notify their line manager and the Compliance Department of any connection with a liquidity provider.

- ii. **Scenario:** Finalto executes buy or sell contract on behalf of Client. If such Client makes profits on their trade, the firm loses money. If the Client makes a loss, the firm profits.
Control: The firm abides by an order execution policy which has been drafted into the mechanics of the platforms to provide best execution to Clients. Compliance does regular checks on execution times and flagged orders to monitor compliance with the best execution policy.

- iii. **Scenario:** Finalto or Relevant Person receives substantial gifts or entertainment from third parties (including non-monetary inducements) that may influence behaviour in a way that conflicts with the interests of the Clients of the business.
Control in place: A register of gifts and entertainment provided by Clients is kept. Training is given to ensure employees are not influenced by such gifts and entertainment.

- iv. **Scenario:** Client facing employee has a personal holding in an exchange traded security and encourages a Client to trade in the security.
Control in place: Employees must have awareness and are bound by personal account dealing rules and must follow Client communication guidelines which do not allow employees to give investment advice. Client communications checked by compliance which view against provision of investment advice.