



FIXI
MARKETS

FIXI PLC
Conflicts of Interest Policy

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FIXI Plc

Conflicts of Interest Policy

The purpose of this Conflicts of Interest policy is to set out the requirements for the Firm in relation to any conflicts of interest and is designed to give guidance on what is expected in relation to any conflicts that could arise. This policy should be read in conjunction with the following to have a comprehensive understanding of the requirements:

- Principle of Business
- Statements of Principles
- Personal Account Dealing Policy
- Gifts and Entertainment Policy
- Other relevant Rules and Regulations

Scope

This policy applies to all employees including senior management and contractors. The Firm respects employees' right to privacy and therefore would not normally take an interest in their conduct outside work. There could however be a potential conflict between an employee's personal conduct and professional duties towards the Firm which should be resolved satisfactorily.

Employees are reminded that they should always treat the Firm's clients, counterparties, and other third parties fairly, professionally and with integrity.

Identifying Conflicts

As a regulated entity, Fixi must take all reasonable steps to identify conflicts of interest between the Firm and a client of the Firm, or one client and another client.

When identifying a conflict of interest that may have a material risk of damage to the interests of a client, as a minimum, the Firm will consider, amongst other things, whether the Firm, its employees, or any other relevant person:

- Is likely to make a financial gain, or avoid a financial loss, at the expense of the client
- 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
- Has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client
- Carries on the same business as the client, or
- Receives or will receive 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.

Managing Conflicts of Interest

- Access to information will be controlled and will be on a 'need to know' basis. The Firm will put in place information barriers in the form of electronic barriers to information to control information flows coming into the Firm, within the Firm, or leaving the Firm.
- Supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Firm
- Limit on any person from exercising inappropriate influence over the way in which a relevant person carries out investment or ancillary services or activities
- Personal Account Dealing Policy will be implemented which specifies the rules and procedures on personal account dealing by employees



- Gifts and Entertainment Policy will be implemented, which details the Firm's rules on the acceptance and offering of gifts and entertainment
- Best Execution Policy will be implemented, governing how Fixi deals with client orders to achieve the best result with their interest in mind
- All employees will receive training on their duties and obligations regarding Market Abuse Regulations
- Relevant staff holding controlled functions will be suitably trained and competent and approved by the FCA

Information Barriers

Fixi will implement information barriers (also known as "Chinese Walls") to control the flow of information on a "need to know basis" whereby information known to persons in one part of the business is not available (directly or indirectly) to those involved in another part of the business.

Access to confidential information will be restricted to those who have a proper requirement for the information consistent with the legitimate interest of a client or the Firm. The purpose is for decisions in one part of the business to be taken without reference to any interest which any other part or any person in any such part of the business may have in the matter.

It is essential that all employees are aware of and respect these information barriers so that the Firm cannot at any time be accused of misusing any confidential information whether it has been entrusted to Fixi by clients, or relates to the operations of a particular business area within the Firm.

Employees who are in any doubt regarding the status or position of information which they have in their possession, or have access to, should contact Compliance.

Conflicts as they arise

Employees need to be aware of the potential conflicts that Fixi could be faced with and consider new events in the light of possible conflicts, and especially:

Employee conflicts- Where the personal interests of any employee conflict with the interests of the Firm

Counterparty conflicts- Where the interests of the Firm and its counterparties either directly conflict or are more generally incompatible, or where the interests of two or more counterparties either directly conflict or are generally incompatible.

Internal conflicts- Where the interests between the Firm's internal units' conflict.

Employees should report to Compliance any actual or potential conflicts of interest.

Compliance will record the raised conflicts of interest, the action taken and the reasoning behind the actions taken. It is imperative that employees report any potential conflicts so they can be managed promptly and successfully.

Compliance will maintain a register of identified conflicts of interests.

Disclosure of Conflicts

Where Fixi considers the arrangements in place to manage potential and/or actual conflicts of interest and not sufficient enough to avoid material risk of damage to a client's interest, Fixi will disclose the general nature and/or sources of the conflict of interest to the client before undertaking any business for the client.

Declining to Act

Where disclosure is not considered adequate in the light of the risks of damage to the interests of a client, Fixi will assess whether it would be appropriate for it to decline to act for the client.

