

## SUMMARY

We provide here a summary of the policy we maintain in order to manage conflicts of interest in respect of the duties we owe to our clients. This applies from 1 January 2019.

## GENERAL

A conflict of interest can arise between the IG Group companies and associates, the directors and staff of such companies ('us') and you as a client, or between your interests and those of another client of ours. Conflicts can also arise as a result of inducements from or to third parties.

We aim to establish and maintain and operate effective organisational and administrative arrangements with a view to taking all appropriate steps to prevent conflicts of interest from constituting or giving rise to a risk of damage to the interests of our clients.

## CIRCUMSTANCES THAT CAN GIVE RISE TO A CONFLICT

A conflict of interest may arise where an IG Group company or a relevant person (for example, an employee), or a person directly or indirectly linked by control to IG Group:

- 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.

For a conflict to arise an IG Group company or linked person must benefit and there must be a possible disadvantage to a client.

## OUR POLICY

We aim to keep a record of the kinds of activity we carry on in which a conflict could arise or has arisen, and, in doing so we take account of the activities of other members of our group of companies. We also maintain procedures to prevent or manage actual or potential conflicts. This includes procedures to maintain appropriate independence between members of our staff who are involved in different activities, for example, through the operation of information barriers, physical separation of staff, the segregation of duties and responsibilities and maintenance of a policy of independence which requires our staff, when providing services to a client, to act in the best interests of the client and to disregard any conflicts of interest; and, in some circumstances declining to act for a client or potential client.