

Conflicts of Interest Policy

iDealing.com Limited (iDealing) conducts a range of investment activities. In so doing, it, or a company with whom it has an association, may from time to time have interests which conflict with its clients' interests or with the duties that it owes to its clients. These include conflicts arising between the interests of iDealing, its associates and employees on the one hand and the interests of its clients on the other and also conflicts between clients themselves.

iDealing's Conflict of Interest Policy includes procedures and controls to safeguard the interests of its clients in circumstance where conflicts may arise. A key element of this policy is that persons engaged in different business activities involving a conflict of interest should carry on those activities independent of one another.

iDealing may also deal as Principal for its own account and may be matching transactions with another client. Procedures are in place in order to protect the client's interest in these instances.

In some cases, iDealing's procedures and controls may not be sufficient to ensure that a potential conflict of interest does not damage a client's interests. In these circumstances, iDealing may consider it appropriate to disclose the potential conflict to the client and obtain the client's formal consent to proceed. However, iDealing may decline to act in any circumstance where there is residual risk of damage to the interests of any client.