



Conflicts of Interest Policy

Tickmill UK Ltd

July 2020



Conflicts of Interest Policy

Tickmill is a trading name of Tickmill UK Limited (the "Company", "us", "we", "our", "ours" or "ourselves" as appropriate) and is authorised and regulated in the United Kingdom by the Financial Conduct Authority ("FCA") under firm reference number 717270. The Company's Principal and Registered Office is 3rd Floor, 27-32 Old Jewry, London EC2R 8DQ (registered company number 09592225).

1. Introduction

Tickmill UK Ltd is committed to taking all necessary steps to identify, manage and resolve conflicts of interest between any of our clients or between us and our clients. Whilst it is not possible to eliminate all sources of potential conflict, we have a duty to act honestly, fairly and professionally in accordance with the best interests of our clients and to comply with the principles set out in the applicable legislation.

2. Definition

- 2.1. We define a conflict of interest as being either:
- a) between us (including our employees, managers or any person directly linked to the Company by control) and you; or
 - b) between yourself and another customer where your interests are materially affected.

3. Areas of Conflict

- 3.1 There are several areas where potential conflicts may arise. They include, but are not limited to:
- a) offering services in different capacities at the same time;
 - b) acting for more than one client in a transaction;
 - c) holding information on other clients that would affect you or them if it was disclosed;
 - d) receiving gifts or entertainment which could conflict with our duties to you; and
 - e) relevant parties pursuing activities or personal relationships potentially detrimental to you.
 - f) issuing financial promotions that might not be fair and clear
 - g) Paying remuneration that might incentivise an employee at the detriment of a client or group of clients
 - h) Computer systems that are designed to charge the client unnecessarily or excessively
 - i) Complaints that are handled fairly and properly.

4. Areas for consideration:

- 4.1 To prevent and to minimise the risk of conflicts of interest, the Company has adopted a number of systems, procedures and controls that are listed below.
- 4.2 Personal account dealing requirements for all employees, including directors, associates, consultants and their immediate family in relation to their own investments.
- 4.3 Restrictions on the flow of information between the different business units of the Company.
- 4.4 Restrictions regarding accessing data stored electronically or in hard-copy form.
- 4.5 Restrictions in the dissemination of trading information.
- 4.6 Restrictions on accepting gifts and inducements and receipt of certain benefits applicable to all employees, including directors, associates, consultants and their immediate family.
- 4.7 The application of segregation of functions that, if performed by the same individual, would increase the risk of a conflict of interest.
- 4.8 The application of a "fit and proper test" before accepting new employees, associates and consultants.
- 4.9 The application of a "appropriateness test" before accepting new clients
- 4.10 Reviews by the board of potential conflicts of interest between external associates of the Company.
- 4.11 Promotion of "whistleblowing" (disclosure of potential conflicting activities) by our employees.
- 4.12 Provision of "awareness campaigns" to alert our employees of the risk of conflicts of interest.
- 4.13 Immediate disclosure to our clients of potential conflicts of interest, if we become aware of any.

Questions regarding Conflicts of Interest should be addressed to:

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