

1. INTRODUCTION

This document sets out a summary of Sigma Broking Limited's (the "**Company**") Conflicts of Interest Policy (the "**Policy**"). The Policy sets out the framework for identifying, preventing and managing conflicts of interest, whether actual, potential or perceived.

The Policy applies to all Staff, which includes contractors for service and temporary staff working for the Company and where applicable, its associated trading names.

References in this Policy to the "**Company**" shall include Associated Companies unless expressly otherwise specified, or where the context provides otherwise. Definitions are located in Appendix I of this document.

2. WHAT IS A CONFLICT OF INTEREST?

A conflict of interest refers to a situation where the interests of a Customer or a potential Customer may be incompatible with those of another Customer, Staff or the Company itself. The Company will take all appropriate steps to identify and to prevent or manage conflicts of interest.

3. IDENTIFYING CONFLICTS OF INTEREST

A conflict of interest can be described as a situation where someone in a position of trust has competing interests (professional and/or personal) which make it difficult to fulfil their duties fairly.

Staff are required to act reasonably and employ good judgement in identifying and responding to potential conflict situations as well as recognising when to seek assistance or escalate them in a timely and appropriate manner. They must disclose personal conflicts appropriately to both their line manager and the Company's Compliance Department.

It is the Company's responsibility to understand its obligation to check whether a new or proposed activity may create a conflict with any existing or proposed activities or relationships within the Company.

4. TYPES OF CONFLICT

A conflict of interest may arise in circumstances where the Company or a member of its Staff:

- is likely to make a financial gain (or avoid a financial loss) at the expense of its Customer;
- has an interest in the outcome of the service provided to its Customer, which is distinct from the customer's interest in that outcome;
- has a financial or other incentive to favour the interests of one Customer (or group of Customers) over the interests of another;
- carries on the same business as a Customer;
- receives an inducement from a third party in relation to a service provided to a Customer, in the form of monetary or non-monetary benefits or services; or
- is in possession of information obtained in the ordinary course of its business which would benefit the individual, or a customer, but such information is not publicly known.

The Company maintains a Conflicts of Interest Register which details the specific conflicts identified within each area of the business, all of which fall within one of the above types of conflicts of interest.

5. MANAGING AND PREVENTING CONFLICTS OF INTEREST

The Company has implemented effective organisational and administrative measures to manage conflicts of interest, which are reviewed annually,

- Standard of Conduct – Staff are provided conflicts training and must abide by the Company’s Code of Conduct and the Policy;
- Separate supervision and segregation of functions - to control the flow of confidential and/or material non-public information.
- Order Execution – policies and procedures to ensure the fair and equitable treatment of Customer orders;
- Inducements – internal controls to ensure that inducements do not impair the Company’s responsibility to act honestly, in accordance with the best interests of the Customer;
- Disclosure and monitoring of personal conflicts relating to Staff;
- Compliance monitoring – to check that the Company’s conflicts management is effective and robust, and to manage exceptions when they may arise.

Any queries, or requests for further information relating to this statement should be addressed to the Compliance Department at compliance@sigma-broking.com.

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Version Control

Document Owner: Compliance

Version No.	Date	Version Author	Approved by	Approval Date	Revisions/Changes
V1	June 2024	Compliance	BoD	June 2024	First draft

APPENDIX I
DEFINITIONS

Associated Companies means in relation to the Company, another company which is from time to time an affiliate, subsidiary, or subsidiary undertaking of, or a holding company or parent undertaking of, or another subsidiary or subsidiary undertaking of a holding company or parent undertaking of, the Company or any Limited Liability Partnership or other vehicle or entity to which the Company transfers any part of its business. The expressions “Subsidiary” and “Holding Company” shall have the meaning ascribed to them by section 1159 of the Companies Act 2006 and “Parent Undertaking” and “Subsidiary Undertaking” shall have the meanings ascribed to them by section 1162 of the Companies Act 2006.

Customer means clients and counterparties of the Company.

FCA means the Financial Conduct Authority, the home state regulator of the Company.

Laws means any law or regulation of application in the United Kingdom relating to the treatment of individuals and groups of individuals, including but not limited to the Equality Act 2010, and the EU Charter of Fundamental Rights.

Staff means consultants, contractors, temporary staff, brokers, employees, and other individuals, such as trainees, apprentices, homeworkers, casual staff, and volunteers working for the Company.