

Conflicts of Interest Policy



FXCM Policy on Conflicts of Interest

1. This policy summarises certain policies adopted by Forex Capital Markets Limited (“FXCM”) for compliance with the requirements of the UK Financial Services Authority (“FSA”) relating to the management of conflicts of interest. This policy applies in respect of all activities undertaken by employees of FXCM.
2. FXCM takes responsibility for identifying and managing any conflicts of interest arising in its business that may entail a material risk of damage to the interests of clients. FXCM have considered, in particular, the potential conflicts of interests arising out of the execution of foreign exchange transactions for its clients. Under FSA rules, a firm is required to take all reasonable steps to identify conflicts of interest between:
 - (a) FXCM, including its managers, employees and FXCM’s affiliates directly or indirectly linked to it by control, and a client; or
 - (b) One client of FXCM and another client.
3. FXCM does not undertake any proprietary trading. The main conflict of interests which may arise in the conduct of FXCM’s business are the potential conflicts of interest between one customer and the firm’s duties to other customers. FXCM has accordingly developed this policy and appropriate procedures to manage these actual and perceived conflicts.
4. The following measures have been adopted in relation to such conflicts of interest:
 - (a) When FXCM executes an order for a client it shall not give any preferential treatment to that client to the detriment of other clients and shall not disclose the details of one client order to other clients other than generic information in respect of client trading trends. Such generic information is not capable of attribution to specific clients.
 - (b) FXCM executes all orders in accordance with its policies and procedures that comply with relevant rules and regulations in relation to transactions which are executed for or on behalf of clients. FXCM’s procedures provide for the prompt, fair and expeditious execution of client orders, relative to other orders. These procedures allow for the execution of otherwise comparable orders in accordance with the time of their reception by FXCM.
 - (c) FXCM procedures are established to ensure that orders executed on behalf of clients are promptly and accurately recorded and allocated and that it carries out otherwise comparable orders sequentially and promptly unless the characteristics of the order or prevailing market conditions make this impractical or the interest of the client require otherwise.
 - (d) FXCM’s procedures are established to ensure that FXCM, its employees and affiliates do not misuse information relating to pending client orders.
 - (e) All employees of FXCM are required to comply with FXCM’s rules and procedures on personal account dealing, in particular that transactions in foreign exchange investments be conducted through FXCM or an approved broker.
 - (f) All employees of FXCM are prohibited from accepting gifts or other inducements from any person with any material interest which is likely to conflict to a material extent with any duty which FXCM and/or its employees owe to customers in connection with its investment business or any duty which such a recipient owes to its customers.
5. FXCM is committed to having an effective and appropriate compliance culture to enable it to deal with any new potential conflicts of interest which may arise in the future. FXCM’s employees are therefore required to monitor any new circumstances giving rise to potential conflicts and to implement appropriate measures to address these including but not limited to establishing information barriers.
6. In the unlikely event that FXCM’s arrangements to manage conflicts of interest are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of a client will be prevented, FXCM must clearly disclose the general nature and/or sources of conflicts of interest to a client before undertaking business for them.

FXCM Ltd