



Summary Conflicts of Interest Policy

Pepperstone Limited

Company no: 08965105
FRN: 684312
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Introduction

This summary of our policy provides information of how Pepperstone Limited (“**Pepperstone**”, “**we**” or “**our**” or “**us**”) identify and manage any conflict of interest in respect of the duties we owe to our clients.

Conflicts of interest may arise between the firm (its managers, employees, appointed representatives) and a client or between one client and another. They may also be caused by the receipt of inducements from third parties.

We aim to maintain and operate effective organisational and administrative arrangements with a view to taking all appropriate steps to prevent conflicts of interest from adversely affecting the interests of our clients.

Types of conflicts

A conflict of interest may arise when we or a relevant person such as an employee or a person directly or indirectly linked to Pepperstone:

- 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 the service 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 one client, or group of clients, over the interests of another 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.

Our Policy

Managing Conflicts

We maintain procedures to identify, prevent and manage actual or potential conflicts. These procedures include maintaining 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. We have procedures in place to



ensure that no improper inducements are given or received and proper inducements are disclosed appropriately. We also provide training to all staff on conflicts of interest.

Our procedures require our staff to act in our clients' best interest when providing services. In some circumstances, we will decline to act for a client or potential client where there may be no means of managing a particular conflict.

Records and Disclosing Conflicts

We aim to keep and regularly update a record of the kinds of service or activity carried out by us or on our behalf in which a conflict of interest entailing a material risk of damage to the interests of one or more clients has arisen or, in the case of an ongoing service or activity, may arise.

Where our arrangements to identify and manage conflicts are not or cannot be sufficient to be reasonably confident that risks of damage to a client's interest will be prevented, we will disclose the general nature and/or sources of conflicts before carrying on business for the client.

This will include an explanation the risks that arise as a result of the conflicts of interest, and to enable the client to take an informed decision with respect to the service in the context of which the conflict of interest arises.

Contact us

If you have any questions on this summary policy, please contact us at support@pepperstone.com



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