



ICLOUDFX

**CONFLICTS
OF INTEREST
POLICY**



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CONFLICTS OF INTEREST POLICY

1. Introduction

- 1.1. Icloud Limited(hereinafter referred to as 'the Company') is an Investment Firm, which is authorised and regulated by the FSCR with Licence No. 07907.
- 1.2. The Company is operating under the Cypriot Law L.87(I)/2017 which provides for the provision of Investment services, the exercise of investment activities, the operation of regulated markets and other related matter" (hereinafter referred to as the "Law") which transposed the European Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 in the markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU, (hereinafter referred to as "MiFID II").
- 1.3. Following the MiFID II legislation, the Company is required to take all appropriate steps to identify, prevent or manage conflicts of interest. The Company is committed to act honestly, fairly and professionally with ultimate purpose the best interests of its clients (hereinafter referred to as 'Client', 'you', 'your' as appropriate).
- 1.4. **Please ensure you take sufficient time to read this Policy as well as any other legal documentation and additional information available to you via our Website prior to opening an account and/or carrying out any activity with us. Should you need any further clarification, please contact us.**

2. Scope of the Policy

- 2.1. The scope of this Policy is to set out our approach to identify and prevent or manage conflicts of interest, which may arise during the course of our business activities.
- 2.2. We are required to take all appropriate steps to identify and to prevent or manage conflicts of interest between: (a) us, including our managers, employees and tied agents, or any person directly or indirectly linked to them by control and our clients;



or, (b) between you and another client, that arise in the course of providing any investment and ancillary services, or combinations thereof, including Company's remuneration scheme and other incentive structures.

- 2.3. In case where the steps taken by the Company to identify, prevent or manage conflicts of interest from adversely affecting the interest of its client are not sufficient to ensure, with reasonable confidence, that risks of damage to client interests will be prevented, the Company shall clearly disclose to the client the general nature and/or sources of conflicts of interest and the steps taken to mitigate those risks before undertaking business on its behalf.
- 2.4. The disclosure shall be made: (a) in a durable medium; and (b) shall include sufficient detail, taking into account the nature of the client, to enable that client to take an informed decision with respect to the service in the context of which the conflict of interest arises.

3. Identification of Conflicts of Interest

For the purposes of identifying the types of conflicts of interest that arise in the course of providing investment and ancillary services or a combination thereof and whose existence may damage the interests of a client, the Company takes into account, whether the Company or a relevant person, is in any of the following situations, whether as a result of providing investment or ancillary services or investment activities or otherwise:

- a. The Company or a relevant person is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- b. The Company or a relevant person has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
- c. The Company or a relevant person has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;
- d. The Company or a relevant person carries on the same business as the client;
- e. The Company or a relevant person 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.



4. Managing Conflicts of Interest

- 4.1. The Company establishes, implements and maintains effective organisational and administrative procedures to manage and prevent any identified conflicts of interest which may damage the interests of the clients according to the size and organisation of the Company, the nature, scale and complexity of its business. The procedures are ongoing monitored and reviewed to ensure that the internal controls are appropriate and therefore to implement corrective measures if any loopholes are identified.
- 4.2. In general, the procedures we follow and measures we adopt in order to manage such conflicts of interests to ensure the necessary degree of independence include the following:
 - a. Effective procedures to prevent or control the exchange of information between relevant persons engaged in activities involving a risk of a conflict of interest where the exchange of that information may harm the interests of one or more clients;
 - b. The separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Company;
 - c. The removal of any direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration of, or revenues generated by, different relevant persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities;
 - d. Measures to prevent or limit any person from exercising inappropriate influence over the way in which a relevant person carries out investment or ancillary services or activities;
 - e. Measures to prevent or control the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services or activities where such involvement may impair the proper management of conflicts of interest.
- 4.3. More specifically, some of the procedures already established includes but are not limited: (list is not exhaustive):
 - a. A 'need to know' policy governing the dissemination of confidential or inside information within easyMarkets group;



- b. Chinese walls restrict the flow of confidential and inside information within easyMarkets group, and physical separation of departments; Information barriers will be in place to prevent communication of material information and other sensitive information from one company of the group to other companies so as to control the flow of such information.
- c. Procedures governing access to electronic and/or in hard copy data and information.
- d. Material information will be confined only to persons who have a need to know that information in order to carry out their responsibilities.
- e. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual;
- f. Establishment of in-house Compliance Function to monitor and report on the above to the Company's Board of Directors;
- g. The Compliance Officer documents and acts expeditiously to address any compliance breaches and take appropriate disciplinary action on his/her own authority, independent of management as warranted. If the Compliance Officer is unable to resolve any breaches on his/her own, he/she should sequentially seek the assistance of senior management or Board of Directors or outside counsel as needed. The Compliance Officer should report violations and other issues related to the procedures on a regular basis to the Board of Directors or the supervisor;
- h. The Compliance Officer will be responsible for reviewing the company's transactions and to ensure the priority of client interests. Because personnel, regulations, business practices, and products constantly change, the role of the Compliance Officer (particularly the role of keeping the firm up to date on such matters) is that much more important. In this regard, each staff member will annually confirm in writing receipt of the procedures manual and agree to abide by its terms.
- i. Appointment of Internal Auditor to ensure that appropriate systems and controls are maintained and report to the Company's Board of Directors;
- j. Establishment of the four-eyes principle in supervising the Company's activities;
- k. Prohibition of external business interests conflicting with the Company's interests as far as the Company's officers and employees are concerned, unless Board of Directors approval is provided.
- l. EasyMarkets' employees must comply with all rules regulations and directives of the competent authorities, the code of business contact for Investment Firms and for the natural persons employed by them;
- m. EasyMarkets' employees are strictly forbidden to trade for themselves either on the easyMarkets platform or on any other platform either directly or through an intermediary/related party;



- n. EasyMarkets' employees must report to their supervisor any potential conflict of interest related to a proposed transaction.
- o. EasyMarkets' employees must be entitled to the same benefits, thus avoiding any conflict of interest.
- p. EasyMarkets' employees must follow the same code of operations, thus avoiding any conflict of interest.
- q. EasyMarkets' employees must report to their supervisor any special relationship they or any related party might have with a proposed transaction that might affect their judgement.
- r. EasyMarkets' employees must consider commission rates, timeliness of trade executions, and the ability to maintain anonymity, minimise incomplete trades, and minimise market impact.
- s. EasyMarkets' employees must not trade on material non-public information. In the case that an employee holds material non-public information he must report it to the supervisor or the compliance officer and in such case the financial instrument will be placed either in the restricted list or the watch list.
- t. EasyMarkets' employees must provide the compliance officer with any trades they may had prior to their employment with easyMarkets. The compliance officer will be responsible for reviewing the employee's transactions and to ensure the priority of client interests.

5. Close Links and conflicts of interest

- 5.1. The Company acts as a principal and not as an agent on client's behalf for all orders executed for the instruments provided by the Company. Consequently, the Company is the sole execution venue used to execute clients' orders and the disclosure related to any close links, conflicts of interest, and common ownerships with respect to another execution venue used to execute clients' orders is not considered relevant.

6. Record Keeping

- 6.1. The Company shall keep and regularly update a record of the kinds of investment or ancillary service or investment activity carried out by or on behalf of the Company 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.



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7. Disclosure of Information

- 7.1. Where a client conflict arises during the course of a business relationship, and the organisational and administrative arrangements and/or measures we have in place are not sufficient to ensure with reasonable confidence that risks of damage to your interests will be prevented, we will disclose such a conflict before undertaking further business with you.
- 7.2. The Company reserves the right to assess and periodically review, at least annually, and if necessary amend this Policy and arrangements, at its sole discretion, whenever it deems necessary, in order to address any deficiencies.



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