

FOCUS **Markets**

Conflicts of Interest Policy

Document Version Control

Document Title	Conflicts of Interest Policy
Owner	Compliance Department
Last approved	May 2026
Current version	V1
Review frequency	Annually (unless required prior)
Approver	Executive Company

Introduction

This Conflicts of Interest Policy sets out the arrangements Focus Markets Ltd has in place for the management of conflicts of interest arising wholly, or partially in relation to the provision of financial services.

Focus Markets has in place adequate controls for the management of conflicts of interest arising from the financial services business of Focus Markets. In certain circumstances, the only way to deal with a conflict will be to avoid it altogether. Often, however, a conflict may be managed in other ways, such as by disclosing it so the client contracts with Focus Markets on a fully informed basis.

Conflicts of interest

Conflicts of interest can arise whenever the personal, professional, or business interests of a Focus Markets employee are, or may be, inconsistent with the best interests of Focus Markets. A conflict may also arise where the interests of clients receiving financial services are inconsistent with, or diverge from, the interests of Focus Markets or its personnel.

Policy

All representatives of Focus Markets are required to act in good faith in performance of their duties for Focus Markets. Representatives include employees of Focus Markets and its representatives (collectively termed "**Staff Members**"). All Staff Members need to be aware of the potential for a conflict of interest to arise and should *always* act in the best interests of Focus Markets.

A Staff Member may have private interests that, from time to time, conflict, or appear to conflict, with being a representative of Focus Markets. An individual Staff Member may be put in a situation where there may be a conflict between the interests of Focus Markets and their own personal or professional interests, or those of relatives or friends. Where such a conflict occurs (or is perceived to occur), the interests of Focus Markets will be balanced against the interests of Staff Members and, unless exceptional circumstances exist, resolved in favour of Focus Markets.

Declaring Conflict

Focus Markets must be made aware of conflicts of interest that exist or may exist between the business and a Staff Member. All Staff Members are required to:

- declare any potential, actual or perceived conflicts of interest that exist on becoming a representative of Focus Markets to management. For example, holding a trading account with another provider;

- declare any potential, actual or perceived conflicts of interest that arise or are likely to arise during employment by Focus Markets to management; and
- avoid being placed in a situation where there is potential, actual or perceived conflict of interest, if possible.

Gifts and Entertainment

Staff Members are required to declare all gifts and entertainment received that relate to, or may relate to, their employment with Focus Markets.

Alternative Employment

Staff Members must disclose any other employment relationship or business interest. If your external involvement such as a business operation or employment affects your performance or attendance, it will be considered a conflict of interest.

Focus Markets' employees must not set up or engage in private business or undertake other employment in direct or indirect competition with Focus Markets, using knowledge and/or materials gained during their employment with Focus Markets.

If a Staff Member declares such an interest, Focus Markets will review the potential areas of conflict with the employee and mutually agree on practical arrangements to resolve the situation.

Failure to declare a potential, actual or perceived conflict of interest or to take remedial action agreed with Focus Markets, in a timely manner, may result in performance improvement proceedings including dismissal.

Managing Conflicts

Focus Markets has identified conflicts of interest that may arise in the course of its business. Conflict response and management requirements set out in this section are to be adhered to.

Recruitment of personnel

Pre-employment screening exercises are undertaken to ensure that Staff are fit, proper and appropriately qualified.

Supervision of personnel (Internal Structures)

All Staff Members are appropriately supervised by and responsible to senior management. Focus Markets has an open plan office layout which helps to reduce barriers that prevent information about conflicts being passed to relevant groups.

Remuneration

Focus Markets avoids remuneration structures where Staff Members are paid exclusively by commission (for example, where no salary or other remuneration is paid).

Personal Account Dealing

Client facing representatives are required to disclose any of their trading accounts to their manager, who in turn is required to report any suspicious activity to senior management.

Staff Members

Where a Staff Member has a potential conflict, they are required to declare it. Practical ways in which Focus Markets may deal with conflicts of interest include:

- allocating another representative to provide the service to a client; and
- declining to provide services to a client.

Potential conflicts of interest may include where a staff member, in the ordinary course of their employment, is required to undertake activities relating to a client with whom they have had, or do have an

ongoing personal relationship with i.e. friend, partner, former colleague etc. In such cases, Focus Markets may implement the remedial action above.

Conflicts of interest are identified on an ongoing basis by regular review of business operations by the Responsible Person, and the Compliance Team. The process we follow to identify actual or potential conflicts of interest is to identify the parties (stakeholders) involved in a particular transaction or event (for example, the parties may be Focus Markets, its representatives and clients). We then list the interests of each of those parties and are able to identify any conflicting interests.

Where conflicts of interest are identified, these are recorded in the Focus Markets Conflicts of Interest Register (see “recording Conflicts” section below) and must be managed. We keep records of this process, and document how identified conflicts are dealt with in some instances, the only way to appropriately deal with a conflict is to avoid it all together.

Recording Conflicts

The Compliance Department keeps records of conflicts pertaining to staff in their shared Conflicts of Interest Register.

Focus Markets keeps, for at least seven (7) years, records of:

- conflicts identified and action taken;
- any reports given to the Licensee’s owners or senior management about conflicts of interest matters; and
- copies of written conflicts of interest disclosures given to clients or the public.

Records will be kept electronically.

The keeping of documents are records assists Focus Markets to demonstrate that it knows whether it is complying with the financial services laws.