

CONFLICT OF INTEREST POLICY

O.C.M ONLINE CAPITAL MARKETS LIMITED ("the Company") wishes to take all reasonable steps to identify and avoid any conflicts of interest and to act with integrity and fairness with its clients/users and counterparties.

This policy is not intended to create third party rights or duties that would not already exist if the Policy had not been made available and it does not form part of any contract between the Company or any of its affiliates and any client/user or prospective client/user.

This policy is in effect the promotion of the Company's obligations as mentioned in the second paragraph above and presents the framework under which the Company manages conflicts of interest that may arise during the course of the Company's business activities in respect of duties owed to its clients.

IDENTIFICATION, MANAGEMENT AND DISCLOSURE OF CONFLICTS OF INTEREST

Identification

The Company identifies below a number of circumstances which constitute or may give rise to a conflict of interest in the course of providing investment and/or ancillary services and, which may potentially but not necessarily involve a material risk of damage to the interest of one or more clients.

The identified types of conflict of interest are the following:

- (1) where the Company or any person directly or indirectly linked to the Company including, but not limited to, its directors and employees (the "linked person") is likely to make a financial gain or avoid financial loss at the expenses of the client;
- (2) acting or offering client advisory services based on the interests of another client at the expense of the other, and the Company or a linked person may have a financial or other incentive to do so (the company does not provide any sort of investment advise);
- (3) where the Company or a linked person may have other interests than the Company's or the client's interests;
- (4) where the Company or the linked person carries on the same business as the client;
- (5) where the Company or a linked person receives or will receive money, goods, services or other inducement in additions to the standard commission or fee charged in respect of a service provided to the client;

(6) where the Company or a linked person has an interest different from the client's transactions, i.e. an interest in the outcome of a service or of a transaction carried out on behalf of the client.

Management

An in-house Compliance Department has been set up by the Company that shall be responsible for the identification and management of conflict of interest. The Company is committed to professionally manage potential conflicts of interests that may arise during the course of the Company's business. For the purposes of identification and management, a framework of rules, policies and controls has been developed, adopted and maintained which includes the following:

- (1) the establishment of an independent and objective Compliance Department responsible for the monitoring of the Company's and linked persons' activities and for reporting to the Board of Directors;
- (2) preventing the improper use of privileged or confidential information concerning clients by certain controls and procedures to regulate and, where appropriate prohibit the flow of information between linked persons engaged in activities that may involve risk of conflict of interest; also,
- (3) where appropriate to physically separate business areas in which there is or may be a conflict of interest to have separate lines of supervision and avoid flow of information;
- (4) Restrictions of access to electronic data;
- (5) Restricting the possibility of the same employee being engaged in more than one service that may involve conflict of interest;
- (6) Prevent the possibility that a third party or, The Company or a linked person may improperly influence the decisions taken by employees that provide investment services;
- (7) Employee's pay in an area where investment services are provided will not be set by another employee form another area with which there is or may be a conflict of interest;
- (8) The management information handled by each business area must be provided on a need-to-know basis to ensure that the information is not improperly communicated.

Disclosure

Once the Company becomes aware of a conflict of interest, The Company will disclose it to the client prior to the undertaking of any transactions or action in respect of that client. The Company retains the right not to disclose to the client any conflict of interest should the Company believe that such disclosure is appropriate to manage the conflict and in effect, the Company may choose to pursue a different route such as not proceedings with the transaction or any other activity giving rise to the conflict.

mation cannot be accessed online by the User, therefore no password shall be selected to view or modify this information.

Contracts for Differences or "CFDs": any contracts for difference between prices of spot FOREX, equity indexes, precious metals, stocks or any other commodities available for trading, in different points of time; Counterparty/ies: any banks and/or brokers, through which the Company may cover its Contracts with Clients; Client Classification: the Company's overall, product or transaction specific classification of Clients;