



Conflict of Interest Policy

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Conflict of Interest Policy

Introduction

Capstone is committed to ensuring that our business is conducted in an honest, fair and professional manner in accordance with the best interests of its clients. All employees of the company are obliged to refrain from doing anything that could be reasonably regarded as creating a conflict of interest in line with their professional responsibilities. It is the policy of the company to avoid any conflict of interest when providing business services to its customers. From time to time, however, we may have interests which conflict with our customers interests. Our Conflicts of Interest Policy aims to ensure that our clients are treated fairly and with the highest level of integrity and that their interests are protected at all times.

Identification of Conflicts of Interest

In order to identify the types of conflicts of interest that may arise in the course of providing its business services, Capstone will take into account the following situations where Capstone and a relevant person including a director, partner manager, employee or other person directly involved in the provision of services to Capstone:

- Is likely to make a financial gain at the expense of the client;
- Is likely to limit or avoid financial loss at the expense of the clients;
- Has a financial or other incentive to favor the interest of another client over the interest of the client;
- Carries on the same business as the client; Receives from a person other than the client 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.

Potential Conflicts of Interest

The following situations are some good examples of conflicts which may arise when Capstone is providing business services for its clients When Capstone executes transactions through its trading platform for its clients, Capstone acts as principal in all dealings. You may have been introduced to Capstone by a third party who receives commission or remuneration from your trades.

Arrangements for Managing Conflicts

Capstone shall adopt a number of approaches within the company to manage conflicts of interest and control the movement of confidential information as shown below:

- Procedures to prevent and control the exchange of information between persons at Capstone which may harm the interests of one or more clients;
- Controlling the disclosure of client order details of one client to another;
- Provision of training to directors and employees of Capstone on conflicts of interest management.

Personal Account Dealing

To prevent conflict arising from the use of information obtained from clients, and the market abuse in general, all directors and employees will not be able to open an account with Capstone.

Employees Activities Outside the Company

Our employees are subject to rules designed to avoid conflicts of interest with activities they undertake outside Capstone.

Declining to Act

We may decline to act for a client in cases where we believe a conflict of interest cannot be managed in any other way.

Capstone Policy

Capstone recognizes, in certain circumstances, conflicts of interest can arise among Capstone, its directors, employees, introducing brokers and all clients. As required by law, Capstone implements and maintains an effective conflicts of interest policy for the purpose of preventing conflicts of interest or potential conflicts of interest from causing a material risk of damage to the interest of clients.

Record Keeping

Capstone maintains a record, which is regularly updated, of the kinds of investments and ancillary services or trading activities carried out by Capstone or on its 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 business service or activity may arise.

Disclosure

Whilst Capstone is devoted to implementing and maintaining our conflicts of interest policy, in some cases, such policy might not be sufficient to prevent risks of damage to the interest of a client. In such a case, Capstone shall disclose the general nature and sources of conflicts of interest to the client so that enables the client to make an informed decision whether to proceed with the transaction in question.

Policy Review

Capstone reserves the right to frequently review and assess the Conflicts of Interest Policy and, if required, amend it to meet and support its clients needs and ensure that the Policy is compliant with the FCA rules. For more information, please contact info@fxcg.com.

When and How to Contact Us

If and when you have any inquiries about this Conflict of Interest Policy, or you wish to help us to improve this Policy, please notify us by contacting us at: info@fxcg.com.