

SSY Futures Limited

Conflicts of Interest Policy Statement

Purpose of this document

This document describes our Policy in relation to the identification and management of conflicts of interest. This Policy statement has been approved by the Board of Directors of SSY Futures Limited.

General Principles

The key concepts underlying our policy are as follows:

We will take all reasonable steps to identify conflicts of interests between ourselves (including our managers, employees, or any person directly or indirectly linked to us by control) and any client; or between one client and another that arise or may arise in the course of us providing any investment service to our clients.

For the purposes of identifying conflicts of interest we will take into account, as a minimum, whether we or a relevant person, or a person directly or indirectly linked by control to us:

- a. Is likely to make a financial gain, or avoid a financial loss, at the expense of a client;
- b. 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. Has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;
- d. Carries on the same business as the client; or,
- e. 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.

We will maintain and operate effective organisational and administrative arrangements with a view to taking reasonable steps to prevent conflicts of interest from constituting or giving rise to a material risk of damage to the interests of our clients.

In relation to the identification and management of conflicts of interest we will take into account:

- a. The risk that a conflict of interest may adversely affect the interests of a client, a group of clients, or all of our clients;
- b. The nature, scale and complexity of our business in the UK and internationally; and,
- c. The nature and range of products and services offered in the course of that business.

We will disclose the general nature and / or the specific sources of conflict with the interests of our client, only where we consider our internal arrangements to manage a specific conflict of interest to be insufficient.

Our broking staff receive training in respect of our Conflicts of Interest Policy as part of their annual training and review.

July 2014