

WGM SERVICES LTD

Authorisation No:203/13

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Conflicts of Interest Policy

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INTRODUCTION

1.1 WGM Services Ltd (hereinafter referred to as 'WGM', the 'Company' or the 'Firm') is incorporated (Certificate of Incorporation No. HE256991) in the Republic of Cyprus. Our registered office is at 12 Themistokli Dervi & 33 Vassilissis Frederikis Street 1066, Nicosia, Cyprus and we are authorised and regulated by the Cyprus Securities & Exchange Commission with authorisation number 203/13. You can check this on the CySec register by visiting the Cysec's website http://www.cysec.gov.cy/licence_members_1_en.aspx or by contacting the Cyprus Securities & Exchange Commission at 27 Diagorou Str. CY-1097 Nicosia, Telephone: +357 22506600, Fax: +357 22506700

1.2 Following the implementation of the Markets in Financial Instruments Directive (MiFID) the Company is required to provide its clients and potential clients with a summary of its Conflicts of Interest Policy (hereinafter the "Policy").

1.3 Under the above legislation, the Company is required to take all reasonable steps to detect and avoid conflicts of interest between:

(1) the firm, including its managers, employee, appointed representatives (or where applicable tied agents), or any person directly or indirectly linked to them by control, and a client of the firm; or

(2) one client of the firm and another client.

The Company is committed to act honestly, fairly and professionally and in the best interests of its clients and to comply, in particular, with the principles set out in the above legislation when providing investment services and other ancillary services related to such services.

1.4 We provide here a summary of the policy we maintain in order to manage conflicts of interest in respect of the duties we owe to our clients. The Policy is effective from 1st January 2014.

1.5 This Policy is not intended to, and does not, create third party rights or duties that would not already exist if the Policy had not been made available, nor does it form part of any contract between the Company and any client.

SCOPE OF THE POLICY

2.1 The Policy is provided to you in accordance with MiFID on the basis that you are proposing to trade with WGM in contracts for difference ('CFDs') which are leveraged products, incur a high level of risk and can result in the loss of all your invested capital.

2.2 The purpose of this document is to set out the Company's approach to identifying and managing conflicts of interest which may arise during the course of its business activities. The Policy applies to all its directors, employees, any persons directly or indirectly linked to the Company

(hereinafter called “related persons”) and refers to all interactions with all clients.

- 2.3 The aim of our Policy is to identify and prevent conflicts of interest which may arise between the Company and its clients or between one client and another. Accordingly, we have adopted a conflicts of interest policy setting out the procedures, practices and controls in place to achieve this.

IDENTIFICATION OF CONFLICTS OF INTEREST

- 3.1 For the purposes of identifying the types of conflict 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 or a person directly or indirectly linked by control to the firm, is in any of the following situations, whether as a result of providing investment or ancillary services or investment activities or otherwise:
- 3.2
- a) The Company or relevant person is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
 - b) The Company or 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 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 relevant person carries on the same business as the client;
 - e) The Company or 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.

MANAGING CONFLICTS OF INTEREST

- 4.1 The Company has set up internal policies and has an in-house Compliance Department that are responsible for identifying and managing potential conflicts of interests. The above will also update the relevant internal procedures and ensure compliance with such procedures.
- 4.2 The Company maintains and operates effective organisational and administrative procedures to manage and prevent the identified conflicts of interest from constituting or giving rise to a material risk of damage to the interests of its clients. The Company also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate.
- 4.3 The measures adopted are designed to ensure that relevant persons engaged in different business activities involving a conflict of interest carry on those activities at a level of

independence at a level of independence appropriate to the size and activities of the firm and its Group, and to the materiality of the risk of damage to the interests of the client.

In general, the procedures and controls that the Company follows regarding conflicts of interest include the following measures to ensure the requisite degree of independence:

- 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.

4.4 Some of these policies and procedures established to prevent Conflicts of Interests are shown below:

- A 'need to know' policy governing the dissemination of confidential or inside information within the Group
- Chinese walls restricting the flow of confidential and inside information within our company, and physical separation of departments
- Procedures governing access to electronic data
- Segregation of duties that may give rise to conflicts of interest if carried on by the same individual
- Personal account dealing requirements applicable to relevant persons in relation to their own investments
- A gifts and inducements log registering the solicitation, offer or receipt of certain benefits
- The prohibition of external business interests conflicting with our interests as far as the Group's officers and employees are concerned, unless board approval is provided
- A policy designed to limit the conflict of interest arising from the giving and receiving of inducements
- Establishment of in-house Compliance Department to monitor and report on the above

to the Company's Board of Directors

- Appointment of Internal auditor to ensure that appropriate systems and controls are maintained and report to the Company's Board of Directors
- Establishment of the four-eyes principle in supervising the Company's activities

DISCLOSURE

- 5.1 Where arrangements made by the firm are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of the client will be prevented, the Company will, if it is aware of it, disclose the general nature and/or sources of conflicts of interest to a client prior to undertaking investment business for that client. The disclosure will be made by way of a written notice and will include sufficient detail to enable the client to take an informed decision with respect to the service in the context of which the conflict of interest arises. Details of potential conflicts of interest identified by the Firm are contained in the Annex to this Policy, which may be amended from time to time.

If the firm does not believe that disclosure is appropriate to manage the conflict, we may choose not to proceed with the transaction or matter giving rise to the conflict.

- 5.2 The Company reserves the right to review and/or amend its Policy and arrangements whenever it deems this appropriate. Further information about the Policy is available upon request.

FAQs

- 6.1 Questions regarding the Conflicts of Interest Policy should be addressed, in the first instance, to the Customer Support Department.

- 6.2 Customer Support Department
Email: support@ezinvest.com _____

ADDITIONAL CONTACTS

- 7.1 Compliance Department
Email: compliance@ezinvest.com _____

ANNEX I

CONFLICTS OF INTEREST

Potential conflicts of interest include the following:

Conflict of interest	Description
Dealing as principal	WGM is an investment firm with permission to deal in investments as principal with respect to investments that are BIPRU designated investments and ensures it deals as principal only to fulfil customer orders. WGM is also licensed to deal on its own account however it does not manage its own portfolio.
Investment Research	WGM does not procure or produce its own research. All communication on the company website is regarded as non-independent research and as marketing communication.
Personal dealing	WGM employees may hold positions in securities that clients of WGM are investing in. WGM has an internal policy that controls personal account transactions and ensures that such transactions do not disadvantage any clients.
Conflicts between clients	There are circumstances in which a number of clients may be wishing to deal in the same security at the same time. WGM's dealing procedures ensure that orders are routed through the automated trading platforms which will ensure that the most advantageous outcome is obtained, regardless of the identity of the client.