

CONFLICT OF INTEREST POLICY

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FXJET, is registered and operates under the laws of the Republic of Cyprus as a trade name of Bogofinance Capital Markets Ltd an investment firm regulated by the Cyprus Securities and Exchange Commission (License No. 321/17), (hereinafter called the “**Company**”). This Conflicts of Interest Policy (hereinafter called the “**Policy**”) is provided to you in accordance with the provisions of the Investment Services and Activities and Regulated Markets Law of 2017 (Mo. L. 87(I)/2017) and Regulation (EU) No 600/2014 of The European Parliament and the Council and amending Regulation (EU) No 648/2012 on markets in financial instruments (MiFIR).

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

Purpose

The purpose of this document is to set out the Company’s approach in identifying and managing conflicts of interest which may arise during the course of its normal business activities. The policy applies to all Related Persons (directors, employees and any other persons directly or indirectly linked to the Company) and refers to all interactions with all clients.

Identification of Conflicts of Interest

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

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Company or a Related Person, is in any of the following situations, whether as a result of providing investment or ancillary services or investment activities or otherwise:

- (a) The Company or a Related Person is likely to make a financial gain, or avoid a financial loss, at the expense of the Client;
- (b) The Company or a Related 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 a Related Person has a financial or other incentive to favor the interest of another Client or group of Clients over the interests of the Client;
- (d) The Company or a Related Person carries on the same business as the Client;
- (e) The Company or a Related 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.

Measures to avoid Conflicts of Interest

1. The Company has set up internal policies and has a Compliance Department that is responsible for identifying and managing potential conflicts of interests, for updating the relevant internal procedures and ensuring compliance with such procedures.
2. The Company maintains and operates effective organizational and administrative procedures to manage the identified conflicts of interest. The Company also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate.

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3. In general, the procedures and controls that the Company follows regarding conflicts of interest include the following measures:

(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 interest 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 conflict of interest.

A non-exhaustive list of policies and procedures to prevent conflicts of interests when providing investment services to the clients are the following:

1. Heightened review or restriction of Dealing on Own Account transactions while the firm is in possession of material nonpublic information and review of trading of instruments by the Dealing on Own Account during periods of “watch”, “restricted” and “rumor” lists.

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2. Careful monitoring of personal employee trading.
3. Material nonpublic information is confined only to persons who have a need to know that information in order to carry out their responsibilities.
4. Chinese walls which restrict the flow of information between the departments and physical separation of departments.
5. Limits on the access of different departments to IT systems that could (i) contain information that could lead to conflict of interest (ii) lead to the alteration of information by unauthorized persons and (iii) restrict the possibility of the improper use of privileged or confidential information concerning customers.
6. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual.
7. Employees are required to disclose any relationship with a client that could lead to preferential client treatment.
8. Employees' pay in any department is never set by someone from another department with which there is or may be a conflict of interest.
9. The company has set up and follows a leverage policy covering all products offered. The leverage policy takes into account client categorization into retail, professional or ECP, risk profile and also various risks associated with the products offered.
10. The company maintains an inducement policy in its Internal Operations Manual to prevent Conflicts of Interest arising from client or employee bonuses.
11. The company maintains a Remuneration policy in its Internal Operations Manual to prevent Conflicts of Interest arising from client or employee remuneration.

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Corporate clients

The conflicts of interest policy for corporate clients includes all the elements in place for retail clients, but has additional elements that arise from their size and nature.

Non exhaustive list of additional Conflicts of Interest with corporate clients:

- a) An employee of the Company is a former or prospective employee of the Client
- b) An unauthorized employee of the Client, registering in the Client's name or using Client's funds

Non exhaustive list of additional measures to avoid conflicts of interest with corporate clients:

1. Request written representations from the Client's management regarding the persons who administer the Client's account.
2. Issue warnings to employees to avoid administering corporate clients if they have business affairs with them.

When the organizational or administrative steps taken to handle conflicts of interest are not considered sufficient to guarantee, with reasonable certainty, that the risk of harming the customer's interests is prevented, the Company shall clearly inform the Client of the general nature or source of the conflicts of interest before acting on his behalf.

The Company maintains an updated copy of its conflicts of interest policy posted on its Website. The conflict of interest policy will be reviewed at least annually.

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The Client should direct any question he might have about conflicts of interest to the Company's Compliance Department at support@fxjet.com

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