

**ACIERFX previously ARGUSFX**  
**CONFLICTS OF INTEREST POLICY**

### 1. Introduction

AcierFX Ltd, previously ArgusFX Ltd, (hereinafter the “Company”) is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE 111588. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (hereinafter the “CySEC”) under the license number 334/17.

Following the implementation of the Markets in Financial Instruments Directive (MiFID II) in the European Union and its transposition into national law with the Investment Services and Activities and Regulated Markets Law 87 (I) /2017 (hereinafter the “Law”), the Company is required to provide its clients and potential clients with a Conflict of Interest Policy (hereinafter the “Policy”).

Under the above legislation, the Company is required to take all appropriate steps to identify, prevent or manage conflicts of interest. The Company is committed to acting honestly, fairly and professionally and in the best interest of its clients and to complying, in particular, with the principles set out in the above legislation when providing investment services and ancillary services.

### 2. Scope

The Policy applies to all its directors, employees, any persons directly or indirectly linked to the Company (hereinafter called “related persons”) and refers to the provision of all investment and ancillary services by the Company to its clients.

### 3. Identification of Conflicts of Interest

The Company hereby identifies and discloses a range of circumstances which may give rise to a conflict of interest and potentially but not necessarily be detrimental to the interests of one or more clients. Such a conflict of interest may arise if the Company, or any person directly or indirectly controlled by the Company or a client, is likely to make a financial gain, or avoid a financial loss, at the expense of a client or may have an interest, relationship or arrangement that is material in relation to the transaction concerned or that conflicts with the client’s interest.

The Company has identified the following circumstances which may give rise to a conflict of interest:

#### **AcierFX Ltd, previously ArgusFX Ltd**

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Registration Number: HE111588, Address: 148 Strovolos Avenue, 1<sup>st</sup> Floor, 2048, Nicosia- Cyprus  
Tel: +357 22059059, Email: [info@argusfx.com](mailto:info@argusfx.com), Website: [www.argusfx.com](http://www.argusfx.com)

- a. The Company or a relevant person is likely to make a financial gain, or avoid a financial loss at the expense of the client;
- b. The Company or a relevant person has an interest in the outcome of a services 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 relevant person has a financial or other incentive to favour the interest of another client or group of clients over the interest of the client;
- d. The Company or a relevant person carries out the same business as the client; or
- e. The Company or a relevant person received 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.

#### **4. Procedures and Controls to Managing Conflicts of Interests**

In general, the procedures and controls that the Company follows to manage the identified 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 interests of one or more clients.
- b. All employees are bound by professional secrecy and confidential information is only to be shared if essential for performing a job function.
- c. All employees receive instructions and guidance regarding managing of conflicts of interest.
- d. 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.
- e. 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.
- f. 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.

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- g. Chinese Walls restricting the flow of confidential and inside information within the Company, and physical separation of departments.
- h. Procedures governing access to electronic data.
- i. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual.
- j. Personal account dealing requirements applicable to relevant persons in relation to their own investments.
- k. A gifts and inducements log registering the solicitation, offer or receipt of certain benefits.
- l. Prohibition of external business interests conflicting with our interests as far as the Company's officers and employees are concerned, unless Board of Directors approval is provided.
- m. Establishment of in-house Compliance Department to monitor and report on the above to the Company's Board of Directors.
- n. Appointment of Internal auditor to ensure that appropriate systems and controls are maintained and report to the Company's Board of Directors.
- o. Establishment of the four-eyes principle in supervising the Company's activities.
- p. The Company also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate.

### **5. Record Keeping**

The Company shall maintain and regularly update a register of the kinds of investment or ancillary service or investment activity carried out or on behalf of the Company in which a conflict of interest entailing a risk of damage to the interests of one of more clients has arisen or may arise.

### **6. Reporting**

The senior management of the Company shall receive on a frequent basis, and at least annually, written on the situation referred to in paragraph 5 above.

### **7. Disclosure of Conflicts of Interest**

Where a conflict arises and the Company becomes aware of it, it shall take all reasonable steps to address that conflict and, if not possible, the Company shall disclose the conflict to the client prior to undertaking investment business for that client or, if it does not believe that disclosure is appropriate to manage the conflict, it may choose not to proceed with the transaction or matter giving rise to the conflict.

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The Company reserves the right to assess and periodically review, at least annually, and if necessary, amend this Policy and arrangement, at its sole discretion, whenever it deems fit or appropriate, in order to address any deficiencies.

This Policy does not form part of the Company's Terms and Conditions and is not intended to be contractually binding or impose or seek to impose any obligation on the Company which it would not otherwise have, but for the Law.

### **8. Questions on this policy**

Should you have questions about the Conflict of Interest Policy or on conflicts of interest in general, you may direct them to the Support Department at: [support@argusfx.com](mailto:support@argusfx.com).

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