



# Conflict of Interest Policy

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#### Version History

Version	Date	Amendments	By
1.0	16 May 2015	Document created	GCG
2.0	03 June 2015	Document updated –Final Draft	GCG
3.0	05 June 2015	Document finalised	GCG
4.0		Document approved	Directors – JS/EZ
	30 July 2016	Document reviewed	KY
5.0	1 September 2016	Document approved	JS/AH

Distribution List:

Approved by **Directors of BL Global Markets Limited**

Date **30 July 2016**

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## **Introduction**

This policy is relevant to the size and nature of the financial services business conducted by BL Global Markets Ltd ("the Company", "BL Global") and is approved by the Board.

BL Global has established a conflict of interest policy setting out the procedures and controls which helps it identify and appropriately deal with conflicts of interest – actual, apparent and potential. The policy applies to all its directors, employees, or any persons directly or indirectly linked to the Company (hereinafter called the "relevant persons").

## **Identification of Conflicts of Interest**

BL Global does not undertake any proprietary trading. BL Global has systems and protocols in place to identify potential conflicts of interest. Once a conflict has been identified, procedures are implemented to ensure it is appropriately managed. The potential conflict interest which may arise in the conduct of BL Global's business are the potential conflicts of interest between one customer and the firm's duties to other customers.

## **Managing Conflict Interest**

The following measures have been adopted in relation to such conflicts of interest:

1. Segregation of duties and responsibilities for persons engaged in different business activities including procedures for ensuring appropriate communication between business units.
2. 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.
3. All employees of BL Global are strictly forbidden to trade Margin FX Contracts for themselves either on the BL Global platform or on any other platform either directly or through an intermediary/related party.
4. All employees of BL Global are prohibited from accepting gifts or other inducements from any person with any material interest which is likely to conflict to a material extent with any duty which BL Global and/or its employees owe to customers in connection with its investment business or any duty which such a recipient owes to its customers.
5. In the case where the Company distributes promotional material to the public, it ensures that the promotional material is reviewed and approved by the compliance officer prior to distribution. The Compliance Officer also ensures that such promotional material meets the relevant definition as well as having the appropriate disclosure statement.
6. BL Global shall execute all CLIENTS orders at the prompt, fair and expeditious execution, relative to other orders.

7. When BL Global executes an order for a client it shall not give any preferential treatment to that client to the detriment of other clients and shall not disclose the details of one client order to other clients.
8. The Company will ensure that all officers, staff and agents including any authorised representatives (collectively described in this document as 'Representatives') are sufficiently trained in identifying and managing conflicts of interest and will also be required to acknowledge their reading of, and understanding of, this Conflicts of Interest Policy on joining the company and at least quarterly, or sooner if the policy has been altered for any reason, to ensure the Representatives ongoing awareness of the Policy and its requirements.
9. Representatives are required to report immediately to the Compliance Officer any situation, real or perceived, which could be regarded as having a conflict. If a potential conflict has arisen, the Compliance Officer will work with the Representative in order to assess what form the conflict takes and formulate a suitable strategy to handle the conflict, including avoiding it altogether.

## **Disclosure**

Whilst BL Global is devoted to implementing and maintaining our conflicts of interest policy, in some cases, such policy might not be sufficient to prevent risk of damage to the interest of a customer. In such a case, BL Global shall clearly disclose the general nature and/or sources of conflicts of interest to the client before undertaking business on the client's behalf.