

SWISS FINANCE CORPORATION LIMITED

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CONFLICTS OF INTEREST POLICY

INTRODUCTION

Swiss Finance Corporation Limited's main activity is dealing in spot FX for Retail, expert individuals, medium sized and corporate institutions.

This policy sets out key areas where Swiss Finance may be subject to a Conflict of Interest in the provisions of services to our clients whilst carrying out regulated or ancillary activities. The policy covers those circumstances, which either constitute or could give rise to a conflict of interest entailing a material risk of damage to the interest of one or more clients.

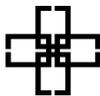
The policy describes the structures Swiss Finance has put in place to limit and to identify and prevent conflicts of interest, which may arise between our clients and us or between one client and another.

TO CLIENTS

When we execute a transaction on your behalf, we may have an interest, relationship or arrangement that is material to all or any part of the information or Services being provided to you.

We take the identification and management of conflicts of interest seriously. We have implemented a conflicts of interest policy that identifies those circumstances that constitute, or may give rise to conflicts of interest which pose a material risk of damage to the interests of one or more of our clients. This policy also addresses the effective organisational and administrative arrangements that we maintain and operate to manage these conflicts, such as departmental procedures and management arrangements, periodic testing of such measures and staff training.

If, in respect of a specific conflict of interest which arises, we consider that the arrangements are not sufficient to enable us to ensure, with reasonable confidence, that the risk of damage to your interests and the interests of our other clients will be prevented, we will decline to act or we will inform you of the nature and type of conflict of interest before we undertake any business on your behalf that may be affected by this conflict. You will then be able to decide whether you agree to us acting for you in these circumstances. If you object to our acting for you, you should notify our Compliance Officer, in writing



SWISS FINANCE CORPORATION LIMITED

IDENTIFICATION OF CONFLICTS OF INTEREST

- ❑ Personal account dealing
- ❑ Likelihood of making a financial gain or avoid a financial loss at the expense of A client
- ❑ Interest in the outcome of a service provided to, or of a transaction carried out on behalf of, a client which is distinct from that client's interest in that outcome;
- ❑ A financial or other incentive to favour the interest of another client or group of clients over the interests of a client;
- ❑ Carries on the same business as a client;
- ❑ Receives, or will receive, from the person other than a client an Inducement in relation to the service provided to that client in the form of monies, goods or services, other than the standard commission or fee for that service;
- ❑ Substantial gifts or entertainment provided to some clients being provided with a better service than others might give appearance of conflicts
- ❑ Designs, markets or recommends a product or service without properly considering all our other products and services and the interests of all our clients.

GUARDING AGAINST CONFLICT OF INTEREST

The procedures and measures we have in place to minimize and manage the conflicts of interest identified above are summarised below. These procedures and measures are designed to ensure that the relevant persons involved in business areas identified above maintain an appropriate degree of independence includes:

- ❑ Personal account dealing requirements applicable to all employees in relation to their own investments; Swiss Finance has a strictest policy in place, where staff are required to seek prior consent of the Compliance officer for all speculative PA transactions in the FX markets. Further details of the PA Dealing are set out in the PA Dealing notice which are given to employees at the start of their employment
- ❑ Chinese walls restricting the flow of confidential and inside information within our Company.
- ❑ Remuneration and incentive policies are designed to avoid rewarding behavior that could lead to the disadvantage of clients. There is no direct link between the remuneration/incentive of sales and trading staff. Each department's remuneration/incentive is decided separately except that all staff remuneration is linked to the general profits of the firm.
- ❑ A 'need to know' policy governing the dissemination of confidential or inside information within the Company

- ❑ Procedures governing access to electronic data;
- ❑ Swiss Finance operates a strict policy in relation to gifts and entertainment. Relevant persons must report any gifts or entertainment over the value of £250 to the compliance officer. Any gift received by any single person which is or appears to be of a value in Excess of £400 must, where possible be pre 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 employees are concerned, unless board approval is provided;
- ❑ Segregation of duties where possible that may give rise to conflicts of interest if carried on by the same individual; as a small firm it is not possible to entirely remove these conflicts
- ❑ A Public Interest Disclosure policy (“whistleblowing”) for our Company;
- ❑ The provision of manuals to directors and employees on conflicts of interest management;
- ❑ A policy designed to limit the conflict of interest arising from the giving and receiving of inducements.

REPORTING CONFLICT OF INTEREST

Where a conflict arises we will, if we are aware of it, disclose it to a client prior to undertaking investment business for that client or, if we do not believe that disclosure is appropriate to manage the conflict, we may opt not to proceed with the transaction or matter giving rise to the conflict; or Where a conflict arises you should report it immediately to the Compliance Officer.

RECORDING OF CONFLICT OF INTEREST

Swiss Finance Corporation Limited must keep a record of the kinds of service or activity we carry out by, or on behalf of, Swiss Finance Corporation Limited in which a conflict of interest leading to a material risk of damage to the interest of one or more clients has arisen, or may arise. This record must be regularly updated.