

## eToro (UK) Ltd

# Conflicts of Interest Policy

This document summarises eToro (UK) Ltd.'s (eToro UK) conflicts of interest policy ("Policy"). eToro UK for these purposes includes its group companies, employees, appointed representatives, tied agents, contractors or any person directly or indirectly linked to them by control.

eToro UK sets out to manage conflicts of interest fairly. eToro UK has established a conflicts of interest policy setting out the procedures and controls which help it identify and appropriately deal with conflicts of interest – actual, apparent and potential.

### **Objective**

The objective of the Policy is to ensure that conflicts of interest within eToro UK are identified, managed appropriately and, where necessary, disclosed in order to ensure the fair treatment of clients and compliance with the rules and principles of the Financial Conduct Authority ("FCA").

### **Application**

This policy applies to all eToro UK FCA regulated activities, and activities in connection with or for the purposes of such regulated activities, including those outsourced activities provided by a third party. All employees are required to comply with the Policy.

### **Conflicts of Interest Identification**

eToro UK has systems in place to identify potential conflicts of interest. Once a conflict has been identified, procedures are implemented to ensure it is appropriately managed. A potential conflict occurs where competing obligations result in, or are likely to result in, risk of damage to the interests of a client, including where:

- eToro UK is likely to make a financial gain, or avoid a financial loss, at the expense of the client; or
- An eToro UK employee is likely to make a financial gain, or avoid a financial loss, at the expense of the client; or
- A client of eToro UK is likely to make financial gain or avoid a financial loss at the expense of another client.

### **Arrangements to Manage Conflicts**

eToro UK has established procedures which are designed to identify and manage conflicts of interests. These include a number of organisational and administrative arrangements to safeguard the interests of clients and minimise the potential for conflicts to arise.

eToro UK adopts a number of approaches to manage conflicts of; the following is a non-exhaustive list of these controls:

- Segregation of duties for persons engaged in different business activities, including procedures for ensuring appropriate communication between business units;
- Personal account dealing restrictions applicable to all staff, and their associates, regardless of seniority;
- Control over sources of remuneration of relevant persons;
- Protocols to ensure that no improper inducements are given or received and proper inducements are disclosed appropriately;
- Gifts and personal benefits procedures including a gift register recording the solicitation, offer or receipt of certain benefits;
- External directorship policy, including the requirement for all external directorships and outside business interests to be declared; and
- Training to directors and employees of eToro UK on conflicts of interest management.

### **Conflicts Disclosure**

Where eToro UK considers that the arrangements in place to manage potential and/or actual conflicts of interest are not sufficient to avoid material risk of damage to a client's interest, eToro UK will disclose the general nature and/or sources of the conflict of interest to the client before undertaking any business for the client.

Further information on eToro UKs conflicts policy, including a full version, can be provided upon request. Alternatively, please address any questions to your usual eToro UK contact.