Wtraders are registered company in TFIZ as a Forex Brokerage Firm
TFZ NUMBER : TFZ/211123/01 , Company ID Number: 405658729

WTRADERS

Conflict of Interest Procedure

Introduction

Services displayed on the website are provided by Wtraders.com or net & , Wtraders.com or net.

Card transactions are processed by , Wtraders.com or net

It is important to identify and effectively manage conflicts of interest, which arise or may arise in the course of providing a service and carrying out activities, as their existence may lead to material risk of damage to a client's interests. This document sets out Wtraders.com or net policy for the management of such conflicts of interest.

Wtraders.com or net has taken this opportunity to examine its policies and procedures to ensure they remain fit for purpose and address, where potentially relevant, the issues in a way which is proportionate to the scale and complexity of its business. Both the policy and the register of conflicts of interest will be reviewed on at least an annual basis.

This document does not intend to create third party rights or duties or form part of any contractual agreement between the firm and any client. This policy may be amended and updated at any time if any material change occurs and will be reviewed on at least an annual basis.

If at any time you are in doubt as to how to act in a given situation where you are faced with an actual or potential conflict of interest, you should contact the Compliance Officer.

Whilst conflicts of interest are important to be adhered to by all of Wtraders.com or net staff, they are non-exhaustive, and certain other additional rules may apply to readers who are members of professional associations by virtue of their job role. Failure to follow any of the rules whether by express breach, or failure to follow any of the spirit of identifying, mitigating and managing conflicts of interest may also be a breach of an employment contract. Disciplinary action may be taken by Wtraders.com or net as a result. Conflicts of Interest

These services that Wtraders.com or net provides to its clients could potentially give rise to conflicts of interest entailing a material risk of damage to the interests of one or more clients. This document aims to set out these potential conflicts and the procedures that are in place to be followed and measures to be adopted in order to manage such conflicts.

Conflicts of interest may occur between a customer and Wtraders.com or net, including its managers, employees or any persons directly or indirectly linked to the firm, or between two or more clients.

Treating customers fairly is central to the core values of Wtraders.com or net. There is an embedded culture that understands what is considered acceptable and unacceptable behavior. As such, conflicts of interest and the identification / management / mitigation thereof are central to this philosophy and culture.

Definition

An actual or potential conflict may arise when, in the exercise of its activities and services, the interests of:

- Wtraders.com or net (including its managers, employees and appointed representatives or any person directly or indirectly linked to them by the control); or

- its associates;

and the interest of its clients, are directly or indirectly in competition, and which could significantly prejudice the client's interests.

Identifying situations where a conflict may arise

The circumstances giving rise to conflicts of interest include all cases where there is a conflict between the:

- Interests of Wtraders.com or net, an individual member of staff, certain persons directly or indirectly connected to Wtraders.com or net; and the duty that Wtraders.com or net owes to a client; or
- Differing interests of two or more clients, as Wtraders.com or net owes a separate duty to each of them.

Conflicts of interests could prejudice a client in various ways, whether or not Wtraders.com or net suffers any financial loss and independently of whether the actions or the motivations of the employees involved are intentional. For the purposes of identifying the types of conflicts of interest that arise, or may arise, Wtraders.com or net must take into account, as a minimum whether the firm, a relevant person (e.g. a partner, employee or an appointed representative or a director, partner or employee of an appointed representative or a person who is directly involved in the provision of services to the firm or its appointed representative under an outsourcing agreement) or a person directly or indirectly linked by control to the firm:

- Is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- Has an interest in the outcome of the service to, or a transaction carried out for, a client which differs from the client's interest;
- Has a financial or other incentive to favour one client (or group of clients) over the interests of another;
- Carries on the same or similar business as the client; and/or
- Receives an inducement from a third party in the execution of the service provided to the client, other than the standard commission/fee for that service.

Generic Conflicts

Wtraders.com or net has identified the following circumstances in which general types of potential conflicts of interest may arise:

- The firm or an associate undertakes designated investment business for other clients including its associates (and the clients of its associates); • A partner or employee of the firm, or of an associate, is a director or partner of, holds or deals in securities of, or is otherwise interested in any company whose securities are held or dealt in on behalf of a client;
- A partner or employee of the firm, or of an associate, is involved in the management of any company whose securities are held or dealt in on behalf of a client;
- A transaction is effected in units or shares of a fund or company of which the firm or an associate is the manager, operator or adviser;
- A transaction is effected in securities in respect of which the firm or an associate, or a partner, director or employee of the firm or an associate, is contemporaneously trading or has traded on its/their own account or has either a long or short position;

- The firm may, when acting as agent for a client, match an order of the client with an order of another client for whom it is acting as agent.

Prevention and management

Wtraders.com or net has identified specific potential conflicts of interests, which may arise in relation to its activities. The general nature and/or source of these conflicts will be disclosed to clients before undertaking business in sufficient detail to enable the client to make an informed decision about the service in the context in which the conflict has arisen. For each potential situation, Wtraders.com or net has analysed whether or not the risk is actual or potential for one or more of its clients.

It is not always possible to prevent actual conflicts of interest from arising. In that case Wtraders.com or net will try to manage the conflicts of interests by segregating duties where possible or by establishing Chinese Walls. In certain circumstances, Wtraders.com or net may have to decline to take on a new client.

If Wtraders.com or net considers developing new products or services or making other changes to its business model or operations, Senior Management will consider whether any additional potential conflicts of interest arise.

Senior management will update the "Conflicts of Interest Policy" and "Register of Potential Conflicts of Interest" as necessary on an ongoing basis and formally consider the continued adequacy of the arrangements on an annual basis.

Inducements including gifts and hospitality

Wtraders.com or net maintains business relationships with third parties who may remunerate Wtraders.com or net in the form of management and performance fees, which can constitute monetary or non-monetary benefits thereby impairing Wtraders.com or net fiduciary duties to the client. Such payments are classified as inducements. Further details are included in the Compliance Manual.

Gifts and hospitality could lead to potential conflicts of interest. No employee may accept from, or give to, any person any gift or other benefit that cannot properly be regarded as justifiable in all circumstances. Policies and procedures have been implemented to ensure that staff and their connected persons do not offer or accept gifts or inducements which may give the perception that decisions or actions are not impartial.

These policies are set out in the Compliance Manual. All employees must act with the highest standards of integrity to avoid any allegations of conflicts of interest.

A record is kept by the Compliance Officer of any gifts or hospitality received or given. Where an invitation to a hospitality event could be construed as being a business inducement, it must be declined and the Compliance Officer informed.

Personal account dealing

Employees may only undertake personal investment activities that do not breach applicable law or regulation, do not unduly distract from their employment responsibilities and do not create an unacceptable risk to the company's reputation. Transactions should also be free from business and ethical conflicts of interest.

Employees must never misuse proprietary or client confidential information in their personal dealings and must ensure that clients are never disadvantaged as a result of their dealings.

Wtraders.com or net Personal Account Dealing Policy has been established to ensure that personal account dealing by members of staff comply with this policy. This includes a requirement for pre-deal approval from the Compliance Officer. Such permission is normally only valid for 24 hours.

Wtraders.com or net Personal Account Dealing policy is set out in the firms' Compliance Manual.

Outside employment, external Directorships and business interests

No employee may engage in any additional occupation without the consent of the Company. In certain circumstances, consent may be withheld.

Employees must not accept personal fiduciary appointments (such as trusteeships, Director appointments or executorships other than those resulting from family relationships) without first obtaining written approval from the COO or the Compliance Officer. Aggregation of orders

Where Wtraders.com or net aggregates the orders of clients, it must ensure that this does not work to the overall disadvantage of any client whose order is to be aggregated. Wtraders.com or net makes reference to this within the Order Execution Policy.

Disclosure

In certain cases, Wtraders.com or net may disclose the general nature and/or source of potential or actual conflicts to its client in writing before undertaking business on its behalf so that the client can decide whether or not to accept these potential conflicts.

If it is not possible to avoid or manage a conflict of interest, Wtraders.com or net may have no choice but to decline to provide the service requested.

Segregation of Duties

There are several distinct tasks within the investment management business that could lead to potential conflicts of interest that are mitigated by them being segregated from the individuals directly involved in the task.

Information barriers

Wtraders.com or net maintains appropriate policies in its internal policies detailing the potential use of "Insider Lists" and "Information Barriers" often known as Chinese Walls so as to limit or withhold the use of information that is pricesensitive, confidential, and could give rise to market abuse, restrictions on dealing, conflicts of interest, or any other improper or unethical activities.

The Compliance Officer monitors along with the relevant business line managers the effectiveness of any Information Barriers that may be required. In certain circumstances staff may need to be taken "across the wall", should this be required, the Compliance Officer must be notified and a record made thereof.

Remuneration and Oversight

The management oversight and determination of appropriate remuneration of members of staff is conducted by Wtraders.com or net Senior Management.
Remuneration is based on the overall results of the firm and is not based on the success of any particular transaction.

Remuneration for customer facing and sales staff should be partly based on business production.

Staff are subject to appropriate management and supervision to ensure that Wtraders.com or net is able to demonstrate that it has appropriate and effective arrangements in place to ensure that conflicts of interest are properly managed. Record Keeping

Wtraders.com or net must keep and regularly update a written record of the kinds of ancillary services or activities carried out by or on behalf of the firm in which a conflict of interest entailing a material risk of damage to the interests of one or more clients has arisen or, in the case of an ongoing service or activity, may arise.
These records will be for a minimum period from the date of creation and are maintained on an ongoing basis by the Compliance Officer.

Reporting

Conflicts of Interest situations or potential conflicts situations should be reported to the Compliance Officer immediately.