

Conflicts of Interest Policy

2015

Policy Owner	Compliance
Document Classification	
Version	v.2.0.15
Approved by	

1. **REVISION HISTORY**

Revision version	Date	Summary of Changes
v.1.0.15	Jul 2015	New Policy
v.2.0.15	Nov 2015	Policy Update

2. **SCOPE**

This Policy applies to all staff in the UK, which includes all permanent employees, contractors, temporary staff, secondees, external consultants, interns, agents, volunteers, third party representatives and business partners and any other person associated with Tullett Prebon (Securities) Limited, Tullett Prebon (Europe) Limited, Tullett Prebon (Equities) Limited, Tullett Prebon Group Limited, PVM Oil Associates Ltd and PVM Oil Futures Ltd (together the 'Firm').

3. **POLICY STATEMENT**

The Firm operates as an intermediary in the world's wholesale over-the-counter and exchange-traded financial and commodities markets and is lead regulated by the Financial Conduct Authority ('FCA').

This Policy sets out the requirements that staff must comply with in relation to conflicts of interest.

4. **POLICY REQUIREMENTS**

4.1 **Overview**

Confidence in the Firm's integrity to act on behalf of its clients is central to the relationship of trust the Firm has with its clients. This means that when providing services to clients the Firm must always act in its clients' best interests and therefore put clients' interests ahead of its own. The Firm must manage actual or potential conflicts of interest fairly, whether those conflicts exist between the Firm itself and its clients, between two or more clients or between any employee and the Firm/any of its clients.

4.2 **Overriding Principles**

Staff must act honestly and in good faith and must not:

- (a) misuse their position within the Firm or information they receive in the course of their employment to procure a personal benefit for themselves, or for their family or friends, or any other person or cause detriment to the Firm or its clients;
- (b) participate in any activity or employment which may compete or conflict with the Firm's interests or those of its clients;
- (c) participate in acts or decisions on behalf of the Firm or its clients when dealing with an entity in which that member of staff has:
 - (i) a material personal interest;
 - (ii) a role; or
 - (iii) a personal relationship with a person who has a role in relation to that transaction that may give rise to a conflict of interest.

Staff must alert the Compliance Department immediately if they become aware of any matter which suggests an actual or potential conflict of interest. Conflicts are identified and recorded in the Firm's Conflicts of Interest Register which is maintained by the Compliance Department. The Compliance Department will then advise of the steps that may need to be taken to manage the potential conflict.

4.3 **Management of Conflicts**

The Firm has a number of different controls in place to manage/mitigate actual and potential conflicts of interest. A non-exhaustive list includes:

(a) **Information Barriers**

Physical separation of departments to restrict the flow of confidential or material non-public price sensitive information within the Firm as well as, where appropriate, physical separation and system access restrictions.

(b) **Personal Account Dealing**

Disclosures on dealings in personal accounts to identify transactions that may give the appearance that staff or persons connected with staff are improperly benefitting from their employment with the Firm.

(c) **Gifts, Entertainment & Hospitality**

Restrictions on the giving and receiving of gifts or benefits that may make either party the subject of an inducement.

(d) **Client Confidentiality**

Restrictions on the use of information received in the course of employment with the Firm which could be used for personal benefit, the benefit of the Firm or for the benefit of another client.

(e) **Benchmarks**

Clear segregation of duties between the area responsible for submitting transactional data to the Wholesale Markets Brokers Association and/or the front-office to prevent potential or existing conflicts from inappropriately influencing benchmark determinations/submissions.

(f) **Outside Business Interests**

Restrictions to ensure that staff do not place themselves, or allow themselves to be placed, in a position where their personal interests or affairs may conflict with any of the duties they owe to the Firm or its clients.

5. **POLICY MANAGEMENT**

5.1 **Responsibilities**

The Boards of Directors (of the entities set out in Section 2 above) have overall responsibility for ensuring that this Policy complies with the Firm's legal and regulatory obligations, and that all those under the Firm's control comply with it.

The Head of Compliance has primary and day-to-day responsibility for implementing this Policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and have adequate training on it.

5.2 **Enforcement and Exception Handling**

The Firm reserves the right to take immediate disciplinary action against anyone who fails to comply with this Policy up to and including dismissal.

Any exceptions to this Policy must be discussed with, and agreed by, the Compliance Department in advance.

5.3 **Review and Revision**

The Head of Compliance is responsible for reviewing and updating this Policy annually or whenever there is a significant change to compliance management best practice, the Firm's business practices, or applicable legal and/or regulatory requirements.

5.4 **Query Resolution**

If you have any questions relating to this Policy or if you are unsure in any way about its application you must raise this with the Compliance Department.