



# Conflict of Interest Policy

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## **PFH Markets Limited**

Registration Number: 2024-00544

Saint Lucia

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2026

## ■ Conflict of Interest Policy

PFH Markets Limited is registered in Saint Lucia as an International Business Company with registration number 2024-00544 by the Registrar under the International Business Companies Act, Cap 12.14: Section 6. PFH Markets carries on the services in the international forex and contract for differences (CFDs) market to retail and corporate clients in accordance with the laws of Saint Lucia.

### 1. Introduction

This policy outlines a suitable, effective and sustainable approach to the identification and management of conflicts of interest ("COI").

The policy aims to comply with best practice and the statutory requirements of Saint Lucia.

### 2. Purpose

This document embodies the Conflict-of-Interest Policy for PFH Markets Limited, which shall be referred to as PFH Markets in this document.

The purpose of this policy is:

- I. to provide guidance on the behaviours expected in accordance with PFH Markets standards;
- II. to promote transparency and to avoid or mitigate any business-related COI that may arise between PFH Markets, its clients, vendors and/or employees respectively;
- III. to ensure fairness in the interests of employees and PFH Markets;
- IV. to document the process for the disclosure, approval and review of activities that may amount to actual, potential or perceived COI;
- V. to provide a mechanism for the objective review of personal outside interests.

PFH Markets is committed to ensuring that all business is conducted in accordance with good business practice. To this end, PFH Markets conducts business in an ethical and equitable manner and in a way that safeguards the interests of all stakeholders to minimise and manage all real or potential conflicts of interest ("COI"). PFH Markets and its representatives must therefore avoid (or mitigate, where avoidance is not possible) any COI between PFH Markets and a client, or between its representative and a client.

### 3. What is "Conflict of Interest"?

Any situation in which PFH Markets or its representatives has an actual or potential interest that may, in rendering a financial service to a client, influence the objective performance of his, her or its obligations to that client; or prevent PFH Markets or its representatives from rendering an unbiased and fair financial service to that client, or from acting in the interests of that client, including, but not limited to:

- a financial interest;
- an ownership interest;

- any relationship with a third party ("third party") means:
  - a. a product supplier,
  - b. another provider,
  - c. an associate of a product supplier or a provider;
  - d. a distribution channel;
  - e. any person who in terms of an agreement or arrangement with a person referred to in paragraphs (a) to (d) above provides a financial interest to a provider or its representatives.

## 4. Causes

In general, conflicts of interest may be caused by the superior knowledge of employees and the variety of products on offer, and may arise between a firm and the client or between the client and another client. When a firm provides service to the client, conflicts of interest may arise in one or more of the following situations when a firm or a relevant person:

- 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 a service provided to or a transaction carried out on behalf of the client, which is different from the client's interest in that outcome;
- has financial or other incentives to favour the interest of other client(s) over the interests of the client;
- carries on the same business as the client; or
- receives or will receive from a person other than the client an inducement, other than standard commission or fee, in relation to a service provided to the client.

With respect to PFH Markets, the above covers the main conflicts of interest that may occur when providing services to our clients.

## 5. Disclosure

As required by law, PFH Markets implements and maintains an effective conflict of interest policy for the aim of preventing conflicts of interest or potential conflicts of interest from causing a material risk of damage to the interests of clients.

PFH Markets keeps records of our business activities so that we can identify any conflict that might arise that would have a material risk of damage to the interests of our clients. PFH Markets's conflicts of interest policy adopts procedures and measures to manage and control the conflicts of interest identified, including segregation of duties and responsibilities and separate supervision of relevant persons.

Whilst PFH Markets is devoted to implementing and maintaining our conflicts of interest policy, in some cases such policy might not be sufficient to prevent risks of damage to the interest of a client. In such a case, PFH Markets shall disclose the general nature and sources of conflicts of interest to the client so as to enable the client to make an informed decision whether to proceed with the transaction in question.

## 6. Ownership and Accountability

This policy is owned by PFH Markets Limited, registered in Saint Lucia with registration number 2024-00544, under the International Business Companies Act, Cap 12.14: Section 6. PFH Markets address

is Saint Lucia.