CONFLICTS OF INTEREST POLICY

CFI UK Limited

1. Introduction

CFI UK Limited ("we", "us", "the Firm") is authorised and regulated by the Financial Conduct Authority (FCA), Firm Reference Number 828955. You can verify our FCA authorisation at any time at register.fca.org.uk.

This document explains what conflicts of interest are, the types of conflict that may arise in connection with our services, how we manage them, and what you can do if you have a concern. It applies to all clients of the Firm, whether you are classified as a retail client or an elective professional client.

We are required by FCA rules to take all reasonable steps to identify and manage conflicts of interest fairly, and to act in your best interests. Where we cannot manage a conflict sufficiently, we will disclose it to you in writing before providing the relevant service so that you can make an informed decision about whether to proceed.

This Policy is reviewed at least annually.

2. Our Business Model and the Principal Conflict

The most important conflict to understand: we act as the counterparty to your trades. This means that when you lose money on a position, we make money and when you make money, we lose. This conflict is inherent to the execution-only CFD and spread betting model and cannot be eliminated. We manage it through the controls described in Section 3.

We are an execution-only firm. We do not give investment advice or make recommendations about whether you should trade, what you should trade, or when. All trading decisions are yours alone. This is an important safeguard: it means we are not in a position to steer your decisions in a direction that benefits us at your expense.

Before you open an account, we are required to assess whether our products are appropriate for you. We will warn you, or decline to open an account, where we conclude that they are not. Our commercial interest in acquiring new clients does not override this obligation.

3. How We Manage Conflicts of Interest

The following table sets out the main conflicts that may arise in our business and the controls we have in place to manage them. If you would like further information about how a specific conflict is managed in relation to your account, please contact us using the details in Section 6.

4. When We Cannot Fully Manage a Conflict

Where our controls are not sufficient to ensure, with reasonable confidence, that a conflict will not harm your interests,

Conflict	How we manage it
Acting as principal counterparty	We operate on an execution-only basis with no advice given. Our pricing and margin policies are documented, applied consistently, and are not adjusted to disadvantage individual clients. We monitor our trading and pricing data on an ongoing basis. This conflict is also disclosed in our Terms of Business.
Interest in client onboarding	We have a commercial interest in onboarding new clients. We manage this by conducting appropriateness assessments independently of any commercial consideration, and by warning or declining where a product is not appropriate for a client.
Third party payments and inducements	We do not receive commission, referral fees, or other payments from third parties in connection with your trades. We may receive minor non-monetary benefits from providers – such as research tools or data services – only where those benefits are capable of improving the quality of service we provide to you and do not compromise our obligation to act in your interests. We do not accept any payment or benefit that would create a conflict with our obligations to you.
Introducer relationships	Where a third party introduces clients to us, we pay that party an agreed fee. That fee is not conditional on the outcome of any trade you place, and the introducer's involvement does not affect the independence of our appropriateness assessment or how we treat you as a client.
Staff personal interests	Our staff are required to disclose any personal financial interests, relationships, or outside roles that could conflict with their duties to clients. Staff personal account dealing in CFDs and related instruments is subject to prior notification and oversight.
Gifts and hospitality	Staff may not accept gifts or hospitality from clients or suppliers above defined thresholds. All gifts and hospitality are recorded. This reduces the risk that personal relationships with third parties influence how we treat you.
Staff remuneration	We maintain controls over staff remuneration to ensure that incentive structures do not conflict with our obligations to clients. No member of staff is remunerated in a way that would encourage them to act against your interests.

we will disclose the conflict to you in writing before providing the relevant service. Any such disclosure will explain:

- the nature of the conflict and how it has arisen;
- the risks the conflict creates for you; and
- the steps we have taken or propose to take to mitigate those risks.

This information will be given to you in sufficient detail to allow you to make an informed decision about whether to proceed. You will not be pressured to continue.

Where we determine that we cannot manage a conflict adequately, we may decline to provide the relevant service. Disclosure is a measure of last resort – it does not replace our obligation to manage conflicts properly in the first place.

5. Our Commitment to You

We are bound by the FCA's Consumer Duty, which requires us to act to deliver good outcomes for retail clients. In practice, in relation to conflicts of interest, this means:

- Any disclosures we make to you about conflicts of interest will be written in plain language and will contain enough detail to be genuinely useful, not just a formality.
- We will not allow conflicts of interest to reduce the quality of service or support we provide to you.
- Our pricing, spreads, and fee structures will not be set in a way that takes unfair advantage of our position as principal counterparty.
- Our appropriateness assessment will not be influenced by our commercial interest in onboarding you as a client.

6. Questions and Complaints

If you have any questions about this Policy, or about how we have managed a conflict of interest in connection with your account, please contact us:

CFI UK Limited

16 Berkeley Street, London, W1J 8DZ

Email: uk@cfi.trade

Telephone: +44 (0)20 3907 4131

If you wish to make a complaint, you are entitled to receive a copy of our complaints handling procedure on request. We will acknowledge your complaint promptly and aim to resolve it as quickly as possible.

If you are not satisfied with our final response, you may be entitled to refer your complaint to the Financial Ombudsman Service (FOS), free of charge. The FOS can be contacted at:

Financial Ombudsman Service

Exchange Tower, London, E14 9SR

Telephone: 0800 023 4567

Website: www.financial-ombudsman.org.uk

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