

TF GLOBAL MARKETS (SOUTH AFRICA) (PTY) LTD

Summary of Conflicts of Interest Policy

Document	Summary of Conflicts of Interest Policy
Date	May 9, 2019
Entity	TF Global Markets (South Africa) (Pty) Ltd
Regulator	Financial Sector Conduct Authority (FSCA)
FSP licence number	49835
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Summary of Conflicts of Interest Policy

A 'conflict of interest' is a situation where a firm, one of its employees or anyone else involved in its running, has conflicting personal and professional interests. This could get in the way of us providing independent and impartial services.

This summary explains how we prevent and manage conflict of interest and make sure that we treat our customers fairly. We do have a detailed policy available if you want a copy.

We have listed the procedures and controls below.

- "Chinese Walls" between business activities likely to generate conflicts of interest. These ensure physical separation of those departments, prevent the undue circulation of confidential information, and prevent the use of confidential information in ways that may damage market integrity or client interests;
- Procedures to ensure the proper execution of customer orders, particularly in relation to the allocation of assets or financial instruments, and the primacy of client orders over trading for our own account;
- Remuneration policies for ThinkMarkets's employees, specifically designed to prohibit direct profit-sharing success fees for a specific transaction;
- Gifts, entertainment, hospitality and other inducements could influence staff to choose a particular supplier rather than acting in customers' best interests. We take care to make sure that any gifts or any other benefits are modest and are recorded and monitored;
- We train staff to make sure they understand their obligations. We check to make sure that staff don't have any undisclosed and unapproved relationships with suppliers, customers colleagues or competitors that might get in a way of their independent judgement and stop them from acting in customers' best interests.

After careful review, we firmly believe that we have taken all the necessary steps to manage or mitigate any potential conflicts of interest that could affect you.

We will continue to review this policy on a regular basis.

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SUMMARY OF CONFLICTS OF INTEREST POLICY
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