



Conflicts of Interest Policy

Sonar Markets is a trading name of BUX Financial Services Limited.

1. Introduction

The aim of this document is to provide a summary of the policy we maintain in order to manage conflicts of interest in respect of the duties we owe to our clients. This policy applies from 3rd January 2018.

2. Purpose

A conflict of interest can arise between BUX Financial Services Limited, its directors and staff and any associates (“BUX”, “BUX Markets” or “us”) and you, the client. Client-to-client conflicts may also arise.

The purpose of this document is to provide you with a summary of BUX Market’s conflict of interest policy which is maintained by BUX Markets in order to identify, prevent, manage and appropriately deal with conflicts of interest in respect of the duty it owes to you.

3. The BUX Markets Policy

The aim of BUX Markets’ policy is to prevent adverse conflicts of interest that may arise in the course of us providing any investment and/or ancillary services to you. BUX Markets achieves this by maintaining and operating effective organisational and administrative arrangements.

BUX Markets maintains robust internal controls and procedures to ensure compliance with its Conflicts of Interest Policy, including:

- Maintenance of appropriate independence between members of staff that are involved in different activities;
- Physical separation of staff and systems via information barriers (‘Chinese Walls’), ultimately restricting and controlling the transfer of personal and/or sensitive information;
- Personal account dealing restrictions applicable to all staff and their close-linked associates; and
- Adherence to a gifts and inducement policy to log and control the receipt of gifts or a certain value/nature by our employees and/or directors.

4. Conflicts Disclosure

If arrangements made by BUX Markets are not sufficient enough to ensure, with reasonable confidence that risks of damage to the interest of a client can be prevented, BUX Markets must disclose the general nature and/or sources of such conflicts of interest and the steps it has taken to mitigate such factors before undertaking any business with/for its clients.