

Summary of conflicts of interest policy

Effective from: 1st November 2007

The aim of our policy is to identify and prevent conflicts of interest which may arise between us and our clients or between one client and another. Accordingly, we have adopted a conflicts of interest policy setting out the procedures, practices and controls in place to achieve this.

The avoidance of potential conflicts of interest is a key consideration for us, and our conflicts of interest policy applies to all directors (whether executive or non-executive), employees and any persons directly or indirectly linked to our business, and refers to all interactions with all clients.

Scope

Types of conflict which may carry a material risk of damage to the interests of a client include situations where we or any person directly or indirectly linked to us:

- is likely to make a financial gain or avoid a financial loss at the expense of a client;
- has an interest in the outcome of a service provided to, or of a transaction carried out on behalf of, a client which is distinct from that client's interest in that outcome;
- has a financial or other incentive to favour the interest of another client or group of clients over the interests of a client;
- carries on the same business as a client;
- receives, or will receive, from the person other than a client an inducement in relation to the service provided to that client in the form of monies, goods or services, other than the standard commission or fee for that service;
- designs, markets or recommends a product or service without properly considering all our other products and services and the interests of all our clients.

Guarding against conflicts of interests

Different systems and procedures are in place to minimise the potential for conflicts of interest. These include:

- personal account dealing requirements applicable to all officers, employees and certain associates of our group of companies (the "Group") in relation to their own investments;
- an investment research policy covering the production and dissemination of investment research by the Group;
- Chinese walls restricting the flow of confidential and inside information within our Group;
- a 'need to know' policy governing the dissemination of confidential or inside information within the Group;
- procedures governing access to electronic data;
- a gifts and inducements log registering the solicitation, offer or receipt of certain benefits;
- the prohibition of external business interests conflicting with our interests as far as the Group's officers and employees are concerned, unless board approval is provided;
- segregation of duties that may give rise to conflicts of interest if carried on by the same individual;
- a Public Interest Disclosure policy ("whistleblowing") for our Group;
- the provision of training to directors and employees of the Group on conflicts of interest management;
- a policy designed to limit the conflict of interest arising from the giving and receiving of inducements.

Where a conflict arises we will, if we are aware of it, disclose it to a client prior to undertaking investment business for that client or, if we do not believe that disclosure is appropriate to manage the conflict, we may opt not to proceed with the transaction or matter giving rise to the conflict.

Should you have a question about conflicts of interest please direct any questions to our Compliance Department at our registered address.

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