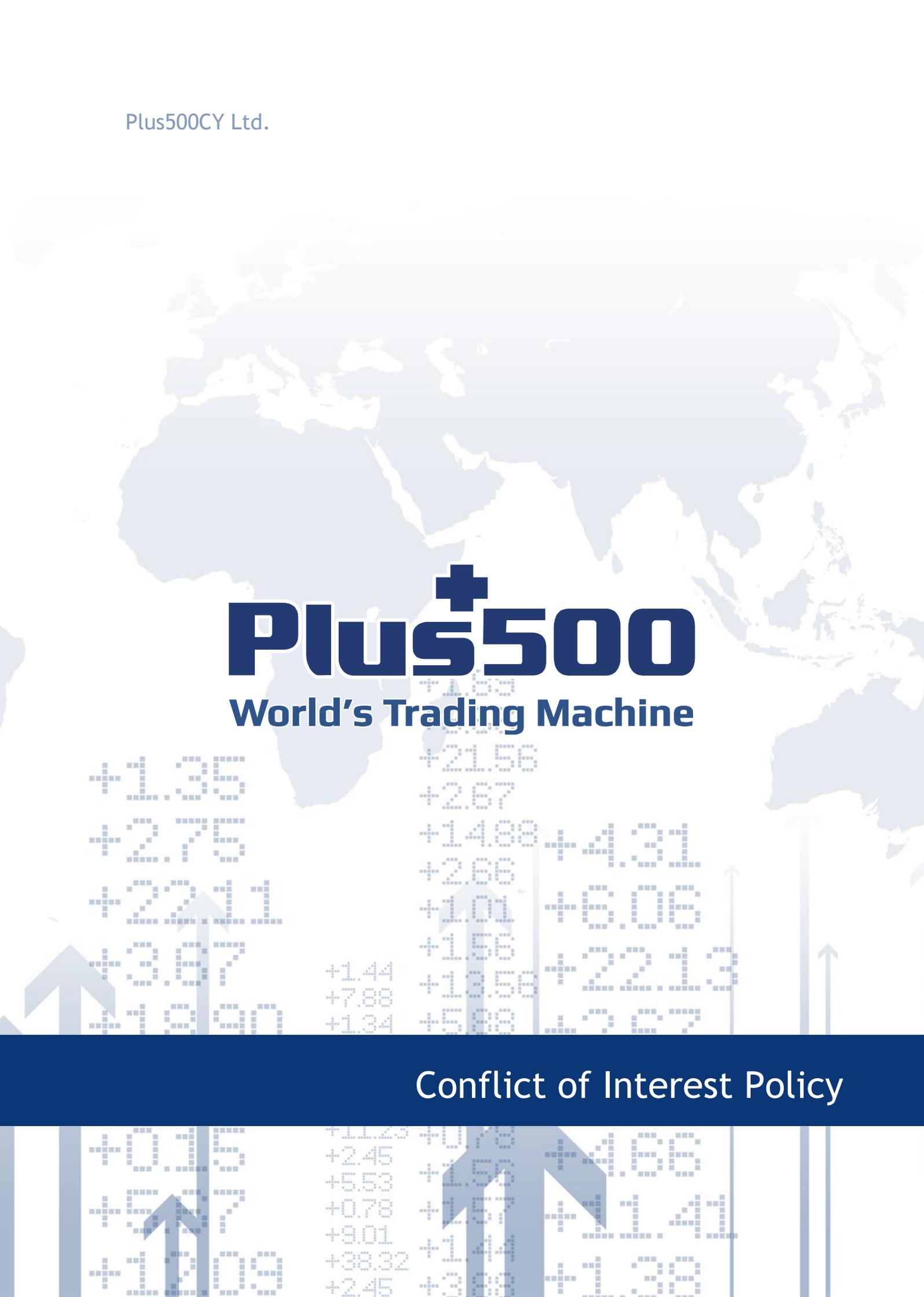


Plus500CY Ltd.



Plus500
World's Trading Machine

Conflict of Interest Policy



Summary of Conflict of Interest Policy

1. Introduction

- 1.1. This Conflict of Interest Policy outlines how Plus500CY Ltd. ("Plus500" or "the Company") manages the conflicts which can arise within Plus500, between Plus500 and its customers and between customers of Plus500. This Policy is reviewed from time to time to take account of changes to operations or practices and, further, to make sure it remains appropriate to any changes in law, technology and the general business environment.
- 1.2. This statement summarises policies adopted by Plus500 in accordance with the Investment Services and Activities and Regulated Markets Law of 2017 L. 87(I)/2017 ("the Law"), pursuant to which Plus500 is required to take all appropriate steps to detect and avoid conflicts of interest.
- 1.3. This policy applies in respect of all activities undertaken by Plus500 and employees of Plus500, and any persons directly or indirectly related to Plus500 ("Related Persons") and refers to all interactions with all Clients.

2. General Identification of Conflicts of Interest

- 2.1. When the Company deals with or on behalf of the Client, the Company, an associate or some other person connected with the Company may have an interest, relationship or arrangement in relation to the Transaction concerned or that it conflicts with the Client's interest.
- 2.2. The Company has identified the following circumstances which constitute or may give rise to a conflict of interest entailing a material risk of damage to the interests of one or more Clients, as a result of providing investment services:
 - (a) Plus500 may be matching the Client's orders with that of another Client by acting on such other Client's behalf as well as on the Client's behalf;
 - (b) Plus500 is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
 - (c) Plus500 may receive or pay inducements to or from third parties due to the referral of new Clients;
 - (d) Plus500 is the counterparty to its clients' positions on a principal capacity while for each trade an identical hedge trade takes place between Plus500 and Plus500 Ltd.



orders. These procedures allow for the execution of otherwise comparable orders in accordance with the time of their receipt.

- (j) Plus500's procedures are established to ensure that orders executed on behalf of customers are promptly and accurately recorded and that it carries out otherwise comparable orders sequentially and promptly unless the characteristics of the order or prevailing market conditions make this impractical or the interest of the customer requires otherwise.
 - (k) Plus500's procedures ensure that Plus500, its employees and affiliates cannot misuse information relating to pending customer orders.
 - (l) All employees of Plus500 are prohibited from dealing on personal accounts to avoid any actual or perceived conflicts of interest.
 - (m) All employees of Plus500 are prohibited from accepting gifts or other inducements from any person with any material interest which is likely to conflict to a material extent with any duty which Plus500 and/or its employees owe in connection with its treating customers fairly policy or any duty which such a recipient owes to customers.
5. Plus500 is committed to having an effective and appropriate compliance culture to enable it to deal with any new potential conflicts of interest which may arise in the future. Plus500's employees are therefore required to monitor any new circumstances giving rise to potential conflicts and to implement appropriate measures to address these.
6. Plus500 is constantly conducting an in-depth analysis of its business and organisational arrangements including best execution arrangements, inducement practices, remuneration practices and marketing communication procedures, to ensure that all likely conflict of interest situations are identified regardless of materiality. Moreover, Plus500 has policies and procedures in place on product governance to ensure that its products are manufactured and distributed in accordance to the intended target market.

4. Client's Consent

- 4.1. By entering into the User Agreement with Plus500 for the provision of Investment Services, the Client is consenting to an application of this Policy on him. Further, the Client consents to and authorizes Plus500 to deal with the Client in any manner which Plus500 considers appropriate, notwithstanding any conflict of interest or the existence of any interest in a Transaction, without prior reference to the Client.

In the event that Plus500 is unable to deal with a conflict of interest situation it shall provide adequate disclosure to the Client.

5. Disclosure of Information

- 5.1. Plus500 must adequately consider how to manage all conflicts of interest before resorting to disclosure. This will be a last resort after all appropriate steps have been taken to prevent or manage conflicts of interest.

