

## **CONFLICT OF INTEREST POLICY**

### **Purpose**

The purpose of this policy is to help to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect our clients' interests.

### **Objective**

Energy Broking Ireland (EBI) aims to ensure that its representatives including shareholders, directors and employees are aware of their obligations to identify and disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest.

### **Scope**

This policy applies to all representatives of EBI including shareholders, directors and employees. This policy provides confirmation that EBI does not trade on its own account and all trades transacted on the EBI platform are settled directly between its clients. However, there may still be a number of circumstances where conflicts of interest may arise and these are addressed in this policy.

### **Statement on EBI acting as a counterparty**

EBI does not act as a counterparty to any transactions on the EBI Trading Platform and no representatives of EBI, including shareholders, directors and employees, are hereby permitted to transact any products offered on EBI's Trading Platform in the name of Energy Broking Ireland.

### **Identifying conflicts of interests**

EBI has identified the type of conflicts of interest that may arise in the course of its business which contains a risk of damage to the interests of its clients.

Actual, potential or perceived conflicts of interest may arise between:

- (i) EBI representatives and clients participating on our trading platform. For example, EBI may have an interest in the outcome of a transaction which is different from the client's interest in the transaction, and

- (ii) different clients participating on our trading platform. For example, EBI may have an incentive to favour one particular client over another client.

For example, EBI could provide information to a client, without giving any investment advice, but which still encourages them to trade and EBI is then financially rewarded for this trade occurring.

A client could provide an inducement or gift to an EBI representative which incentivises the EBI representative to pass information to that client which is not made available to other clients. EBI representatives may have a close personal relationship with an employee of a client which is used to provide information to that client which is not made available to other clients.

### **Policy**

This policy has been developed because conflicts of interest can arise, and need to be openly and effectively managed. It is the policy of EBI that conflicts of interest be avoided and that any such conflicts (where they do arise) do not damage the interests of our clients.

EBI will manage conflicts of interest by requiring its representatives to:

- not participate in the EBI trading platform on their own behalf,,
- avoid conflicts of interest where possible,
- identify and disclose any conflicts of interest, and
- carefully manage any conflicts of interest.

EBI restricts the giving and receiving of gifts, entertainment and hospitality to ensure that no conflicts of interest might arise on the basis of an inducement. EBI representatives must declare any such offer of a gift or hospitality.

### **Identification and disclosure of conflicts of interest**

Once an actual, potential or perceived conflict of interest is identified, it must be entered into EBI's register of interests. The register of interests must be maintained by the Compliance Manager, and record information related to a conflict of interest (including the nature and extent of the conflict of interest and the steps taken to address it).