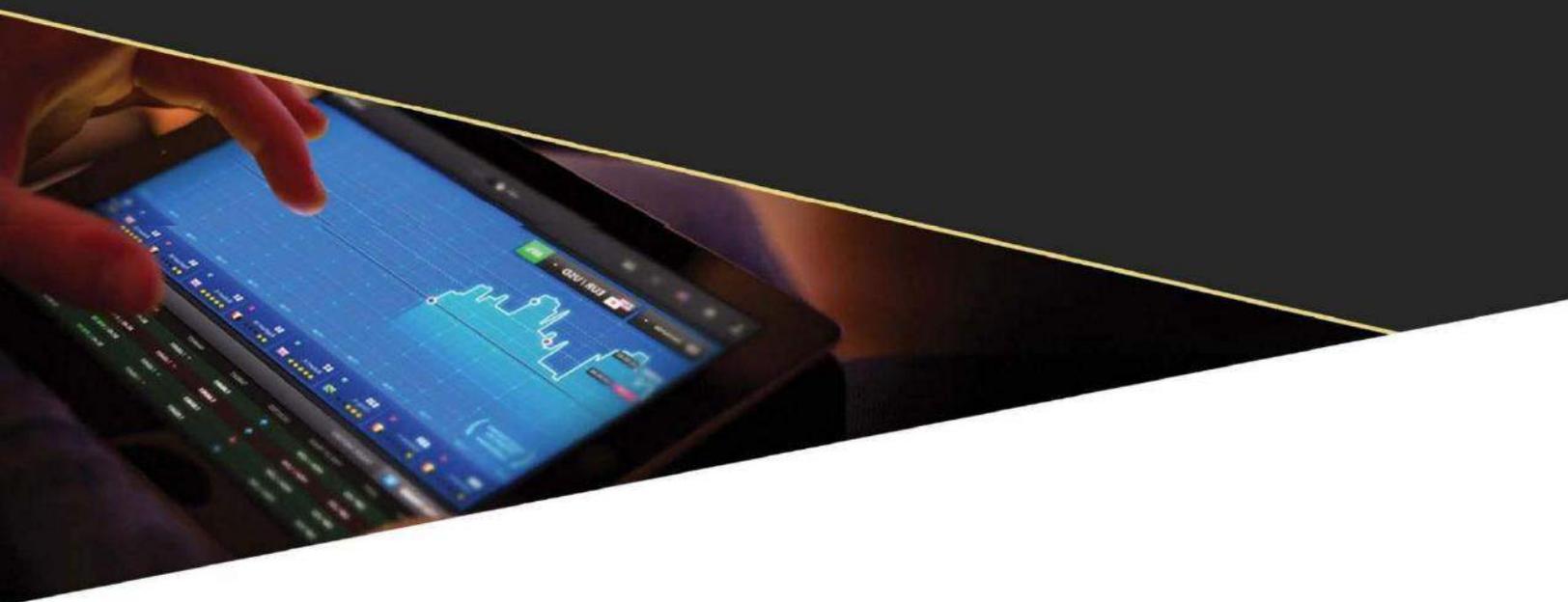




Summary of Conflicts Of Interests Policy 2016



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1. Introduction

1.1 This summarised Conflicts of Interest Policy (“the Policy”) is provided to the Company’s Client or prospective Client in accordance with the Provision of Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets and Other Related Matters, pursuant to which the Company is required to take all reasonable steps to detect and avoid conflicts of interest.

1.2 The Company is committed to act honestly, fairly and professionally and in the best interests of its Clients and to comply, in particular, with the principles set out in the above legislation when providing investment services and other ancillary services related to such investment services.

1.3 The purpose of this document is to set out the Company’s approach in identifying and managing conflicts of interest which may arise during the course of its normal business activities. In addition, this document identifies circumstances which may give rise to a conflict of interest.

2. Scope

2.1 The Policy applies to all its directors, employees, any persons directly or indirectly linked to the Company (Hereinafter called “Related Persons”) and refers to all interactions with all Clients.

3. Identification of Potential Conflicts of Interest

3.1 For the purposes of identifying the types of conflicts of interest that arise in the course of providing investment and ancillary services or a combination thereof and whose existence may damage the interests of a Client, the Company takes into account, by way of minimum criteria, the question of whether the Company or a Related person, or a person directly or indirectly linked by way of control to the Company, is in any of the following situations, whether as a result of providing investment or ancillary services or investment activities:

- a. The Company or a Related person is likely to make a financial gain, or avoid financial loss, at the expense of the Client;
- b. The Company or a Related person has an interest in the outcome of a service provided to the Client or of a transaction carried out on behalf of the Client, which is distinct from the Client's interest in that outcome;
- c. The Company or a Related person has a financial or other incentive to favour the interest of another Client or group of Clients over the interests of the Client;
- d. The Company or a Related person carries on the same business as the Client;
- e. The Company or a related person receives or will receive from a person other than the Client, an inducement in relation to a service provided to the Client, in the form of monies, goods or services, other than the standard commission or fee for that service.

4. Examples of Conflicts of Interest

4.1 While it is not feasible to define precisely or create an exhaustive list of all relevant conflicts of interest that may arise, as per the current nature, scale and complexity of the Company's business, the following list includes 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. The Company may be matching the Client's Order with that of another Client by acting on such other Client's behalf as well as on the Client's behalf.
- b. The Company may receive or pay inducements to or from third parties due to the referral of new Clients or Clients' trading.
- c. The Company may use entities which are members of its group as counterparties to certain transactions.

5. Managing Conflicts of Interest

5.1 The Company has established suitable and adequate internal procedures for minimizing any potential conflicts of interest which include the following:

- a. The Company maintains a compliance department that is an independent unit within the Company. Some of the duties of the compliance officer is to monitor any possible deviation from the Company's internal policies and procedures as well as identifying and managing any possible conflicts of interest and report on the above to the Company's Board of Directors.
- b. Appointment of Internal Auditor to ensure that appropriate systems and controls are maintained and report to the Company's Board of Directors.
- c. Effective procedures to prevent or control the exchange of information between Related persons engaged in activities involving a risk of a conflict of interest where the exchange of that information may harm the interests of one or more Clients;
- d. Procedures governing access to electronic data;
- e. the separate supervision of Related persons whose principal functions involve carrying out activities on behalf of, or providing services to, Clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Company;
- f. the removal of any direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration of, or revenues generated by different Related persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities;
- g. Prohibition on officers and employees of the Company having external business interests conflicting with the interests of the Company without the prior approval of the Company's board of directors.
- h. Personal account dealing requirements applicable to Related Persons in relation to their own investments.
- i. Measures to prevent or limit any person from exercising inappropriate influence over the way in which a Related person carries out investment or ancillary services or activities) measures to prevent or control the

Simultaneous or sequential involvement of are Related person in separate investment or ancillary services or activities where such involvement may impair the proper management of the conflicts of interest.

j. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual.

k. Establishment of Chinese Walls restricting the flow of confidential and inside information within the Company, and physical separation of departments.

l. In the case where the Company distributes marketing communication to its Clients, it ensures that the said communication is reviewed and approved by the compliance officer prior to distribution. The compliance officer also ensures that such communication meets the relevant definition of marketing communication as well as having the appropriate disclosure statement.

m. Establishment of the “four-eyes” principle in supervising the Company’s activities.

6. Disclosure of Information

6.1 If during the course of a business relationship with a Client or group of Clients, the organizational or administrative arrangements/measures in place are not sufficient to avoid or manage a conflict of interest relating to that Client or group of Clients, the Company will disclose the conflict of interest before undertaking further business with the Client or group of Clients.

7. Client’s Consent

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

8. Amendment / Review

8.1 The Company has the right to amend the current Policy at its discretion and at any time it considers is suitable and appropriate.

9. Further Information

9.1 For further details with regards to the Company’s conflicts of interest policies and procedures, you should contact the compliance department and request for such documentation.



Email: Support@24stockoption.com | Web: www.24stockoption.com

BHL Trading Network Ltd, a Canadian Investment Firm that is
Regulated by the CANADIAN INVESTMENT INDUSTRY REGULATORY ORGANIZATION (CIPF)
CG&B Investment Services Inc.