



Conflicts of Interest Policy

May 2026



Tickmill is a trading name of Tickmill UK Limited (the "Company", "us", "we", "our", "ours" or "ourselves" as appropriate) and is authorised and regulated in the United Kingdom by the Financial Conduct Authority ("FCA") under firm reference number 717270. The Company's Principal and Registered Office is First Floor, The Bengal Wing, 9A Devonshire Square, London EC2M 4YN (registered company number 09592225).

1. Introduction

Tickmill UK Ltd is committed to taking all appropriate steps to identify, prevent, manage and, where necessary, disclose conflicts of interest between any of our clients or between us and our clients to ensure the fair treatment of clients and compliance with the rules and principles of the Financial Conduct Authority ("FCA"). Whilst it is not possible to eliminate all sources of potential conflict, we have a duty to act honestly, fairly and professionally in accordance with the best interests of our clients and to comply with the principles set out in the applicable legislation.

2. Definition

2.1. We define a conflict of interest as being either:

- a) between us (including our employees, managers or any person directly linked to the Company by control) and you; or
- b) between you and another client where your interests are materially affected.

3. Areas of Conflict

3.1 There are several areas where potential conflicts may arise. They include, but are not limited to:

- a) offering services in different capacities at the same time;
- b) acting for more than one client in a transaction;
- c) holding information on other clients that would affect you or them if it was disclosed;
- d) receiving gifts or entertainment which could conflict with our duties to you; and
- e) relevant parties pursuing activities or personal relationships potentially detrimental to you.
- f) issuing financial promotions that might not be fair and clear
- g) Paying remuneration that might incentivise an employee at the detriment of a client or group of clients
- h) System design, pricing, charging or platform functionality
- i) Complaints that are handled fairly and properly.

4. Areas for consideration:

- 1. All clients are to be treated fairly and with transparency.
- 2. To prevent and to minimise the risk of conflicts of interest, the Company has adopted a number of systems, procedures and controls that are listed below.
- 3. Personal account dealing requirements for all employees, including directors, associates, consultants and their immediate family in relation to their own investments.
- 4. Restrictions on the flow of information between the different business units of the Company.

5. Restrictions regarding accessing data stored electronically or in hard-copy form.
6. Restrictions in the dissemination of trading information.
7. Restrictions on accepting gifts and inducements and receipt of certain benefits applicable to all employees, including directors, associates, consultants and their immediate family.
8. The application of segregation of functions that, if performed by the same individual, would increase the risk of a conflict of interest.
9. The application of a "fit and proper test" before accepting new employees, associates and consultants.
10. The application of a "appropriateness test" before accepting new clients
11. Reviews by the board of potential conflicts of interest between external associates of the Company.
12. Promotion of "whistleblowing" (disclosure of potential conflicting activities) by our employees.
13. Provision of "awareness campaigns" to alert our employees of the risk of conflicts of interest.
14. Where our arrangements are not sufficient to ensure, with reasonable confidence, that the risk of damage to a client's interests will be prevented, we will disclose the general nature and/or source of the conflict and the steps taken to mitigate the risk before undertaking business for the client..

5. Conflict Identification and Recordkeeping

The Company maintains arrangements to identify and record actual, potential or perceived conflicts of interest that may arise in the course of providing services to clients.

When assessing whether a conflict may exist, the Company will consider whether the Company, its employees, managers, or any person directly linked to the Company:

- 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 or transaction that is different from the client's interest;
- has a financial or other incentive to favour one client or group of clients over another;
- carries on the same business as a client; or
- receives, or may receive, an inducement from a third party in relation to services provided to a client.

Where a conflict is identified, it will be escalated to Compliance and recorded in the Company's conflicts register, together with the nature of the conflict, the affected parties, the controls applied, and any further action required. The conflicts register will be reviewed periodically to ensure that identified conflicts remain appropriately managed.

Questions regarding Conflicts of Interest should be addressed to:

Head of Compliance

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