

# Conflicts of Interest

## Introduction

Revollet International Limited is committed to ensuring that our business is conducted in an honest, fair and professional manner in accordance with the best interests of its clients. All employees of the company are obliged to refrain from doing anything that could be reasonably regarded as creating a conflict of interest in line with their professional responsibilities. It is the policy of the company to avoid any conflict of interest when providing business services to its customers. From time to time, however, we may have interests which conflict with our customers interests. Our Conflicts of Interest Policy aims to ensure that our clients are treated fairly and with the highest level of integrity and that their interests are protected at all times.

## Identification of Conflicts of Interest

In order to identify the types of conflicts of interest that may arise in the course of providing its business services, Revollet International Limited will take into account the following situations where Revollet International Limited and a relevant person including a director, partner manager, employee or other person directly involved in the provision of services to Revollet International Limited is likely to make a financial gain at the expense of the client. Is likely to limit or avoid financial loss at the expense of the clients. Has a financial or other incentive to favor the interest of another client over the interest of the client. Carries on the same business as the client. Receives from a person other than the client 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.

## Potential Conflicts of Interest

The following situations are some good examples of conflicts which may arise when Revollet International Limited is providing business services for its clients When Revollet International Limited executes transactions through its trading platform for its clients, Revollet International Limited acts as principal in all dealings. You may have been introduced to Revollet International Limited by a third party who receives commission or remuneration from your trades.

## Revollet International Arrangements for Managing Conflicts

Revollet International Limited shall adopt a number of approaches within the company to manage conflicts of interest and control the movement of confidential information as shown below. Procedures to prevent and control the exchange of information between persons at Revollet International Limited which may harm the interests of one or more clients. Controlling the disclosure of client order details of one client to another. Provision of training to directors and employees of Revollet International Limited on conflicts of interest management.

## **Personal Account Dealing**

To prevent conflict arising from the use of information obtained from clients, and the market abuse in general, all directors and employees will not be able to open an account with Revollet International Limited.

## **Employees Activities Outside the Company**

Our employees are subject to rules designed to avoid conflicts of interest with activities they undertake outside Revollet International Limited.

## **Declining to Act**

We may decline to act for a client in cases where we believe a conflict of interest cannot be managed in any other way.

## **Revollet International Policy**

Revollet International Limited recognizes, in certain circumstances, conflicts of interest can arise among Revollet International Limited, its directors, employees, introducing brokers and all clients. As required by law, Revollet International Limited implements and maintains an effective conflicts of interest policy for the purpose of preventing conflicts of interest or potential conflicts of interest from causing a material risk of damage to the interest of clients.

## **Record Keeping**

Revollet International Limited maintains a record, which is regularly updated, of the kinds of investments and ancillary services or trading activities carried out by Revollet International Limited or on its behalf in which a conflict of interest entailing a material risk of damage to the interests of one or more clients has arisen, or in the case of an ongoing business service or activity may arise.

## **Disclosure**

Whilst Revollet International Limited is devoted to implement and maintain our conflicts of interest policy, in some cases, such policy might not be sufficient to prevent risks of damage to the interest of a client. In such a case, Revollet International Limited shall disclose the general nature and sources of conflicts of interest to the client so that enables the client to make an informed decision whether to proceed with the transaction in question.

## **Policy Review**

Revollet International Limited reserves the right to frequently review and assess the Conflicts of Interest Policy and, if required, amend it to meet and support its clients

needs and ensure that the Policy is compliant with the MWALI INTERNATIONAL SERVICES AUTHORITY rules. For more information, please contact [support@revollet.com](mailto:support@revollet.com)

## **When and How to Contact Us**

If and when you have any inquiries about this Conflict of Interest policy, or you wish to help us to improve this Policy, please notify us by contacting us at: [support@revollet.com](mailto:support@revollet.com)