



TOP TRADER CONFLICTS OF INTEREST POLICY

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Version 1.0

Marigold Global Markets Corporation

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NOTICE

Please be advised that trading in Derivative Instruments involve, besides the potential for profit, the risk of loss which may under adverse trading conditions exceed the amount of initial margin deposit. Movements in the prices of Derivative Instruments are influenced by a variety of factors of global origin and dimensions many of which are unpredictable. Client may be unable to settle adverse trades during volatile market movements in the prices of Derivate Instruments. Although the staffs of MGMC are in constant touch with market movements, they are unable to guarantee the accuracy of their predictions nor could they guarantee that any loss would not exceed a specified figure.

1. INTRODUCTION

- a) Marigold Global Markets Corporation (hereinafter referred to as "MGMC") is a corporation regulated by the Belize International Financial Services Commission (license number IFSC/60/208/TS/12), a global investment firm that trades in financial and commodity-based derivative instruments and other securities.
- b) Under the above legislation, MGMC takes all reasonable steps to detect and avoid conflicts of interest. MGMC 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 services.
- c) We provide here a summary of the policy we maintain in order to manage conflicts of interest in respect of the duties we owe to our clients. The Policy is effective from 1st May, 2012.
- d) This Policy is not intended to, and does not, create third party rights or duties that would not already exist if the Policy had not been made available, nor does it form part of any contract between MGMC and any client

2. SCOPE OF THE POLICY

- a) The Risk Disclosure Notice('the Notice') is provided to you in accordance with Belize International Financial Services Commission on the basis that you are proposing to trade with MGMC in contracts for difference ('CFDs'). These are leveraged products and you can incur a high level of risk which can result in the loss of all your invested capital.
- b) The purpose this summary document is to set out MGMC's approach to identifying and managing conflicts of interest which may arise during the course of its business activities. The Policy applies to all its directors, employees, any persons directly or indirectly linked to MGMC (hereinafter called "related persons") and refers to all interactions with all clients.
- c) The aim of our Policy is to identify and prevent conflicts of interest which may arise between MGMC and its clients or between one client and another. Accordingly, we have adopted a conflicts of interest policy setting out the procedures, practices and controls in place to achieve this.

3. IDENTIFICATION OF CONFLICTS OF INTEREST

- a) For the purposes of identifying the types of conflict 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, MGMC takes into account, whether MGMC or a relevant person, is in any of the following situations, whether as a result of providing investment or ancillary services or investment activities or otherwise:
 - (1) MGMC or relevant person is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
 - (2) MGMC or relevant 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;
- b) MGMC or relevant person has a financial or other incentive to favor the interest of another client or group of clients over the interests of the client;
- c) MGMC or relevant person carries on the same business as the client;
- d) MGMC or relevant 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. MANAGING CONFLICTS OF INTEREST

- a) MGMC has set up internal policies and has an in-house Compliance Department that will be responsible for identifying and managing potential conflicts of interests. The above-stated will also update the relevant internal procedures and ensure compliance with such procedures.
- b) MGMC maintains and operates effective organizational and administrative procedures to manage the identified conflicts of interest. MGMC also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate.
- c) In general, the procedures and controls that MGMC follows regarding conflicts of interest include the following measures:
 - (1) Effective procedures to prevent or control the exchange of information between relevant 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;
 - (2) The separate supervision of relevant 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 MGMC;
 - (3) 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 relevant persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities;
 - (4) Measures to prevent or limit any person from exercising inappropriate influence over the way in which a relevant person carries out investment or ancillary services or activities;
 - (5) Measures to prevent or control the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services or activities where such involvement may impair the proper management of conflicts of interest.
- d) Some of these policies and procedures established to prevent Conflicts of Interests are shown below:
 - (1) A 'need to know' policy governing the dissemination of confidential or inside information within the Group;
 - (2) Create walls restricting the flow of confidential and inside information within MGMC, and physical separation of departments
 - (3) Procedures governing access to electronic data
 - (4) Segregation of duties that may give rise to conflicts of interest if carried on by the same individual
 - (5) Personal account dealing requirements applicable to relevant persons in relation to their own investments
 - (6) A gifts and inducements log registering the solicitation, offer or receipt of certain benefits
 - (7) The prohibition of external business interests conflicting with our interests as far as the Group's officers and employees are concerned, unless board approval is provided
 - (8) A policy designed to limit the conflict of interest arising from the giving and receiving of inducements
 - (9) Establishment of in-house Compliance Department to monitor and report on the above to the MGMC Board of Directors
 - (10) Appointment of Internal auditor to ensure that appropriate systems and controls are maintained and report to the MGMC Board of Directors
 - (11) Establishment of the four-eyes principle in supervising the MGMC activities

5. DISCLOSURE

- a) Where a conflict arises MGMC will if it is aware of it, disclose it to the client prior to undertaking investment business for that client or, if it does not believe that disclosure is appropriate to manage the conflict, we may choose not to proceed with the transaction or matter giving rise to the conflict.

- b) MGMC reserves the right to review and/or amend its Policy and arrangements whenever it deems this appropriate. Further information about this summary document is available upon request.

6. FAQs

- a) Questions regarding the Conflicts of Interest Policy should be addressed to the Customer Support Department.
- b) Customer Support Department
Email: **support@mgmc-belize.com**
Telephone: +501.2236910

7. ADDITIONAL CONTACTS

- a) Compliance Department
Email: **compliance@mgmc-belize.com**
Telephone: +501.2236910