

# Conflict of Interest Policy Statement

## Introduction

This Conflict of Interest Policy Statement outlines how Hoxton Cap manages conflicts that may arise within the company, between Hoxton Cap and its customers, and between customers of Hoxton Cap. This policy is reviewed periodically to account for changes in operations, practices, laws, technology, and the general business environment. It applies to all activities undertaken by Hoxton Cap and its employees.

## Trading as Principal

Hoxton Cap undertakes all trading as the principal to its customers' transactions. It hedges its net risk with counterparties, ensuring that customers' aims are more aligned with its own, notwithstanding that it acts as the principal in all transactions. Since Hoxton Cap does not provide investment advice, no conflict arises from this source. Hoxton Cap only offers CFDs, eliminating conflicts that could arise between different product lines.

## Managing Conflicts of Interest

Hoxton Cap is responsible for identifying and managing conflicts of interest within its business that may pose a material risk to customers. Particular attention is given to potential conflicts arising from the execution of transactions for customers.

## Measures to Manage Conflicts of Interest

The following measures have been adopted to manage conflicts of interest:

- **Order Execution:** When executing an order for a customer, Hoxton Cap does not provide preferential treatment to any customer to the detriment of others and does not disclose one customer's order details to other customers.
- **Electronic Order Processing:** All orders are executed electronically, following policies that comply with relevant rules and regulations. Hoxton Cap ensures prompt, fair, and expeditious execution of customer orders relative to others, prioritizing them based on receipt time.
- **Order Recording and Fair Execution:** Procedures are in place to ensure that orders executed on behalf of customers are promptly and accurately recorded. Comparable orders are executed sequentially unless market conditions or customer interests require otherwise.
- **Data Protection:** Hoxton Cap ensures that employees and affiliates cannot misuse information related to pending customer orders.
- **Employee Trading Restrictions:** All employees are prohibited from dealing in personal accounts to prevent actual or perceived conflicts of interest.
- **Gifts and Inducements:** Employees are prohibited from accepting gifts or inducements from individuals with material interests that may conflict with their duty to customers and Hoxton Cap's fair treatment policies.

## Commitment to Compliance

Hoxton Cap is committed to fostering an effective compliance culture to address any new potential conflicts of interest. Employees are required to monitor emerging conflicts and implement measures to mitigate them.

## Disclosure of Conflicts

If Hoxton Cap's conflict management arrangements are insufficient to prevent risks to a customer's interests, it will clearly disclose the general nature and/or sources of the conflict before conducting business with the customer.

## Contact Information

If you have any questions regarding this Conflict of Interest Policy or suggestions for its improvement, please contact us at:

□ [support@hoxtoncapital.net](mailto:support@hoxtoncapital.net)