



# CONFLICTS OF INTEREST POLICY

## Xtream Markets Ltd

Registration Number: 84516

Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Marshall Islands – MH96960

Website: [www.xtrememarkets.com](http://www.xtrememarkets.com)

Email: [support@xtrememarkets.com](mailto:support@xtrememarkets.com)

Effective Date: September 2015

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## 1. INTRODUCTION

Xtream Markets Ltd ("Company") is committed to acting honestly, fairly and professionally in the best interests of its Clients.

The purpose of this Conflicts of Interest Policy is to identify, manage and where appropriate disclose conflicts of interest that may arise during the provision of services.

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## 2. OBJECTIVE

This Policy aims to:

- Identify potential conflicts of interest;
  - Prevent conflicts where possible;
  - Manage conflicts fairly;
  - Disclose conflicts where necessary;
  - Protect Client interests.
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## 3. WHAT IS A CONFLICT OF INTEREST

A conflict of interest arises where the interests of the Company, its employees, partners, affiliates or other Clients may conflict with the interests of a Client.

Conflicts may be actual, potential or perceived.

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## **4. POTENTIAL CONFLICTS**

Conflicts may arise between:

- The Company and a Client;
  - One Client and another Client;
  - Employees and Clients;
  - Introducing Brokers and Clients;
  - Affiliates and Clients;
  - Money Managers and Investors.
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## **5. COMPANY REMUNERATION**

The Company may earn revenue through:

- Trading spreads;
- Commissions;
- Overnight financing charges;
- Administrative fees;
- Partner programs;
- Other service fees.

The Company therefore has a financial interest in trading activity conducted through its services.

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## **6. INTRODUCING BROKERS (IBs)**

The Company may compensate Introducing Brokers and Partners.

Compensation may be based upon:

- Trading volume;
- Spread sharing;
- Commission sharing;
- Referral arrangements.

Such arrangements may create potential conflicts of interest.

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## **7. AFFILIATE RELATIONSHIPS**

The Company may operate affiliate programs.

Affiliates may receive compensation for introducing prospective Clients.

Affiliate compensation arrangements may influence marketing activities.

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## 8. COPY TRADING SERVICES

Copy Trading may create conflicts where:

- Strategy Providers receive performance fees;
- Strategy Providers seek to improve rankings;
- Trading decisions benefit providers more than followers.

Clients should independently assess all Copy Trading opportunities.

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## 9. PAMM AND MAM SERVICES

Money Managers may have incentives that differ from those of investors.

Examples include:

- Increased risk-taking;
- Performance fee motivations;
- Short-term trading decisions.

The Company does not guarantee alignment of interests between investors and managers.

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## 10. EMPLOYEE ACTIVITIES

Employees may:

- Hold trading accounts;
- Participate in financial markets;
- Maintain personal investments.

The Company maintains controls designed to prevent employee activities from creating unfair advantages.

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## 11. MARKET INFORMATION

The Company may provide:

- Market commentary;
- Educational content;
- Trading analysis.

Such information is provided for informational purposes only and should not be considered investment advice.

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## **12. THIRD-PARTY PROVIDERS**

The Company may receive services from:

- Liquidity Providers;
- Technology Providers;
- Payment Processors;
- Marketing Partners.

Relationships with third parties may create potential conflicts of interest.

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## **13. MANAGEMENT OF CONFLICTS**

The Company seeks to manage conflicts through:

- Internal procedures;
  - Employee training;
  - Segregation of responsibilities;
  - Compliance oversight;
  - Monitoring systems.
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## **14. DISCLOSURE OF CONFLICTS**

Where conflicts cannot be adequately managed, the Company may disclose the nature of the conflict to affected Clients.

Disclosure does not eliminate the conflict but allows Clients to make informed decisions.

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## **15. CLIENT RESPONSIBILITY**

Clients should carefully evaluate:

- Trading decisions;
- Investment opportunities;
- Copy Trading arrangements;
- PAMM/MAM investments.

Clients remain responsible for their own decisions.

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## 16. POLICY REVIEW

The Company reserves the right to review and amend this Policy at any time.

Updated versions shall become effective upon publication on the Company's website.

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## 17. CONTACT DETAILS

Xtream Markets Ltd

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## 18. CLIENT ACKNOWLEDGEMENT

By opening and maintaining an account with Xtream Markets Ltd, the Client acknowledges that:

- They have read this Conflicts of Interest Policy;
  - They understand that conflicts may arise in the provision of services;
  - They accept that the Company may manage or disclose such conflicts in accordance with this Policy.
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### END OF CONFLICTS OF INTEREST POLICY

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