



金道环球投资(英国)有限公司
GOLDENWAY GLOBAL INVESTMENTS (UK) LIMITED

Conflict of Interest Policy

This Document Contains Important Information Concerning
The Legally Binding Terms And Conditions Applicable To You

Address : New Broad Street House, 35 New Broad Street, London, EC2M 1NH, United Kingdom

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As a firm authorised and regulated by the Financial Conduct Authority (“FCA”) Goldenway Global Investments (UK) Limited (GWGUK) could sometimes be exposed to potential conflicts of interest. We will take all reasonable steps to identify and manage all conflicts of interest to prevent any risk that may damage the interests of our customers.

■ **Our Policy**

We endeavour to maintain a record of the types of activity we carry on in which a material conflict could arise or has arisen, including the activities of other members of our group of companies.

We also maintain procedures to manage actual or potential conflicts. This includes procedures to maintain appropriate independence between members of our staff who are involved in different activities, for example, through the operation of information barriers (i.e. Chinese Walls), physical separation of staff, the segregation of duties and responsibilities and maintenance of a policy of independence which requires our staff, when providing services to a client, to act in the best interests of the client and to disregard any personal interests; and, in some circumstances declining to act for a client or potential client.

Where our arrangements to manage conflicts are not or cannot be sufficient to be reasonably confident that risks of damage to a client’s interest will be prevented we aim to disclose the general nature and/or sources of conflicts before carrying on business for the client. This is to allow the client to consider whether to ask for more information and whether to continue with the service. We do not aim to provide detailed, highly specific or comprehensive information.

■ **Gifts and Hospitality**

All employees of GWGUK are prohibited from accepting gifts or other inducements from any entity which is likely to conflict, or perceived to conflict, with our duty to act in the best interests of our clients or other legal or regulatory obligations at all times.

■ **Personal Account Dealing**

All employees of GWGUK are restricted from trading such products offered by Goldenway in their own name, otherwise known as Personal Account dealing (“PAD”).

■ **Inappropriate Influences**

Goldenway monitors and attempts to prevent any person exercising inappropriate influence over the way in which a relevant person carries out services or activities.



■ Disclosure of Outside Business Interests

All employees of GWGUK are restricted from engaging in any outside business interest. This includes being employed by another person, or serving as an officer, director, partner or consultant, or receiving any compensation from another organisation (including a family business). It also includes any fees for a work product such as an article or speech or position held at the request of, or as part of their role with Goldenway. Civic activities such as participating in elected or appointed political posts are also included, as are other community enterprises, and serving as a director, officer or employee of, or consultant to, a non-profit organisation.

■ Disclosure

Whilst Goldenway 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 interests of a client. In such instances we shall disclose the general nature and sources of conflicts of interest to the client to enable the client to make an informed decision whether to proceed with the transaction in question.

■ Review

We regularly review and assess our conflicts of interest policy to ensure the adequacy of the policy in compliance of the FCA rules.

Please read our regulatory standardised risk warning, including percentage of losses on CFD provider's retail investor accounts on our webpage www.gwguk.com before investing.