

# Today Markets

Today Markets Conflicts of Interest Policy

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**Effective Date:** 01/01/2025

**Last Updated:** 03/1/2025

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## **1. Purpose and Scope**

This **Conflicts of Interest Policy** outlines the principles and procedures adopted by **Today Markets** to identify, prevent, and manage conflicts of interest that may arise in the course of providing investment and ancillary services to clients.

The policy applies to all employees, directors, contractors, tied agents, and any third parties acting on behalf of Today Markets.

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## **2. Definition of a Conflict of Interest**

A **conflict of interest** occurs when the interests of the firm or its staff are in conflict with the duty owed to a client, or when the interests of one client are in conflict with those of another client. Such conflicts may arise directly or indirectly and may be actual, potential, or perceived.

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## **3. Situations Where Conflicts May Arise**

Conflicts of interest may arise in various scenarios, including but not limited to:

- When Today Markets may receive monetary or non-monetary benefits (e.g. rebates, commissions, or other incentives) from third-party providers for directing client orders.
- When employees or departments within Today Markets have personal or financial interests that may influence their professional duties.

- When Today Markets executes client orders against its own book or hedges client positions internally.
  - When preferential treatment is given to one client over another.
- When Today Markets provides multiple services (e.g. execution and dealing) to different clients with competing interests.
- When proprietary trading activities are conducted by the firm alongside client trading.

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#### **4. Identifying Conflicts of Interest**

Today Markets uses a risk-based approach to identify potential conflicts of interest. This includes:

- Reviewing new business lines, services, and products
- Conducting regular internal audits and compliance reviews
  - Maintaining an internal conflicts register
- Requiring staff to disclose personal trading, external interests, or relationships that may impact impartiality

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#### **5. Managing and Mitigating Conflicts**

Where conflicts are identified, Today Markets employs one or more of the following measures to manage or mitigate risk:

- **Internal Controls:** Segregation of duties between departments such as trading, client services, and compliance to avoid undue influence or leakage of sensitive information.
- **Personal Account Dealing Policy:** Staff are restricted from trading in personal accounts without prior approval from the compliance department.

- **Remuneration Policy:** Employee compensation is structured to avoid incentives that might lead to conflicts of interest or unethical behavior.
  - **Disclosure:** Where a conflict cannot be effectively prevented or managed, Today Markets will disclose the nature of the conflict to the client before proceeding with the service.
- **Declining to Act:** In extreme cases, if a conflict of interest cannot be adequately managed, Today Markets may decline to act on behalf of the client.

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## 6. Disclosure of Conflicts

Where appropriate, Today Markets will provide clear, fair, and not misleading disclosures to clients about the nature and source of potential conflicts, including any steps taken to mitigate them. These disclosures will be made before providing any services that may be affected by such conflicts.

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## 7. Employee Responsibilities

All employees are required to:

- Familiarize themselves with this policy and adhere to it at all times
- Promptly report any actual or potential conflicts to the Compliance Department
- Avoid situations where personal interests conflict with those of clients or the firm

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## 8. Oversight and Review

The **Compliance Department** is responsible for monitoring adherence to this policy and maintaining the firm's Conflicts Register. This policy is reviewed **at**

**least annually**, or more frequently if required due to regulatory changes or business developments.

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## **9. Client Acknowledgement**

By engaging with Today Markets and using our services, clients acknowledge and accept that conflicts of interest may arise and that the firm has put in place procedures to manage such situations fairly and effectively.

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## **10. Contact Information**

If you have questions or concerns about this policy, please contact:

 **Compliance Department**

 Email: [compliance@todaymarkets.com](mailto:compliance@todaymarkets.com)

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