

Summary LYNX Conflict of Interest Policy

Introduction

Under the Markets in Financial Instruments Directive (“MiFID”), LYNX B.V. (LYNX) is required to maintain and operate effective organisational and administrative arrangements with a view to taking all reasonable steps to identify, monitor and manage (potential) conflicts of interest. The nature of the financial services market is such that (potential) conflicts of interest can sometimes develop. It is impossible to rule out conflicts of interest.

LYNX has put in place a Conflicts of Interest Policy to safeguard its clients' interest. In accordance with its obligations to its clients, LYNX seeks to ensure that its clients are properly notified where there is or could be (potential) conflicts of interest. All clients of LYNX must be treated fairly and the interests of clients should at all times take precedent over the interests of LYNX, its employees or the group which LYNX belongs to. The protection of our clients' interests is our number one concern.

This is a summary of our Conflicts of Interest Policy. More detailed information is obtainable on request from retail clients¹.

About LYNX

LYNX is an online broker, headquartered in The Netherlands and present in three EU countries by means of a branch office. LYNX is furthermore passporting into another five EU countries as well as Switzerland. LYNX has one fully owned subsidiary in the Netherlands, TradersOnly B.V. LYNX is receiving and transmitting orders exclusively to either of the following Interactive Brokers entities: Interactive Brokers Luxembourg SARL, Interactive Brokers Ireland Limited etc. In some countries, LYNX is furthermore intermediating in IB's Stock Yield Enhancement Program and IB's margin lending product and provides investment recommendations to its clients.

What are conflicts of interest?

Our Conflicts of Interest Policy defines (potential) conflicts of interest as:

- Conflicts of interest between LYNX and you. For example, if we are providing a service to you and, beyond that, we have a material interest, relationship or arrangement in the transaction or product or service. The decisive factor here is whether we make a profit or avoid a loss to your disadvantage;
- Conflicts of interest between our clients if we are acting for you and for another client and these two interests conflict materially.

How are conflicts managed?

LYNX maintains a Conflicts of Interest Policy appropriate to the size of our firm and the nature, scale and complexity of our business. As part of our Conflicts of Interest policy, we maintain a number of internal policies which our employees are obliged to comply with. To prevent conflicts of interest we have, among other things, taken the following measures:

Code of Conduct

We have established a LYNX Code of Conduct through which we try to prevent from getting into a conflict of interest. This means, among other things, that our team members are required to report outside interests and appointments to ensure they do not conflict with their duties to LYNX and its clients. Our staff is furthermore subject to restrictions on the offering and receipt of gifts and entertainment to or from clients and other business counterparties. LYNX also has specific policies and procedures on when and how employees are permitted to undertake personal account transactions.

Segregation of duties

LYNX has implemented procedures and controls and segregations of duties appropriate for its business profile. Staff are segregated operationally, such that they report to functional managers.

Confidentiality

All our employees as well as external consultants and contractors must sign a confidentiality undertaking prior to commencing work for us.

Remuneration

We also monitor the way in which our staff are remunerated, in accordance with the LYNX remuneration policy, in order to ensure that remuneration structures do not conflict between our staff and LYNX's clients' best interests.

¹ A retail client means a consumer, retail investor, customer of LYNX or proxy holder.

Inducements

We carefully consider the payment or receipt of fees or commissions (or other non-monetary benefits) between LYNX and (advisory) firms we might engage in our services offering to ensure that they are not an inducement (and therefore do not create potential conflicts of interest).

Training and awareness

All our employees are trained to recognise, prevent and where necessary properly handle (potential) conflicts of interest.

Reporting of (potential) conflicts of interest

Each employee is required to report (potential) conflicts of interest to the Compliance function in order to receive clearance prior to taking any action. We have a reporting tool for this purpose. When we receive a report, we start an investigation and if it turns out there is a (potential) conflict of interest we:

- Will inform all relevant stakeholders;
- May decide to take additional (temporary) measures;
- Evaluate whether we should take (additional) measures to prevent similar conflicts in the future;
- May decide to refuse or discontinue our services to a customer.

The Compliance department of LYNX maintains a Conflict of Interest Register recording all potential conflicts of interest. This is maintained for a period of five years.

Disclosure of conflicts to our clients

On occasion we may need to disclose specific conflicts of interest where we feel our internal arrangements are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of one of our clients will be prevented. We will clearly disclose the general nature and/or sources of conflicts of interest to a client before undertaking the relevant business for that client.

We will, however, always seek to manage conflicts internally in accordance with our conflicts of interest policy and shall only disclose specific conflicts to our clients as a last resort.

Review of our Conflicts of Interest Policy

We will monitor the effectiveness of our Conflicts of Interest Policy to identify and, where appropriate, correct any deficiencies. Furthermore, the policy is fully reviewed at least on an annual basis to ensure the record of conflicts is up to date and relevant and the appropriate mitigating controls are in place. The review is reported to the Board of Directors of LYNX. We shall notify our clients of any material changes to our Conflicts of Interest Policy.

Further information

If you are a retail client and require any further details on our Conflicts of Interest policy, please contact the Compliance function at LYNX (email: compliance@lynx.nl or compliance@lynxbroker.cz).