



# Conflicts of Interest Policy

## 利益冲突政策

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## Introduction (引言)

We owe a certain duty to our clients in respect of managing any conflicts of interest which may arise. Outlined below is a detailed plan of our Policy.

在管理可能出现的任何利益冲突方面，我们对客户负有一定责任。以下为我们政策的详细计划。

## Explanation (解释)

Conflicts of interest can arise between us, our directors, staff and any of our associates and you, the client. Client-to-client conflicts may also arise. It is the scope of this policy to prevent and deal with these conflicts should they arise. We aim to maintain effective procedural and operational policies in order to deal with, and prevent any such situations.

利益冲突可能在我们的董事、员工以及任何工作人员和客户之间发生。也可能发生客户与客户之间的冲突。该政策的涵盖的范围是阻止并处理他们引起的冲突。我们旨在维护有效的程序和操作政策，以处理并阻止任何此类情况。

## Potential Conflict (潜在冲突)

Conflicts of interest may take many forms but they can all be defined as causing material risk of damage to the interests of a client. Such situations include, but are not limited to, where we or any person or entity directly associated with us:

利益冲突可能有多种形式，但均可定义为引起客户利益损失的物质风险。该情况包括但不限于我们或直接与我们有联系的个人或团体：

- is likely to benefit financially at the expense of a client
- 可能通过牺牲客户的利益获利
- is likely to limit or avoid financial loss at the expense of a client
- 可能通过牺牲客户的利益来限制或避免财务损失
- has a particular leaning towards the interest of one client over that of another which could potentially result in financial gain
- 对其中一个客户的利益有特殊倾向，可能引起经济获益
- designs, markets or recommends a product or service without considering the interests of the client
- 设计、营销或推荐产品或服务而不考虑客户利益
- receives monies, goods or services outside of the standard commission or other fee/remuneration for that service
- 收取标准佣金以外的货币、物品或服务或服务之外的其他费用 / 报酬



## Safeguards (保障措施)

We enforce several methods and procedures to ensure compliance with our Conflicts of Interest Policy. A summary of these is detailed below.

我们采取多种方法和程序，保证遵守利益冲突政策。以下为详细总结。

- Maintenance of appropriate independence between members of staff who are involved in different activities
- 保持参与不同活动的工作人员间适当的独立性
- Physical separation of staff through ‘Chinese Walls’ – restriction of personal or sensitive information
- 通过“职能划分制度”对员工进行物理分离——一个人或敏感信息的限制
- We insist that all employees sign and adhere to a Personal Account Dealing Notice. This document applies to ALL employees and directors and a record of receipt and signature is maintained by the Compliance Officer. The Personal Account Dealing notice applies to employees in relation to their own investments.
- 我们坚持所有员工签署并遵守个人账户交易通知。此文件适用于所有员工与董事，收据与签名纪录由合规官保存。个人账户交易通知适用于所有员工有关的个人投资。
- We employ a gifts and inducements policy to log and control the receipt of certain gifts by employees and directors of the company. It is reasonable to allow our employees to receive small gifts and minor hospitality. However, if in the opinion of a director or the Compliance Officer, the gift is sufficiently lavish or large as to be viewed as a compromise to the best interests of the client, the gift must be reported to/noted by the Compliance Officer and such benefits of the gift may be denied.
- 我们使用礼物与奖励政策来纪录和控制公司员工和董事接受某些礼物。允许员工接受小礼品和小款待。但是，如果董事或合规官认为该礼物昂贵至足以以客户的最佳利益为妥协，必须向检合规官上报 / 告知该礼物且该礼物的福利可能被拒绝。
- Employees may not give advice to clients (unless part of a dedicated research/advisory group). Any such research/advisory would, in all circumstances, be physically segregated from any standard execution-only client dealing function.
- 员工不得向客户提出建议（部分专门研究 / 咨询小组除外）。在所有情况下，任何此类研究 / 咨询与只有客户处理功能的执行标准分离。
- We operate a ‘Whistle Blowing’ policy. If any employee believes the company is acting wrongly and incorrectly with regards to any regulatory procedures, they may act by contacting, in confidence, the Financial Conduct Authority (FCA).
- 我们实行“举报”政策。如果任何员工认为公司执行的监管程序存在错误和失误，他们可秘密联系金融市场行为监管局（FCA）。

If a conflict does arise, we will disclose this to the client prior to carrying out any business for that client. If we do not believe the disclosure is appropriate to manage the conflict, we may opt not to proceed with the transaction or matter giving rise to the conflict.

如果确实产生冲突，我们将在为该客户执行业务前向其告知。如果我们认为披露不适用于冲突管理，我们可能选择不进行引起冲突的交易或事项。

For more information, please contact our Customer Services department.

其他信息请联系我们的客服部门。