



# Lightyear Europe AS Conflicts of Interest Policy

Version 1 - 28th of February 2022

In order for Lightyear Europe AS (the Firm/we/us/our) to be as transparent as possible with our customers, we are setting out our Conflicts of Interest Policy below. We have in place a policy that enables us to identify, manage and prevent any conflicts of interest which have the potential to arise when customers use our services.

Conflicts of interest are inevitable while providing services to customers. The Firm and its employees are required to identify and manage conflicts/potential conflicts of interest in line with our conflicts of interest policies.

## **What is meant by Conflicts of Interest?**

Conflicts of interest occur where, the interest of the Firm (or another company with which the Firm is associated), and/or the interests of the Firm's staff, are in conflict with the interests of one or more customers. A conflict of interest can also arise between the Firm and its employees.

There are various instances where a conflict of interest may occur. Conflicts could be between various persons, such as:

- The Firm and the customer;
- One customer and another customer;
- An employee of the Firm and a customer;
- An employee and the Firm.

Below are some examples of situations that may cause conflicts of interest to materialise, where the Firm:

- would make a financial gain, or avoid a financial loss, at the expense of a customer;
- has an interest in the outcome of a service provided to the customer or of a transaction carried out on behalf of the customer, which is distinct from the customer's interest in that outcome;
- holds knowledge in confidence for one customer which would benefit another;

- has a financial or other incentive to favour the interest of another customer or group of customers over the interests of the customer;
- may be remunerated in a way which encourages it to act against its customers' interests; and
- receives or will receive from a person other than the customer an inducement in relation to a service provided to the customer, in the form of monies, goods or services, other than the standard commission or fee for that service.

### **Preventing and Managing Conflicts of Interest**

As per applicable regulations, we take all appropriate and reasonable steps to prevent and manage conflicts of interest. In order to achieve this, the Firm maintains and operates effective organisational and administrative arrangements with a view to taking all reasonable and appropriate steps to prevent and manage conflicts of interest in order to prevent them from adversely affecting the interests of our customers.

If the Firm's arrangements to manage a potential conflict of interest are not sufficient to ensure with reasonable confidence that the risk of damage to a customer's interests is prevented, the Firm will disclose the conflict to the customer. The Firm may decline to act in situations where conflicts of interest are unavoidable.

### **Order Execution**

The Firm executes your orders according to our Best Execution and Order Handling Policy.

The Firm does not receive any benefit (monetary or otherwise) from any trade execution venues in return for sending the Firm's customers' orders to them.

### **Investments Offered**

The Firm will be providing services to customers in relation to Instruments made available in Lightyear App. Those services include reception and transmission of orders in relation to Instruments, execution of orders on behalf of customers, safekeeping and administration of financial instruments for the account of clients, and foreign exchange services where these are connected to the provision of investment services. We provide our services on an execution-only basis. This means that our services are non-advised and so we will not provide the customer with any advice of any kind, nor will we provide a view as to whether a particular Instrument is suitable for the customer.

The Instruments that can be purchased or sold through the Lightyear App may change from time to time.

**Gifts**

Staff at the Firm are unable to accept gifts that surpass a specified threshold. Additionally, any gifts received by staff will be recorded by the Firm.

**Contact Information**

If you need to get in touch with the Firm about anything, you can email us at [support@golightyear.com](mailto:support@golightyear.com). We do not currently offer a dedicated phone helpline.