

Set out below is a summary of the Revolut Group Conflicts of Interest Policy

## The Revolut Group

This Policy applies to the Revolut Group (“Revolut”), its subsidiaries and regulated entities globally. This Policy also applies to trading and investment services that are provided by the Revolut Group where Revolut acts as an Appointed Representative.

The following activities and services are not undertaken by the Revolut Group and, accordingly, there are no identified conflicts of interest that arise or may arise from such services and activities:

- Investment Research for external distribution
- Investment advice to retail clients
- Proprietary trading, or
- Corporate finance

## Conflicts of Interest Policy Summary

This statement sets out a summary of Revolut’s Conflicts of Interest Policy and includes those circumstances that have been identified by Revolut as potentially giving rise to a conflict of interest which may damage the interests of Revolut’s customers and clients. A high level overview of the systems and controls adopted to manage such conflicts and mitigate conflicts of interest risks is also included.

Other perceived conflicts of interest may exist in certain aspects of Revolut’s business which do not create a risk of damage to the interests of Revolut’s customers and clients. Perceived conflicts of interest are appropriately managed through suitable risk and compliance processes and procedures; accordingly they are not reflected here.

Conflicts of Interest are inevitable in the normal course of business and Revolut employees (including executive and non-executive directors) are required to identify and manage conflicts in accordance with Revolut’s established Conflicts of Interest Framework. The identification and management of conflicts, whether real, possible or perceived, is critical. Some conflicts of interest may be impermissible as a matter of law, regulation, or Revolut policy. Other conflicts may be permissible and Revolut has procedures and controls in place to manage and mitigate risks of customer detriment from conflicts of interest that might arise. Such conflicts of interest may exist between:

1. Revolut (including its managers, employees, or any person directly or indirectly linked to them by control) and a customer / client; or
2. Between two (or more) Revolut customers / clients

### **A conflict may arise where Revolut:**

- Is likely to make a financial gain, or avoid a financial loss, at the expense of a customer / client;
- Has an interest in the outcome of a service provided to a customer / client, which is distinct from the customer’s / client’s interest in that outcome;

- Has a financial or other incentive to favour the interests of one customer / client or group of customers / clients over the interests of another customer / client; or
- Receives or will receive from a person other than the customer / client an inducement (i.e. a fee or a gift or entertainment) in relation to a service provided to the customer / client, in the form of monies, goods or services, other than the standard commission or fee for that service.

## Identification and Management of Conflicts of Interest

Regulators require organisations to maintain and operate effective governance and administrative arrangements, with a view to taking all appropriate steps to manage conflicts of interest and prevent them constituting or giving rise to a risk of damage to the interests of its customers and clients. Where it is not possible to avoid or manage a conflict of interest, Revolut has the discretion to decline to provide the service requested. As part of Revolut's governance framework, a number of organisational arrangements, systems and internal controls have been implemented which are designed to identify and manage potential conflicts of interest to prevent damage to the interests of Revolut's customers and clients. The controls include, but are not limited to:

- Governance structure, e.g. Revolut's Risk & Compliance Committees
- Senior management oversight, management information and reporting;
- Mandatory training, including treating customers fairly, conflicts of interest and anti bribery and corruption;
- Employee Handbook which includes terms and conditions of employment;
- Global Conflicts of Interest Policy and Procedure, Anti Bribery and Corruption Policy for gifts and entertainment reporting and Personal Account Dealing arrangements

In addition to the above controls, conflicts of interest are reported using a central conflicts of interest reporting tool and are reviewed by Compliance to establish mitigating controls. All employees (including executive and non executive directors) are required to report perceived, possible or real conflicts of interest using Revolut's global conflicts of interest portal. Revolut maintains a list of all conflicts which may give rise to a conflict of interest with a record of the controls recommended to manage such conflicts.

## Inducements

In the provision of investment services to customers and clients, Revolut may from time to time provide, accept or retain certain minor non-monetary benefits to or from third parties. Should this occur, it may give rise to potential conflicts of interest where such benefits could impair Revolut's obligation to act in the best interests of its customers and clients. As part of Revolut's regulatory responsibilities and with regard to fiduciary obligations it owes to customers and clients, it is Revolut's policy to avoid providing, accepting or retaining any fee, commission or monetary benefit to or from third parties, apart from minor non-monetary benefits. To further minimise the risk of conflicts, Revolut has adopted a Gifts and Entertainment reporting

procedure to support Revolut's Global Anti Bribery and Corruption Policy which is designed to ensure benefits are proportionate and reasonable. Where benefits are provided, accepted or retained, Revolut's policies are designed to ensure that such benefits are declared, pre-approved and recorded.

## Order handling and Best Interests

Revolut's subsidiary Revolut Trading Limited ("RTL") provides a non-advised order transmission service in shares and fractions of shares and therefore does not offer any advice or provide any recommendations regarding the appropriateness of any particular Instrument. RTL will transmit Orders to a Third Party Broker for execution or onward transmission. RTL's primary obligation is to ensure that customer Orders are transmitted to the Third Party Broker promptly and fairly. RTL is under a duty to act in a customer's best interest when transmitting an Order to another entity for execution or onward transmission. Therefore, in selecting the Third Party Broker RTL has considered industry guidance and believes best execution for orders is best obtained by only using the Third Party Broker who has the necessary expertise in the instruments in which Orders are executed. RTL conducts due diligence on the Third Party Broker to ensure that it has the necessary expertise in the relevant instruments and to satisfy itself that the Third Party Broker delivers fair outcomes.

Revolut or RTL does not engage in principal trading or trading for its own account (i.e. proprietary trading) and as such no conflicts arise between Revolut or RTL and its customers / clients. The selected Third Party Broker is fully independent of Revolut and Revolut has no association with the Third Party Broker except for the business services provided by the Third Party Broker.

## Overview of Revolut's systems and controls to manage certain conflicts of interest

### Personal Trading

#### **Real or possible conflicts identified by Revolut Systems and controls for managing conflicts of interest**

Revolut employees may undertake personal account dealing, including personal investments in securities or funds. This may cause a conflict between Revolut's employees and its customers / clients, as this may encourage 'front running' or the use of confidential information for personal gain.

To manage this conflict Revolut has adopted a Global Personal Account Dealing policy, including a minimum 30-day holding period, pre-clearance requirements for securities and stocks available to trade using the Revolut App and personal account dealing reporting requirements for specific employees in order to manage the potential conflict and related risks. Policies and procedures exist to prevent all employees from insider trading, trading on material non-public information, and disclosing confidential information. Further, employees are required to periodically attest compliance with, and understanding of, Revolut's conflicts of interest arrangements and controls during Rev  
Inducements, Gifts or Entertainment

## **Real or possible conflicts identified by Revolut Systems and controls for managing conflicts of interest**

Revolut employees may give or receive gifts or entertainment to or from third parties which may influence their behaviours or induce them to act in an inappropriate or unethical manner to the detriment of customers and clients. This could prevent Revolut from focusing on the appropriateness of costs charged for services and the quality of services offered, potentially leading Revolut to favour a third party over its customers and clients.

To manage the risks associated with gifts and entertainment, Revolut's anti bribery and corruption framework includes a gifts and entertainment policy and procedure. Revolut employees are also required to undertake mandatory anti-bribery and corruption training periodically. Revolut seeks to ensure that its employees do not offer or give, solicit or accept gifts or entertainment which are likely to conflict with the duties owed to its customers and clients. All gifts and entertainment to third parties must be a reasonable non-monetary benefit and enhance the quality of service to customers and clients. Gifts and entertainment must be declared and recorded, and, in some cases must be pre-approved by Compliance. In certain circumstances, gifts and entertainment will not be permitted. The compliance function conducts periodic assurance reviews to assess the control framework in place at Revolut to manage the risks associated with the giving and receipt of gifts and entertainment.

### **Outside Business Interests**

## **Real or possible conflicts identified by Revolut Systems and controls for managing conflicts of interest**

Revolut employees, directors or non-executive directors may hold outside business interests such as directorships, advisory board memberships, trusteeships or otherwise serve in alternative roles either within the Revolut Group or in an oversight capacity for other public or private companies or charities. These outside business interests may create conflicts with the best interests of customers and clients

Revolut has controls in place so that where outside business interests are held by individuals, or an individual intends to hold such a position, reporting and, in many cases, pre-approval is required..In addition, directors (including non-executive directors) of Revolut are required to declare any conflicts of interest in accordance with their directors' duties.