



CONFLICTS OF INTEREST POLICY

What is a Conflict of Interest and when may it arise?

A conflict of interest may arise where a company, or one of its employees, is providing a financial service to its clients and may entail a material risk of damage to those clients interests, & whether the company or its staff:

Is likely to make a financial gain, or avoid a financial loss, at the expense of the client;

Has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;

Has a financial or other incentive to favour the interest of another client, or group of clients, over the interests of the client;

Carries on the same business as the client; or Receives or will receive from a person other than the client, an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service

How we manage conflicts of interest (The following are examples of conflicts of interest and how we manage these conflicts)

Contracts, proposed contracts and similar transactions or arrangements

A conflict of interest may arise where an employee has a direct, or indirect interest in a transaction. This may be where the employee has a connection with the other party to the transaction, or where the employee's family has a connection. The connection may be from a directorship, significant shareholding, employment or consultancy. We require disclosure of any connection which could, or could be seen to have the effect of compromising the judgment of any of our employees. Employees are required to notify our Compliance Officer of any such potential conflicts of interest, who will then decide if the employee can be involved in the transaction. The Compliance Officer will also ensure that the relevant provisions have been met, and if deemed necessary, ensure that all relevant disclosures are made to clients, upfront.

Gifts, Hospitality & Inducements

Inducements, gifts & hospitality are all issues that could lead to potential conflicts of interest. We have a strict policy regarding such issues, and as such do not permit staff to accept any gifts. All Employees must act with the highest standards of integrity to avoid any allegations of Conflicts of Interest.

Employees must not accept any cash payments, significant gifts or hospitality. Token gifts may be accepted, providing they have not been solicited, have not been given as a business inducement and will not compromise our integrity. A register is kept of any gifts, or hospitality received and is available for public scrutiny.

Staff cannot attend hospitality events, without our prior approval. Where an invitation could be construed as being a business inducement, it must be declined.

Company Policy

We expect all staff to maintain the highest standards in carrying out their business activities, adhering to legislative requirements & our policies on business conduct. We expect employees to act professionally, honestly and ethically in all their dealings with clients, colleagues & third parties.