



Summary conflicts of Interest Policy

August 2018

SUMMARY CONFLICTS OF INTEREST POLICY

I. INTRODUCTION

This is a summary of the main policy we maintain in order to prevent and manage any conflicts of interest in respect of the duties we owe to clients.

II. DEFINITION AND IDENTIFICATION OF CONFLICTS

Conflict situations are defined as those in which a customer or potential customer's interest conflicts with those of another customer/other customers and/or our interests. As a result, there is a material risk that the interests of one or more customers could be harmed. For the purposes of this policy, our interest includes the interests of employees or other people who work under our direct or indirect control, as well as any associated agents. We will take reasonable steps to detect conflicts of interest that could arise when a service is being provided, between our self, which includes managers, employees and associated agents or any person directly or indirectly controlled by us, and our customers, or between our customers.

III. POLICY

We maintain an up-to-date list of the specific investment services and activities, carried out by us or on our behalf, which may give rise to a conflict of interest or pose a significant risk of harming the interests of one or more customers. We maintain procedures to be followed and measures to be adopted in order to prevent or manage such conflicts.

IV. DISCLOSURE

Where our organizational and administrative arrangements to prevent or manage conflicts are not, or cannot be sufficient to be reasonably confident that the risk of damage to a client's interest will be prevented, we will aim to disclose the general nature and/or sources of conflicts, as well as the risks to the client that arise as a result of the conflict and the steps

undertaken to mitigate these risks, before carrying on business for the client. Any disclosure shall contain sufficient information to allow the client to make an informed decision.

V. MANAGEMENT OF CONFLICTS

We have in place operational procedures to manage actual and potential conflicts. This includes procedures to maintain appropriate independence between employees of Company who are involved in different activities, for example through the operation of information barriers, segregation of duties and responsibilities and physical separation of staff.

A lot of care has been taken to ensure access to customer information and trading data is only available to staff who absolutely need it. Staff duties are segregated to ensure there is no crossover of information and, where possible, staff supporting Company are kept physically segregated.

Gifts and/or hospitality offered to, or given by, employees are monitored and no gift, or series of gifts, can be accepted or donated by employees if they are considered excessive or may impair the duty of Company to act in the best interest of customers.

VI. COMPLIANCE AND SUPERVISION

All employees are responsible for complying with this policy and the senior management is responsible for ensuring that the systems and controls put in place meet the requirements imposed by the applicable regulations.