# 1 Introduction

1.1 Principle 8 of the Financial Conduct Authority's [Principles for Businesses](http://fshandbook.info/FS/html/handbook/PRIN) requires a firm to "manage conflicts of interest fairly, both between itself and its customers and between a customer and another client."

1.2 Under the Markets in Financial Instruments Directive investment firms are required to maintain and operate effective organisational and administrative arrangements with a view to taking all reasonable steps to identify, monitor and manage such conflicts of interest.

1.3 The company, directly authorised by the Financial Conduct Authority, operates a conflicts of interest policy to ensure that it manages conflicts of interest properly to meet this obligation. The policy is set out below together with key information that is needed by clients to understand the measures it has taken to safeguard the interests of its customers.

# 2 The Company’s Commitment

## Commitment

2.1 The Company is committed to:

2.1.1 Identifying circumstances, which may give rise to conflicts of interest entailing a material risk of damage to their customers' interests.

2.1.2 Establishing appropriate mechanisms and systems to manage those conflicts.

2.1.3 Maintaining systems in an effort to prevent actual damage to customers' interests through the identified conflicts.

# 3 What is a Conflict of Interest?

## General

3.1 A conflict of interest under the Markets in Financial Instruments Directive is a conflict that arises in any area of the authorised firms' business in the course of providing their customers with a service which may benefit The company (or another customer for whom it acts) whilst potentially materially damaging another.

3.2 There may be a conflict where The company (or anyone connected to it):

3.2.1 Is likely to make a financial gain (or avoid a loss) at the expense of its customer;

3.2.2 Is interested in the outcome of the service provided to its customer where the interests of The company is distinct from that of the customer;

3.2.3 Has a financial or other incentive to favour the interests of one customer over another;

3.2.4 Carries on the same business as a customer;

3.2.5 Receives money, goods or services from a third party in relation to services provided to a customer other than standard fees or commissions.

# 4 Policies and Procedures

## General

4.1 The company will implement the Conflicts of Interest Management Procedures set out in its Compliance and Procedures Manuals in order to manage recognised conflicts of interests that may exist within each authorised firm.

4.2 The company will review this Conflicts of Interest Policy at least annually and where appropriate on an ad hoc basis to ensure it adequately reflects the types of conflicts that may arise and how those are best managed.

4.3 The company recognises an ongoing obligation to monitor the business (and any appointed representatives) to ensure that any new conflicts of interest that may arise are documented and controls are put in place to manage them. Changes to the business are accordingly addressed at Board level of The Company to ensure that appropriate procedures are put in place to manage such conflicts.

## Specific

4.4 The company has adopted the following specific internal policies and procedures to manage potential conflicts of interest within each authorised firm.

## Training

4.4.1 The Company will provide an induction programme and implements training and competency procedures along with a monitoring programme designed to ensure that all relevant staff (including directors and employees) are familiar with and observe inter alia the Financial Conduct Authority's [Principles for Businesses](http://fshandbook.info/FS/html/handbook/PRIN), the Statements of Principle and Code of Practice for Approved Persons and the contents of this policy document.

4.4.2 The Company will further provide ongoing training to all relevant staff (including employees) on conflicts of interest management.

## Personal Relationships

4.4.3 All employees of The Company are required under the Terms of their Contracts of Employment and/or Service Contracts and its Compliance and Procedures Manual to immediately advise their Compliance Officer of any family members or personal friends who are either customers, employees or service providers to The Company.

## Inducements

4.4.4 No employee, director or self-employed consultant providing services to The Company is permitted to accept gifts, entertainment or any other inducement from any person which might benefit one customer at the expense of another when conducting investment business.

## Remuneration

4.4.5 The remuneration policy of The Company does not provide extra reward to advisers for advising clients where a conflict of interest can exist.

4.4.6 The remuneration policy of The Company is designed to ensure that each item of remuneration is independently reviewed to monitor for and avoid any conflicts of interest arising.

## Separate supervision and segregation of function

4.4.8 Where appropriate, The Company will arrange for the separate supervision of those carrying out functions for customers whose interests may conflict, or where the interests of customers and The Company may conflict and has taken steps to prevent simultaneous or sequential involvement of a relevant person in separate services or activities where such involvement may impair the proper management of conflicts of interest.

## Dealings with customers

4.4.10 In all dealings with customers, The Company will disclose any conflict, where it arises and becomes apparent, to a customer prior to undertaking investment business or in the event that disclosure is not appropriate to manage the conflict. The Company will decline to proceed with any transaction or matter giving rise to the conflict.

4.4.12 The Company will take all reasonable steps to avoid material damage being caused to customers; to exercise consistent standards and to operate the same processes across all markets, clients and financial instruments in which it operates. In order to ensure a fair and orderly dealing environment within the market, The Company further ensures that all its relevant staff will comply with the relevant directives, as well as the relevant Financial Conduct Authority rules which aim to prevent insider dealing, the misuse of information and market manipulation.

## Confidentiality and information barriers

4.4.13 The Company insists on strict customer confidentiality to ensure that information is disclosed only to those entitled to receive it.

## Recording conflicts

4.4.14 T The Company is required to keep a record of the kinds of services or activities in which a conflict of interest entailing a material risk of damage to the interests of one or more customers has arisen or may arise. This record is kept up-to-date.

# 5 Whistle Blowing

5.1 The Company operates a Public Interest [Disclosure Policy](http://www.financial.ltd.uk/corporate_governance/disclosure-policy) as part of its Conflicts of Interest Management Procedures.

5.2 Reporting lines are likewise designed to avoid any conflicts arising and assist in those which do being appropriately addressed.

# 6 Third Parties

By creating this policy document pursuant to the requirements of the Financial Conduct Authority Rules, The Company do not intend to create any contract between a prospective customer and/or between a customer and any of the associated companies; this document is not intended to create any form of third party rights.