

FTI Financial Services Limited

Summary of Conflicts of Interest Policy

FTI Financial Services Limited (“FTI”) is authorised and regulated by the UK Financial Conduct Authority (“FCA”). FTI is an investment firm that is subject to the requirements of the FCA rules that implement the requirements of the revised EU Markets in Financial Instruments Directive (2014/65/EU).

The purpose of this document is to provide a summary of our Conflicts of Interest policy (the “Policy”). Further information is available on request.

FTI takes all reasonable steps to identify conflicts of interest between:

- Ourselves, including our managers, employees and appointed representatives or tied agents, or any person directly or indirectly linked to us by control (including other entities in the FTI group) and our clients; or
- One client and another;

which might arise in the course of providing the services.

We have in place organisational and administrative controls to manage the conflicts of interest identified such that we can be reasonably confident that risks of damage to clients as a result of any conflict will be prevented.

By reference to the specific services and activities carried out by or on behalf of FTI, the Policy identifies a number of circumstances which may give rise to a conflict of interest entailing a risk of damage to the interests of one or more clients.

For each of these potential conflicts of interest, the Policy describes the procedures that FTI will follow and the measures that FTI has adopted in order to prevent actual conflicts of interest from arising in practice or, in case they do arise, to manage them in such a way as to eliminate any material risk of prejudice to a relevant client.

The Policy makes it clear that it does not serve as an exhaustive list of all conflicts of interest that may be encountered by FTI. In the event that a new or ad-hoc conflict of interest arises which has not been anticipated by the Policy, FTI will identify and manage such conflicts in accordance with the processes identified therein.

Disclosure of conflicts of interest to clients is a measure of last resort in FTI’s arrangements to identify, prevent and manage conflicts of interest.

The Policy will be periodically assessed and reviewed.

This document has been issued by FTI Financial Services Ltd. only and does not apply to any other entities in the FTI group. FTI Financial Services Limited is a company incorporated in England and Wales (company number 04851184), with registered office at 200 Aldersgate, Aldersgate Street, London EC1A 4HD. FTI Financial Services Limited is authorised and regulated by the Financial Conduct Authority (the “FCA”). Its FCA reference number is 400856.