

Conflicts Policy

Introduction

The purpose of this document is to provide information on our policy on conflicts of interest and our approach to managing any conflicts of interest fairly: both between us, our directors, employees, group companies and associates and our clients, and between your interests and those of other clients. It is required under the EU Markets in Financial Instruments Directive (MiFID) and will apply from 1 November 2007.

Our Conflicts Policy

We aim to establish and maintain effective systems, controls and procedures which are designed to identify and manage actual and potential conflicts of interest in the course of its business that pose a material risk to clients' interests.

We keep a record of potential conflicts of interest which could arise during our activities and take into account, among other things, whether we:

- (a) are likely to make a financial gain, or avoid a loss, at the expense of a client
- (b) have an interest in the outcome of a service or transaction provided to a client, which is distinct from the client's own interest in that outcome
- (c) have a financial or other incentive to favour the interest of a client or group of clients over the interests of another client
- (d) carry on the same business as the client
- (e) 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.

Dealing in contracts for differences or Spread Betting as principal, personal account dealing, inducements and gifts and entertainment are all examples of situations in which potential conflicts of interest may arise.

Management of Conflicts

Having identified potential conflicts of interest, we have procedures in place to manage conflicts promptly and fairly. The following minimum systems, controls and procedures are in place:

- (a) procedures to ensure that the compliance function operates with appropriate independence
- (b) procedures to prevent or control the exchange of information between relevant persons engaged in activities involving a conflict of interest, where exchange of that information may harm one or more clients
- (c) supervisory arrangements providing for the separate supervision of employees, where this is necessary for the fair management of conflicts of interest
- (d) controls to monitor outside business interests
- (e) procedures to ensure that disclosures are fair, clear and not misleading, so that clients can make an informed decisions
- (f) rules on personal account transactions to which relevant persons are subject
- (g) periodic reviews of the effectiveness and continued relevance of our systems and controls
- (h) an Execution Policy, which aims to ensure the best possible outcome on client orders
- (i) rules on inducements, gifts and entertainment which apply to us

Disclosure

When there is no effective way of managing a conflict, this will be disclosed in outline in our Terms of Business. You may request further information from us in relation to such conflicts in order to enable you to make an informed decision about whether to deal with us in particular circumstances. In addition, we may decline to act for you if the conflict of interest cannot otherwise be effectively managed.

Further Details

For further details of how we manage conflicts of interest, please contact us directly.