



SUMMARY OF INFINOX CONFLICTS OF INTEREST POLICY

JANUARY 2019

Summary of INFINOX Conflicts of Interest Policy INFINOX CAPITAL LIMITED (“INFINOX”)

INFINOX Capital Limited trading as “INFINOX” provides here a summary of the policy we maintain in order to manage conflicts of interest in respect of the duties we owe to our clients. This applies from 1 November 2007.

1 What is a conflict of interest?

A conflict of interest is a situation in which someone in a position of trust has competing professional or personal interests. Such competing interests can make it difficult for individuals to fulfil their duties impartially. A conflict of interest may exist even if no unethical or improper act results from it.

A conflict of interest can arise between the INFINOX and its directors, employees, associated agents and any person directly or indirectly controlled by them and you as a client or between your interests and those of another client of ours.

2 Our responsibility

We aim to establish, maintain and operate effective organisational and administrative arrangements with a view to taking all reasonable steps to prevent conflicts of interest from constituting, or giving rise to a material risk of damage to the interests of our clients. We also keep a record of the kinds of activity undertaken in which a material conflict of interest has arisen or could arise.

INFINOX is committed to avoiding conflicts of interest and where actual or potential conflict of interest could arise, it sets out to manage it fairly. INFINOX has established a Conflicts of Interest Policy (the “Policy”) setting out the procedures and controls which help it identify and appropriately deal with conflicts of interest – actual, apparent and potential.

3 Policy objective

The objective of the Policy is to ensure that conflicts of interest within INFINOX are identified, managed appropriately, monitored and, where necessary, disclosed in order to ensure the fair treatment of clients and compliance with the rules and principles of the Financial Conduct Authority (“FCA”).

4 Application

This policy applies to all INFINOX FCA regulated activities, and activities in connection with or for the purposes of such regulated activities, including those outsourced activities provided by a third party. All employees are required to comply with the Policy.

5 Conflicts of Interest Identification

INFINOX takes into account whether:

- INFINOX is likely to make a financial gain, or avoid a financial loss, at the expense of the client; or
- An INFINOX employee is likely to make a financial gain, or avoid a financial loss, at the expense of the client; or
- A client of INFINOX is likely to make financial gain or avoid a financial loss at the expense of another client.

6 Arrangements to Manage Conflicts

INFINOX has the following measures in place to manage conflicts of interest:

- Segregation of duties and supervision for persons engaged in different business activities including procedures for ensuring appropriate communication between business units;
- Personal account dealing requirements applicable to all staff in relation to their own investments.
- Control over sources of remuneration of relevant persons; we do not and will not offer remuneration packages that reward behaviour that disadvantages the interests of customers or members in our favour, or other clients. Staff will be rewarded on the basis of merit and long-term value-adding performance.
- Protocols to ensure that no improper inducements are given or received and proper inducements are disclosed appropriately
- On occasion our employees may personally benefit from dealings with potential or existing clients, services providers etc. A Gifts and Inducements Policy is in place to ensure that these are not excessive and do not create an obligation or debt, including a gift register recording the solicitation, offer or receipt of certain gifts or entertainment.
- External directorship policy, including the requirement for all external directorships and outside business interests to be declared; and
- The provision of training to directors and employees of INFINOX on conflicts of interest management.

7 Conflicts Disclosure

Where INFINOX considers, with reasonable confidence, that the arrangements in place to manage potential and/or actual conflicts of interest are not sufficient to avoid material risk of damage to a client's interest, INFINOX will disclose the general nature and/or sources of the conflict of interest to the client before undertaking any business for the client.

Further information on INFINOX's conflicts policy, including a full version, can be provided upon request. Alternatively, please address any questions to your usual INFINOX contact.