

## **Conflicts of Interest Policy**

### **1 Introduction**

Citypoint Trading Limited aim to identify and prevent conflicts of interest which may arise between us and our clients and between one client and another in order to avoid any adverse effect on our clients. This conflicts of interest policy sets out the procedures practices and controls in place to achieve this.

This policy applies to all directors and staff (whether executive or non-executive) and any persons directly or indirectly linked to us and refer to interactions with all of our clients.

### **2 Regulatory Requirements**

The FCA has detailed requirements relating to the management of conflicts of interest which are found primarily in the FCA Senior Management Arrangements, Systems and Controls (SYSC) Sourcebook, section 10.

SYSC Section 10 requires us to:

- Take all reasonable steps to identify conflict of interest between us and our client, or one client of ours or another.
- Keep and regularly update a record of the level of service or activity we carry on (or which is carried on our behalf) in which a conflict of interest entailing a material risk of damage to the interests of one or more of our clients has arisen or may have arisen.
- Maintain and operate effective organisational and administrative arrangements with a view to taking all reasonable steps to prevent conflicts of interest from constituting or given rise to a material risk of damage to the interests of our clients: and
- Establish, implement and maintain an effective written conflicts of interest policy.

As with all laws and regulations applicable to our business, we take our regulatory requirements relating to conflicts of interest very seriously.

### **3 Scope**

We have identified the types of conflicts which may occur in our business and which carry a material risk of damage to the interest of a client. These include, but are not limited to, when we or any person directly or indirectly linked to us:

- Is likely to make a financial gain or avoid a financial loss at the expense of our client.
- Has an interest in the outcome of a service or product provided to, or of a transaction carried out on behalf of our client which is distinct from our clients interest in that outcome.
- Has a financial or other incentive to favour the interests of another client or group of clients over the interests of our client.
- Carries on the same business of our client

- Receives, or will receive, from a person other than our client an inducement in relation to the service provided to our client in the form of monies, goods or services, other than the standard commission or fee for that service: or
- Designs, markets or recommends a product or service without properly considering all of our other products and services and interests of our clients.

#### **4 Guarding Against Conflicts of Interest**

We have put in place systems and procedures described below to; minimise the potential for conflicts of interest; to ensure that we have adequate arrangements to manage all conflicts of interest and where possible to avoid material conflicts of interest; and where possible to avoid material conflicts of interest.

##### **4.1 Personnel Account Dealing**

All personnel are bound by the requirements of our Personal Account Dealing Policy. All transactions undertaken by personnel are actively monitored by our compliance department.

##### **4.2 Investment Research/Recommendation**

We do not provide investment research or recommendation

##### **4.3 Need to Know Policy**

Where personnel in possession of confidential or inside information such as information relating to a client's trade, personnel may not disclose such information to another party without ensuring that:

- There is clear need to know on the part of the recipient
  - The procedures set out in the policy are adhered to
  - Where the information relates to a client, the information transfer is in accordance with the best interests of the client and
  - The recipient is made aware of the requirement to treat the information as confidential.
- Only information required for the intended use may be disclosed and the receiving individual is then bound by the same restrictions. Personnel are required to take care when handling confidential information, such as information relating to a client's trades or personal details. In particular personnel are required to ensure that they do not leave documents containing confidential information on their desks and that they refrain from discussing confidential information in circumstances where it could be overheard by other personnel who have no need to know such information.

##### **4.4 Restriction on Access to Information/Electronic Data**

The access to computer drives and to files located within the drives are restricted by the use of passwords and user IDs. Computers are automatically locked if left unattended for short periods. In addition personnel are reminded of the importance of data protection.

##### **4.5 Gifts and Inducements**

Personnel may not solicit or accept any gift of inducement which may influence their independence or business judgement or which could create a conflict with any duty owed to us or our clients. This restriction does not include special promotions on products and services which have been agreed by our senior management, nor does it cover corporate gifts and hospitality which are considered to be incidental to our ordinary business. Examples of gifts and inducements which may not be offered or accepted include cash, gifts readily convertible to cash or any other object of significant value.

Personnel are required to register with the compliance department details of hospitality or gifts whether given or received with an estimated value in excess of £250 (or the equivalent in other currencies) and to seek guidance from the compliance department if in doubt about the suitability of any gift.

Such items are recorded in our Gifts and Hospitality register which is subject to regulatory inspection.

#### **4.6 External Business Interests**

Personnel undertake that they will not (unless granted prior written consent from our senior management or permitted under the terms of their employment) be engaged in or have an interest, either directly or indirectly, in any trade, business or occupation, which is or may be in competition with us and/or which would involve use of our time, property facilities or resources.

#### **4.7 Segregation of Duties**

Job roles are designed to limit the potential for conflicts of interest. Where appropriate and proportionate, systems and controls exist to prevent personnel from undertaking roles where such a conflict may exist. However due to the nature, scale and complexity of our business there can be occasions when a member of staff is required to undertake duties that could give rise to conflict. In this event every effort will be made to ensure that such circumstances exist for only a limited period or that additional controls are in place to identify inappropriate behaviour.

#### **4.8 Whistleblowing Policy**

We are committed to ensuring that malpractice is prevented and, should it arise, to deal with it immediately. Employees are informed as to whom they should report public interest issues in the firms Whistleblowing Policy.

#### **4.9 Disclosure Policy**

We believe that our internal policies and procedures, systems and controls, generally mitigate the risk of any conflict of interest arising, either between us and our client or between two or more of our clients.

Where however the potential for conflict arises and that conflict cannot be avoided we would either make a full disclosure or, if it is considered that the disclosure is an appropriate method of managing the conflict, we would not proceed with the matter or transaction giving rise to the conflict.

If any personnel are aware of any circumstances which may give rise to a conflict of interest they must immediately refer the matter to the compliance department.

### **5 Policy Review**

We regularly review our conflicts of interest policy to ensure that it covers conflicts that can be reasonably expected to arise within the course of our business. Any significant amendments to this policy must be approved by senior management.