



Conflicts of Interest Document



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CONFLICTS OF INTEREST

Outlined below is a summary of our Conflicts of Interest Policy. In providing investment services to retail clients, actual or potential conflicts of interest may arise between the interests of the service provider (including its employees and businesses within the same group) and the interests of its clients. Blackbee Investments acknowledges the legal and regulatory responsibility to effectively manage actual or potential conflicts of interest which entail a risk of damage to the interests of one or more of its clients. Blackbee Investments has implemented a Conflicts of Interest Policy to manage such situations. The Policy sets out the legal and regulatory requirements:

- To identify actual or potential conflicts;
- To have procedures in place for managing such conflicts;
- To keep necessary records.

It is our commitment to disclose to clients the general nature and/or source of conflicts where there is a potential risk of damage to the interests of a client and where our arrangements to manage such conflicts may not be sufficient to ensure, with reasonable confidence, that the client will not be disadvantaged. The Policy is underpinned by procedures designed to manage conflicts of interest that could arise. This includes procedures:

1. For internal information barriers to prevent or control exchange of confidential information that may harm the interest of clients;
2. For the appropriate level of independence between persons engaged in business activities involving a conflict of interest;
3. To ensure that staff adhere to rules on company directorships and outside activities which could give rise to a conflict with the interests of a client;
4. To ensure that staff adhere to the rules governing the giving or receiving of gifts, benefits or inducements;
5. For the disclosure of information on soft commission arrangements, where relevant.