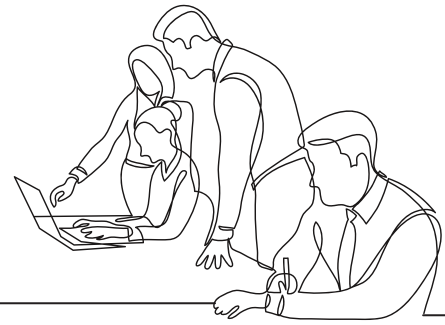


Conflicts of interest



Killik & Co (the “firm”) helps clients to save, plan and invest for their families and future by offering wealth management, investment management and stockbroking services. A core principle of the firm is client centricity, which requires maintaining integrity and trust. This policy outlines how Killik & Co identifies, prevents, manages and monitors conflicts of interests in accordance with the Financial Conduct Authority’s (FCA) regulatory requirements. If conflicts of interest are not appropriately addressed, they may undermine decision making and/or damage the interests of a client.

Regulatory Framework

In alignment with Principle 8 of PRIN 2.1.1 in the FCA Handbook, the firm is committed to managing conflicts of interest fairly, whether they arise between the firm and its clients, or between individual clients.

Defining Conflicts of Interest

A conflict of interest arises when a firm, its personnel, or its clients have competing business or personal interests that may influence, or be reasonably perceived to influence, the ability to act in the best interests of clients. These are categorised as:

- **Actual:** Where a conflict may affect decisions taken in the best interests of clients.
- **Potential:** Where interests could influence an individual’s judgment.
- **Perceived:** Where no actual conflict exists, but the situation appears conflicted to an external observer.

Conflicts of interest may occur between:

- Killik & Co or its personnel, and one or more clients
- Two or more clients

Examples of conflicts include:

- Remuneration structures for personnel
- Handling of service complaints
- Allocation of new shares through placings or initial public offerings (IPOs)
- Outside business interests of personnel, including employment, investment and ownership activities
- The giving or receiving of gifts by personnel
- Third party suppliers related to personnel

Controls and Oversight

All personnel are responsible for identifying and reporting conflicts of interest in line with the Conflicts of Interest procedure. Key controls include:

- Risk and Controls Self Assessments are updated at least annually and on an ongoing basis
- Comprehensive training programs are implemented across the business
- Regular management information is provided to the Audit and Risk Committee.

Conflicts are further managed through specific internal policies, including:

- Personal Account Dealing Policy
- Complaints Management Policy
- Vulnerable Clients Policy
- Outsourcing Policy
- Employee Handbook
- Whistleblowing Policy
- Products and Services Policy
- Anti Bribery & Corruption (ABC) and Inducements Policy.