

CONFLICTS OF INTEREST POLICY

Category I FSP



Silvertree Risk & Wealth Management

CONFLICTS OF INTEREST MANAGEMENT POLICY FOR SILVERTREE RISK & WEALTH MANAGEMENT

1. INTRODUCTION

Who does this policy apply to?

2. WHAT IS A CONFLICT AND WHEN MAY IT ARISE

High level standards.

3. HOW WE MANAGE CONFLICTS OF INTEREST

- Financial interests:
Cash, voucher, gift, discount, advantage, benefit, domestic or foreign travel, hospitality, accommodation, sponsorship, training.
- Immaterial financial interests:
Gifts & hospitality (determinable monetary value).
- Ownership interests.

4. XXX's POLICY

4.1 Introduction

This document details Silvertree Risk & Wealth Management C.C Conflicts of Interest Management Policy.

A short summary of this policy is included in the "Letter of Introduction" document, issued and explained to clients at the beginning of the sales process. The full Management Policy document is also available on request.

This policy applies to all employees of Silvertree.

4.2 What is a Conflict of Interest and when may it arise?

A conflict of interest may arise where a company, or one of its employees, is providing a financial service to its clients and may entail a material risk of damage to those clients' interests, and whether the company or its employee:

- is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
- has a financial or other incentive to favour the interest of another client, or group of clients, over the interests of the client;
- carries on the same business as the client; or
- receives or will 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.

4.3 How we manage Conflicts of Interest

The following are examples of conflicts of interest and how we manage these conflicts:

- Contracts, Proposed Contracts and similar transactions or arrangements

A conflict of interest may arise where an employee has a direct, or indirect interest in a transaction. This may be where the employee has a connection with the other party to the transaction, or where the employee's family has a connection. The connection may be from a directorship, significant shareholding, employment or consultancy.

Silvertree requires disclosure of any connection which could, or could be seen to have the effect of compromising the judgment of any of our employees. Employees are required to notify Silvertree of any such potential conflicts of interest, who will then decide if the employee can be involved in the transaction. Silvertree will also ensure that the relevant provisions have been met.

- Gifts, Hospitality and Inducements

Inducements, gifts and hospitality are all issues that could lead to potential Conflicts of Interest. Silvertree has a strict policy regarding such issues, which is documented in Silvertree. All Employees must act with the highest standards of integrity to avoid any allegations of Conflicts of Interest.

Employees must not accept any cash payments, significant gifts or hospitality. Token gifts may be accepted, providing they have not been solicited, have not been given as a business inducement and will not compromise Silvertree's integrity. A register is kept of any gifts, or hospitality received.

Employees cannot attend hospitality events, without Silvertree's approval. Where an invitation could be construed as being a business inducement, it must be declined.

4.4 Silvertree Risk & Wealth Management C.C Policy

Silvertree expects all its employees to maintain the highest standards in carrying out their business activities, adhering to legislative requirements and our policies on business conduct. Silvertree expects its employees to act professionally, honestly and ethically in all their dealings with clients, colleagues and third parties. Silvertree has a clear policy on Conflicts of Interest:

- Conflicts of Interest should always be avoided, wherever possible.
- Conflicts or potential Conflicts of Interest must always be disclosed. Silvertree will not tolerate non-disclosure by its employees.