

Conflicts of Interest Policy



Satis Wealth Management (Satis) is a trading style of Satis Asset Management Limited who are permitted by the FCA to advise on and arrange deals in pensions, savings and investment products under the registration number 761140.

Under FCA's Principle for Business, Principle 8 (Conflicts of interest) Satis are required to pay due regard to the interests of each client and to prevent or manage any conflicts of interest fairly, both between our firm and our clients and between a client and another client. The specific rules for dealing with conflicts of interest can be found under the Senior Management Systems and Controls (SYSC) rules which can be found at SYSC 10.

The Satis Conflicts of Interest policy document confirms the following:

- a) What is a Conflict of Interest?
- b) The stance Satis takes on Conflicts of Interest
- c) Identification of a Conflict of Interest
- d) Managing of a Conflict of Interest
- e) Disclosure of a Conflict of Interest

What is a conflict of interest?

A conflict of interest is where a situation arises that has the potential to undermine the impartiality of a person/company because of the possibility of a clash between the person's self-interest and professional interest or public interest.

A situation in which a party's responsibility to a second-party limits its ability to discharge its responsibility to a third-party.

Satis stance on Conflicts of Interest

Satis will take all appropriate steps to identify and prevent or manage conflicts of interest, by:

- a) Identifying and preventing any potential circumstances which may give rise to conflicts of interest, and which pose a risk of damage to clients' interests;
- b) Establishing and maintaining appropriate mechanisms and systems to manage those conflicts; and
- c) Maintaining systems at all times in an effort to prevent actual damage to clients' interests through the identified conflicts.

The Satis Board fully support this and are committed to ensure that all conflicts between our firm and our clients, and between clients, are managed fairly with no party disadvantaged.

At least on an annual basis, our senior management team will receive a written report providing details of the kinds of services or activities carried out by our firm in which a conflict of interest entailing a risk of damage to the interest of one or more client has arisen or, in the case of an ongoing service or activity, may arise.

In addition to complying with the FCA requirements Satis recognise that handling conflicts fairly is a fundamental element of good business practice and is required to assist in maintaining and developing our firm's business.

Identification of a conflict of Interest

Conflicts of interest may include but are not restricted to interests between:

- Satis and Satis clients
- Satis staff and Satis clients
- Two or more different Satis clients
- Third parties and Satis clients
- New services / products and Satis clients
- Strategic changes and Satis clients

When identifying the types of conflicts that arise, or may arise, Satis will assess whether the firm, anyone connected with the firm or (if relevant) another client has an interest in the outcome of a service provided to the client which is distinct from the clients interest in that outcome and has the potential to influence the outcome to the detriment of the client.

As a minimum, Satis will take into account whether Satis, anyone connected with Satis or another client:

- a) Is likely to make a financial gain, or avoids a financial loss, at the expense of a client;
- b) Has a financial or other incentive to favour the interest of another client or group of clients over the interests of a client;
- c) Carries on the same business as a client;
- d) Receives or will receive from a person other than a 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; or
- e) Is substantially involved in the management or development of policies in particular where they have influence pricing or distribution costs.

Satis have sought to identify and prevent conflicts of interest that exist in our business and have put in place measures we consider appropriate to the relevant conflict in an effort to prevent, monitor, manage and control the potential impact of those conflicts on our clients.

Examples of conflicts identified by Satis are:

a) Client orders

In order to ensure as fair treatment as possible for clients, our Best Execution Policy requires us to take all sufficient steps to achieve the best overall trading result for clients.

On some occasions client orders may have a material effect on the relevant securities price. In order to ensure our staff do not take advantage of the situation by dealing on their own account (Personal Account Dealing) or encourage a third party to deal, we operate a 'No front running' policy whereby client orders will always take priority. We regularly monitor business transactions in order to ensure we meet these requirements.

b) Personal account dealing

Our staff may buy, sell or hold the same investments as our clients. We control personal account deals by ensuring that all deals in shares and securities are identified and where applicable approved by management prior to execution. All staff, irrespective of their position in the firm sign on an annual basis to confirm their understanding of our procedures.

c) Inducements to staff

We have a policy on gifts and benefits which confirms when they can be accepted or given and the steps that should be taken.

If in doubt as to whether a benefit is allowable, all staff must consult the Satis Asset management CF10 before accepting it, or decline to accept it.

Staff are not permitted to accept gifts, entertainment or any other (allowable) inducement - – unless it enhances to quality of our firm’s service and doesn’t have a detrimental impact on the quality of service we provide

A record of all allowable benefits are made and retained on the firm’s inducements register.

Similarly our staff are not allowed to place undue pressure on clients to persuade them to trade through the firm to the extent that this gives rise to a conflict of interest between that client and another client.

d) Segregation of duties

Satis strive to ensure that the performance of multiple functions by relevant persons does not and is not likely to prevent those persons from discharging any particular functions soundly, honestly and professionally. Our policies concerning the segregation of duties within the firm and the prevention of conflicts of interest are laid out below.

Satis are aware that effective segregation of duties is an important element in the internal controls of a firm in the prudential context. In particular, it helps to ensure that no one individual is completely free to commit the firm’s assets or incur liabilities on its behalf. Segregation also helps to ensure that the firm’s senior management receives objective and accurate information on financial performance, the risks faced by the firm and the adequacy of its systems.

Satis ensure that, in general, no single individual has unrestricted authority to do all of the following:

- a) initiate a transaction;
- b) bind the firm;
- c) make payments; and
- d) account for it.

Where Satis are unable to ensure the complete segregation of duties due to a limited staff base, we have adequate compensating controls in place including the frequent review of an area by relevant senior managers. The firm ensures that its relevant persons are aware of the procedures which must be followed for the proper discharge of their responsibilities.

e) Remuneration policy

All relevant staff who are open to a conflict of interest are paid a basic salary including those who hold key support areas such as compliance, finance and operations. This salary is not dependent on business performance. Relevant persons involved in the compliance function will not be directly involved in the performance of services or activities they monitor.

A bonus structure does exist which is linked to business performance, team performance or the individuals performance. This is at the discretion of the senior management and notified only on payment. In addition, we have implemented monitoring which includes reviewing of advice given to clients, the frequency of transactions and portfolio performance.

Managing of a Conflict of Interest

The measures for dealing with conflicts are designed to ensure that relevant persons engaged in different business activities involving a conflict of interest carry on those activities at a level of independence, appropriate to the size and activities of the firm and of any group to which it belongs and to the of the risk of damage to the interests of clients.

Examples of procedures for managing conflicts include:

- Effective procedures to prevent or control the exchange of information between relevant persons engaged in activities involving a risk of a conflict of interest where the exchange of that information may harm the interests of one or more clients;
- The separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the firm;
- Satis also prevent or manage conflicts of interest by the establishment and maintenance of internal arrangements restricting the movement of information within the firm. This requires information held by a person in the course of carrying on one part of our business to be withheld from, or not to be used by, persons with or for whom we act in the course of carrying on another part of our business. Such an arrangement is referred to as a 'Chinese Wall' and can include hierarchical separation and physical barriers between the activities likely to involve conflicts of interest, thereby aiming to prevent any undue transmission of information.

Disclosure of a Conflict of Interest

There may be occasions where we are not, in our opinion, reasonable confident that the risks of damage to the interests of the client will be prevented. Therefore as a last resort, where there is no other means of preventing or managing a conflict, we will disclose clearly, in writing, sufficient details, taking into account the nature of the client, to enable the client to make an informed decision with respect to the service in the context of which the conflict of interest arises.

This disclosure will also:

- Clearly state our firm's arrangements to prevent or manage that conflict are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interest of the client will be prevented;
- Include specific description of the conflicts of interest that arise in the provision of providing our services; and
- Explain the risks to the client that arise as a result of the conflicts of interest.

Where, despite the above procedures Satis identify a conflict of interest which may present risks of damage to the interests of a client, Satis will clearly disclose, in writing, to the general nature and/or sources of conflicts and the steps taken to mitigate those risks, to the client before undertaking business with the client.

This disclosure will take place as follows:

- The individual who oversees compliance within our firm will be advised of the potential conflict of interest in writing;
- Satis will advise our client in writing, of the potential conflict of interest and ask them to provide their written consent to proceed;
- The client's written consent along with the request will be passed to the individual who oversees compliance within our firm who can then provide approval to proceed as appropriate;
- Copies of both letters, together with the written authorisation to proceed will be retained on the client file.

Declining to act

Where we consider we are not able to prevent or manage the conflict of interest in any other way, we may decline to act for the client.

Review of Policy

This policy will be assessed and reviewed on at least an annual basis. Any necessary changes will be made within 14 working days of any review.

SATIS^o

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