

Summary Conflicts of Interest Policy

Introduction

This Conflicts of Interest Policy ("CI") sets out the policy procedure operated by Harlands Services Limited ("Harland's", "our", "the Firm" "we" "us") in order to ensure its compliance with the Financial Services Act 2012 ("the Act"), the Financial Conduct Authority ("FCA") issued Handbook and the Money Laundering Regulations 2017.

This is a Conflicts of Interest policy summary that the Firm maintains in order to identify and manage any conflicts of interest that arise in respect of obligations we owe to our clients.

Our Policy

1. The Firm's aims to establish and maintain an effective systems and control with a view to taking all reasonable steps to prevent conflicts of interest from arising or giving rise to a material risk of damage to the interests of our clients.
2. We would make every effort to maintain a record of the types of activity we carry on in which a material conflict could arise or has arisen, and, in doing so, we take account of the activities of other members of our group of companies.
3. We also have procedures in place to manage actual or potential conflicts.

Types of Conflicts

A conflict of interest might arise when the Firm or one of its personnel, in the course of providing a client with a service as part of the Firm's business:

1. are likely to make a financial gain, or avoid a financial loss, at the expense of the client
2. have an interest in the outcome of the service or of a transaction carried out on behalf of the client, which is different from the client's interest in that business
3. have favoured the interest of one client, or group of clients, over another client's interest.
4. carry on the same business as the client
5. receive, or will receive, from any person other than the client an inducement in relation to a service provided to the client, in the form of goods, monies or services, other than the standard commission or fee for that service.

Managing Conflicts

1. We maintain total independence between our personnel who are involved in different activities, for example, through the operation of information barriers, physical separation of personnel, the segregation of duties and responsibilities.
2. The trading terms & condition for each client are identical and, as such, the interests of one client are not favoured over another.

3. Employees are required to adhere to numerous internal policies to prevent price-related information. Our staff members will only be given access to such information when required in order to discharge their responsibilities and duties.
4. No employee may engage in any other employment, outside directorships or provide services to any other legal entity unless specifically approved in writing, in advance by senior management. It is strictly forbidden for personnel to participate in any outside business interests which may interfere with their work, or which may give rise to conflicts with the firm or its clients.
5. We will not prohibit our personnel from receiving small gifts or minor hospitality from other parties with which we do business. Any gifts and hospitality from other third parties will only be permitted where, in the opinion of a director or senior manager, it is at a level that is not lavish or excessive and it will not impair our duty to act in the best interests of our clients, or other legal (such as Bribery Act 2010).

Disclosure of Conflicts

1. Where our arrangements to manage conflicts are not or cannot be enough to minimize the risks of damage to a client's interest and cannot be prevented, we will disclose the general nature or sources of conflicts before carrying on business for the client.
2. The disclosure we would make is to allow the client to consider whether to request for further information and whether to continue with the service; and we do not aim to provide detailed, highly specific or comprehensive information.
3. Where we reasonably believe that there is no means to manage a conflict, we would decline to act for the client(s) in question.

How to contact us

If you have any queries about this Summary Conflicts of Interest Policy, please contact us at Compliance Department directly, if you would prefer to speak to the department on:

Telephone: +44 (0) 1444227154

Email: compliance@harlandsgroup.co.uk