

VIEWS

Conflicts of Interest Policy June 2024

Introduction

This document records Visions Integrated Exchange Ltd.'s (VIEWS) policy for the identification and management of conflicts of interest in respect of providing investment services to clients.

A conflict of interest is a situation in which someone in a position of trust has competing professional or personal interests. Such competing interests can make it difficult for individuals to fulfil their duties impartially. A conflict of interest may exist even if no unethical or improper act results from it. Conflicts of interest may arise between the firm (its managers, employees, appointed representatives) and a client or between one client and another. They may also be caused by the receipt of inducements from third parties.

We aim to maintain and operate effective organisational and administrative arrangements with a view to taking all appropriate steps to prevent conflicts of interest from adversely affecting the interests of our clients.

Types of conflicts

A Conflict of Interest may arise when the Firm or a relevant person such as an employee or a person directly or indirectly linked to VIEWS:

- has a financial incentive to favour a certain client/group of clients over other clients.
- 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.
- 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 money, goods or services or promise of gifts etc. including future benefits, other than the standard commission or fee for that service; and
- where common directors of VIEWS and VIEWS' partners might act in a way in which they have or could have an interest which conflicts with the interest of the firm or connected parties (i.e. where a senior manager or director also holds a similar position with a third party such as a liquidity provider or an outsourced function, such as the exploitation of any information or opportunity available to us).

Managing Conflicts

We maintain procedures to identify, prevent and manage actual or potential conflicts. These procedures include:

- segregation of duties.
- personal account dealing requirements applicable to all staff in relation to their own investments.
- a gifts and hospitality policy and register.
- the requirements for outside business interests to be declared; and
- the provision of training to directors and employees of VIEXS on conflicts of interest management.

Our procedures require our staff to act in our clients' best interest when providing services. In some circumstances, we will decline to act for a client or potential client where there may be no means of managing a particular conflict.