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King & Shaxson – Policy on Conflicts of Interest

The companies within the King & Shaxson (K&S) Group provide a wide range of services to many sectors within the financial markets. As such, K&S, or a company with whom it has an association, may from time to time have interests which conflict with its client's interests or with the duties that it owes its clients. These include conflicts arising between the interests of K&S, its associates and employees on the one hand and the interests of its clients on the other and also conflicts between clients themselves.

K&S has established procedures which are designed to identify and manage such conflicts. These include organisational and administrative arrangements to safeguard the interests of its clients. A key element of this policy is that persons engaged in different business activities involving a conflict of interest must carry on those activities independently of one another.

Where necessary, K&S maintains arrangements which restrict the flow of information to certain employees in order to protect its clients' interests and to prevent improper access to client information.

K&S may also deal as Principal and may be matching transactions with another client. Procedures are in place to protect the client's interest in this instance.

In some cases, K&S's procedures and controls may not be sufficient to ensure that a potential conflict of interest does not damage a client's interests. In these circumstances, K&S may consider it appropriate to disclose the potential conflict to the client and obtain the client's formal consent to proceed. However, K&S may decline to act in any circumstance where there is a residual risk of damage to the interests of any client.

If you have any further questions regarding K&S's procedures, please contact <u>compliance@kasl.co.uk</u>.

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