

# Conflicts of Interest Policy

## Summary

June 2022

## 1. Conflicts of Interest Policy Summary

The FNZ Group is an international, market leading provider of end-to-end technology and investment services to the financial services and wealth management sectors and its customers. FNZ is committed to group-wide governance and a risk management framework that is appropriate to the nature, scale, and complexity of the business. This applies to our identification and management of conflicts of interest at a Group and also at an individual company level.

### What is a conflict of interest?

A Conflict of Interest is a situation where the FNZ Group, any company within the Group, such as FNZ Securities Limited (**FNZ SL**), any of its employees or anyone else involved in running the business is subject to competing influences which might adversely affect decision-making or outcomes in the course of conducting business. From time to time, FNZS may have interests that conflict with our clients' interests or with the duties that we owe to our clients.

Conflicts can arise between:

- one client and another;
- FNZ SL and a client;
- an employee and a client;
- an employee and FNZ SL; or
- one part of the FNZ Group and another.

### How we manage conflicts

FNZ SL has taken steps to identify, record, and manage conflicts of interest that exist within its business, FNZ SL's policy is to take all reasonable steps to maintain and operate effective organisational and administrative arrangements to identify, record and manage conflicts. The steps we take include restricting the flow of, or access to, information where appropriate; ensuring that employee activities are visible to, and monitored by, management, segregation of duties and appropriately structuring employee remuneration. Conflicts are managed by the business with oversight from the Risk and Compliance function. All conflicts are maintained within the firm's conflicts of interest register and reviewed annually by the FNZ SL Board.

FNZ SL will disclose any identified conflict of interest where management are not reasonably confident that the organisational arrangements are sufficient to ensure that risks of damage to the interests of a client will be prevented. Any disclosure will clearly disclose the general nature and sources of conflicts of interest, as well as the steps taken to mitigate those risks, to the client before undertaking business for the client.

Further details of our Conflicts of Interest Policy are available on request.