



**FOW**

CONFLICTS  
OF INTEREST  
POLICY



## **CONFLICTS OF INTEREST POLICY**

FOW Business Financial Ltd. (hereinafter referred to as the "Company", "FOW Business", "We" or "Us"), is incorporated under the laws of England and Wales with company number 12352783 having its registered office at 20-22, Wenlock Road, London, England N1 7GU.

This Conflicts of Interest Policy document is maintained to manage the conflicts of interest for FOW Business. For the purpose of this policy conflicts relate to its employees, appointed representatives, tied agents, contractors or any person directly or indirectly linked to them by control.

### **PURPOSE AND SCOPE**

The purpose of this document is to set out the Company's approach to identify and manage the conflicts of interest, which may arise during the course of business activities between the Company and its clients or, between one client and another. Company sets out to manage conflicts of interest fairly with a view to taking all reasonable steps to prevent conflicts of interest from constituting or giving rise to actual, apparent and potential risks to the interest of its clients.

Conflict situations are defined as those in which a Client's or potential Client's interest conflicts with that of another Client and/or the Company's interest and as a result there is a material risk that the interests of one or more Clients could be affected. For the purposes of this policy, the Company's interest includes the interests of its employees or other people who work under its direct or indirect control. Accordingly, we have adopted a conflicts of interest policy setting out the procedures, practices and controls in place to achieve this.



## **APPLICATION**

The Policy applies to all the Company's directors, employees; any persons directly linked to the Company and refer to all interactions with all clients. All employees are required to comply with the Policy.

## **IDENTIFICATION OF CONFLICTS OF INTEREST**

For the purpose of identifying the types of conflict of interest that arise in the course of providing investment and ancillary services or a combination thereof and whose existence may damage the interests of a client, the Company takes into account, whether the Company or a relevant person, is in any of the following situations:

- • The Company is likely to make a financial gain, or avoid a financial loss, at the expense of the client
- • A client of the Company is likely to make financial gain or avoid a financial loss at the expense of another client
- • The Company or relevant person 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 in that outcome
- • The Company or relevant person has a financial or other incentive to favor the interest of another client or group of clients over the interest of the client
- • The Company or relevant person carries out the same business as the client
- • The Company or relevant person 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 monies, goods or services, other than the standard commission or free for that service



## MANAGING CONFLICTS OF INTERESTS

We have established policies and procedures, which are designed to identify and manage conflicts of interests. These include a number of organizational and administrative arrangements to safeguard the interests of clients and minimize the potential for conflicts to arise.

Our Compliance Department is responsible and sets out the monitoring procedures and controls that we follow to identify and manage the potential conflicts of interest, but are not limited to, the following measures:

- • 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 interest of one or more clients
- • Procedure governing access to electronic data
- • Segregation of duties and supervision for persons engaged in different business activities including procedures for ensuring appropriate communication between business units
- • A “need to know” policy governing the dissemination of confidential or inside information within the group
- • All Personal Dealing activity should be declared in the “Annual Staff Declaration”, regardless of seniority
- • Control over remuneration of relevant persons
- • Gifts and personal benefits disclosure on provision of Bribery
- • The prohibition of external business interests conflicting with our interest as far as the

Company’s officers and employees are concerned, unless approved by the Board.



## **CONFLICTS DISCLOSURE**

Where a conflict arises and the Company is aware of it, to avoid material risk of damage to a client's interest, it will disclose the conflict of interest to the client prior to undertaking investment business for that client. If we do not believe that a disclosure is appropriate to manage the conflict, we may choose not to proceed with the transaction of matter giving rise to the conflict.

The Company reserves the right to review and/or amend this Conflicts of Interest Policy at its sole discretion, whenever it deems appropriate.

## **ENQUIRIES**

For further CONFLICTS OF INTEREST enquiries, please contact us at [support@fowbusiness.com](mailto:support@fowbusiness.com)