

# Albert E Sharp LLP

## Conflicts Of Interest Policy

It is important to identify and manage conflicts of interest which arise or may arise in the course of providing a service, as their existence may lead to a material risk of damage to a client's interests. The Investment Manager's Conflict of Interest policy is designed to effectively manage the conflicts of interest that may arise where it provides services to clients in the course of carrying on regulated activities. The policy is designed to fulfil the 'Investment Manager' obligations under the Markets in Financial Instruments Directive ("MiFID"). This document is prepared and published in order to comply with the FCA Handbook rules and is not intended to create third party rights or duties or form part of any contractual agreement between the firm and any client. This policy may be reviewed and amended at any time.

- (a) Conflicts of interest may exist in the structure and operation of the Investment Manager's business. Where the Investment Manager are aware or made aware that the Investment Manager are faced with a situation of competing interests (whether that be between the Investment Manager's interests and the Client interests or the interests of our other clients and the Client interest), the Investment Manager will undertake all reasonable steps to protect the Client interests. When the Investment Manager are not satisfied the Investment Manager have sufficient controls in place to manage any potential harm to clients' interests, the Investment Manager will;
  - (i) Disclose the nature of the source of the conflict; and if appropriate
  - (ii) Obtain the requisite permissions to proceed with the service
- (b) The Investment Manager has in place a Conflicts of Interest Policy and procedures specifically designed to identify and manage such conflicts. These include organisational and administrative arrangements that are intended to restrict the flow of information and access to client data so as to protect the interests of clients and to ensure that the activities of employees are visible to senior management and are monitored.