

**CONFLICTS OF INTEREST POLICY
SUMMARY
31 OCTOBER 2018**

Conflicts of Interest

This document summarises a summary of Squared Financial Services Limited ('SFSL') conflicts of interest policy ("Policy"). SFSL, for these purposes, includes its employees, appointed representatives, tied agents, contractors or any person directly or indirectly linked to them by control.

SFSL sets out to manage conflicts of interest fairly. SFSL has established a conflict of interest policy setting out the procedures and controls which help it identify and appropriately deal with conflicts of interest – actual, apparent and potential.

Objective

The objective of the policy is to ensure that conflicts of interest within SFSL are identified, managed appropriately and, where necessary, disclosed in order to ensure the fair treatment of clients and compliance with the rules and principles of the Central Bank of Ireland.

Application

This policy applies to all SFSL's regulated activities, and activities in connection with or for the purposes of such regulated activities, including those outsourced activities provided by a third party. All employees are required to comply with the policy.

Conflicts of Interest Identification

SFSL has systems and protocols in place to identify potential conflicts of interest. Once a conflict has been identified, procedures are implemented to ensure it is appropriately managed. A potential conflict occurs where competing obligations or motivations result in, or are likely to result in, material risk of damage to the interests of a client, including where:

- SFSL is likely to make a financial gain, or avoid a financial loss, at the expense of the client; or
- An employee of SFSL is likely to make a financial gain, or avoid a financial loss, at the expense of the client; or
- A client of SFSL is likely to make financial gain or avoid a financial loss at the expense of another client.

- A third party is likely to make financial gain or avoid a financial loss at the expense of a client.

Arrangements to Manage Conflicts

SFSL has established procedures which are designed to identify and manage conflicts of interests. These include a number of organisational and administrative arrangements to safeguard the interests of clients and minimise the potential for conflicts to arise.

Disclosure of Types of Potential Conflicts of Interest

SFSL is authorised to provide investment advice to its clients, however this authorisation is not currently utilised and as such conflicts do not arise in this regard at present.

SFSL adopts a number of approaches to manage conflicts of interest and control the movement of confidential information. The following is a list of these controls:

- Segregation of duties and supervision for persons engaged in different business activities including procedures for ensuring appropriate communication between business units;
- Control over sources of remuneration of relevant persons;
- Protocols to ensure that no improper inducements are given or received and proper inducements are disclosed appropriately; and
- Gifts and personal benefits procedures, including a gift register recording the solicitation, offer or receipt of certain benefits.

Conflicts Disclosure

Where SFSL considers, with reasonable confidence, that the arrangements in place to manage potential and/or actual conflicts of interest are not sufficient to avoid material risk of damage to a client's interest, SFSL will disclose the general nature and/or sources of the conflict of interest to the client before undertaking any business for the client.

Further Information

Further information on SFSL's conflicts policy, including a full version, can be provided upon request.

A copy of our Conflicts of Interest Policy is available on request by contacting our Client Support team clientsupport@squaredpro.com