



# Conflict of interests policy

## Purpose

The purpose of this Policy is to specify in writing the procedures established by ECM Limited (the “Company”), in accordance with the size, organization, nature, and complexity of the Company’s business for the identification and responsible management and control and, where necessary, disclose the conflicts of interests arising in relation to its business and to reduce the risk of client disadvantage and/or legal liability, regulatory censure or damage to the Company’s commercial interests and reputation.

Another scope of the Conflict of Interest Policy is ensuring that the Company is compliant with the legislative requirements it must abide by and with the internal procedures, whether departmental or general, that are established in its Internal Procedures Manual.

## Policy


Adequate policies and measures have been established by the Company to prevent, control and manage the exchange of information between relevant persons engaged in activities involving a conflict of interest risk.



### How Do We Manage Conflicts of Interest a. Description


Conflicts of interests include those situations where the Company or a person is in the position that exploits in some way a professional or official capacity to obtain a benefit, whether corporate or personal. Conflicts of interest can occur in the following situations:

1. The Company, a relevant person, or a person who is linked directly or indirectly by control to the Company may attain financial gains or bypass a financial loss with the involvement of the client’s expense.
2. The Company, a relevant person, or a person who is linked directly or indirectly by control to the Company is interested in the outcome of a service which is provided to a client or in the transaction which is performed on the client’s behalf, and that interest is different from the one the client has regarding the outcome.
3. The Company, a relevant person, or a person who is linked directly or indirectly by control to the Company decides to favor the interest of a client or a group of clients in favor of a nother client by expecting financial or other forms of incentives.

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4. The Company, a relevant person, or a person who is linked directly or indirectly by control to the Company does the same business as the client.
5. The Company, a relevant person, or a person who is linked directly or indirectly by control to the Company gets or will get from a third-party stimulus for a service provided to a client. The inducement can be in the form of money, goods, services that do not include the standard commissions or fees for that service.

## **A relevant person in relation to the Company can be:**

1. Members of the board of directors, partners or persons in an equivalent position, as well as managers or tied agents of the Company;
2. Members of the board of directors, partners or persons in an equivalent position, as well as managers of tied agents of the Company;
3. Company employees or tied agents;
4. Natural persons who place services at the disposal and under the Company's control;
5. A Company's tied agent who is involved in the provision by the Company of investment services or/and the investment activities performance;
6. Natural persons who are involved in providing services to the Company or its tied agents under an outsourcing arrangement that is aimed at the provision by the Company of investment services or/and investment activities performance.

When a conflict of interest occurs, the parties that are affected may be the Company, its employees and its clients.

To be more specific, a conflict of interest can arise between:

1. The client and the Company;
2. Two clients of the Company;
3. The Company and its employees;
4. A Company's client and a Company's manager/employee.
5. Departments of the Company.



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Conflicts of interest can arise in situations such as:

1. By executing an order requested by the client, the Company may have an overall financial loss or may avoid that loss;
2. By not executing an order requested by the client, the Company may sustain an overall financial gain.
3. As the market may move in a certain direction, by executing an order requested by the client, the Company will suffer a financial loss.
4. The Company's hedging policy is affected negatively by the market movement and as a result client's orders are rejected in order to prevent a financial loss for the Company.

## **b. Independence**

The Company has adopted the following measures to ensure a degree of independence

1. Measures for preventing or controlling information exchange between persons who are involved in activities that involve a conflict of interest risk;
2. Relevant persons suffer further supervision. These persons refer to the ones who carry out activities on behalf of or provide services to clients whose interest may enter into conflict or who have different interests than those of the Company. The departments of the Company that may enter under further supervision are:
  - Dealing Room
3. Any direct link between the remuneration of persons principally involved in one activity and the remuneration of / revenues generated by different relevant persons involved in another activity is removed, if there is a chance that a conflict of interest may arise:
  - Employees of the Dealing Room do not have their remuneration linked to clients' performance.
4. Measures are taken to prevent or limit a person's capacity to exercise an inappropriate influence regarding the way that a person carries out his duties related to investment or ancillary services or activities.



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5. Measures are also taken to control the involvement of a relevant person in activities like the reception and transmission of clients' orders and tasks, including decisions related to portfolio and performance calculation.

## c. The Senior Management of the Company Must:


1. engage completely in all actions regarding policy and procedure implementation, management and monitorization of conflicts of interest;
2. try to ensure all measures are taken to identify potential and emerging conflicts within and across business lines and to make informed decisions related to any of these conflicts;
3. raise awareness and ensure compliance of the employees and any individuals related to the Company by offering regular training; clearly communicating the policies, procedures, and expectations; increase awareness related to the conflict of interest procedures; sharing best practices throughout the Company.
4. take measures for ensuring that the strategies used to manage and mitigate risks remain appropriate and effective;
5. utilize information held by management to stay up-to-date with all procedures; 6. support a constant review of the processes and procedures.



## d. Chinese Walls


The Company has developed Chinese Walls that comply with legal requirements between the departments. Clear lines of responsibility have been established to avoid that information held by a person when carrying out his / her responsibilities isn't used in an improper manner.

Furthermore, the Company has established physical barriers in order that the flow information remains between employees. In the course of carrying out parts of the business by employees, access has been limited regarding information, documentation, and communication according to each employee's attributions.

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## e. Conflict of Interest Disclosure

When the measures the Company takes to manage conflicts of interest are not sufficient to prevent the risk of damaging the clients' interests, the Company will disclose the conflicts of interest to the client for the prevention of risk damage regarding clients' interests. Before a transaction is carried out or an investment or ancillary service is provided to a client, the Company has the obligation to disclose any potential or actual conflict of interest, and the disclosure must happen in a timely manner.

## f. Reporting Conflicts of Interest

When a possible conflict of interest is identified, the employee who identified it must contact immediately his supervisor to assist him in the assessment of the risk and send a filled-out Notification Form with all details, including:

- **Actions for correction and prevention;**

- The appropriateness of these actions;
- Conditions that might be imposed;
- Whether conflicts are still ongoing, how they are managed and how the client has been advised.g. Marketing Communication

The Company must make sure that any recommendation that has been made has a clear and prominent statement. These communications must be prepared according to legal requirements.


## Record Keeping



According to FSA requirements, the Company must maintain records, which are constantly monitored and updated, related to the investment services and ancillary services that have been carried out by the Company or on its behalf and which carry a risk of conflict of interest.


Any conflict of interest that shall arise must be reported to the Company's CEO and Compliance Officer, who must keep records of conflicts of interest.

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