

## **Conflicts of interest policy**

At Jarvis, we expect our business activities to be conducted honestly and with integrity. We believe that it is good business practice to try to identify and manage conflicts of interest which could harm our client's interests.

### **Our commitment**

We are committed to identifying and managing the risk of a conflict of interest to make sure that we treat our customers fairly and comply with the law and regulations.

As part of this, we consider conflicts involving Jarvis Investment Management and the firm's individuals. For example:

- Any of our directors, managers or employees;
- Other people or companies we use to provide investment and related services (for example: appointed representatives or consultants).

### **What is a conflict of interest?**

We provide a wide range of services to many different clients. Sometimes circumstances may arise where our duties to customers differ from what is best for us or for another client. This is a conflict of interest. We take our responsibility to identify and manage conflicts of interest fairly between us and our client's, or between two different clients, very seriously.

Principal 8 of the FCA's Principles for Business states that "a firm must manage conflicts of interest fairly, both between itself and its customers and between a customer and another client".

### **When could a conflict of interest affect me as a customer?**

A conflict of interest could result in Jarvis having an unfair advantage over you that you are not aware of. For example where we:

- are likely to make a financial gain or avoid a loss at your expense.
- have an interest in the outcome of a service we give you, or a transaction we make for you, which is different from your interest in the outcome.
- have an incentive to favour the interest of one client, or group of customers, over another.
- could receive an inducement (such as money, goods or services) for a service we provide other than the standard commission or fee for that service.

### **How do we deal with conflicts of interest?**

The first step in dealing with conflicts of interest is to make sure that we can identify any real, or potential conflicts. To do this, we have procedures in place to prevent, identify and report conflicts of interest between us and our clients, and conflicts between one customer and another. These include:

- A review of new business activity we may want to start to find out whether it results in any new conflicts of interest.
- Designing the aims of the Jarvis and the personal objectives of employees to deliver fair treatment of customers as well as driving our commercial success

While we do everything we can to avoid a conflict, where this is not possible we make sure we manage any conflicts of interest to avoid any material risk, disadvantage or loss to clients. In every case, a senior member of staff will own and manage any conflict of interest we have identified. We also keep a written record of conflicts and potential conflicts of interest that involve a risk of damage to the interests of one or more clients.

If we believe we may not be able to effectively manage a potential or actual conflict of interest that affects clients, we will tell them about this. We will also tell them what steps we will take to reduce the risk of damage to their interests. We will give clients enough information to allow them to decide whether to do business with us regardless of the conflict.

### **How do you manage conflict of interests that might affect clients?**

To help you understand the way we work to manage potential conflicts of interest we've included a few examples of our activities:

- We operate appropriate systems and controls to manage confidentiality and security of information so that we do not disclose client confidential information inappropriately.
- The nature of our business is non-advisory.
- We design reward structures for our employees that are not target-based.
- We do not impose unfair conditions when pricing products.
- We operate appropriate restrictions and controls where our employees have outside interests that could cause a conflict of interest.
- We operate personal account dealing policies for our employees and monitor their accounts.
- We take all reasonable steps to carry out client orders to buy or sell their investments in a fair way that does not benefit us.
- We do not seek to gain from delays in paying out client money.
- We aim to pay the right amount for genuine claims, and to pay these quickly.
- We have processes in place to deal with complaints fairly and objectively.