



Conflicts of Interest Policy



INTRODUCTION

Hubwise Securities Limited 'Hubwise' provides a Platform service via Financial Advisers to a wider range of clients and does this by using a number of third party product partners.

As a Firm and in line with the Financial Conduct Authority's (FCA) Systems and Control rules we must take all reasonable steps to identify actual or indeed potential conflicts of interest between the Firm and its clients.

The purpose of this policy document is to highlight the potential conflicts of interest arising in the course of business between Hubwise, its employees, partners and clients, that could impact the interests of Hubwise's clients in the absence of adequate controls.

Such conflicts include circumstances where a material risk of damage to the interests of a client could occur. Considerations include whether Hubwise or a relevant person:

- is likely to make a financial gain or avoid a financial loss at the expense of the client;
- has an interest in the outcome of a service or transaction distinct from the client's interest in that outcome;
- has a financial or other incentive to favour the interest of another client or group of clients over interests of the client;
- 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 fee for that service;
- Hubwise provides a comprehensive service with transparent pricing structure that allows clients to select from alternative offerings.

As a Firm we are also obliged;

- To maintain and operate effective organisational and administrative arrangements with a view to taking all reasonable steps to prevent conflicts of interest from constituting or giving rise to a material risk of damage to the interests of the clients;
- To establish, implement and maintain an effective conflicts of interest policy that:
- Identify the circumstances which constitute or may give rise to a conflict of interest that risks causing material harm to the interests of clients; and
- Specifies procedures to be followed and measures to be adopted in order to manage such conflicts.

Hubwise manages conflicts, whether actual or potential by the adoption of appropriate systems and controls. The aim being to ensure that accurate records are maintained of all situations where the potential for a conflict could arise. Where necessary, Hubwise may restrict the flow of information to certain employees in order to protect client interests and to prevent improper access to client information.

It is Hubwise's policy to disclose any interests that could potentially conflict with our responsibilities. Should our procedures and controls not be sufficient to ensure that a potential conflict of interest does not damage a client's interest, we would disclose the issue to the client.



SUMMARY OF OUR APPROACH TO CONFLICTS OF INTEREST

This Policy provides the framework within which we aim to meet clients' expectations and deliver fair outcomes in the context of conflicts of interest. We believe that our current organisational structure together with appropriate systems and controls for managing conflicts of interest provide an effective way of mitigating as far as possible any conflicts of interest and avoiding your interests being unfairly affected.

We will always seek to manage any conflict of interest that arises. In the event that we are unable, with reasonable confidence to manage a conflict, we will disclose in writing to you, the nature and source of the conflict before we undertake any further business for you. This will help you decide whether you want to do (or continue to do) business with us.

Any Personal Data used in the operation of our Policy is used fairly, responsibly and in accordance with applicable law and regulation.

Organisational structure – Where practical to do so, we arrange our business model and services to avoid conflicts of interest; for example, we segregate duties so that no one person has inappropriate influence over a particular process and we do not carry out proprietary trading.

Training – We provide all employees, including our board members, with training and support materials to help them recognise conflicts of interest and understand that they are expected to take all reasonable steps to avoid or manage those conflicts and to record and disclose them.



CONFLICTS OF INTEREST POLICY SUMMARY

Account dealings – Our order execution policy sets out the criteria by which we manage our aggregated customer orders and details how we try to ensure the best possible results for you at all times. To prevent any conflicts arising from the use of information obtained by clients and market abuse in general, we have a personal account dealing policy and associated procedures in place which all employees are expected to follow.

Personal conflicts – Employees must disclose any business or other relationships which might give rise to a conflict of interest while they are employed by us. When required, individuals may be asked to resign from external positions or make other arrangements to ensure that they are not conflicted.

Inducements – We only accept new business from UK authorised financial adviser firms and in our business relationships with them, we ensure that any training and support we give them is appropriate, not paid for by your fees and is always provided so as to improve the quality of our service to you and not to conflict with your best interests. Our employees are not permitted to accept or offer any gift or other benefit which would be likely to conflict with your best interests or which, in any event, is more than moderate in value. All gifts and hospitality must be reported and recorded.

Whistleblowing – Our whistleblowing arrangements ensure that employees can confidentially report any wrongdoing by others.

Selection of suppliers – We do not permit personal relationships with third party service providers. During the selection process, due diligence and a risk assessment are conducted before any relationship is formed. We have a supplier management policy and procedures in place which all employees must follow.

Annual reviews and monitoring – We keep all of our policies and procedures, including this Policy, under review. Monitoring is in place to confirm adherence to these policies and oversight is provided by the board and external auditors where applicable.



POTENTIAL CONFLICTS

Personal Dealing

Employees, who are exposed to information such as pending transactions, could use such information to carry out transactions for on their own behalf in order to benefit financially.

With the exception of deals involving collectives, discretionary managed accounts and life policies, all employees of the Firm regardless of seniority are subject to a personal account dealing notice which constitutes part of Hubwise's Compliance Procedures. All deals must be subject to prior approval of a Director and copies of the contract notes should be forwarded to the Compliance team on the same trading day as the transactions are confirmed. Employees are discouraged from dealing elsewhere through third party brokers, but if an employee feels that it is necessary then a representation can be made to a Director of the Firm. However, the Firm and its directors maintain the right of refusal and may do so without a full explanation being proffered. Where an employee is permitted to deal through a third-party provider, they must ensure that copies of the contract note (s) must be dispatched in a timely manner to the Hubwise Compliance team for monitoring purposes.

This is one of the higher risk areas with regard to conflicts of interest between the Firm and its clients. Employees are expected to act with integrity at all times and exercise good judgement in the execution of their duties. Additionally, they should regard themselves as custodians of the reputation of the Firm and act accordingly.

Order Handling

The processes involved in the execution of trades could prioritise pending trades for one client or more clients which may disadvantage other clients.

Hubwise seeks to treat all customers fairly and we take all reasonable steps to obtain the best possible result when orders to buy or sell are transmitted for execution on behalf of customers.

Deals in collectives are executed at the next valuation point (if received within certain time limits) and orders in respect of exchange traded securities such as equities are transacted as received subject to obtaining a price from the relevant execution venue.

IFA Considerations

In selecting a wrap Platform, the Adviser must reflect on the FCA's stated position that "intermediaries should consider any constraints a Platform imposes and whether the Platform is therefore appropriate for them and their customers".

Control

Hubwise's policy of providing a 'whole of market' offering with a transparent pricing structure eliminates the potential conflict of interest inherent with other Platform providers that either restrict the choice of suitable products to those offered by the Platform provider or which maintain bundled and opaque remuneration structures.

Ongoing review and monitoring

We will keep the Conflicts of Interests Policy and all associated policies referred to under continual review and carry out a formal review annually. Additionally, our approach to compliance with the various policies will be regularly monitored to ensure that our clients are properly protected.