

# Conflicts of Interest Policy Summary

## Introduction

Hamilton Court FX (“**HCFX**”) is authorised and regulated in the UK by the Financial Conduct Authority (the “**FCA**”). This document is a summary of HCFX’s Conflicts of Interest Policy. Further information is available upon request.

### 1. Types of conflict

HCFX must take all appropriate steps to identify and prevent or manage conflicts of interest between (i) the firm, its management, employees or any person directly linked to the firm and HCFX’s clients; and (ii) one client of the firm and another client, which may arise in the course of HCFX providing services to clients.

For the purposes of identifying the types of conflict of interest that arise, or could arise, in the course of providing a service to HCFX clients and during the course of ordinary business activities, and the existence of which could damage the interests of a client, HCFX takes into account any situation in which it, an employee, manager, or person directly or indirectly linked by control to HCFX:

- may make a financial gain or avoid a loss at the expense of a client;
- has an interest in the outcome of a service provided to the client or, of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
- has a financial or other incentive to favour the interest of one client / group of clients over the interests of a different client / other group of clients;
- carries on the same business as the client; and
- 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 monetary or non-monetary benefits or services.

### 2. Recording and managing conflicts

HCFX maintains a register listing all the types of conflict which it has identified as a risk for its business and HCFX clients. The register further details the controls to prevent or manage these conflicts, to ensure there is no risk of harm to the interests of clients of HCFX.

### 3. Disclosure of conflicts of interest

Where HCFX considers that its conflicts of interest arrangements are not sufficient to ensure, with reasonable confidence, that in any particular case risks of harm to the interests of a client will be prevented, HCFX will clearly disclose to the relevant client(s):

- i. the general nature or sources of such conflicts of interest (or both); and
- ii. the steps taken to mitigate those risks.

Any such disclosures will be made in the manner prescribed by the FCA rules.