

Reyker Securities plc

Conflicts of Interest Policy

Introduction

Reyker Securities plc is bound by the eleven FSA Principles for Business. Principle 8 states

“a firm must manage conflicts of interest fairly, both between itself and its customers and between a customer and another client”.

Reyker deals with retail clients and acts as a Receiver and Transmitter of orders in relation to financial instruments such as shares, derivatives, bonds and units.

Reyker manages conflicts of interest in a number of ways. This policy comprises a list of criteria which help to identify the potential conflicts of interest which exist for Reyker.

Identifying the Conflicts

When identifying the types of conflict of interest which may arise, we take into account whether Reyker or an employee:

1. is likely to make a profit or avoid a loss at the expense of the client;
2. has an interest in the outcome of a service to the client;
3. has a financial or other incentive to favour the interest of another client;
4. receives or will receive from a person other than the client an inducement in relation to a service provided to the client;
5. could be in a position where its ability to act in a client's best interests is potentially affected by any other matter.

Methods of Managing Conflicts

Reyker actively manages such conflicts of interest in order to minimize any material risk of damage to its clients.

Management of these risks are achieved by one of more of the following;

- a. Chinese Walls – where information held by a person in one part of the business is withheld from, or not to be used for people in another part of the business;
- b. Removal of direct remuneration links for employees;
- c. Promoting a culture of integrity;
- d. PA dealing – details policies and procedures are in place to monitor employees personal account dealing;
- e. Best Execution – our policies for acting in clients' best interests when passing orders to third parties for execution are designed to ensure that we meet our best execution obligations;
- f. Inducements – employees must not solicit nor accept any inducements which may conflict with our obligations to clients.

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