

Conflicts of Interests

Due to the nature of Alaric Securities (UK) Ltd business, a number of situations might arise in which a client's interests' conflict (or could be perceived to conflict) with our interests, those of our associates or those of our other clients. In order to aim to identify and prevent or manage these potential conflicts of interest, we have established, implemented and maintain an effective internal Conflicts of Interest Policy, as required by and in accordance with the Financial Conduct Authority (FCA) Rules^[1]_[SEP].

Where conflicts may arise

Our internal policies and procedures are designed to ensure that potential conflicts of interest that arise or may arise between us and our clients and between one client and another are identified.

Examples of potential conflicts of interest that could arise in the course of our providing services to our clients include, but are not limited to, the following:

- acting as agent or arranging a transaction for an associate or another client or investor and also acting as agent for another client in the same transaction, and receiving and retaining commission or other charges from both parties, and the price of the transaction being different from the bid or, as appropriate, offer price;
- where any of the above examples involves our sister company Alaric Securities OOD (regulated by the FSC in Bulgaria and passported for services within the entire European Union and European Economic Area).

Alaric Securities (UK) Ltd has access to a wide range of investment instruments and research but does not hold itself out as being independent.

Measures adopted to prevent and manage conflicts

We have implemented and maintain a number of procedures and measures for preventing and managing conflicts of interest that arise in the course of our business and for ensuring that our employees engaged in different business activities involving a conflict of interest carry on those activities with the requisite degree of independence. These include, but are not limited to, the following:

- **Information barriers** including physical separation, an information barrier protocol and other information barriers to regulate and restrict the flow of information between and within the different business areas;

Version 2.00 Effective 30 December 2024

Alaric Securities (UK) Ltd is authorised and regulated in the UK by the Financial Conduct Authority (firm reference number 783168) and is a company registered in England and Wales (company number 10204731). The Firm's registered address is One Fleet Place, London EC4M 7WS and its principal place of business, Innovation, 11, Watermill Wharf, Canal Road, Rochester, Kent, ME2 4DT.

- **Segregation of duties** ASUK has practical measures in place to ensure that our business areas conduct their day-to-day business independently of each other as much as reasonably practical taking into consideration our current size.
- **Remuneration:** our employees are remunerated on the basis of salary and bonus. Bonus may be based on the revenues and results as a whole (provided this is not the predominant criteria), and on individuals performance, reflecting compliance with applicable regulations, the fair treatment of clients and the quality of service;
- **Personal account dealing:** our employees may not deal in securities without obtaining prior approval;
- **Outside business activities:** our employees may not engage in outside business activities that might give rise to a real or apparent conflict of interest. All outside business activities have to be pre-approved;
- **Gifts and entertainment:** the giving and receiving of gifts (including entertainment) to or from those doing business with the company can give rise to a real or apparent conflict of interest and is, therefore, generally prohibited subject to certain limited exceptions;
- **Monitoring:** we monitor the performance of products and services to ensure best execution;
- **Research:** all research provided by our sister company Alaric Securities OOD (regulated by the FSC in Bulgaria and passported for services within the entire European Union and European Economic Area) is produced in accordance with policies and procedures for managing conflicts of interest that may arise in connection with research.

Disclosure

Where our arrangements for preventing or managing potential conflicts of interest are not sufficient to ensure, with reasonable certainty, that risks of damage to the interests of one or more clients will be prevented, we will clearly disclose all relevant details relating to the conflict to the client. This will be done before undertaking business with or for the client(s) and ask the client(s) to consent to us acting notwithstanding such conflict of interest. If we believe there is no other practicable way of preventing damage to the interests of one or more clients, we may decline to act.

Further information on conflicts of interest is available upon request.

Version 2.00 Effective 30 December 2024

Alaric Securities (UK) Ltd is authorised and regulated in the UK by the Financial Conduct Authority (firm reference number 783168) and is a company registered in England and Wales (company number 10204731). The Firm's registered address is One Fleet Place, London EC4M 7WS and its principal place of business, Innovation, 11, Watermill Wharf, Canal Road, Rochester, Kent, ME2 4DT.