



Havelock Hunter

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Conflicts of Interest

Havelock Hunter has established a Conflicts of Interest Policy to take all reasonable steps to prevent conflicts of interest from giving rise to a material risk of damaging your interests.

We aim to treat you fairly and to operate in your best interests and, where we identify a conflict of interest, we will not knowingly deal or advise unless we have taken all possible steps to ensure that you receive fair treatment.

The main areas of conflicts within our business and the steps we take to mitigate the risk are as follows:

When matching your order with that of another client, we will treat you both fairly and we may receive a commission or payment from both parties.

When making a discretionary decision, or making a recommendation to buy or sell for you, we may have instructions from other clients to buy or sell the same investment and we will treat all clients fairly and provide best execution of the orders according to our Execution Policy.

When making a discretionary decision, or making a recommendation to buy or sell for you, we may receive payment of commission from a third party. Payment of this commission will not compromise our duty to act in your best interests and to ensure that the investment is suitable to you.

Employee Dealing

When dealing on their own behalf, our employees are required to comply with our Personal Account Dealing Policy, which prohibits them from dealing ahead of client orders or dealing in an investment when they know that this investment may be recommended to clients in the near future.

Aggregation of Client Orders

Sometimes it may be necessary to aggregate your orders with those of other clients. When aggregating client orders, we will treat all clients fairly but this may result in you obtaining a more or less favourable price than if the order had been executed separately.