



**WPC**  
**STEPHENSON**



# **CONFLICT OF INTEREST POLICY**

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## 1. Scope

1.1. This policy is to ensure that conflicts of interest within the Company are identified and managed appropriately. Conflict of interest can arise between the Company and its employees, managers or directors and the Clients. The conflict of interest may arise between the following parties:

- 1.1.1. Between the Client and the Company
- 1.1.2. Between the Clients of the Company
- 1.1.3. Between the Company and its workforce
- 1.1.4. Between the Company's departments

1.2. The Company takes reasonable procedures in identifying, managing and preventing conflicts that arise in relation to the Company's scope of services. Conflicts will be identified accordingly where the Company will:

- 1.2.1. Partake in an interest in the outcome of a service provided to the Client or a transaction executed on behalf of the Client that may be distinct from the Client's interest in that outcome; or
- 1.2.2. Make financial profit or avoid loss at the expense of the Client.

1.3. If the Company finds an actual or potential conflict of interest, the Company may:

- 1.3.1. Decline to act where there is a possible conflict;
- 1.3.2. Cease engaging in the activity that resulted the conflict;
- 1.3.3. Accept the conflict of interest but will take steps to protect the Client's interest; or
- 1.3.4. Disclose the conflict of interest and consent the Client to act.

## **2. Identification**

2.1. The Company has established procedures to identify and manage conflicts of interests. The Company implements several methods to manage conflicts and to control the movement confidential information. The following are some occurrences that may cause the conflict of interest:

2.1.1. The Company or any of its employees makes financial gains or avoids losses at the expense of the Client;

2.1.2. The Company is interested in the outcome of a service or a trade executed on behalf of the Client, which is different from the Client's interest in the outcome;

2.1.3. The Company receives information from a third party to provide him/her a certain service or product or receives a commission for these services and products.



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