



# Finance Managers International Limited Conflicts of Interest Policy



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Due to CFTC regulatory restrictions and in accordance with the Dodd-Frank Act, FINANCE MANAGERS INTERNATIONAL LIMITED AND THEIR PRINCIPAL — TIGERWIT LIMITED — CANNOT OPEN ACCOUNTS FOR RETAIL CUSTOMERS WITH RESIDENCE IN THE UNITED STATES\*.

\*A United States resident means any of the following: any natural person resident of the United States; any company, partnership, or other legal entity created or organised under the laws of any jurisdiction of the United States; a branch or agency of a foreign entity located in the United States; a trust of which the trustee is a United States resident; an estate of which a United States resident is the executor or administrator; or any account held for the benefit of a United States resident.

## Conflicts of Interest Policy

This is a summary of the policy we maintain in order to manage conflicts of interest in respect of the duties we owe to our clients.

## General

A conflict of interest can arise between Finance Managers International Limited trading as UBFX, our directors and staff ("we", "our") and you as a client or between your interests and those of another client of ours.

We aim to establish and maintain and operate effective organisational and administrative arrangements with a view to taking all reasonable steps to prevent conflicts of interest from constituting or giving rise to a material risk of damage to the interests of our clients.

## Our Policy

We endeavour to maintain a record of the types of activity we carry on in which there may be (or has been) a material conflict. We also maintain procedures to manage actual or potential conflicts. This includes procedures to maintain independence between members of our staff who are involved in different activities, for example, through the operation of information barriers, physical separation of staff, the segregation of duties and responsibilities and maintenance of a policy of independence which requires our staff, when providing services to a client, to act in the best interests of the client and to disregard any conflicts of interest; and, in some circumstances declining to act for a client or potential client.

## Disclosure

Where we cannot be reasonably confident that our arrangements to manage conflicts are sufficient to mitigate the risk of damage to a client's interest we will disclose the general nature of such conflicts before carrying on business for the client. The client must then consider whether this conflict is material to their interests and then decide if they wish to continue using our services.

## Gifts and hospitality

Our Staff may receive small gifts and reasonable hospitality from other parties with which we do business but only where in the opinion of a director or senior manager it is at a level that does not impact their impartiality or influence our obligation to act in the best interests of our clients. Such permission does not apply where the gift/hospitality may be deemed to breach any relevant legislation pertaining to bribery (such as the Bribery Act 2010) or our regulatory obligations.