

## Maxis Investments Ltd - Conflicts of Interest Policy

- **Identifying conflicts:** Maxis Investments Ltd ('Maxis') takes all reasonable steps to identify conflicts of interest between:
  - (1) Maxis (including its directors, managers and employees) and a client; or
  - (2) One client of the firm and another client;
  
- **Types of conflicts:** For the purposes of identifying the types of conflict of interest that arise, or may arise, in the course of providing a service and whose existence may entail a material risk of damage to the interests of a client, Maxis will take into account whether the firm or a relevant person:
  - (1) is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
  - (2) has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
  - (3) has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;
  - (4) carries on the same business as the client; or
  - (5) receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service.
  
- **Record of conflicts:** Maxis keeps and regularly updates a record of the kinds of service or activity carried out by or on behalf of the firm in which a conflict of interest entailing a material risk of damage to the interests of one or more clients has arisen or, in the case of an ongoing service or activity, may arise.
  
- **Managing conflicts:** Maxis maintains and operates 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 its clients.
  
- **Disclosure of conflicts:** If arrangements made by Maxis to manage conflicts of interest are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of a client will be prevented, the firm will clearly disclose the conflict of interest to the client before undertaking business for the client. The disclosure will be made in a durable medium and will include sufficient detail, taking into account the nature of the client, to enable that client to take an informed decision with respect to the service in the context of which the conflict of interest arises.
  
- **Conflicts monitoring and conflicts register system**

Compliance reviews conflicts on a regular basis and maintains a Conflicts Register designed to ensure that potential and actual conflicts arising from Maxis' business are

identified and either managed, mitigated or avoided as quickly as possible and as appropriate to the nature of the conflict.

- **Gifts, entertainment and other benefits policy**

The FCA requires that the firm must take reasonable steps to ensure that it, and any employee acting on its behalf, does not offer, give, solicit or accept an inducement, if it is likely to conflict to a material extent with any duty that the firm owes to its customers.

Unless justifiable in all the circumstances, personal gifts or any other benefits are not offered or provided to employees of any company or person in an existing or potential business relationship with the firm without the specific authorisation of the Compliance Officer.

Notification of all benefits over the value of £250.00 is made to the Compliance Officer, who maintains a register of all reports.