



Summary of Conflicts of Interest Policy.

Edgewater Markets Limited (“EML”) is a company incorporated in the United Kingdom, company number 08730386, and regulated by the Financial Conduct Authority, Firm Reference Number 988539.

This document summarises EML’s Conflicts of Interest Policy. EML will use all reasonable endeavours to identify conflicts of interest and manage these appropriately and treat customers fairly. The Conflicts of Interest Policy sets out how it manages conflicts between itself, clients, service providers and with the Group.

The Board of EML bears ultimate responsibility for the oversight and the management of conflicts of interest and ensure the Board is made aware of area where potential conflicts may arise.

Failure to identify and manage conflicts of interest may damage the reputation of EML, its shareholders and other members of the Edgewater Group of companies. Therefore, all staff have a duty to avoid conflicts of interest as required by the Conflicts of Interest Policy.

Where that is not possible, staff must promptly advise EML of such conflicts or potential conflicts, so these may be addressed fairly and transparently. Regulatory action may be taken in cases of breach of regulation such as conflicts of interest. All staff of EML are responsible for adherence to this Policy.

To whom does this Policy apply?

The Policy applies to all full-time staff, consultants, temporary staff, and anyone whom EML has engaged to perform a service or provide products along with their connected persons and shall remain in effect for the duration of the contract or service.

How is a conflict of interest defined?

A conflict of interest arises where the objectivity, impartiality, or professional judgement of a member of staff may be compromised due to competing interests, which may arise as follows:

- EML and a Client.
- A Connected Person and EML, or
- Two or more clients to whom EML provides products or services.

How are conflicts managed?



EML maintains effective organisational and operational arrangements to minimise, monitor and manage any conflicts that may arise. These to be reported under the Conflict of Interest Policy, and an appropriate arrangement made to mitigate the identified conflict(s) shall be implemented.

Staff shall be briefed to ensure awareness and understanding of how conflicts of may arise and properly manage such conflicts.

Governance

The Chief Executive Officer is responsible for the oversight of conflicts and supported by the Board to ensure a culture to support the standards of integrity expected from the Senior Managers and staff of EML.

Should you have any further questions on the EML's Conflicts of Interest Policy please contact us on london@edgewatermarkets.com