

## Conflicts of Interest Policy

### 1. Introduction

W. G Wealth Guardian Ltd (hereinafter, “the Company”) is an Investment Firm regulated by the Cyprus Securities and Exchange Commission (hereinafter, “CySEC”) with Licence number XX/XX.

In conforming with Law 144(I)/2007 which Provides for the Provision of Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets and Other Related Matters Law, as subsequently amended from time to time (the “Law”), the Company has established a Conflicts of Interest Policy (the “Policy”) appropriate to the size and organisation of the Company and the nature, scale and complexity of the Company’s business.

### 2. Scope

With the implementation of the Conflicts of Interest Policy the Company aims to identify conflicts of interest between itself, including its managers and employees, tied agents, or other relevant persons, as well as any person directly or indirectly linked to them by control, and their clients or between one client and another, that arise in the course of providing any investment and ancillary services, or combinations thereof, including those caused by the receipt of inducements from third parties or by the investment firm’s own remuneration and other incentive structures.

### 3. Identification of Potential Conflicts of Interest

3.1. For the purposes of identifying the types of conflict of interest that arise in the course of providing investment and ancillary services or a combination thereof and whose existence may damage the interests of a client, the Company takes into account, by way of minimum criteria, the question of whether the Company or a relevant person, or a person directly or indirectly linked by control to the Company, is in any of the following situations, whether as a result of providing investment or ancillary services or investment activities:

- a. The Company or a relevant person is likely to make a financial gain, or avoid financial loss, at the expense of the Client;
- b. The Company or a relevant person 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;
- c. The Company or a relevant person has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;
- d. The Company or a relevant person carries on the same business as the Client;

- e. The Company or a relevant person 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.

As per the Law, a 'relevant person' means any of the following:

- a. a member of the board of directors, partner or equivalent, manager or tied agent of the Company;
- b. an employee of the Company or of a tied agent of the Company, as well as any other natural person whose services are placed at the disposal and under the control of the Company or a tied agent of the Company who is involved in the provision by the Company of investment services or/and the performance of investment activities; and
- c. a natural person who is directly involved in the provision of services to the IF or to its tied agent under an outsourcing arrangement for the purpose of the provision by the IF of investment services or/and the performance of investment activities.

#### **4. Procedures and Controls to Managing Conflicts of Interest**

- 4.1. In general, the procedures followed and measures adopted by the Company and which are necessary and appropriate to ensure the requisite degree of the Company's independence, are the following:
  - 4.1.1. effective procedures to prevent or control the exchange of information between relevant persons engaged in activities involving a risk of a conflict of interest where the exchange of that information may harm the interests of one or more clients;
  - 4.1.2. the separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the CIF;
  - 4.1.3. the removal of any direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration of, or revenues generated by, different relevant persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities;
  - 4.1.4. measures to prevent or limit any person from exercising inappropriate influence over the way in which a relevant person carries out investment or ancillary services or activities and

- 4.1.5. measures to prevent or control the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services or activities where such involvement may impair the proper management of conflicts of interest.
- 4.2. The Company, has established the following suitable and appropriate internal procedures and controls for minimizing any potential conflicts of interest which include the following (the list is not exhaustive):
  - 4.2.1. Establishment of the “four-eyes” principle in supervising the Company’s activities.
  - 4.2.2. Chinese walls restricting the flow of confidential and inside information within the Company, and physical separation of departments.
  - 4.2.3. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual.
  - 4.2.4. Procedures governing access to electronic data.
  - 4.2.5. Prohibition of external business interests conflicting with our interests as far as the Company’s officers and employees are concerned, unless Board of Directors approval is provided.
  - 4.2.6. Establishment of in-house Compliance Department to monitor and report on the above to the Company’s Board of Directors
  - 4.2.7. A policy designed to limit the conflict of interest arising from the giving and receiving of inducements.
  - 4.2.8. A gifts and inducements log registering the solicitation, offer or receipt of certain benefits.
  - 4.2.9. In the case where the Company distributes marketing communication to its Clients, it ensures that the said communication is reviewed and approved by the Compliance Officer prior to distribution. The Compliance Officer also ensures that such communication meets the relevant definition of marketing communication as well as having the appropriate disclosure statement.
  - 4.2.10. Appointment of Internal auditor to ensure that appropriate systems and controls are maintained and report to the Company’s Board of Directors.
  - 4.2.11. Personal account dealing requirements applicable to relevant persons in relation to their own investments.
  - 4.2.12. The Company also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate.

## **5. Disclosure of Information**

5.1. If at any given time and during the course of a business relationship between the Company and a Client or group of Clients, it appears to be the case that the organizational or administrative arrangements/measures in place are not sufficient to mitigate and/or avoid and/or manage a conflict of interest relating to that Client or group of Clients, the Company will disclose the conflict of interest (i.e. general nature and/or sources of conflicts of interest) before undertaking further business with the Client or group of Clients.

The disclosure in 5.1 shall:

- (a) be made via a durable medium; and
- (b) 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.

## **6. Amendment/Review of the Policy**

The Company reserves the right to review and/or amend this Policy at any given time it deems suitable and appropriate without notice to the Client.

## **7. General Information**

For further details with regards to the Company's Conflicts of Interest Policy and procedures, you may contact the Company's Support Department at [info@wguardian.com](mailto:info@wguardian.com).