

SBI Shinsei International Limited

Conflicts of Interest Policy

This policy is applicable to services provided by SBI Shinsei International Limited ("SBISIL", "it" or the "Firm") to its clients.

The Firm is subject to regulatory requirements which requires it to ensure appropriate steps are taken to identify, prevent and manage potential and actual conflicts of interest. If a conflict should arise, the Firm will manage it fairly and in the best legitimate interest of its clients.

A Conflict of Interest may arise where the Firm, or a member of its staff:

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 monetary or non-monetary benefits or services, other than the standard commission or fee for that service.

Conflicts of Interest which may arise include:

- staff outside business interests
- between clients with competing interests
- between the business activities of the Firm and those of its clients, and
- between an affiliate of the Firm and the Firm's clients

Records are maintained of all potential and actual conflicts, and the Firm has implemented a Compliance Monitoring Programme part of which focusses on conflicts of interest.

The Firm has developed policies and procedures as part of its organisational and administrative arrangements to ensure that all reasonable steps are taken to prevent conflicts of interest which may constitute or give rise to a risk of damage to the interests of its clients. These policies and procedures are reviewed periodically, and updated as required, to ensure adequacy.

Examples of the types of policies and procedures for managing conflicts include:

- procedures to prevent or restrict information flows, where the exchange of information could create a conflict of interest
- Confidentiality of client and the Firm's information
- Anti-Bribery and Inducements policies to prevent or limit a person exercising inappropriate influence in relation to the provision of services
- Internal segregation of duties and functions
- Personal Account Dealing policies, to manage conflicts between client and staff trading activity

Disclosure

In the event that a conflict of interest arises where it is found that there is no other way of managing the conflict or the measures the Firm has put in place are found not to be sufficient to protect a client's interests, we will disclose the conflict of interest and the steps taken to mitigate the conflict, to the client. Such disclosure will be:

- in a durable medium
- clearly state that the organisational and administrative arrangements established by the Firm to prevent or manage that conflict are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of the client will be prevented
- include specific description of the conflicts of interest that arise in the provision of the Firm's services
- explain the risks to the client that arise as a result of the conflicts of interest; and
- 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.

Disclosure is required to be made prior to acting for the client.

Where the Firm considers it is not able to manage a conflict in any other way it may decline to act for a client.