

BLACKWELL GLOBAL INVESTMENTS LIMITED

CONFLICTS OF INTEREST POLICY

Blackwell Global Investments Limited (“Blackwell Global” or the “Company”) is a company duly incorporated under the laws of the Commonwealth of The Bahamas, with company registration number 201732 B and having registered office at 201 Church Street, Sandyport, P.O. Box N-3406, Nassau, NP, The Bahamas. Blackwell Global is authorised and regulated by the Securities Commission of The Bahamas (“SCB”), with registration number SIA-F215.

CONFLICT OF INTEREST POLICY

Overview

A conflict of interest is a situation in which someone in a position of trust has competing professional or personal interests. Such competing interests can make it difficult for individuals to fulfil their duties impartially. A conflict of interest may exist even if no unethical or improper act results from it. Blackwell Global is committed to identifying, monitoring and managing all actual and potential conflicts of interest that can arise between us and our clients and between clients of all areas of the Group.

Our Policy

We aim to keep a record of the kinds of activity we carry on in which a material conflict could arise or has arisen. We also maintain procedures to manage actual or potential conflicts. This includes procedures to maintain appropriate 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.

In the event of a conflict of interest arising, we identify that our actions to manage the conflict are sufficient to ensure, with reasonable confidence, that risks of damage to the interests of our client will be prevented and we will clearly disclose the general nature and/or sources of conflicts of interest to our clients before undertaking business for the client.

Gifts and Inducements

On occasions our employees may personally benefit from dealings with potential or existing clients, suppliers, service providers etc. A gifts and inducements policy is incorporated into our internal controls to ensure that these are not excessive and do not create an obligation or debt.