



Summary Conflicts Policy

We recognise that, in certain circumstances, conflicts can arise between Palm Global Capital Ltd (“Palm”), its directors and employees and other related group companies and associates and you as a client, or between your interests and those of another client of Palm.

Palm seeks to resolve its conflicts fairly and act in a transparent and reasonable manner at all times. To prevent and minimise the risk of such conflicts giving rise to a risk of damage to the interests of our clients we endeavour to maintain a robust and effective governance and operational framework, therefore we have adopted a number of internal systems, procedures and controls, as follows:

- Personal account dealing restrictions for all employees and associates regardless of seniority,
- Internal disclosure requirements which cover the giving and accepting of gifts or other inducements relating to our business for all employees and associates,
- Internal segregation of functions where their performance by the same person would increase the risk of conflict,
- The maintenance of a Policy of Independence requiring our directors and employees to act in the best interests of our clients and disregard any conflicts arising,
- Restrictions of access to data stored electronically or in hard-copy form,
- Our directors, officers and employees are required to maintain confidentiality of all information entrusted to them, except where disclosure is required by law. Further, employees are not permitted to use such information for their personal gain.

Where there is no other way of managing a conflict, or we do not consider that the measures in place are sufficient to prevent the risk of damage to a client as a result of a particular conflict, then we will make a disclosure to allow the client to consider their position, and to decide whether to continue with the service in the situation concerned. This type of disclosure may be made verbally or in writing before or at the time of dealing. Specific disclosure regarding any other conflicts we identify which give rise to a risk of damage will be made verbally or in writing when we become aware of them.