

Odey Wealth Management (UK) Limited

Conflicts of Interest Policy

INTRODUCTION

This document constitutes Odey Wealth Management (UK) Limited's ("OWMUK") policy with respect to conflicts of interests (the "Policy"). The Policy aims to identify the circumstances which constitute or may give rise to a conflict of interest and specifies procedures to be followed and measures to be adopted in order to manage such conflicts. Whenever a new conflict is identified by the Firm the Conflicts of Interest Register will be updated.

This Policy applies to all staff. For the purpose of this Policy "staff" includes "relevant persons"¹ as defined by the FSA but will exclude outsourcers operating pursuant to outsource arrangements which address conflicts of interest arising, including personal account dealing. This policy is included in the OWMUK Compliance Manual which is provided to all OWMUK staff. All OWMUK staff are required to confirm their adherence to its standards on an annual basis.

THE BASIC OBLIGATION

OWMUK must act honestly, fairly and professionally and in accordance with the best interests of its clients at all times. Specifically, it must take "all reasonable steps" to identify and, wherever possible, prevent by management any potential or actual conflicts of interest between:

1. the Firm and its clients; and
2. between its clients.

In taking all "reasonable steps" OWMUK will consider the level of risk associated with a particular conflict, the nature, scale and complexity of OWMUK's business, the nature and range of products that it offers and the nature of its client base.

Where OWMUK is unable to manage any conflict of interest such that it has reasonable confidence that risks of damage to the interests of a client will be prevented, then OWMUK must disclose the general nature and sources of such conflict of interest to the client before undertaking business for the client.

IDENTIFICATION OF CONFLICTS

In order to identify the types of conflict of interest that arise, or may arise, in the course of provision by the Firm of its services, and to identify those conflict of interest which may entail a material risk of damage to the interests of a client, OWMUK has taken into account whether OWMUK or a relevant person, or another member of the Odey Group:

- is likely to make a financial gain, or avoid a loss, at the expense of a client;
- has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of a client, which is distinct from the client's interest in that outcome;
- has a financial or other incentive to favour the interest of one client or group of clients over another;
- carries on the same business as a client;

¹ Relevant person (in summary) is defined as any of the following (a) a director, partner or equivalent, manager, employee or appointed representative of the Firm, and (b) any other natural person, including persons operating under an outsourcing arrangement, whose services are placed at the disposal and under the control of the Firm and who is involved in the provision by the firm of regulated activities.

- receives 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.

If at any time a conflict is identified that has not been included in this Policy, or a material risk of damage to a client has been identified, OWMUK's Compliance Officer should be contacted.

MANAGEMENT OF CONFLICTS OF INTEREST

Senior management is responsible for ensuring that OWMUK identifies and manages its conflicts of interest. In managing the conflicts of interest, senior management will:

1. Ensure that all staff are aware of the critical importance of the Policy in carrying out OWMUK's business, and the need to report any perceived conflict of interest promptly;
2. Review any actual or potential conflict of interest as soon as it is identified and identify appropriate steps to manage the conflict as necessary; these steps shall have the aim of preventing the risks of damage to the interests of a client;
3. Communicate to all relevant staff the procedures to be followed in order to manage the conflict of interest; and
4. Document the conflict of interest and the measures so undertaken in managing the conflict.

PROCEDURES WHERE CONFLICT MANAGEMENT DOES NOT REMOVE THE RISK OF DAMAGE TO A CLIENT'S INTERESTS

If the Firm considers that either (i) it cannot make appropriate arrangements, or (ii) that its arrangements to manage a conflict of interest are not sufficient, to ensure that material risks of damage to the interests of a client will be prevented, then OWMUK will disclose the general nature and sources of the relevant conflict of interest to the client before undertaking further business for the client. The disclosure should be sufficient to enable the client to take an informed decision. While specific disclosure may be appropriate in some circumstances, this disclosure will normally be included in the client's Investment Management Agreement.

In the event that such a conflict is identified, the Compliance Officer must be informed immediately so that disclosure and any other appropriate steps, including whether it is appropriate to decline to undertake the business, are properly considered by senior management.

UPDATING AND REVIEW OF THIS POLICY

This Policy should be updated as and when new service or activity is undertaken by the Firm, or new conflicts are identified, or new procedures to manage the conflicts are put in place. Ongoing relevance of and compliance with this Policy will be reviewed on a six monthly basis, or as new kinds of service or activity are undertaken by the Firm, as part of the Firm's compliance monitoring programme and be reported to senior management. The Compliance Officer is responsible for ensuring that required disclosures and record keeping requirements are complied with.

RECORD RETENTION

The Conflicts of Interest Policy and records relating to the review and management of actual or potential conflicts of interest should be retained for 5 years.