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CONFLICTS OF INTEREST POLICY

Synergi Insurance Advisors, Agents and Sub-Agents Ltd ('The Company') is required to establish and communicate to clients its Conflicts of Interest Policy. The purpose of such policy is to identify, avoid, and (where avoidance is not possible) mitigate and manage the conflicts of interest that may arise when the company provides advice to clients.

The Conflicts of Interest Policy must contain mechanisms for the identification of conflicts of interest and measures and procedures for the avoidance, disclosure and mitigation of such conflicts. Clients or Associated Persons who believe there is a real or perceived conflict of interest are requested to notify The Company in writing, enclosing a full description and any relevant documentation.

Scope of Application

This policy applies to all services provided by the Company and aims to identify and prevent conflicts of interest between the Company and its clients or between one client and another. It applies to all directors, senior management, employees and any person directly or indirectly linked to the Company.

What is a Conflict of Interest?

A conflict of interest is a conflict that arises in any area of The Company's business in the course of providing its customers with a service which may benefit The Company (or another customer for whom The Company is acting) whilst potentially materially damaging another customer where The Company owes a duty to the customer. There may be a conflict where The Company (or anyone connected to The Company):

- is interested in the outcome of the service provided to its customer where the interests of The Company is distinct from that of the customer;
- is likely to make a financial gain (or avoid a loss) at the expense of its customer;
- has a financial or other incentive to favour the interests of one customer over another; carries on the same business as a customer;
- receives money, goods or services from a third party in relation to services provided to a customer other than standard fees or commissions.

What are the Company's Potential Conflicts of Interest?

Where the company is a member of a group: A conflict of interest may arise as a result of the structure and business activities of other members of the group. This potential conflict is managed by the policies, procedures & systems that have been put in place to control and prevent the flow of information between

the Company and its subsidiaries and ensure that all employees comply with their professional duties in the exercise of their activities.

Financial Gain: A conflict of interest may arise in a situation where The Company is likely to make a financial gain or avoid a financial loss at the expense of a Client. It also includes situations of promoting the interests of one Client over those of another.

Gifts: On occasion our employees may give gifts or receive them from clients, companies or other institutions in recognition of services provided. We take care to ensure that these gifts are not excessive and do not create an obligation or debt.

Inducements and favouritism of one product provider over another: The company has relationships with many third party product providers/financial institutions who may remunerate the company via commission or fees and may favour one over the other in the recommendation process if higher commission/fees are available. The company and all affiliated persons are expected to act in the clients best interest at all times and to make suitable recommendations according to the clients individual profile.

The Company has set up a Committee made up of Senior Management from within the company and are tasked with approving products that may be used in The Company's services which ensures no advisor is able to make recommendations that have not been pre-approved.

The company or Associated Person has an interest in the outcome of service or transaction, which is distinct from that of the client: The Company or its affiliated persons favours a particular service or a particular product (e.g. favouring one product over another) due to the particular service or fund creating a greater gain to The Company or its associated persons which were to conflict with the interests of the Client.

The Company and its associated persons act according to a code of conduct and best advice practice. This means that services and products recommended are done so following a review of the Client's financial situation, investment objectives and knowledge & experience. Services and products are therefore recommended according to the best interests of the client and their individual circumstances. Disclosure where The Company is aware of a conflict that may arise, it shall disclose the general nature or/and the sources of conflict of interest to the client before undertaking to provide any service.