

# Conflicts of Interest Policy

Fisher Funds Management Limited | April 2019

# Conflicts of Interest Policy

## 1. Introduction

Fisher Funds Management Limited (Fisher Funds) is committed to acting honestly, fairly and in the best interests of our clients when providing products, services and advice.

## 2. Purpose

The purpose of the Policy is to ensure colleagues understand their responsibility to identify, avoid and/or manage conflicts of interests.

## 3. Application

The Policy applies to all Fisher Funds' colleagues.

Colleagues include permanent, temporary and fixed-term employees as well as contractors.

## 4. Conflict

A Conflict is any situation where the separate interests of Fisher Funds; colleagues; clients; or external parties differ and serving one party's interest may conflict with the interests of others.

## 5. Conflicts awareness

The identification, avoidance and/or management of conflicts of interest is an ongoing process. Fisher Funds has a conflict-aware environment, central to which are the following elements:

- fostering a culture of compliance which encourages open reporting issues, incidents and conflicts;
- a set of Conduct Principles which puts good clients outcomes at the forefront of everything we do;
- Gifts and Entertainment Policy – colleagues are required to comply with the Policy, which is designed to ensure that they are not inappropriately influenced by the receipt or giving of gifts or entertainment;
- Personal Share Trading – colleagues are subject to limitations regarding their personal investing which, amongst other things, requires prior approval of personal investment decisions. Colleagues must also comply with insider trading laws and regulations;
- Client and colleague personal information – colleagues are made aware of their obligations to protect client and colleague personal information through the Privacy Policy; and
- Segregation of duties – duties that may give rise to conflicts of interest if performed by the same person are segregated and performed by other colleagues.

## 6. Identification

Colleagues are responsible for identifying and escalating conflicts. Colleagues receive induction and annual re-training to enable them to identify, avoid and/or manage conflicts.

## 7. Escalation

Actual or potential conflicts of interest should be referred by a colleague to their manager. Conflicts can be escalated to the Risk and Compliance Team for advice and guidance, which may include assisting the relevant colleague or business group prepare a conflicts management plan.

Material conflicts of interest are referred to the Chief Executive Officer.

## **8. Review**

Each business group is required to periodically review and / or update their identified conflicts and maintain effective controls to mitigate them.

## **9. Register**

Conflicts are recorded in the Conflicts Register.

## **10. Non-compliance**

Risk and Compliance monitors compliance with the Policy.

Non-compliance with the Policy may result in disciplinary action which could include performance review, employment suspension or termination.

## **11. Review of policy**

The Policy will be reviewed bi-ennially or more frequently if required. The Policy is subject to change at any time.