

Conflicts of Interest Policy

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Conflicts of Interest Policy

Purpose

This policy addresses the requirements of the Financial Markets Conduct Act 2013 and the Financial Advisers Act 2008. Its purpose is to ensure that conflicts of interest (Conflicts) are identified and managed appropriately to prevent any negative effect on our clients, loss of our regulatory licenses and status, offences under law, or reputational damage to Fisher Funds.

Scope

This policy applies to all Employees and directors (together Employees) and any Associates of either.

Associate is defined as:

- a spouse, de facto partner or dependent child of an Employee;
- any person over whom an Employee has influence for investment decisions (except in the ordinary course of business);
- a company controlled by an Employee or where the Employee is beneficially entitled to more than 50% of the issued capital of the company; and
- a trust in which the Employee is a trustee, a sole or majority beneficiary or where the Employee has the ability to remove the person acting as trustee of the trust.

Definitions

A Conflict is a situation where:

- some or all of Fisher Funds or an Employee's interests are incompatible with, or differ from, some or all of a fund's or a client's (together Client) interests;
- the concerns or aims of two different parties are incompatible;
- some or all of an Employee's interests are in conflict with the company's interest; or
- an Employee is in a position to derive personal benefit from actions or decisions made in their official capacity.

Policy statement

Employees have an obligation to ensure that their interests and the interests of Fisher Funds are not placed ahead of the client's interests especially where to do so would disadvantage a client or would negatively impact on the service a client receives. If there is any concern that an action might create a Conflict, no action should be taken.

We must inform clients about any actual or potential Conflicts even if these Conflicts have not actually influenced the opinions or recommendations we may give them.

Conflict identification

Employees receive induction and annual retraining on the contents of this policy. All Employees must familiarise themselves with the types of Conflicts that may arise in their area so that they understand and can practically comply with the Conflicts management systems that are in place.

Actual or perceived Conflicts should be escalated to senior management and the Corporate Compliance Manager for review.

Conflict management

Ongoing management of Conflicts is achieved by:

- fostering a culture of compliance which encourages open reporting of Conflicts;

- a written code of conduct (Code of Ethics & Standards of Professionalism Policy) which outlines expected standards of individual behavior and client care;
- development of specific policies (including this policy), to manage specific risk areas;
- the extensive use of disclosures which allow clients to make informed decisions about the Conflict and its potential impact on the product or service being provided to them; and a designated compliance function with responsibility for monitoring compliance with relevant policies.

Gifting and Gifts Register

The giving or receiving of gifts can create a Conflict. The Code of Ethics and Standards of Professional Conduct stipulate that no Employee may solicit gifts, hospitality or benefits from a client, supplier, business partner or other external party. Nor may Employees accept or give any gift, hospitality or benefit that is likely to influence the commercial decision making of the giver or receiver of the gift.

All gifts with a value of over \$250 must be recorded in the Gifts Register and must be disclosed to Compliance or the Chief Executive Officer. The Gifts Register will be provided to the Board periodically.

No gift or other benefit may be received if it has a monetary value greater than \$500 unless previously approved by the Board.

Conflicts Register

Conflicts which have been identified are recorded together with the applicable mitigant in the Conflicts Register. The Register is updated as required and reviewed annually by all managers.