



Conflict of Interest Policy

Introduction

Chip Financial Ltd (Chip) is committed to maintaining the highest professional standards and, therefore, we endeavour to identify, consider and manage potential conflicts of interest to ensure that we treat all of our customers fairly and in accordance with FCA rules, regulations, and principles.

Nature of a Conflict of Interest

In essence, a conflict of interest is: a situation in which Chip (or any of its employees) finds itself in a position where its own interests' conflict with the duties and obligations owed to its clients; or a situation in which Chip's duty to one client conflicts with its duty to another causing potential material risk of damage to the interests of said client. In order to identify these risks, we must consider whether Chip or its directors, employees or contractors or any other person linked by control to Chip:

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

- receives or will receive from a person other than a client an inducement in relation to a service provided to the client, in the form of remuneration, goods or services.

Conflict Situations

We have identified a number of situations which may give rise to a potential conflict of interest. These situations include, but are not limited to, the following:

We may receive gifts, entertainment or other monetary and non-monetary benefits from our service providers or business partners (for example, the Issuers of the Investment Products we make available to clients through the Mobile App), which could give rise to a conflict with respect to the duties that we owe to our clients;

Chip employees who have outside commitments (e.g. directorships or other outside business interests) may be influenced to act in a manner that conflicts with the interests of Chip or its clients; and where Chip employees invest for their own account in certain investments which are retained as investments for client accounts.

Conflict Avoidance

We seek to organise our business in such a way as to avoid conflicts of interest arising.

Conflict Management

For conflicts of interest which are unavoidable, we have put in place procedures which are designed to ensure that the management of any conflict takes place in such a way that Chip (and its employees) are not advantaged and that no client is disadvantaged. Relevant employees are provided with training in these procedures and the standards of conduct expected of them. Chip's Board of Directors remains responsible for ensuring that such procedures are appropriate and that employees act accordingly. Specifically, we have put in place the following internal policies and procedures to assist in our identification and management of conflicts of interest:

- Anti-bribery and Corruption Policy
- Gifts & Entertainment Policy
- Chip Employee Handbook

Conflicts Disclosure

If we are not reasonably confident that we are able to manage a particular conflict to adequately protect the interest of a client, the general nature and/or source of conflicts of interest will be clearly disclosed before we undertake any business.