

The companies within the Premier Asset Management Ltd group provide services to a wide range of clients. It is possible that one of our regulated companies, or a company with which we have an association, may from time to time have interests which conflict with clients' interests or with the duties owed to clients. These include conflicts arising between Premier Asset Management Ltd, its associates and employees on the one hand and the interests of clients on the other and also conflicts between clients themselves.

Premier has established procedures which are designed to identify and manage such conflicts. These include organisational and administrative arrangements to safeguard the interests of clients. A key element of this policy is that persons engaged in different business activities involving a conflict of interest must carry on those activities independently of one another.

Where necessary, Premier maintains arrangements which restrict the flow of information to certain employees in order to protect clients' interests and to prevent improper access to client information. Employees are subject to controls on their personal dealing intended to ensure that the interests of clients always have priority.

Should our procedures and controls not be sufficient to ensure that a potential conflict of interest does not damage a client's interests we may consider it appropriate to disclose the potential conflict to the client and obtain the client's formal consent to proceed. We may also decline to act in circumstances where there is risk of damage to the interests of any client.

(SYSC 10.1.10(1))