



Instant Funding

Conflicts of Interest Policy

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1 Introduction

It is important to identify and effectively manage conflicts of interest which arise or may arise in the course of providing a service and carrying out any activity, as their existence may lead to material risk of damage to a client's interests.

As such, Instant Funding ('us', 'we', 'our', 'the firm') has put in place and maintains appropriate systems and controls to enable us to identify, record, monitor and manage conflicts of interest. This document sets out Instant Funding's policy for the management of such conflicts of interests.

Please note that this document does not intend to create third party rights or duties or form any part of any contractual agreement between Instant Funding and any client.

2 What is a conflict of interest?

A conflict of interest can be defined as the general situation in which Instant Funding or any of its Employees may have a business or personal interest, which would potentially compete with the interest of any client or with Instant Funding itself.

Due to their nature, conflicts of interests should be managed even when they do not materialise in practice, either because they are only potential conflicts or because they appear as such only from an outsider's view. The following can be taken as a reference guide of what may constitute a conflict of interest or a potential conflict of interest:

- An actual conflict of interest is a situation in which financial or other personal considerations have the potential to compromise or bias professional judgment and objectivity
- An apparent conflict of interest is one in which a reasonable person would think that the professional's judgment is likely to be compromised
- A potential conflict of interest involves a situation that may develop into an actual conflict of interest.
- More specifically, where we gain a benefit and there is also a possible disadvantage to the client; or
- One client, to whom we owe a duty of care, makes a gain or avoids a loss and there is an associated possible loss to another client.

It is important to note that, a conflict of interest exists irrespective of whether decisions are affected by a personal interest; a conflict of interest implies only the potential for bias, not a likelihood. Therefore, any considerations as to the role, worthiness, social or moral standing of an individual should not be considered when assessing the situation.

Treating Customers Fairly is central to our core values. There is an embedded culture that understands what acceptable and unacceptable behavior is. As such, conflicts of interest and the identification/management /mitigation thereof are central to our philosophy and culture.

3 How do we identify conflicts of interest?

Instant Funding must take all appropriate steps to identify, prevent or manage any conflicts of interest between:

- Instant Funding (which includes our employees, directors, and any person directly, or indirectly, linked to our firm as a controller) and our clients; and
- Clients of Instant Funding.

This should include any conflicts caused by us receiving inducements from third parties or our remuneration structure.

3.1 What are appropriate steps?

As a minimum, Instant Funding will consider the following factors to identify, if by providing the service or activity, we might:

- likely make a financial gain, or avoid a financial loss, at the expense of the client.
- have an interest in the outcome of a service or transaction provided to the client which is distinct from the client's interest in that outcome.
- have a financial, or other incentive, to favour the interest of another client, or group of clients, over the interests of the client.
- carry on the same business as the client; or
- receive, or will receive, from a person other than the client, an inducement relating to a service provided to the client, in the form of monies, goods, services, other than the standard commission or fee for that service.

3.2 Other situations where there may be conflicts of interest

Conflicts of interest may also result from other activities conducted by us or the wider Group. Instant Funding will also identify if there are conflicts in the following circumstances:

- when we are approving a new business line or product.
- if we consider any activities, or combination of activities, creates a heightened risk of conflicts impacting our client's interests – both at the start and during the client relationship.

3.3 New conflicts of interest

The Head of Legal and Compliance will assess all new identified conflicts and make a decision whether:

- existing control mechanisms are sufficient to mitigate it.
- new / additional controls are required; and
- we should disclose the conflict to relevant clients so that they are able to take an informed decision as regards the related service.

4 Recording conflicts

Instant Funding will keep and maintain a record of the types of services and activities carried out by us, or on our behalf, where a conflict has been identified that may result in a material risk of damage to the interests of our clients. This includes potential and actual conflicts and any that might arise when providing an ongoing service to our clients.

5 Managing conflicts

Instant Funding will always put in place arrangements that demonstrate we have taken all appropriate steps to prevent a conflict from adversely affecting the interests of our clients. We use the following types of arrangements in place to mitigate our conflicts:

- Training to all staff on identification of conflicts and their importance
- Requiring disclosure of all conflicts and competing interests
- A Gifts, Hospitality and Third-Party Benefits (Inducements) Policy that sets out Instant Funding's arrangements.
- Appropriate restrictions on outside interests, such as directorships of other companies.
- Independent management structures and reporting lines

6 Disclosure of conflicts

If we are unable to put in place arrangements that are sufficient to prevent conflicts from adversely affecting our client's interests, we must disclose this to the client before carrying out any business on their behalf.

Any disclosure made under this section will be as a last resort, we expect to have effective organisational and administrative arrangements in place to prevent or manage conflicts. Instant Funding will not make a disclosure before we have properly considered how we can reasonably manage a conflict to reduce the potential damage to the client's interests.

If we need to disclose, then we must disclose the general nature and source of the conflicts of interest and the steps we have taken to mitigate any risks. This disclosure must:

- be made in a durable medium (a letter or email).
- clearly state that we are reasonably confident the organisational and administrative arrangements we have in place will not prevent the risk of damage to the client's interest.
- include a specific description of the conflict.
- explain what risks to the client might arise as a result of the conflict.
- be made before business is undertaken for the client.
- relate to specific conflicts of interest.
- include sufficient detail to enable the client to take an informed decision about whether to proceed with the service offered by the firm.

The disclosure must be signed off by Head of Compliance before being issued.

7 Outside Business Interests

Employees are required to disclose, in writing, and receive written approval for, any outside business activities prior to engaging in such activity. Charitable activities are not necessarily included in this requirement unless the employee is being compensated for such work or unless the activity is an investment-related activity.

Outside business activities that must be disclosed may include a wide range of activities, including but not limited to the following:

- Employment with an outside entity
- Acting as an independent contractor to an outside party
- Serving as an officer, director, or partner of an outside entity
- Acting as a finder or agent
- Referring someone to another entity and receiving a referral fee
- Receiving any other compensation for services rendered outside the scope of employment with Instant Funding.

