

# Summary of our Conflicts of Interest Policy.

Harvest Financial Services Limited (Harvest) is deemed authorised under Regulation 5(2) of the European Union (Markets in Financial Instruments) Regulations 2017 (as amended) (MiFID) for the provision of the investment services of:

- i. investment advice; and
- ii. the reception and transmission of orders in relation to transferable securities, money-market instruments and units in collective investment undertakings.

Potential conflicts of interest may arise between ourselves and our retail clients, between two or more retail clients, etc.

Under MiFID, we:

- implement and maintain an effective policy which is designed to identify actual / potential conflicts of interest;
- take appropriate steps to identify and to prevent or manage conflicts of interest;
- disclose conflicts of interest as a last resort;
- give retail clients an opportunity to consider whether or not they wish us to continue to provide investment services;
- keep records of the disclosed conflicts of interest;
- oblige our employees to refrain from doing anything that could reasonably be regarded as creating a conflict of interest;
- encourage our employees to discuss actual / potential conflicts of interest with the Chief Risk Officer;
- encourage our employees to notify the Chief Risk Officer of actual / potential conflicts of interest;
- take disciplinary action against employees for failures to notify the Chief Risk Officer of actual conflicts of interest;
- oblige our Compliance Department to report to the Board, at least annually, on the implementation and effectiveness of the overall control environment for investment services; and
- assess the conflicts of interest policy on an annual basis.

The following are examples of situations where a conflict of interest may arise:

- we are likely to make a financial gain, or avoid a financial loss, at the expense of a retail client;
- we have an interest in the outcome of a service provided to or a transaction carried out on behalf of a retail client which is different from that of the retail client;
- we have a financial or other incentive to favour the interest of one retail client over the interest of another retail client;
- we carry on the same business as a retail client; and / or
- we receive or will receive from a person, other than a retail client, an inducement in the form of monetary or non-monetary benefits or services in relation to a service provided to a retail client;
- we exchange an excessive level of hospitality with an individual or organisation. Excessive hospitality is determined by the Chief Risk Officer.

The following are examples of controls to prevent conflicts of interest:

- we disclose, prior to the provision of investment services, any commissions and fees (inducements) we receive from third parties;
- we have policies on inducements, gifts and hospitality. We oblige our employees to record all gifts given and received which ensures that no conflicts of interest arise on the basis of an inducement i.e. certain gifts are not acceptable;
- we have an order execution policy (details provided on our website);
- we have a remuneration policy; and
- we put Chinese walls in place to prevent information moving from one area to another.

**The legislative information contained herein is based on our understanding of current practice as at September 2020 and may be subject to change in the future.**

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Harvest Financial Services Limited is regulated by the Central Bank of Ireland.

