

Conflicts Of Interest Policy

This document describes our policy in relation to the identification and management of conflicts of interest by PakGreen Group Ltd (the 'Firm'). This Policy has been approved by the approved by the directors of the Firm.

General Principles

1. We will take all reasonable steps to identify conflicts of interests between ourselves (including our managers, employees or any person directly or indirectly linked to us by control) and any client, or between one client and another, that arise or may arise in the course of us providing any service to our clients in the course of carrying on regulated activities or ancillary services;
2. For the purposes of identifying conflicts of interest we will take into account, as a minimum, whether we:
 - 2.1. are likely to make a financial gain, or avoid a financial loss, at the expense of a client;
 - 2.2. have an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
 - 2.3. have a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;
 - 2.4. carry on the same business as the client; or
 - 2.5. receive or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service;
3. We will maintain and operate effective organisational and administrative arrangements with a view to taking reasonable steps to prevent conflicts of interest from constituting or giving rise to a material risk of damage to the interests of our clients;
4. In relation to the identification and management of conflicts of interest we will take into account:
 - the size, organisation, nature, scale and complexity of our firm, both in the United Kingdom and overseas as appropriate;
 - the specific services and activities carried out by us;
 - the risk that a conflict of interest may adversely impact the interests of a client, a group of clients, or all of our clients;
5. We will disclose the general nature and / or specific sources of a conflict of interest as a method of managing that conflict only where we consider our internal arrangements to be insufficient.

Controls in place to manage conflicts of interest

We would like to draw your attention to the following controls that we have put in place to manage the conflicts of interest that we face:

- As part of our onboarding process, our Compliance Officer determines whether additional conflicts of interest arise as a result of the new client relationship;
- We have in place a Personal Account Dealing policy which, in circumstances which may give rise to conflicts of interest, places restrictions on the personal account dealing undertaken by our staff. Further to this, we monitor the personal account dealing to ensure that our clients have not been adversely impacted;