

Lifeforce Financial Services cc

Conflicts of Interest Policy

1. Introduction

This document details Lifeforce Financial Services' Conflicts of Interest Management Policy

This policy applies to all employees of Lifeforce Financial Services.

2. What is a Conflict of Interest and when may it arise?

A conflict of interest may arise where a company, or one of its employees, is providing a financial service to its clients and may entail a material risk of damage to those clients interests, and whether the company or its employee:

- Is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- Has 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;
- Has a financial or other incentive to favour the interest of another client, or group of clients, over the interests of the client;
- Carries on the same business as the client; or
- Receives 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. How we manage conflicts of interest

The following are examples of conflicts of interest and how we manage these conflicts:

Contracts, proposed contracts and similar transactions or arrangements

A conflict of interest may arise where an employee has a direct, or indirect interest in a transaction. This may be where the employee has a connection with the other party to the transaction, or where the employee's family has a connection. The connection may be from a directorship, significant shareholding, employment or consultancy.

Lifeforce Financial Services requires disclosure of any connection which could, or could be seen to have the effect of compromising the judgment of any of our employees. Employees are required to notify Lifeforce Financial Services of any such potential conflicts of interest, who will then decide if the employee can be involved in the transaction. Lifeforce Financial Services will also ensure that the relevant provisions have been met.

Gifts, Hospitality & Inducements

Inducements, gifts and hospitality are all issues that could lead to potential Conflicts of Interest. Lifestance Financial Services has a strict policy regarding such issues. All Employees must act with the highest standards of integrity to avoid any allegations of Conflicts of Interest.

Employees must not accept any cash payments, significant gifts or hospitality. Token gifts may be accepted, providing they have not been solicited, have not been given as a business inducement and will not compromise the employee's integrity. A register is kept of any gifts, or hospitality received.

Employees cannot attend hospitality events, without Lifestance Financial Services' approval. Where an invitation could be construed as being a business inducement, it must be declined.

4. Lifestance Financial Services' policy

Lifestance Financial Services expects all its employees to maintain the highest standards in carrying out their business activities, adhering to legislative requirements and our policies on business conduct. Lifestance Financial Services expects its employees to act professionally, honestly and ethically in all their dealings with clients, colleagues and third parties. Lifestance Financial Services has a clear policy on Conflicts of Interest:

- Conflicts of Interest should always be avoided, wherever possible.
- Conflicts or potential Conflicts of Interest must always be disclosed. Lifestance Financial Services will not tolerate non-disclosure by its employees.