

ALT 21 Limited - Conflicts of Interest Policy

1.0 Introduction

ALT21 Limited (ALT21) is authorized and regulated by the Financial Conduct Authority (FRN: 783837) and is a company registered in England and Wales (company number 10723112). Its registered office is located at 45 Eagle Street, London WC1R 4FS.

This policy outlines the arrangements of ALT21 Limited (“ALT21,” “the Firm,” “we,” “our,” “us”) for identifying, documenting, escalating, and managing conflicts of interest within the regulatory environment in which we operate.

A conflict of interest may occur when a company or employee, in fulfilling their duty to a client, has personal or professional interests that could conflict with that duty, potentially leading to material harm to the client’s interests. A conflict can exist even if no improper action or direct disadvantage to the client arises.

The purpose of this policy is to identify and outline the types of conflicts the firm may face and how it plans to address the challenges these conflicts present. It also provides clients with relevant information regarding the firm’s procedures for identifying and managing conflicts of interest.

This policy is reviewed periodically, at least once a year.

2.0 Regulation

This policy is intended to meet ALT21’s requirements under SYSC 10, COBS 12, and Principle for Business 8 of the FCA Handbook, with the first two of these reflecting the implementation of the Markets in Financial Instruments Directive (MiFID).

The policy aims to establish procedures for identifying, monitoring, and managing all potential and actual conflicts, ensuring that these conflicts do not negatively impact the client.

3.0 Definition of Conflicts of Interest

A Conflict of Interest is a situation where one or more persons or entities have competing interests, and the serving of one interest may involve detriment to another.

Conflicts of interest are defined in the context of FCA rules as any conflicts which arise between:

- The firm and a client; or
- A client and another client

A conflict of interest includes both an actual conflict of interest (i.e. a conflict of interest that has arisen) and a potential conflict of interest (i.e. a conflict of interest that may arise given particular facts and circumstances). It also includes a perceived conflict of interest (i.e. a situation which may give rise to the perception of a conflict of interest), even where a conflict of interest may not in fact exist.

The types of conflicts envisaged by the FCA may include situations where the firm:

- Stands to make a financial gain, or avoid a loss, at the expense of the client;
- Has an interest in the outcome of a service provided to the client, or a transaction carried out on their behalf, which is materially different from the interest of that client;
- Has financial or other incentive to favour the interests of another client or group of clients over that client;
- Carries on the same business as the client; or
- Is likely to receive from a person other than the client an inducement, whatever the form, relating to the service provided to the client other than standard fees or commission for that service.

Some conflicts of interest are ongoing and require continuous management, while others may arise in connection with a specific event (such as a transaction) and can typically be addressed through one-time measures.

Failing to identify and properly manage conflicts of interest can lead to various negative consequences for clients, the firm, and employees. These may include reputational damage to client relationships, loss of client business, regulatory sanctions, and the potential for litigation.

3.1 Examples of Conflicts of Interest

The below is a sample of specific examples of transactions and activities that may give rise to conflicts of interest which require appropriate management, mitigation or prevention:

Allocations	A conflict of interest may arise between the firm and the client if the firm is involved in allocating a product or service because the firm may be incentivised to allocate or price the transaction in a manner which favours itself or certain clients.
Cross-Selling Products	A conflict of interest arises between the firm, an employee and a client if the employee engages to the detriment of a client in cross selling activities or providing multiple service/products to the client which are not in the best interest of the client principally to generate higher fees/commission or revenue.
Family/Close Personal Relationship	A conflict of interest may arise between the firm, an employee, or client if an employee deals with individuals who are family members or close personal relationships in the course of conducting business for, or on behalf of, the firm because the dealings may compromise or otherwise call into question the employee's judgement, ability to act objectively or properly discharge their duties and responsibilities owed to the firm and/or clients.
Inducements	A conflict of interest may arise between the firm, an employee, or a client if the firm and/or employees give or receive fees, commissions or other monetary and non-monetary benefits that may inappropriately influence the behaviour of the firm, employees, the client and/or the client's employees in a way that creates a disadvantage for the firm or its client(s).

4.0 Approaches to Conflicts of Interest

ALT21 seeks to ensure that a conflict of interest does not adversely affect the interests of clients, the shareholders or other stakeholders through the identification, prevention or management of the conflict of interest.

Some conflicts of interest are not permitted as a matter of law or regulation and others are permitted so long as the firm has appropriate means by which to manage them. The firm may utilise a number of means (which may be used individually or in combination) to manage a conflict of interest. Some of these have been outlined below:

Organisational arrangements - The terms of reference for all individual committees set out the obligations of these bodies relating to the management of conflicts.

Segregation of Functions and Duties – ALT21 operates a “Three Lines of Defence” framework that requires the independence of control functions.

Policies, procedures, systems and controls – ALT21 employs a number of systems, controls, policies and procedures to manage conflicts of interest.

5.0 Managing and Recording Conflicts of Interest

ALT21 takes responsibility for identifying and managing potential conflicts of interest through implementing and monitoring compliance procedures.

The framework includes the following key control measures:

1. Information Management: Implementing controls to restrict information sharing between relevant staff members when such exchange could harm client interests.
2. Supervisory Structure: Ensuring separate oversight for staff whose primary functions may involve conflicting interests, including potential conflicts with the firm.
3. Compensation Controls: Eliminating direct links between remuneration of staff in different activities where conflicts may arise.
4. Influence Prevention: Establishing safeguards against inappropriate influence over staff performing investment or ancillary services.
5. Duty Separation: Dividing responsibilities that could create conflicts if performed by one person.
6. Oversight System:
 - Regular monitoring and reporting of significant compliance matters to the Board.
 - Implementation of "four-eyes principle" for supervision of firm activities.

ALT21 maintains records of activities that may generate conflicts of interest and regularly reviews these activities.

When conflicts cannot be managed without risking client interests, full disclosure will be made.

Supporting Policies: ALT21 enforces the following policies:

1. Personal Account Dealing Policy
2. Privacy Policy
3. Gifts and Entertainment Policy
4. Record Keeping Policy

6.0 Employee Responsibilities

Staff members have ongoing responsibilities regarding conflicts of interest, which include:

1. Promptly reporting any conflicts of interest to the Compliance department.
2. Following established procedures for identifying, documenting, escalating, and managing conflicts of interest.
3. Maintaining professional integrity and demonstrating sound judgment in all activities
4. Protecting confidential information obtained through their work at ALT21, particularly regarding securities transactions, and refraining from misusing such information.

7.0 Board Responsibilities

Board Members have a duty to maintain objectivity in their decision-making by:

1. Taking initiative to identify any conflicts of interest arising from their Board position
2. Making required disclosures of such conflicts promptly
3. Avoiding actions that could harm ALT21's interests

The Board as a whole must properly document, discuss, and address significant conflicts of interest. This includes both individual conflicts and those affecting multiple Board members.

8.0 Training and Review

All firm employees are given training on how to be aware of conflicts of interest and how to report any new or future conflicts.

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