

Conflicts of Interest Policy
Summary – ALTi Wealth
Management (UK) Limited
June 2025

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1. INTRODUCTION

- 1.1 At AITi Wealth Management (UK) Limited, we are committed to maintaining the highest standards of integrity, transparency, and professionalism in the delivery of our wealth management services. As an FCA-authorised firm, we are required to take all appropriate steps to identify, manage, and where necessary, disclose any actual or potential conflicts of interest that may arise between our firm, our employees, and our clients.
- 1.2 A conflict of interest may arise where our interests or those of another client could conflict with the interests of a client. Examples include, but are not limited to:
 - 1.2.1 Advising multiple clients on investments in the same financial instrument or opportunities
 - 1.2.2 The receipt of gifts and hospitality or other forms of inducement, including research
 - 1.2.3 Situations where our employees have relationships that may influence impartiality
 - 1.2.4 Employee remuneration
 - 1.2.5 Personal account dealing
 - 1.2.6 Co-investing in investment transactions that AITi arranges alongside external investors
 - 1.2.7 Aggregation and allocation of transactions and investment opportunities amongst different clients
 - 1.2.8 Arrangements with introducers

2. CONFLICT OF INTEREST MANAGEMENT

- 2.1 To manage the risks related to conflicts of interest, we maintain a comprehensive Conflicts of Interest Policy which includes:
 - 2.1.1 Internal controls to monitor and manage potential conflicts (disclosure requirement)
 - 2.1.2 Staff training to ensure awareness and compliance
 - 2.1.3 Segregation of duties where appropriate
 - 2.1.4 Disclosure of relevant conflicts to clients where they cannot be effectively mitigated
 - 2.1.5 Controlling information flows
 - 2.1.6 Supervision and monitoring
 - 2.1.7 Order Aggregation and allocation
- 2.2 In addition, there are various other policies and procedures in place that address conflicts at all levels within AITi Wealth Management (UK) Limited such as:
 - 2.2.1 Personal Account Dealing Policy

- 2.2.2 Gifts and Hospitality Policy
- 2.2.3 Order Execution Policy
- 2.2.4 Outside Business Interest and Related Party Policy

3. DISCLOSING CONFLICTS

- 3.1 Our aim is always to act in our clients' best interests. Where conflicts cannot be effectively managed, we will disclose them to you clearly and in good time, or, if necessary, decline to act.
- 3.2 AITi Wealth Management (UK) Limited will not usually require clients to specifically acknowledge the conflict of interest, but clients will be given sufficient time to object or raise queries to the conflict prior to the engagement or transaction proceeding.

4. REVIEWS AND UPDATES

- 4.1 This Policy Statement will be reviewed and updated as appropriate and in response to changes of legislation, internal policies, technology, increased risks, or new vulnerabilities.
- 4.2 The Policy will be accessible to [relevant staff members] via the firm's training platform.

Date	Reviewer	Summary of review [reason for review, changes made]
June 2025	UK Compliance	Policy summary review and update