

# SUMMARY OF THE CONFLICTS OF INTEREST POLICY

## Introduction

The Policy sets out the processes and procedures that Tidswell Financial Services Ltd ABN 55 010 810 607 (**Tidswell**) has adopted to identify, assess and manage Conflicts of Interest and Duties (**Conflicts**) that may arise in the course of its operations.

The Policy applies to all Tidswell Directors, Responsible Managers, employees, representatives and service providers (**Applicable Persons**) and has a framework designed to ensure it reflects the nature, scale and complexity of Tidswell's operations.

## Role of the Board

The Board is ultimately responsible for the development and maintenance of its Conflicts management framework, including this Policy. It must also take all reasonable steps to ensure that Applicable Persons clearly understand:

- the need to identify all actual and potential Conflicts
- the circumstances that might give rise to a Conflict
- the content and purpose of Tidswell's Conflicts management framework, including this Policy
- their obligations under the Policy.

## Management and monitoring of conflicts of interest

The Law requires Tidswell and the Board to manage Conflicts. The aim of the Tidswell Board is to avoid Conflicts. However, there might be circumstances where the avoidance of Conflicts of Interest will not always be possible or prudentially practical. The Board will identify, analyse and evaluate all such Conflicts and then determine whether to avoid a particular Conflict or accept and act notwithstanding the Conflict, subject to any management controls. Any Conflict that cannot be avoided must be managed, as is reasonable in the circumstances, but always so that priority is given firstly to the interests of the business or where Tidswell acts as Trustee or Responsible Entity to the members and beneficiaries of the particular Fund.