

## Disclosure of Conflicts of Interest Policy

### Identifying and Managing conflicts of Interest summary

In accordance with its obligations to you, Autonomous Research LLP (Autonomous) seeks to ensure that its clients are properly treated where there are or could be conflicts of interest.

### What conflicts of interest could arise?

The nature of the financial services market is such that conflicts of interest can sometimes develop. Generally, a conflict of interest arises where the interests of the financial services company and its associates are different from its client or clients. For example, where Autonomous discharges its duty to one client it might create a conflict with another client

### How are conflicts managed?

Autonomous has prepared a Conflicts of Interest Policy, which identifies the types of conflicts it faces and the controls it operates in order to mitigate those conflicts. The policy is reviewed regularly to ensure the record of conflicts is up to date and relevant and the appropriate mitigating controls are in place. The review is reported to the Autonomous Board and senior management.

Autonomous has implemented procedures and controls and segregations of duties appropriate for its business profile. Staff are segregated operationally, such that they report to functional managers and each have distinct password protected IT access.

Autonomous also has specific policies and procedures on when and how employees are permitted to undertake personal account transactions, restrictions on the offering and receipt of gifts to or from clients and other businesses counterparties. We also monitor staff external interests to ensure they do not conflict with their duties to Autonomous and its clients.

Finally, we also monitor the way in which staffs are remunerated in order to ensure that remuneration structures do not conflict between staff and the Autonomous clients' best interests.

A full Conflicts of Interest Policy is available upon request. Please contact Jonathan Firkins, Chief Compliance Officer (+44 (0) 20 7776 3403), [jfirkins@autonomous.com](mailto:jfirkins@autonomous.com)) for further information.