Conflict Policy

1. INTRODUCTION

YCM-Invest Ltd is a company incorporated in England and Wales with Company Number 06039502 having its registered office at 201 Haverstock Hill, London, United Kingdom, NW3 4QG. The Company is authorised and regulated by the Financial Conduct Authority. Financial Services Register Number [470392].

The Company is committed to taking measures to recognise, supervise, examine and resolve conflicts of interest. The Company recognises that it is not possible to eliminate all sources of conflict of interest; however, safeguarding customers' welfare remains the Company's primary objective. This policy encompasses the relationships with customers and third party contacts.

2. DEFINITION

We define a conflict of interest as being either:

- between us and you as a customer

- between you and another customer where your interests are materially affected

3. SITUATIONS

We have identified areas where a conflict of interest may arise. They include, but are not limited:

- services in different capacities at the same time

- acting for more than one customer in a transaction

- holding information on other customers that would affect you or them if it was disclosed

- receiving gifts or entertainment which could conflict with our duties to you

- employees pursuing activities or personal relationships potentially detrimental to you.

4. PROCEDURES

4.1. Our protocols are noted below and we consider them satisfactory to allow us to act without bias to prohibit damage to your interests. At all times stringent criteria to address

and resolve conflicts is followed. Protocols have been developed and introduced to manage conflicts of interest. Our employees are provided with relevant training about the protocols and standards of conduct expected thereafter. Our management remains responsible for ensuring the protocols and resources are sufficient to identify and attend to a conflict as it may arise.

4.2. We maintain an internal log of conflicts that arise, listing how each conflict was monitored and any solution which was developed and applied to resolve the problem and to prevent the customer's interests from being disadvantaged. The effectiveness of our protocols is assessed by staff members who execute their duties in a wholly independent capacity.

4.3. We have in place protocols to prevent un-authorised access or inappropriate dissemination of information.

4.4. Where our functions could create an internal conflict our duty lines are kept separate and individual management and reporting structures are established. The operations functions are maintained and conducted separately from the front office functions and in both an appropriate level of qualification, expertise and supervision is applied.

5. RESOLUTION

Where we are unable to resolve a conflict of interest we will notify you formally in writing. This disclosure will permit you to evaluate whether it is appropriate to continue using our services in respect of the pertinent conflict.

Where we have examined the conflict of interest and its cause it may inform you of its decision not to act on your behalf if it determines no other course of action is possible.