



Conflict of interests Policy

Version Control			
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Principle for Business number 8 (Conflicts of interest) requires Alchemy to pay due regard to the interests of each customer and to manage any conflicts of interest fairly, both between itself and its customers and between a customer and another client. The specific rules for dealing with conflicts of interest can be found under the Senior Management Systems and Controls (SYSC) rules which can be found at SYSC 10.1 onwards.

Conflicts of Interest appear in situations where Alchemy:

- Is likely to make a financial gain, or avoid a financial loss, at the expense of the client
- Has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome
- Has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client
- Carries on the same business as the client; or
- Receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service.

The firm must not knowingly advise, or deal in the exercise of discretion, in relation to that transaction unless we take reasonable steps to ensure fair treatment for the customer. This is normally achieved by managing the conflict of interest by taking reasonable steps in one or more of the following ways:

- Managing the conflicts internally; or
- Establishing special arrangements such as a Chinese wall; or
- Disclosing our interest to the customer.
- Declining to act for a customer.

Managing Conflicts

Alchemy shall demonstrate that it has taken reasonable steps to ensure fair treatment for its customers by relying on this Conflicts of Interest policy. In such cases, relevant employees are required to disregard any material interest or conflict of interest when advising a customer. If considered appropriate by the director/partners, Alchemy may, at its discretion disclose its material interest or conflict of interest to its customer.

The FCA requires firms to identify all known conflicts within this policy along with the method of dealing with the conflict. The Company should pay special attention to the activities of investment research and advice, proprietary trading, portfolio management and corporate finance business, including underwriting or selling in an offering of securities and

advising on mergers and acquisitions. Special attention is appropriate where Alchemy or a person directly or indirectly linked by control to the Company performs a combination of two or more of those activities.

The measures for dealing with conflicts will be designed to ensure that relevant persons engaged in different business activities involving a conflict of interest carry on those activities at a level of independence, appropriate to the size and activities of the Company and of any group to which it belongs and to the materiality of the risk of damage to the interests of clients.

Examples of types of procedures for managing conflicts

- Effective procedures to prevent or control the exchange of information between relevant persons engaged in activities involving a risk of a conflict of interest where the exchange of that information may harm the interests of one or more clients.
- The separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Company.
- The removal of any direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration of, or revenues generated by, different relevant persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities.
- Measures to prevent or limit any person from exercising inappropriate influence over the way in which a relevant person carries out services or activities; and
- Measures to prevent or control the simultaneous or sequential involvement of a relevant person in separate services or activities where such involvement may impair the proper management of conflicts of interest.

a. Chinese Walls

Another method by which Alchemy can manage conflicts of interest is to establish and maintain internal arrangements restricting the movement of information within the Company. This requires information held by a person while carrying on one part of our business to be withheld from, or not to be used by, persons with or for whom we act while carrying on another part of our business. Such an arrangement is referred to as a Chinese Wall.

The FCA's rules with regard to Chinese Walls are set out in SYSC 10.2. Alchemy has adopted these rules in determining its own policies with regard to Chinese Walls which is as follows:

1. When Alchemy establishes and maintains a Chinese wall it may:
 - a. Withhold or not use the information held; and
 - b. For that purpose, permit persons employed in the first part of its business to withhold the information held from those employed in that other part of the business; but only to the extent that the business of one of those parts involves the carrying on of regulated activities or ancillary activities.
2. Information may also be withheld or not used by the Company when this is required by an established arrangement maintained between different parts of the business (of any kind) in the same group. This provision does not affect any requirement to transmit or use information that may arise apart from the rules in AFS.
3. For the purpose of this rule, "maintains" includes taking reasonable steps to ensure that the arrangements remain effective and are adequately monitored and must be interpreted accordingly.



Attribution of knowledge

Where Alchemy establishes and maintains a Chinese Wall, individuals on the “other side of the wall” will not be regarded as being in possession of knowledge denied to them because of the Chinese Wall. Acting as outlined above does not amount to market abuse, making misleading statements or engaging in misleading practices.

b. Segregation of Duties

Alchemy is aware that effective segregation of duties is an important element in the internal controls of a firm in the prudential context. It helps to ensure that no one individual is completely free to commit the Company’s assets or incur liabilities on its behalf. Segregation also helps to ensure that the Company’s governing body receives objective and accurate information on financial performance, the risks faced by the Company and the adequacy of its systems.

Alchemy ensures that, in general, no single individual has unrestricted authority to do all the following:

- Initiate a transaction
- Bind the Company
- Make payments; and
- Account for it.

Where Alchemy is unable to ensure the complete segregation of duties due to its limited employee base, it has adequate compensating controls in place including the frequent review of an area by relevant senior managers. The Company ensures that its relevant persons are aware of the procedures which must be followed for the proper discharge of their responsibilities.

The Company monitors and, on a regular basis, evaluates the adequacy and effectiveness of its systems, internal control mechanisms and arrangements in relation to conflicts of interest and will take appropriate measures to address any deficiencies.

c. Disclosing an Interest

1. If arrangements made by Alchemy to manage conflicts of interest are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of a client will be prevented, Alchemy will clearly disclose the general nature and/or sources of conflicts of interest to the client before undertaking business for the client.
2. The disclosure must:
 - a. Be made in a durable medium; and
 - b. Include sufficient detail, considering the nature of the client, to enable that client to take an informed decision with respect to the service in the context of which the conflict of interest arises.

Disclosing an interest to a customer would normally be required where the Company has an interest in a transaction on which it is advising or where the Company derives, or will derive, consultancy, non-executive director or other fees from customers involved in a transaction.



Disclosure of a material interest or conflict of interest to a customer must be made in writing. Oral disclosure is to be avoided. Disclosure must be made before the customer is advised on a transaction, and there must be evidence that Alchemy has adopted all reasonable steps to ensure that the customer does not object to the firm material interest or conflict of interest.

d. Declining to Act

If Alchemy determines that it is unable to manage a conflict of interest using one of the methods described above, we should decline to act on behalf of the customer concerned.

Annex 1

Conflict of Interest Register

Name	Position	Date	Type of Conflict	Details of the conflict	Nature of potential conflict (and estimated value if known)	Action taken / Recommendations	Date implemented	Review/comments	Monitoring