

## **Management of conflicts of interest (MC101 policy)**

**4 September 2018, Reckon LLP**

1. This document sets out a policy for the management of potential conflicts of interest.
2. We work for a diverse client base. Our clients frequently have interests or positions that conflict with each other.
3. We operate on the basis of first come, first served.
4. Before accepting any assignment, we check whether there are reasons why we cannot act. In particular, we examine the following points:
  - (a) Whether anyone might be unduly harmed as a result of non-public information known or available to members of the prospective project team. For example, we would not help one party to a dispute if we had previously seen non-public information about the matter in dispute from another party or a regulatory authority, unless the information had been restricted to individuals not involved in the prospective project team and our information separation arrangements were acceptable to all parties.
  - (b) Whether the new assignment would put members of the prospective project team in possession of non-public information that could prejudice their ability to deliver existing assignments or give rise to any undue harm.
  - (c) Whether we have satisfied any applicable contractual obligation to inform or seek clearance from any current or past clients before undertaking the proposed assignment.
  - (d) Whether the award of the new assignment could reasonably be seen as an improper reward or as a remuneration for an improper information disclosure.
  - (e) Whether Reckon LLP, any of its partners, or any members of the project team, have a material interest in the outcome of the work under the new assignment, and whether these have been disclosed to the prospective client.
5. If we have a doubt, we explain the issue to the clients that may be affected, insofar as we can do so without breaching confidentiality obligations.
6. We do not accept any new assignment unless we are confident that there are no valid reasons why we cannot act, and unless we have understood and accepted the consequences of taking on the new assignment, including any restraints on future conduct resulting from confidentiality obligations, laws on insider trading, or any of the points listed above.