



## Conflicts of interest policy

Fusion Wealth Platform

Version 3.3 – September 2023

## Policy overview

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### What do we mean by conflict of interest?

Fusion Wealth is an investment platform, delivering services through advisers to a wide range of investors, including a variety of products and services provided by third-party product providers.

We have a responsibility to our clients to actively manage conflicts of interest as part of our ongoing commitment to treating our clients fairly. A conflict of interest in this context means a situation or circumstances where we may be in a position to do things for the benefit of the company rather than the benefit of our clients.

We accept that potential conflicts of interest may arise in the normal course of business, so we conduct regular reviews to identify and address any perceived or potential conflicts of interest and manage these appropriately, to ensure that the business is managed with the appropriate level of due care and diligence.

This document covers the potential conflicts of interest arising in the course of business between Fusion Wealth, its employees, its partners, and its clients that could significantly impact the interests of Fusion Wealth's clients in the absence of adequate controls.

There are several ways that a conflict of interest may arise which are considered below.

### Key considerations

Key considerations include:

- Does Fusion Wealth have the opportunity to make a financial gain or avoid a financial loss at the expense of the client?
- Does Fusion Wealth have a financial or other incentive that favours the interests of one or more clients over the interests of others?
- Does Fusion Wealth provide a comprehensive service with a transparent pricing structure that allows clients to compare alternative offerings?

### Policy

We manage potential conflicts of interest by having appropriate systems and controls in place. These take the form of individual policies and written procedures. The aim is to ensure that accurate records are maintained in all situations where the potential for a conflict could arise.

It is our policy to disclose any interests that could potentially conflict with our duties. In the event that it is not possible to manage a particular potential conflict of interest through the procedures and controls we have in place, we would disclose this to the client or clients whose interests may be compromised. We may decline to act in circumstances where a conflict of interest cannot be managed or where there is a risk of damage to the interests of any client.

## Potential conflicts

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### Personal account dealing (general)

#### Potential conflict of interest

Employees of Fusion Wealth who have access to information not available to the wider public (e.g. regarding pending transactions in securities) could use such information to carry out transactions for themselves in the same security in order to benefit financially, which would constitute insider dealing.

#### Control

Fusion Wealth is a wholly owned subsidiary of Benchmark Capital Limited (Benchmark). Benchmark has a comprehensive Personal Account Dealing Policy which applies to all employees, contractors and the long-term

in-house staff of outsourced service providers, as well as to anyone closely connected to them, such as spouses or family members, and requires them to obtain prior written approval from appropriate senior management within Fusion Wealth's compliance department before dealing on a personal account, except in respect of dividend reinvestment plans, discretionary managed accounts, or regular savings, investment, or trading plans. A log of transactions is maintained, and this is reviewed regularly by the Executive Board.

## Personal account dealing (Schroders PLC)

### Potential conflict of interest

Fusion Wealth Limited is a wholly owned subsidiary of Benchmark. Benchmark is owned by Schroder Administration Limited. Employees who are exposed to information such as release of company results, trading statements, business venture announcements prior to market disclosure could use such information to carry out transactions for themselves in the same security in order to benefit financially.

### Control

Any staff member wishing to buy or sell Schroders PLC shares must obtain specific compliance approval in advance of trading, and will be required to execute the trade before the market closes the following business day. A duplicate contract note must be provided to compliance within 5 working days for record keeping purposes. This requirement is part of Benchmark Capital's Personal Account Dealing Policy and is designed to ensure that Schroders PLC shares are not traded by staff during closed periods, for example preceding market disclosure events, or by any employee who may be considered an 'insider' in relation to a confidential project.

## Order handling

### Potential conflict of interest

The processes involved in the execution of trades could allow us to prioritise pending deals for one or more clients which may disadvantage other clients.

### Control

The Financial Conduct Authority (FCA) rules require us to treat clients fairly, and Fusion Wealth takes all reasonable steps to obtain the best possible result when orders to buy or sell are placed for clients. These steps may vary depending on the type of instrument being traded, but all orders are handled in a consistent and repeatable manner. For more detailed information please refer to our **Best Execution Policy**, which is available from your adviser.

## Discretionary investment management

### Potential conflict of interest

Where we provide discretionary investment management through our Model Portfolio Service, trading decisions may be made on the basis of Fusion Wealth's own interests rather than client interests.

### Control

The Fusion Wealth Investment Committee is responsible for all investment decisions relating to the Fusion Wealth Model Portfolio Service. The Investment Committee acts solely for the benefit of Fusion Wealth clients, as described within their governing documentation, and acts independently from Fusion Wealth in its capacity as platform service provider in order to achieve the best results for clients. The Investment Committee is also subject to an annual audit and ongoing compliance monitoring.

## Adviser considerations

### Potential conflict of interest

In selecting an investment platform, an adviser must reflect on the FCA's stated position that intermediaries should consider any constraints a platform imposes and whether the platform is therefore appropriate for them and their clients.

## Control

Fusion Wealth's policy of providing access to a broad range of products and investments with a transparent pricing structure eliminates the potential conflict of interest encountered where the choice of suitable investments or products is restricted, or where remuneration structures lack transparency or include bundled charges. Fusion Wealth provides significant information to advisers in order to facilitate their thorough due diligence process in order to support any recommendation or advice they may give you.

## Company ownership and directors

### Potential conflict of interest

Fusion Wealth Limited is a wholly owned subsidiary of Benchmark. Benchmark is owned by Schroder Administration Limited, a subsidiary of Schroders plc. Other subsidiaries within the Benchmark Capital group include Aspect8 Limited, Best Practice IFA Group Limited, Creative Technologies Limited, Bright Square Pensions Limited, Family Capital Limited, and Evolution Wealth Network Limited.

### Control

An Executive Board of directors has been appointed to maintain oversight and control of the subsidiaries of Benchmark Capital. Any conflict within business decisions is managed appropriately by the Executive Board to ensure that client interests are represented in all decisions made.

## Group interests

### Potential conflict of interest

The Fusion Wealth SIPP is provided by Bright Square Pensions which, like Fusion Wealth, is a wholly owned subsidiary of Benchmark Capital. Benchmark Capital could exert undue influence over Fusion Wealth to prioritise the interests of the group over the interests of clients by promoting Bright Square Pensions favourably in relation to other third-party SIPP providers.

### Control

Fusion Wealth acts independently from Bright Square Pensions in its capacity as platform service provider in order to achieve the best results for clients. Fusion Wealth has a policy of providing a 'whole of market' offering with a transparent pricing structure and provides significant information to advisers in order to facilitate their thorough due diligence process.

## Ongoing review and monitoring

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We will keep this Conflicts of Interests Policy, and all associated policies referred to within this Policy, under continual review and carry out a formal review annually. Additionally, our approach to compliance with the various policies will be regularly monitored to ensure that our clients are properly protected.

If you wish to discuss the above or have any further questions please contact your adviser.

**Important information:** Fusion Wealth Limited is authorised and regulated by the Financial Conduct Authority, the registration number is 541404. Registered office: Broadlands Business Campus, Langhurst Wood Road, Horsham, West Sussex, England, RH12 4QP. Registered in England and Wales No 07469060.