Spiko UK
Policy on identifying, preventing and managing conflicts of interest

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1. Introduction

Spiko UK Ltd ("Spiko UK") operates as an Appointed Representative ("AR") of RiskSave Technologies Ltd ("RiskSave"), a firm authorised and regulated by the Financial Conduct Authority (the "FCA"). As such, Spiko UK is subject to the applicable regulatory requirements relating to the identification, prevention and management of conflicts of interest, in particular the FCA's rules on conflicts of interest.

The purpose of this document is to present the framework implemented by Spiko UK in order to:

- identify situations likely to generate a conflict of interest;
- prevent the occurrence of such situations through appropriate organisational and procedural measures;
- manage and document actual conflicts of interest;
- inform clients, where applicable, when the measures taken do not allow, with reasonable certainty, the absence of any impact on their interests to be guaranteed.

2. Definition of a Conflict of Interest

A conflict-of-interest situation corresponds to any situation in which Spiko UK or one of its employees is confronted with multiple or divergent interests, likely to influence the objective exercise of the functions performed to the detriment of the interest of one or more clients.

Conflicts of interest may arise:

- between Spiko UK and a client;
- between Spiko UK and a related company;
- between two clients;
- between an employee of Spiko UK and a client;
- or between a client and a business partner of Spiko UK.

3. Conflicts of Interest Identification Framework

Spiko UK maintains a mapping identifying situations likely to give rise to a conflict of interest, taking into account its size, the organisation of the company, and the nature and complexity of its activities.

The mapping is reviewed as often as necessary, in particular following any internal or external event likely to generate a new potential conflict-of-interest situation previously unidentified.

4. Conflicts of Interest Prevention Framework

Spiko UK has implemented a conflicts-of-interest prevention framework based on several pillars.

- **Organisational Measures**

Spiko UK implements a separation of functions and responsibilities in order to avoid any situation of self-monitoring or self-validation, as well as information barrier arrangements intended to prevent any inappropriate circulation of confidential information.

- **Procedural and Ethical Measures**

Spiko UK has implemented several internal procedures aimed at preventing conflict-of-interest situations. These procedures define, in particular, the applicable rules relating to professional ethics, internal organisation and the selection of service providers. They contribute to ensuring the objectivity of decisions taken, the primacy of clients' interests and compliance with applicable regulatory requirements.

- **Awareness**

Spiko UK ensures that all its employees are adequately aware of the principles of professional ethics and the rules applicable to the management of conflicts of interest.

5. Conflicts of Interest Management Framework

Where a conflict of interest is identified by an employee, the latter must immediately notify the Compliance department of Spiko UK, which will determine the measures to be adopted.

Where a conflict of interest is identified, the Compliance department of Spiko UK is responsible for qualifying the reported situation in order to determine whether it is detrimental to one or more clients, for determining the corrective or preventive measures to be implemented, and for documenting the actions taken in a dedicated register.

6. Client Information

Where the measures taken are not sufficient to guarantee, with reasonable certainty, that the risk of harm to a client's interests is eliminated, Spiko UK communicates clearly and in detail the nature and source of the identified conflict.

This information is provided on a durable medium, prior to the execution of the relevant transaction, in order to enable the client to make an informed decision.

7. Contact

For any question relating to this policy, please contact:

- by email, at the following address: contact@spiko.io
- by post, at the following address: Spiko UK Ltd - 6th Floor, One London Wall, London, United Kingdom, EC2Y 5EB