

Conflicts of Interest Policy Statement

Top things to takeaway



Conflicts must be managed

Identified, prevented, mitigated, disclosed



Employee compliance

Breaches may lead to disciplinary action



Conflicts defined

Includes personal, financial, and client interests



Early escalation expected

Employees must promptly notify leadership



Client notification mandatory

Written notice within one working day



Confidentiality always required

Client information protected and restricted

Proprietary Notice

Information contained in the document is accurate to the best of Node4's knowledge at the time of publication and is required to be treated as confidential at all times. Information presented herein may not be used, copied, disclosed, reproduced, or transferred to any other document by the recipient, in whole or in part, without the prior written authorisation from a Node4 authorised representative.

Version control and ownership

Policy owner: Kate Lincoln

Version no	Date	What changed	Changed by	Approver
1.0	21/03/2025	Approved version	Eddie Adams	Kate Lincoln
1.1	15/04/2026	Rebrand	Eddie Adams	n/a

What is this policy for?

This policy sets out how Node4 identifies, prevents, manages and (where required) discloses conflicts of interest that may arise in the provision of services. It defines what a conflict of interest is, explains how employees must recognise and escalate potential conflicts, and describes the controls Node4 uses to protect clients, the organisation and its employees, including requirements for confidentiality and timely written notification to clients where a conflict is identified.

Who is this policy for?

This policy applies to all Node4 employees, including contractors and any other individuals acting on behalf of Node4, who may influence or be involved in providing services to clients. It is relevant to anyone who could create, identify, or be exposed to actual or potential conflicts of interest (including personal, financial, or business interests), and must be followed whenever dealing with clients, potential clients, third parties, or confidential information.

Contents

Top things to takeaway	1
Proprietary Notice	2
Version control and ownership	2
What is this policy for?	2
Who is this policy for?	2
Contents	3
Policy Statement	4
What is a “Conflict of Interest”?	4
Identifying Conflicts	4
Managing Conflicts of Interest	5
Independence Policy	5
Confidential Information	6
Review	6
Contact Information	6

Policy Statement

Node4 is committed to maintaining the highest of ethical standards and complying fully with its regulatory and legal obligations. Node4 conducts its business according to the principle that it will manage conflicts of interest fairly, both between itself and its clients, and between one client and another.

Compliance with this Conflict-of-Interest Policy is a requirement for each of Node4's employees and any breach may lead to disciplinary proceedings, up to and including dismissal.

What is a “Conflict of Interest”?

A conflict of interest arises when Node4, or one of its employees, is providing a service to a client, which competes with the interests of another Node4 client and/or the interests of Node4's own account and/or the interest of a Node4 employee who is involved in providing the service to the client. For example, where Node4 or its employee:

- could make a financial gain, or avoid a financial loss, at the expense of the client; or
- 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; or
- has a financial or other incentive to favour the interest of another client, or group of clients, over the interests of the client; or
- 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 fee for that service.

This list is not exhaustive and all Node4 employees staff must consider all services and activities carried out by Node4 in order to identify any conflicts that may arise.

Identifying Conflicts

Node4 is required to take all appropriate steps to identify conflicts of interest within the organisation, between its clients, and between the interests of different clients, that arise in the provision of services.

The following section details some of the conflicts that can arise and have been identified by Node4, however Node4 expects its employees to recognise and escalate to Node4 Leadership. Equally, employees must not put themselves in a position in which their personal interests, financial or otherwise, might influence or give the appearance of influencing any action taken, judgement made, or advice given on behalf of Node4.

Node4 will notify a client on becoming aware on a conflict of interest with written notice within one working day of becoming aware of the conflict of interest. The notification will contain as a minimum the following information:

- the identity of the third party, including any individuals;
- the nature of the relationship;

- any representations made by the Contractor or the third party;
- a detailed account of action required and/or taken to mitigate the risk and impact of the Conflict of Interest on the client.

Node4 has in place policies and procedures designed to manage conflicts of interest. Such policies and procedures, together with training and internal guidance given by Node4, are used to help employees identify circumstances which may give rise to potential conflicts of interest and provide them with the necessary tools to manage any such conflicts. In addition, all employees are made aware of Node4 escalation procedures for ensuring Node4 Leadership's consideration of material conflicts issues.

Node4 requires all employees to share relevant information that allows Node4 to consider and identify the general conflict circumstances of the organisation at Exec level at the earliest opportunity.

Managing Conflicts of Interest

Node4's first priority is to identify potential conflicts of interest inherent in its business model and, wherever possible, prevent them or put in place reasonable steps to mitigate them. In the event that a conflict of interest cannot be prevented, it will be managed. Node4 has established a number of internal approaches and rules to manage conflicts of interest. These approaches and rules are subject to ongoing monitoring and review processes and include, but are not limited to:

Independence Policy

Node4 is committed to ensuring that its business activities and those of its employees are conducted with the highest level of integrity and independence. To achieve this, Node4 will disregard any significant personal or business interests it may have when making recommendations or arranging transactions for its clients. This policy ensures that, in providing services, Node4's employees act independently of any interests that may conflict with their duties to different clients or between Node4 and its clients.

All employees must disregard any personal interests, including those of their family members or any connected persons, and must not allow such interests to influence their dealings with clients or potential clients.

Where appropriate, a client should be advised of such an interest, notwithstanding this policy;

- any existing, proposed or prospective business relationship between Node4 and any third party;
- any agreement or transaction which has been, will or may be, entered into by Node4;
- the holding by interest or position of Node4 in any securities issued by the client or any third party.

The above examples are not exhaustive and Node4 and its employees are required at all times to consider the need to act independently of any conflict.

Confidential Information

Node4, in the ordinary course of business, receives non-public information relating to potential and actual clients and other parties. This information must be safeguarded and must not be disclosed to employees who do not have a legitimate need to know the information or to unauthorised third parties. It is Node4's policy that all non-public information obtained from a client or potential client or other source which has been provided in the expectation that it will be kept confidential shall be treated as confidential and shall not be shared with any other company or individual.

Review

This policy will be reviewed periodically, at least annually, and appropriate measures will be taken to address any deficiencies.

Contact Information

If you have any questions regarding this policy, please contact compliance@node4.co.uk.