Helfenstein Asset Management AG

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Conflicts of interest policy

A conflict of interest exists where our interests, or those of a related person, could interfere with our duty to act in your interest. This policy explains how we identify, prevent, disclose and manage those situations. It is part of our FinSA organisation.

1. Our model

We are paid only by our clients. We do not accept retrocessions, trailer fees or placement commissions. Advisers have no product sales targets and no variable pay linked to product volumes. We do not hold client assets, so we have no incentive to retain cash on our own balance sheet.

2. How we identify conflicts

We maintain a conflicts register. New mandates, personal account dealing, gifts, outside roles and vendor relationships are reviewed against it. Staff must disclose potential conflicts promptly.

3. Examples and how we treat them

Example A - Product providers offer a conference or research trip. We decline benefits that could influence a recommendation. Modest market-standard hospitality is recorded; anything material is refused or, if already received, disclosed and credited where it has a cash value.

Example B - Two clients want the same scarce placement. We do not favour the larger fee. Allocation follows a pre-set fairness rule documented on the register.

Example C - We help you choose a custodian bank. We receive no payment from banks for introductions. The comparison is written and uses custody price and service quality, not our convenience.

Example D - An adviser or related person holds a personal position in a security we discuss. Personal dealing is pre-cleared, restricted around client orders, and recorded. If the holding is material to the advice, we disclose it or assign another adviser.

Example E - A family member of staff seeks advice. The mandate is accepted only with a second-pair review and full fee disclosure; preferential terms that harm other clients are not permitted.

4. Residual conflicts

Where a conflict cannot be prevented, we disclose it to you in writing before we act, and we may decline the assignment. Disclosure does not replace the duty to treat you fairly.

5. Review

This policy is reviewed at least annually and after material incidents. Complaints about conflicts follow the same route as other complaints, including the FINOS ombudsman if needed.
