



COLLINS SARRI STATHAM
INVESTMENTS

CONFLICTS OF INTEREST POLICY

Summary for Clients and Prospective Clients

Collins Sarri Statham Investments Limited (CSSI)

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1. Introduction

Collins Sarri Statham Investments Limited (“CSSI”, “we”, “us” or “the Firm”) is authorised and regulated by the Financial Conduct Authority (FCA). Like all regulated firms, we may from time to time encounter conflicts of interest in the course of our business. This summary explains what conflicts of interest are, how we identify them, and how we prevent or manage them so that our clients are treated fairly and receive good outcomes.

We are required to manage conflicts of interest fairly, both between ourselves and our customers and between one customer and another (FCA Principle 8). For our retail clients, we are also subject to the FCA’s Consumer Duty (Principle 12), which requires us to act to deliver good outcomes for retail customers. The detailed rules we follow are set out in the FCA Handbook, principally in SYSC 10. We maintain a full internal Conflicts of Interest Policy; this document is a summary for clients and prospective clients.

2. What is a Conflict of Interest

A conflict of interest is a situation in which we, or someone acting on our behalf, have competing professional or personal interests that could affect our ability to act in the best interests of a client. Conflicts can arise:

- between the Firm and a client;
- between one client and another; or
- between a member of our staff’s personal interests and a client.

Examples relevant to our advisory broking business include: holding information in confidence for one client which would be useful to another; advising one client to buy a security while advising another to sell it, reflecting their different objectives; the way our staff are remunerated; the research notes we publish as marketing communications; and the personal investment dealing of our staff.

3. How We Identify Conflicts

We have arrangements to identify conflicts that may damage a client’s interests. In doing so, we consider in particular whether we, or a member of our staff, might: make a financial gain (or avoid a loss) at a client’s expense;

have an interest in the outcome of a service or transaction that is different from the client's; have an incentive to favour one client over another; or receive a benefit from someone other than the client in relation to a service we provide to that client.

4. How We Prevent and Manage Conflicts

Our policy is to prevent conflicts wherever possible and to manage fairly any that do arise, so that no client is disadvantaged. The arrangements we maintain include:

- clear internal procedures and supervision of our advisory and dealing activities;
- controls over how confidential information is handled within the Firm;
- a personal account dealing policy under which staff must obtain prior approval before dealing for themselves, so that they cannot act to the detriment of clients;
- remuneration arrangements designed to encourage good compliance and customer outcomes, and which are operated so as not to conflict with delivering good outcomes for retail customers;
- clear labelling of our research notes as marketing communications, which do not constitute investment advice or independent research; and
- registers in which we record gifts, entertainment, personal account dealing and outside interests, together with any conflicts that arise.

Our Compliance function oversees and monitors these arrangements, and our Board provides governance oversight. The FCA expects firms to prevent and manage conflicts rather than relying on disclosure, and that is our approach.

5. Disclosure

If, in a particular case, our arrangements are not sufficient to ensure with reasonable confidence that a client's interests will not be damaged, we will, as a last resort, tell the affected client about the nature and source of the conflict and the steps we have taken to manage it, before we carry out the relevant business. We will provide this information in a durable medium and in sufficient detail to allow the client to make an informed decision.

6. Further Information

This document is a summary. If you would like more information about how we manage conflicts of interest, or wish to raise a concern, please contact our Compliance Department using the contact details on our website.

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