

# Conflict of Interest Statement

The Wealthtime Group's\* main activity is to provide financial advisers with comprehensive platform services which allows them to provide their customers with an online investment platform, supported by a level of offline service that achieves good customer outcomes and helps meet their personal financial objectives. Wealthtime Group also provides access to a range of tax wrappers, which can be used to facilitate the purchase of a range of financial instruments.

## What is a conflict?

A Conflict of Interest is a situation where the Wealthtime Group, any company within the Group, such as any of its employees or anyone else involved in running the business is subject to competing influences which might adversely affect decision-making or outcomes in the course of conducting business. From time to time, Wealthtime may have interests that conflict with our clients' interests or with the duties that we owe to our clients.

Conflicts can arise between:

- one client and another;
- Wealthtime and a client;
- an employee and a client;
- an employee and Wealthtime; or
- one part of the Wealthtime Group and another.

## How do we manage conflicts?

Wealthtime has taken steps to identify, record, and manage conflicts of interest that exist within its business, Wealthtime's policy is to take all reasonable steps to maintain and operate effective organisational and administrative arrangements to identify, record and manage conflicts. The steps we take include restricting the flow of, or access to, information where appropriate; ensuring that employee activities are visible to, and monitored by, management, segregation of duties and appropriately structuring employee remuneration. Conflicts are managed by the business with oversight from the Risk and Compliance function. All conflicts are maintained within the firm's conflicts of interest register and reviewed annually. Wealthtime will disclose any identified conflict of interest where management are not reasonably confident that the organisational arrangements are sufficient to ensure that risks of damage to the interests of a client will be prevented. Any disclosure will clearly disclose the general nature and sources of conflicts of interest, as well as the steps taken to mitigate those risks, to the client before undertaking business for the client. Further details of our Conflicts of Interest Policy are available on request.

\*Wealthtime Group consist of: Novia Financial PLC, Copia Capital Management (or 'Copia') as a Novia Financial PLC brand, Wealthtime Limited.

If you require this document in an alternative format please contact us.

Wealthtime is a trading name of Novia Financial plc. Novia Financial plc is a limited company registered in England & Wales. No. 06467886. Registered office: Cambridge House, Henry St, Bath, BA1 1JS. Novia Financial plc is authorised and regulated by the Financial Conduct Authority. FCA Number 481600.

Wealthtime Classic is a trading name of Wealthtime Limited. Wealthtime Limited is a private limited company registered in England & Wales. No. 06016480. Registered Office: 1 London Road Office Park, London Road, Salisbury SP1 3HP. Wealthtime Limited is authorised and regulated by the Financial Conduct Authority. FCA Number 468461.