



Wilson & Wilbur

Modernizing Expert Advice



Conflict of Interest Policy

This Policy aims to identify, manage, and mitigate potential conflicts of interest that may arise in our business activities. This Policy ensures that all employees, directors, and stakeholders act in the best interest of the Firm and its clients.

Definition of Conflict of Interest

A conflict of interest occurs when an individual's personal interests, relationships, or activities could interfere with their ability to act impartially and in the best interests of the Firm and its clients. Conflicts of interest may involve financial interests, personal relationships, or other situations where personal or financial considerations may compromise professional judgment.

Identifying Conflicts of Interest

- **Personal Financial Interests:** Employees and directors should avoid any financial interest in entities that the Firm does business with or provides advisory services to, if such interests could influence their professional decisions.
- **Outside Employment or Business Activities:** Employees and directors must disclose any outside employment or business activities that could potentially conflict with their responsibilities to the Firm.
- **Personal Relationships:** Employees and directors should disclose any personal relationships with clients, suppliers, or competitors that could influence their professional decisions.
- **Gifts and Entertainment:** Employees and directors should avoid accepting gifts, entertainment, or other benefits from clients, suppliers, or other stakeholders that could be perceived as influencing their professional judgment.

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Disclosure and Reporting

- **Disclosure Requirement:** Employees and directors must promptly disclose any potential or actual conflicts of interest to their supervisor or the Firm's Compliance Officer.
- **Reporting Process:** Disclosures should be made in writing and include details of the nature of the conflict and the individuals or entities involved.

Managing Conflicts of Interest

- **Mitigation Measures:** The Firm will implement appropriate measures to manage and mitigate conflicts of interest, which may include:
- **Recusal:** Individuals with a conflict of interest may be required to recuse themselves from decision-making processes related to the conflict.
- **Segregation of Duties:** Separating responsibilities to avoid conflicts and ensure impartiality.
- **Disclosure to Clients:** Informing clients of any potential conflicts that may affect their advisory services.

Approval of Transactions

Certain transactions or decisions involving potential conflicts may require prior approval from the Firm's Leadership.

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Consequences of Non-Compliance

Failure to disclose or manage conflicts of interest may result in disciplinary action, which could include termination of employment or other consequences as deemed appropriate by the Firm.

Policy Review and Updates

This Policy will be reviewed annually and updated as necessary to ensure it remains effective and compliant with relevant regulations and industry standards.

**For more information, please
contact us**

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