

Conflict of Interest Policy

Freisenbruch Insurance Services ("FIS") is a company incorporated and registered in Bermuda whose registered office is at 75 Front Street, Hamilton Bermuda, HM11.

In drafting this policy, FIS is acting in accordance with the legal and statutory requirements by which it must abide as a broker and agent, notably:

- The Insurance Code of Conduct August 2016
- The Insurance Brokers and Insurance Agents Code of Conduct 2019
- The Insurance Act 1978

In accordance with the aforementioned legislation and regulations, and in the interests of its clients, FIS endeavors to market its products and services in an honest, fair and professional manner and ensure that if there is a conflict of interest that the conflict of interest is appropriately managed, including establishing and implementing policies and procedures related to appropriate disclosure and segregation of duties.

In certain circumstances, we may act for your insurer, for example, where we have delegated underwriting authority and/or claims settlement authority, or where we have entered into a managing general agency agreement with one or more insurers. In cases where we are acting on behalf of the insurer, we will be acting as their agent.

FIS seeks to prevent conflicts of interest, specifically conflicts of interest that may harm the interests of one or more of its clients when these interests come into conflict with those of an insurance intermediary, those of other clients, of FIS itself, or those of one of FIS's staff members who are consider the person concerned.

Circumstances may arise where we have a conflict of interest between us (including our managers, employees or agents) or another of our group companies and you, or between you and another of our clients. We always aim to treat you fairly and avoid conflicts of interest. We never deliberately put ourselves in a position where our interests, or our duty to another party, prevent us from discharging our duty to you. In arranging an insurance solution that meets your demands and needs, we will ensure that our duty to you does not conflict.

We may act as agent of an insurer under a delegated underwriting authority and/or delegated claims settlement authority. In these instances, where we act as your agent for your insurance needs we will always act in your best interests when arranging your policy. As part of paying your claim, your insurer may require us to deduct the value of sums due (such as premiums or instalments under a credit scheme) before sending the balance of any claim's payment to you.

We follow our own conflict management policies and procedures (for example, using information barriers). These are designed to prevent any conflicts of interest adversely affecting or compromising your interests. However, in some cases, where we cannot be reasonably confident that we can prevent the risk of damage to your interests, we will discuss this with you. If you have any concerns in relations to conflicts of interest, please contact us.