



## Conflicts of Interest Policy 利益冲突政策摘要

(Effective: 1st November 2007 / 自 2007 年 11 月 1 日开始生效)

This policy covers conflicts that may arise between the company or an employee of the company and its clients, as well as between clients. The firm's senior management is responsible for ensuring that the systems, controls and procedures in place are robust and adequate to identify and manage a conflict as and when it arises. These procedures are regularly reviewed by the Compliance Department in order to ensure that they are up to date, reflect best practice and that all the necessary activities and regulations are covered.

本政策包含可能发生在CCC或本公司雇员与公司客户之间的冲突以及客户与客户之间的冲突。CCC高级管理层有责任确保公司的制度、管理和程序健全，并在冲突发生时足以作出识别及处理。合规管理部会定期复核这些程序，以保证程序得以及时更新和有效地实施，且包含所有相关活动和规章。

### Guarding Against Conflicts of Interest

#### 预防利益冲突

Different systems and procedures have been put in place to minimise any potential for conflicts of interest. This list, although not exhaustive, includes:

已实施不同制度和程序将任何利益冲突的潜在性降至最低。下述内容虽然并非详尽无疑，已包括：

- Personal account detailing requirements within the firm  
制订公司内部个人账户的详细要求。
- Chinese walls preventing the flow of information between individual departments where a conflict may exist  
利用防火墙防止信息在公司各部门流通。
- A gifts and inducements policy  
表扬和奖励政策。
- Segregation of duties where a potential conflict of interest may arise if duties are carried out by the same individual  
职权分离，避免由一人兼任数职而可能出现的潜在性利益冲突。
- A public disclosure policy ("whistleblowing") for the firm  
制订公众披露政策。

### Disclosure

#### 冲突披露

Where we are aware of a conflict we will disclose it to our clients prior to undertaking investment business for the clients or, if we do not disclose it, we will manage the conflict in line with our policy and procedures. In some cases we may decide not to proceed with a transaction which has given rise to a conflict of interest.

无论何时当我方意识到冲突的出现，我方将会按照我方的政策和程序处理冲突。在我方无法有效处理冲突或我方认为有必要披露时，我方将会向相关客户披露该冲突。在某些情况下，我方可能会决定不再继续进行引起利益冲突的交易。

Any further questions on this matter should be addressed to our Compliance Department.

若您有任何疑问，请与本公司合规部联系：

Compliance Department  
City Credit Capital (UK) Ltd  
Tower 42, 20th Floor  
25 Old Broad Street  
EC2N 1HQ  
UK

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Should there be any discrepancy between the English and Chinese version, the English version shall prevail.  
此中文译本只供参考之用，如与英文有任何歧异，概以英文为准。

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