

Overview

Management of commercial conflicts is of the highest importance to Omni Bridgeway and this Commercial Conflicts Guide (**the Guide**) describes our approach to ensuring all commercial conflicts of interest across our business are identified and appropriately managed.

What is a commercial conflict of interest?

As an asset manager of legal risk assets we provide financing to many different organisations in relation to disputes against all types of counterparties, including sovereigns, corporates, individuals and various other forms of legal entity. Omni Bridgeway has obligations to a number of different stakeholder groups, including its shareholders, its clients, its investors and its employees. Assessing and managing the potential commercial conflicts in the conduct of the business is an important function of our on-boarding process for new business.

A commercial conflict of interest may exist where a commercial interest of Omni Bridgeway, or one of its personnel, is actually, potentially, or apparently inconsistent with or divergent from a commercial interest of one or more of Omni Bridgeway's stakeholders. Whilst we would never finance opposing parties in the same proceeding, there are other potential, apparent conflicts which will be context specific and require careful analysis.

Identification of Commercial Conflicts

Omni Bridgeway has a comprehensive conflict screening process in place to identify any potential commercial conflicts of interest.

Management of Commercial Conflicts

Omni Bridgeway's approach is to manage all identified actual, potential or apparent commercial conflict of interest where possible through the implementation of appropriate mitigating steps.

By way of example, Omni Bridgeway may be financing Party A in a dispute with Party B whom it financed in an unrelated dispute with Party C two years ago. Our systems and processes would identify that potential commercial conflict and an assessment would be made, through application of our management procedures, whether that potential commercial conflict resulted in an actual conflict and, if so, whether it could be fully mitigated by appropriate steps, such as the implementation of information barriers.

Omni Bridgeway acknowledges that certain commercial conflicts of interest can only be managed by determining not to provide its products and services in a particular situation. An obvious example of this would financing a claimant and defendant in the *same* proceeding.

Monitoring, managing and recording conflicts

All identified potential or actual conflicts are recorded in a centralised conflict management system which is regularly reviewed.
