Conflicts of Interest Summary

Identifying and managing conflicts of interest

In accordance with our obligations to you, we seek to ensure that our clients are properly treated where there are or could be conflicts of interest.

What conflicts of interest could arise?

The nature of the financial services market is such that conflicts of interest can sometimes develop. Broadly, a conflict of interest occurs when the interests of a financial services provider are different from those of its clients or where discharging its duties to one client could make it difficult to comply with the duties owed to another client.

How are conflicts managed?

We operate a Conflicts of Interest Policy which is communicated to all relevant employees, and which identifies the types of conflict that may arise and provides instructions on the management of those conflicts.

Under the policy we maintain a record of identified potential conflicts. We regularly review our business to identify potential conflicts of interest and to assess whether we are taking appropriate steps to manage those that could have an adverse effect on clients. Formal reports are made to the Board in relation to Conflicts of Interest.

There are also specific policies and procedures on when and how employees are permitted to undertake personal account transactions, restrictions on the offering and receiving of gifts to or from clients, and an outright ban on any gift that could be construed as an inducement.

As part of our conflicts management policy, we also consider the way in which our staff are remunerated, to ensure that remuneration structures do not create a conflict between incentives given to staff and our clients' best interests.

A copy of the full Conflicts of Interest policy is available on request.

Conflicts of Interest Summary v2, May 2025