

## Summary of our approach to Conflicts of interest

Our Conflicts of Interest Policy provides the framework within which we aim to meet clients' expectations and deliver fair outcomes.

We believe our current organisational structure, together with our systems and controls for managing conflicts of interest, provides an effective way of preventing conflicts of interest and avoiding your interests being unfairly affected.

We will always seek to manage any conflict of interest that arises. If we are not able to manage a conflict with reasonable confidence, we will disclose to you the nature and source of the conflict before we undertake any further business for you. This will help you decide whether you want to do (or continue to do) business with us.

Our staff are trained to recognise conflicts of interest and they are expected to take appropriate steps to avoid or manage those conflicts.

Our Order Execution Policy sets out the criteria by which we manage client's order and mandate and details how we try to obtain the best possible results for you.

Our staff are not permitted to accept or offer any gift or other benefit which is likely to conflict with your best interests.

Our staff are expected to comply with our Personal Account Dealing Policy and Procedures to prevent any conflicts arising from the use of client's information.

Our Whistleblowing Policy ensures that staff can report confidentially any wrongdoing by others.

Any personal data collected and/or processed by us will be carried out responsibly and in accordance with applicable law and regulation.

We keep all our policies and procedures, including the Conflicts of Interest Policy, under review and monitoring is in place to ensure all staff comply with them.