Conflicts of Interests Policy

In accordance with the EU Markets in Financial Instruments Directive (MiFID) and the rules of our regulators, the Financial Conduct Authority, this document sets out a summary of our policy for the identification, recording, management and resolution of conflicts of interest.

A conflict of interest can be defined as a financial or other interest that may result in a decision being made which is not in the best interests of clients.

For the purposes of this policy, a conflict of interest is a situation where competing obligations or motivations of persons result in, or are likely to result in, one of the following outcomes:

Equiniti must take all appropriate steps to identify and to prevent or manage conflicts of interest between:

- Equiniti, including its managers, employees and appointed representatives (or where applicable, tied agents), or any person directly or indirectly linked to them by control, and a client of the firm; or
- one client of the firm and another client;

In order to prevent this risk and to strengthen the confidence of our customers, a series of policies, procedures and controls designed to identify, record, manage and resolve conflicts of interest have been implemented.

If arrangements to manage conflicts of interest are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of a client will be prevented, we will fully and clearly disclose any general or specific conflict to that client before undertaking business for them. At the time of the issue of this document no material conflicts of interest were identified which could not be managed without detriment to any clients.

Our conflicts of interest policy is reviewed annually to ensure it continues to comply with relevant laws and remains relevant and effective.

Our full policy is available upon request, by calling the Customer Experience Centre on 0345 300 0430.

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