



Slater Investments Limited

Conflicts of Interest Policy

October 2019

Conflicts of Interest Policy

Slater Investments Limited (SIL) faces actual and potential Conflicts of Interest periodically. It is the firm's policy to take all reasonable steps to maintain and operate effective organisational and administrative processes to identify and manage conflicts. This document constitutes SIL's policy with respect to conflicts of interest. A potential conflict of interest arises if you are compromised personally and/or professionally in your duty to act in the best interest of SIL and/or its Clients. It is recognised that potential conflicts of interest do arise from time to time. It is the firm's policy to avoid conflicts of interest wherever possible. In order to deal with such conflicts the firm has devised policies and procedures to deal with any actual or perceived conflict of interest. Clients' interests must be protected at all times.

If conflicts cannot be avoided then full disclosure must be made to our clients and to their advisers. The firm has set up procedures that aim to minimise actual and perceived conflicts. These procedures protect our clients, our staff and the firm's reputation.

The firm maintains a conflicts of interest register detailing potential conflicts with the firm's mitigating procedures which may include disclosure to clients. The firm undertakes an annual review of conflicts of interest and a periodic review if new products are introduced.

This policy document sets out our procedures in managing new and existing conflicts and the actions we take to prevent bribery and corruption to ensure the business operates with integrity.

WHO THIS POLICY APPLIES TO

This policy applies to all SIL staff which includes members, employees, and any permanent or temporary contractors.

CONFLICT OF INTEREST COMMITTEE

SIL's Risk Committee will act as the Conflict of Interest Committee and will deal with any related matters as well as the annual review of conflicts register.

ANTI-BRIBERY AND CORRUPTION

Under the Bribery Act 2010 it is a criminal offence to:

- Offer, promise or give a financial advantage to another person whether within the UK or overseas, for the purposes of inducing or rewarding improper conduct;

- Request, agree to receive or accept a financial or other advantage for or in relation to improper conduct;
- Bribe a foreign public official where the intention is to influence them and obtain or retain business.

Instances where bribery or corruption may have common factors to circumstances where conflicts of interest may arise and therefore both are dealt with in the policy that follows.

Members of staff are reminded that the Bribery Act relates to all business, whether conducted in the UK or overseas.

All of SIL's business is UK based, however should business be conducted outside of the UK, members of staff are reminded that, in addition to complying with the Bribery Act, they should also comply with the anti-bribery and anti-corruption legislation in the relevant jurisdiction.

For more information please refer to the Anti-Bribery Policy and Procedures Statement.

POTENTIAL CONFLICT OF INTEREST

❖ SENSITIVE INFORMATION

Occasionally SIL will receive sensitive information regarding companies in which it invests in on behalf of clients. Should such information be received it is logged on the Embargo List, which then is monitored by Compliance against any transactions entered to ensure compliance with the regulations.

❖ DECLARATION OF INTERESTS IN THIRD PARTY COMPANIES

All members of staff must declare any interest in any third party company that SIL is involved with (or conducts business with) – this includes (but is not limited to) Financial Advisers/Wealth Managers, Corporate Relationships, IT Providers, and any other business relationships or outsourced services used by SIL.

In circumstances where the Risk Committee consider a conflict (which may arise) to be unmanageable, they may request the employee to relinquish that interest.

In the event of a decision as to whether an interest in which a member of staff is involved in is a conflict, this matter will be discussed by the Risk Committee. All decisions relating to a Conflict of Interest should be recorded.

❖ PRODUCT APPROVAL

SIL is the ACD/Manager of the Slater OEICs and Unit Trusts respectively. We maintain, operate and review the process for the approval of each Fund (and any new Funds we may launch) before the Fund is marketed or distributed in order to prevent conflicts of interest from adversely affecting the interests of our clients. This includes identifying the target market of end clients and ensuring that all relevant risks to that target market are assessed and

the intended distribution strategy is consistent with the target market. We also review the Funds on an ongoing basis to take into account any event that could materially affect the potential risk to the identified target market, to assess whether the Funds remain consistent with the needs of the market and whether the intended distribution strategy remains appropriate.

❖ RECEIPT OF INDUCEMENTS FROM THIRD PARTIES

SIL does not receive any fee or commission or provide or are provided with any non-monetary benefit in connection with the provision of an investment service or ancillary service, to or by any party except our client or on behalf of the client, other than where the payment or non-monetary minor benefit is designed to enhance the quality of the relevant service to the client and does not impair compliance with our duty to act honestly, fairly and professionally in accordance with the best interests of the clients.

❖ REMUNERATION AND OTHER INCENTIVE STRUCTURES

The Directors have a very clear Remuneration policy which ensures employees are not remunerated or have their performance assessed which may in any way conflicts with their duty to act in the best interests of its clients. In particular it does not make any arrangements by way of remuneration, sales targets or otherwise that could provide an incentive to our employees to recommend a particular product to a client when we could offer another product that would better meet the clients' needs.

❖ DECLARATIONS OF OUTSIDE DIRECTORSHIPS

If any member of staff holds or intends to hold an outside Directorship this must be reported to the Directors of SIL on joining or before the directorship is undertaken and included in the conflicts register.

❖ PERSONAL ACCOUNT DEALING

All members of staff are covered by the Personal Account Dealing policy contained within the Compliance Manual. The policy has been designed to ensure clients are not disadvantaged and that conflicts are extinguished at the earliest opportunity. Specific confirmation is sought from all new joiners that they have read, understood and agree to abide by the policy.

Pre-approval must be sought from a Director and Compliance when wishing to conduct any personal dealing. Monitoring is conducted on monthly basis to ensure compliance with the rules and management are informed of any issues arising.

❖ GIFTS AND CORPORATE HOSPITALITY

Clients and brokers, for a variety of reasons, may offer gifts to employees such as annual celebrations or to commemorate the completion of a large and/or complicated transaction. Care must be taken to ensure that such gifts cannot be construed as an inducement to provide

a service more favourably to that client or broker ahead of another. We must at all times act in the best interest of the clients.

SIL has an Inducements, Gifts and Hospitality policy contained within the Compliance Manual which all members of staff must be familiar with.

WHAT SHOULD YOU DO?

It is the responsibility of all SIL members of staff to take all reasonable steps to ensure compliance with this policy and to prevent, detect and report any suspected bribery, fraud, corruption or breaches of this policy.

Any reports of suspicion should be directed to Compliance Department who will, where practical and appropriate, maintain confidentiality during the investigation.

WHAT HAPPENS IF PROCEDURES ARE NOT FOLLOWED?

A breach of any of the policies referred to above is considered a disciplinary offence and dealt with in accordance with SIL's disciplinary policy.

SIL members of staff are reminded that they can be held personally liable for offences under the Bribery Act. If it is suspected that an offence has been committed, SIL may report this to the appropriate authorities which may include regulatory bodies such as the FCA and the police.

If you are unsure of anything contained within this Policy or associated policies then you should contact Compliance for further training and guidance.

TRAINING

We provide periodic training to our employees on relevant commercial and regulatory elements including the need to identify and manage actual or potential conflicts of interest. This training stresses the importance of employees escalating relevant issues they become aware of to the Compliance Department.

WHISTLEBLOWING POLICY

We also have a Whistleblowing policy in place to ensure that an employee can report any potential breach or conflict in a confidential manner according to our whistle blower framework.

MONITORING

The effectiveness of this Conflicts of Interest policy is monitored by the Compliance Department as part of the SIL's regular compliance monitoring programme. This policy is reviewed annually to ensure that it meets our regulatory and compliance obligations by the Compliance and Risk Committee.