

Conflicts of Interest Policy



A 'conflict of interest' is a situation where the firm or an employee, or other associate of the firm has competing professional or personal interests, which may prevent services being provided to clients in an independent or impartial manner.

We are committed to identifying, monitoring and managing all actual and potential conflicts of interest that can or may arise between us and our clients and any person directly or indirectly associated with the firm. We are required to establish, implement and maintain a written Conflicts of Interest policy. This document provides information in relation to the policies we have in place to manage conflicts of interest.

Identifying Conflicts

We will take all reasonable steps to identify conflicts of interests that arise or may arise, in the course of the provision of service(s) to clients, between:

- the firm, including managers, employees and appointed representatives;
- any person directly or indirectly linked to the firm; and
- amongst clients of the firm.

Types of Conflicts

We will take into account whether the firm, or a relevant person, or a person directly or indirectly linked to the firm:

- is likely to make a financial gain, or avoid a financial loss, at the expense of a client;
- has an interest in the outcome of a service provided to a client;
- has an interest in the outcome of a transaction carried out on behalf of a client;
- has a financial or other incentive to favour the interest of a client or group of clients over the interests of another client;
- carries on the same business as a client;
- receives, or will receive from a person, other than a client an inducement in relation to a service provided to a client, in the form of monies, goods or services, other than the standard commission or fee for that service.

Below is a summary of the principal conflicts that could arise in our business and the steps we take to mitigate them.

Gifts & Inducements

In accordance with the Rules of our regulator, the Financial Conduct Authority, we are prohibited from accepting a fee, commission or other non-monetary benefit which is likely to conflict with the duty the firm owes to its clients.

The firm may receive non-monetary benefits from product providers or other third parties. Such benefits are typically of a modest nature and generally relate to the provision of literature, participation in seminars, training and hospitality. The provisions of such benefits are designed to enhance the quality of the services we provide to our clients.

We may occasionally receive gifts from clients and providers in recognition of services provided. We take care to ensure that these gifts are of a modest nature and do not create any obligations or debt.

Details of any gifts or inducements must be reported and recorded within our 'Gifts and Inducements' Register. Where relevant we will disclose the amount of any benefit to clients and provide further details on request.

Business Interest and Suitability

We offer advice in accordance with that disclosed to you in our 'Terms Of Business' and 'Letter Of Engagement'. Occasions may arise where we or one of our other clients have some form of interest in business being transacted for you. If this happens or we become aware that our interests or those of one of our other clients conflict with your interests, we will write to you and obtain your consent before we carry out your instructions, and detail the steps we will take to ensure fair treatment.

When we make personal recommendations in relation to specific investments we are required to take reasonable steps to ensure that the recommendation is suitable for the client's needs and circumstances.

Remuneration

Our income normally comes from either commission from the product providers (e.g. life assurance companies) we write business with, or fees paid to us by our clients. Whenever commission is available to us, you can choose whether to pay us by allowing us to keep the commission, or by paying us a fee instead. This is in line with standard industry practice. We will tell you how much any commission is before the transaction.

Alternatively, if it is agreed that we will operate on a fee basis, we will agree its basis, frequency and method in writing before we carry out any chargeable work.

We may also receive some form of benefit if we introduce business to a product provider or another firm. We will tell you before the transaction if we are likely to receive some form of benefit from recommending any product to you, or from working with any product provider or firm.

Disclosure of Conflicts of Interest

Where we identify that an actual or potential conflict of interest exists we will notify you in writing of that fact to enable you to make an informed decision about whether or not you wish to proceed.

Recording Conflicts of Interest

We will keep and maintain a record of circumstances in which a conflict of interest may arise, or has arisen, as a result of the activities carried out by the firm.

Managing Conflicts

To ensure that we manage conflicts of interest effectively, Joanne Graham will have the overall responsibility to ensure that the firm identifies and manages any conflicts of interest appropriately, effectively, and in line with the Financial Conduct Authority Rules and Guidance.

Staff Understanding

All of our employees are made aware of this policy to highlight and emphasise the importance of identifying and managing conflicts of interest.

Review

Our conflicts of interest policy is reviewed on a regular basis and at least on an annual basis.

Further Information

If you require any further information on our Conflicts of Interest policy please contact Joanne Graham on 01904 607 291.