

OUR APPROACH TO CONFLICTS OF INTEREST

Bank of Scotland is a trading name of Bank of Scotland plc, which is a subsidiary of Lloyds Banking Group plc (“us” or “we”). We have established and implemented a Conflicts Policy which governs how we seek to identify and manage actual or potential conflicts of interest (together referred to as “conflicts”), which may pose a risk of detriment to the interests of a client.

Such conflicts may arise out of our day-to-day business activities. For example, one of our clients may make a gain at the direct expense of another client, or we may have an opportunity to make a gain, but this is to the direct disadvantage of one or more of our clients. There may also be conflicts at individual colleague level or between different parts of the Lloyds Banking Group.

We have implemented systems to identify conflicts or potential conflicts, and processes that are designed to manage them appropriately. The specific nature and circumstances of any conflict identified will determine the specific action(s) we may take to identify and manage the potential conflict. Such actions include, but are not limited to:

- (i) Appointment of a Conflicts of Interest Officer for each part of our business. His/ her responsibilities include ensuring that the part of our business for which he/she is responsible undertakes the steps listed in sub-paragraphs (ii) and (iii) below
- (ii) Identifying and recording conflicts. We review the potential for conflicts in all the different types of relationships that we may be engaged in, both internal and external.
- (iii) Preventing or mitigating conflicts via implementation of appropriate controls (examples of which are listed below).

We may seek to prevent or mitigate conflicts by taking one or more of the following steps:

- (i) Prevent or control the exchange of information between individuals and entities within the organisation, where the exchange may harm the interests of you and/or our other clients. This includes the use of physical and electronic information barriers for example;
- (ii) Prevent or control the exchange of information between individuals and entities within the organisation, where the exchange may harm the interests of you and/or our other clients. This includes the use of physical and electronic information barriers for example;
- (iii) Undertake the separate supervision of our staff or colleagues (“Colleagues”) whose principal functions involve carrying out activities or services, including on behalf of clients, whose interests may conflict;
- (iv) Removal of any direct link between the remuneration of one Colleague principally engaged in one activity, and the remuneration of different Colleagues principally engaged in other conflicting (or potentially conflicting) activities;

- (i) Undertake measures to prevent or limit any individual from exercising inappropriate influence over the way in which a Colleague carries out investment activities, or contributes to and/or uses benchmarks, indices and client price setting processes;
- (ii) Refusing to accept or provide fees, commissions or other non-financial benefits from or to suppliers, which do not directly enhance the service provided;
- (iii) Decline to act, or terminate an existing relationship where necessary; and/or
- (iv) Disclosure by Bank of Scotland Directors or Colleagues of any connection that could result in a conflict that could, or may be seen to, have an effect of compromising the judgment of any Colleague.

Furthermore, the Conflicts Policy contains additional controls in relation to:

- (i) The offer or acceptance of gifts, entertainment or hospitality;
- (ii) Provision or receipt of other inducements; and
- (iii) Minimising any conflicts between a person working for Bank of Scotland and the Group and/or its clients.

Where controls do not sufficiently eliminate the potential risk of damage to clients arising from specific conflicts, then we will disclose such conflicts to you. We will:

- (i) provide details of the general nature and/or source of such conflicts of interest;
- (ii) explain the risks to you that arise as a result of the conflict;
- (iii) provide this information to you in a durable medium prior to our undertaking the relevant business; and
- (iv) Ensure that any conflicts that we have from our contribution to benchmarks is monitored and managed effectively. More information is available at: [Benchmark Transparency Statement \(bankofscotland.co.uk\)](https://www.bankofscotland.co.uk/benchmark-transparency-statement)

In some circumstances we may decline to act for you if we determine that we are unable to manage a conflict of interest using one of the methods described above.

Our Conflicts Policy may be revised, updated and/or supplemented from time to time and this will be available on our Website at <https://business.bankofscotland.co.uk/assets/25m-plus-turnover/banking-with-us/schemes-reviews-and-regulations/our-approach-to-conflicts-of-interest.pdf>

If you wish to receive further information on the Conflicts Policy or on any specific conflict of interest that you think might affect you, please contact us.