

Policy on Conflicts of Interest

We have put in place this Policy, together with our internal policies and procedures, to fulfil our obligations to identify conflicts of interest (“conflicts”) and then take appropriate steps to either manage those conflicts or, where they cannot be managed, ensure that the conflict is eliminated or there is appropriate disclosure of the conflict.

Conflicts can arise between:

- one of the A J Bell Group entities, including its managers, employees or any person directly or indirectly linked to them by us, and a client of the firm; or
- one client of the firm and another client.

Consequently, we aim to identify and prevent conflicts that may arise internally, between us and our associates, employees and our clients, and between one client and another, wherever possible.

Some examples of potential conflicts that could occur are where we could:

- make a financial gain, or avoid a financial loss, at the expense of our clients;
- have an interest in the outcome of a service provided to our clients, or a transaction carried out on behalf of our clients, which is distinct from the client’s interests in that outcome;
- have a financial or other incentive to favour the interest of one client or group of clients over the interests of another;
- carry on the same business as our client; and
- receive from a person, other than our clients, an inducement in relation to a service provided to our client, in the form of monies, goods or services, other than the standard commission or fee for that service.

If an actual conflict arises during the course of business, we will deal with it promptly. In order to do so we have procedures in place to both identify where a potential conflict might arise and to decide how we will manage it. These include policies applicable to all our staff including Personal Account dealing and Gifts and Inducements policies and a prohibition on external business interests, where such interests create a conflict with the interests of the business or our clients.

We regularly monitor any conflicts of interest to ensure they are managed correctly and we conduct an annual review of conflicts management to ensure that responsibility for conflict identification and management is allocated to appropriate and accountable individuals and that controls are in place to reduce the impact of conflicts and are reviewed on a regular basis.

Where our conflicts management arrangements are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of a client will be prevented, we will disclose the conflict to the client before undertaking business.

Regulatory

A J Bell includes A J Bell Holdings Limited and its wholly owned subsidiaries A J Bell Management Limited, A J Bell Limited and A J Bell Securities Limited.

A J Bell Management Limited is authorised and regulated by the Financial Services Authority. A J Bell Securities Limited is a member of the London Stock Exchange and is authorised and regulated by the Financial Services Authority.

Sippdeal, Sippdealxtra and Sippcentre are platforms provided by A J Bell Management Limited. A J Bell Platinum SIPP is provided by A J Bell Management Limited. A J Bell Platinum SSAS is provided by A J Bell Limited.

The companies listed in the adjacent table are all registered in England and Wales at Trafford House, Chester Road, Manchester M32 0RS.

Company	Company Number	VAT Number
A J Bell Holdings Limited	4503206	833 5478 13
A J Bell Management Limited	3948391	759 3531 03
A J Bell Limited	3091664	639 0316 44
A J Bell Securities Limited	2723420	918 4226 21