

**Summary of  
Conflicts of  
Interest Policy.**



**BANK OF  
SCOTLAND**

# Summary of Conflicts of Interest Policy.

A 'conflict of interest' is a situation where a firm, one of its employees or anyone else involved in its running, has conflicting personal and professional interests. This could get in the way of us providing independent and impartial services.

This leaflet explains how we prevent and manage conflicts of interest and make sure that we treat our customers fairly. We do have a detailed policy available if you want a copy.

We've listed the main potential conflicts and how we manage them below

## **Lloyds Banking Group Connections** **What's the conflict of interest?**

Bank of Scotland Share Dealing is part of Lloyds Banking Group and it's possible that the Group's decisions or strategy could lead to a conflict of interest for our customers if they have a significant impact on us.

## **How do we manage this?**

Bank of Scotland Share Dealing is operated by Halifax Share Dealing Limited, which is a separate legal and regulated entity to Lloyds Banking Group, and has a separate Board of Directors who are approved and regulated by the FCA. They have ongoing training and development to make sure they act independently and understand their responsibilities.

## **Employee Rewards and Payment** **What's the conflict of interest?**

Incentive schemes could encourage staff to favour certain transactions or investment types, or influence how complaints are dealt with.

## **How do we manage this?**

We don't offer incentive schemes or pay commission to staff. Instead, their performance is measured on how well they look after customers, meet compliance requirements and act in line with our values.

## **Gifts and Other Inducements**

### **What's the conflict of interest?**

Gifts, entertainment, hospitality and other inducements could influence staff to choose a particular supplier rather than acting in customers' best interests. We sometimes receive modest non-monetary benefits from product providers or other third parties, including the provision of literature or participation in training and seminars. We may also occasionally receive gifts from customers and suppliers.

### **How do we manage this?**

We take care to make sure that any gifts or other benefits are modest and are recorded and monitored.

## **Personal Conflicts**

### **What's the conflict of interest?**

If our staff, or any of their close family or friends, hold positions of responsibility in other companies, staff may prioritise their interests over those of our customers.

Close links with other companies could also influence staff to choose them as suppliers over others who might offer a better service for customers.

Staff may also have personal relationships with customers, and prioritise their complaints or claims over those of other customers.

### **How do we manage this?**

We train staff to make sure they understand their obligations. We check to make sure that staff don't have any undisclosed and unapproved relationships with suppliers, customers, colleagues or competitors that might get in the way of their independent judgement and stop them acting in customers' best interests.

We also segregate duties, which means that staff have separate roles and responsibilities so any activities cannot be carried out without supervision and monitoring.

We also restrict and carefully control how confidential information that could cause a conflict is shared across the business.

## **Personal Account Dealing**

### **What's the conflict of interest?**

Staff working at Bank of Scotland Share Dealing can have their own accounts and use these to trade. They could trade ahead of customers for their own benefit, which could disadvantage customers.

### **How do we manage this?**

We have a detailed Personal Account Dealing policy and any transactions by staff on their own accounts must be carried out in accordance with this policy. These are monitored by our Compliance department who check to make sure that personal account transactions haven't affected customer orders.


## Summary


After careful review we firmly believe that we have taken all necessary steps to manage or mitigate any potential conflicts of interest that could affect you.

We will continue to review this policy on a regular basis.

**Notes.**

## Get in touch

 [bankofscotland.co.uk/  
sharedealing/](https://bankofscotland.co.uk/sharedealing/)

 0345 606 1188

 Visit your local branch

Please contact us if you'd like this information in an alternative format such as Braille, large print or audio.

If you have a hearing or speech impairment you can use Text Relay or Textphone on **0345 604 2543** (lines are open 8am-6pm, Monday-Friday.) If you are Deaf you can use BSL and the SignVideo service available at [bankofscotland.co.uk/accessibility/signvideo](https://bankofscotland.co.uk/accessibility/signvideo)

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Calls may be monitored or recorded in case we need to check we have carried out your instructions correctly and to help improve our quality of service.



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