

# Conflicts of interest policy

This policy covers Scottish Equitable plc (SE plc), Aegon Investment Solutions Limited (AISL) and Cofunds Limited.

A conflict of interest may arise where an action taken by us could be seen to compromise or conflict with the best interests of our advisers, intermediaries and customers. We're completely transparent about where conflicts of interest can arise and our policy to deal with them.

## Business entertainment and gifts

From time to time we may receive or provide corporate hospitality from/to service providers and suppliers. We may also receive these from advisers/intermediaries. We have a strict policy regarding the receipt or provision of gifts and business entertainment and you can find more details about this in our **Anti-Bribery and Corruption** policy. A disciplinary process may be enforced if this policy isn't strictly adhered to.

## Client data

We expect high standards of performance and integrity from our staff. This is embedded in our way of working and is detailed in our procedures. Any breaches of our procedures are investigated and managed through our **Disciplinary** policy.

## Third party fees

To enable our investment services, parts of Aegon may pay fees to third parties for services relating to the maintenance of investor accounts. Fees may also be paid to third party technology providers who offer investors access to trade on our platforms through their **advisers'/intermediaries'** website.

## Adviser/intermediary benefits

We may provide certain monetary and non-monetary benefits to advisers/intermediaries who use our platforms. These benefits are provided on the strict understanding that they'll enable advisers and intermediaries to:

- improve and extend the range of services provided to customers, and
- provide greater opportunity to pass savings on to customers by discounting funds, rebating commissions or reducing fees.

We have a strict policy regarding the frequency and cost of the benefits provided to each adviser/intermediary firm. For more information please see the **Anti Bribery and Corruption Policy** and the **Distributor Inducements Policy**.

### 1. Monetary

We may contribute towards our share of advisers'/intermediaries' costs to promote our Protection proposition and services at events or through marketing activity.

### 2. Non-monetary

Minor non-monetary benefits may also be provided to advisers/intermediaries at no charge. These can include:

- tools to help them provide financial advice on our service and the products we distribute;
- technical training on the use of our platform and their associated facilities;
- integration of their computer systems and websites with our platforms;
- meetings including reasonable and appropriate hospitality, round table discussions and marketing support, and
- exposure to market updates and fund manager commentary at conferences and other events.

## Further information

If you have any questions about our **Conflicts of interest** policy or **Anti-Bribery and Corruption** policy please get in touch. Our contact details are below.

### General queries

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Platform Client Services

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The Aegon Platform

Customer Experience

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**For Aegon Retirement Choices, One Retirement and Retiready** – Aegon is a brand name of Scottish Equitable plc (No. SC144517) and Aegon Investment Solutions Ltd (No. SC394519) registered in Scotland, registered office: Edinburgh Park, Edinburgh, EH12 9SE. Both are Aegon companies. Scottish Equitable plc is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Aegon Investment Solutions Ltd is authorised and regulated by the Financial Conduct Authority. Their Financial Services Register numbers are 165548 and 543123 respectively. An Aegon company. © 2019 Aegon UK plc.

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