

## Conflicts of Interest - Summary

Castle Trust Bank has a policy on the management of potential conflicts of interest, to ensure that all reasonable steps are taken to identify and manage conflicts that may arise, which might result in a material risk to the interests of our clients.

Our approach is to identify those aspects of our service, including how we interact with the Castle Trust Bank group of companies and third party suppliers, which could result in a conflict between your interests and ours, or between the interests of different clients.

### Confidentiality and protection of inside information

Our internal dealing rules prevent staff in possession of price sensitive information from taking advantage of that information by dealing in the respective security, or arranging for someone else to do so on their behalf.

### Organisational arrangements

Our organisational structure provides for segregation of duties and appropriately apportioned roles and responsibilities to prevent conflicts arising, ensuring that no single person can exercise inappropriate influence over a particular process. Procedures are in place to ensure that potential conflicts between Castle Trust Bank and our clients are managed fairly.

### Personal conflicts

Contracts of employment prevent staff from accepting roles or directorships with other companies outside the group unless prior approval has been received from the CEO. We do not display preference to any client or group of clients over any others in the provision of our services.

Further, staff bonus and remuneration arrangements are carefully considered to ensure that conflicts do not inadvertently arise through inappropriately set targets. An internal whistleblowing policy is in place which affords staff a high level of protection should they report any wrongdoing by others.

### Selection of suppliers

We prevent potential conflicts arising through the selection of suppliers by refusing to accept or provide fees, commissions and non-monetary benefits which do not directly enhance the service offered. Any personal relationships are disregarded in the selection of service providers, agents, third party suppliers, and distributors to prevent the possibility of inappropriate selection.

### Charges disclosure

Charges which are applied to your savings or mortgage may be shared with other members of the Castle Trust Bank group or other third parties. You will not be liable to pay more fees than are disclosed to you.

We acknowledge that gifts and entertainment arrangements are common in the industry may give rise to adverse influence. We address this by limiting the receipt of gifts/entertainment to those where the value is not material.

### Further information

This summary reflects our detailed Conflicts of Interest Policy that is in place to ensure the fair treatment for all of our clients through the effective management of potential conflicts. We are not aware of any further material conflicts of interests.