

Aviva Wrap UK Limited and  
Aviva Pension Trustees UK Limited  
**Conflicts of Interest Policy**  
**Summary for customers**

## Conflicts of interest policy

At Aviva, fair treatment of our customers is of paramount importance. So we expect our business activities to be conducted honestly and with integrity. Any dealings we have with you and with any third parties should be carried out in line with our ethical principles.

It's not always possible to prevent conflicts of interest, but we'll always aim to identify these and manage them properly, so they don't adversely impact our customers.

This policy summary covers Aviva Wrap UK Limited & Aviva Pension Trustees UK Limited. These companies manage the advised Aviva Platform and/or Aviva Online Investment Service, where your plan is held.

## Our commitment to you

We'll always aim to treat you fairly and to comply with laws and regulations.

As part of this commitment, we'll consider conflicts involving all Aviva group companies, any other companies connected with Aviva and the people working for them. These include:

- Any of our directors, managers or employees.
- Other people or companies we use to provide services.

## What is a conflict of interest?

There can be situations where what's best for us (or for one customer) may be at odds with what's best for the majority of customers. This is a conflict of interest.

We take our responsibility to identify and manage conflicts of interest very seriously indeed.

## How could a conflict of interest affect you?

Aviva could have an unfair advantage over you if there were a conflict of interest. Examples of this could be where:

- Aviva might make a financial gain (or avoid a loss) at your expense
- we have a different interest (to the one you expected) in the outcome of a service we give you or a transaction we make for you
- Aviva puts the interest of one customer, or a group of customers, above another customer or group of customers because it's more advantageous for us to do so
- a customer is carrying out the same business as us
- Aviva employees accept gifts and hospitality from suppliers, distributors or intermediaries
- our employees might gain at customers' expense because they have inside information.

## How we'll handle any conflict of interest

We have robust procedures in place designed to prevent conflicts happening in the first place. These include:

- An annual review to identify any new conflicts of interest and to check the controls we're using to manage any existing conflicts are still effective. We'll make sure any conflicts are overseen by a senior individual.
- A thorough analysis of existing and new business activity we may want to start, to see whether it might cause any new conflicts of interest.
- Training for employees to make sure they're aware of their responsibilities around conflicts of interest.
- A conflicts of interest committee chaired by an Aviva non-executive director, so that there's independent oversight of our policy and procedures.
- Putting the fair treatment of customers at the core of Aviva's and its employees' objectives.

We do everything we can to prevent conflicts of interest. However, if it isn't possible to prevent a conflict of interest, we'll actively record and manage it to avoid any material risk, disadvantage or loss to customers.

If we think a conflict of interest will affect our customers, we'll tell them about it and let them know what we're doing to minimise any risk. We'll give our customers any necessary information about the conflict, so they can decide whether they want to continue doing business with us.

## How we'll actively manage any conflicts of interest

There are a number of ways in which we actively manage conflicts of interest. Here are just a few:

- Conflicts of interest could happen where different parts of our own business have their own, specific remits. So we take care to make sure information being passed between them is controlled to reduce this risk.
- To reduce the risk of 'inside information' being misused, we have systems and controls in place to manage sensitive information.
- We reward employees in a way that reflects our need to avoid conflicts of interest.
- When our customers buy or sell investments, we always aim to process transactions fairly, in a way that doesn't benefit us.
- We won't delay paying out money to you for our own gain.
- We'll deal with complaints fairly and objectively, and if we've caused a loss, we'll compensate customers accordingly.
- Aviva employees are able to anonymously report any concerns about potential conflicts of interest.

Every year, Aviva employees must complete and pass tests on compulsory training material that covers:

- Our policy on gifts, hospitality and inducements. We don't allow employees to give or accept gifts, hospitality or inducements that could affect their judgement or mean we're not acting in the best interests of our clients.
- Our stance on any business activities they have outside of our organisation that may present a conflict of interest.

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