

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

Effective January 2018

Customer Document

Overview

A conflict of interest is a situation in which someone in a position of trust has competing professional or personal interests. Such competing interests can make it difficult to fulfill his or her duties impartially. A conflict of interest may exist even if no unethical or improper act results from it.

Aviva is committed to identifying, monitoring and managing all actual and potential conflicts of interest that can arise between us and our customers and between customers of all areas of our Group.

The purpose of this document is to provide our customers with appropriate information in relation to the policies we have in place to manage conflicts of interest.

Our policy for managing conflicts of interests

From time to time Aviva Wrap UK Limited & Aviva Pension Trustees UK Limited may encounter conflicts of interest in respect of its management of the Advised Platform and OIS system your portfolio is held on. In all such situations it is our policy to manage such conflicts in a manner that does not compromise or prejudice our primary objective which is our client's best interests.

Aviva will take all appropriate steps to identify and manage all conflicts of interest with the purpose of preventing any conflicts of interest which may constitute or give rise to a material risk which could adversely affect the interests of its customers.

Where, despite all efforts to manage a conflict of interest, a conflict of interest cannot be prevented and there remains a direct and material risk to customers, Aviva will disclose this to customers.

The process is designed to:

- Identify conflicts of interest
- Ensure that conflicts of interest between Aviva and its customers are prevented or managed appropriately
- Ensure that conflicts of interest between the Aviva's people and its customers are prevented or managed appropriately
- Ensure that where required these conflicts of interest are disclosed to customers.

Conflicts of interest can take a number of forms, below are some common types:

- Employees being remunerated for the Firms* / Aviva's interests over and above client's interests.
- Accepting gifts and hospitality from suppliers / distributors and intermediaries.
- Employees taking out products and services of Aviva.
- Personal gain at customers expense through awareness of non public information

Disclosure

Where, despite all efforts to manage a conflict of interest, the conflict of interest cannot be prevented, we will disclose it to you before you commit to taking out a relevant product or taking any investment action in relation to it. If you have a financial adviser this disclosure may be made to them and they should provide you with a copy of it. This is an important document and you should read it before making any investment decision.

*Firms are companies that Aviva has a business relationship with.