



# **Slater Investments Limited**

## **Conflicts of Interest Policy**

**May 2026**

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## **Conflicts of Interest Policy**

Slater Investments Limited (Slater Investments) faces actual and potential Conflicts of Interest periodically. It is the firm's policy to take all appropriate steps to maintain and operate effective organisational and administrative processes to identify and manage conflicts.

A potential conflict of interest arises if you are compromised personally and/or professionally in your duty to act in the best interest of Slater Investments, the funds and segregated accounts it manages and/or its clients or investors (collectively referred to in this policy as "Clients"). It is recognised that potential conflicts of interest do arise from time to time. It is the firm's policy to avoid conflicts of interest wherever possible. The firm has therefore implemented policies and procedures to avoid or prevent any conflicts of interest which risk damaging the interests of our Clients. Where Slater Investments cannot avoid or prevent conflicts, there are procedures in place to manage and monitor them to ensure that the Clients are treated fairly. Our Clients' interests must be always protected.

Slater Investments identifies and manages conflicts in accordance with SYSC 10 and the FCA's Consumer Duty (PRIN 2A), ensuring that conflicts do not result in foreseeable harm or impede the delivery of good outcomes for retail Clients.

Paying due regard to the interests of our Clients, treating Clients fairly and acting to deliver good outcomes for all of our Clients are central to the core values of Slater Investments. These values are embedded into our culture, our aim being that all staff understand what acceptable and unacceptable behaviour is. As such, conflicts of interest and the identification, management, mitigation and prevention of conflicts of interest are central to Slater Investments's culture.

If conflicts cannot be avoided, then we will make a full disclosure to any affected clients and/or our investors. Disclosure is used only where other measures cannot adequately mitigate the conflict, and such disclosure must be clear, fair and not misleading, with sufficient information for Clients to understand the nature and implications of the conflict.

Disclosures are provided in good time before a service is provided and, where relevant, are tailored to the specific Client, product or service affected rather than relying solely on generic statements. Slater Investments seeks to ensure that disclosures are presented in plain, non-technical language and are capable of being understood by the intended audience. Disclosure is not relied upon as a substitute for effective governance, controls or mitigation, and Clients are not expected to consent to unmanaged conflicts or foreseeable harm.

The firm maintains a conflicts of interest register which is owned and maintained by the Compliance function. The register records, as a minimum, the nature of each identified conflict, the Clients, products or services affected, the mitigating controls applied ownership of those controls and the date of the next review.

The register is reviewed formally at least annually and, on an ad-hoc basis where trigger events occur, including (but not limited to) new fund launches, material changes to products or services, new distributor or commercial relationships, changes to remuneration structures or emerging risks identified through monitoring or complaints. The Compliance and Risk Committee oversees the completeness and ongoing effectiveness of the register.

This policy document sets out our procedures in identifying, managing, mitigating or preventing new and existing conflicts and the actions we take to prevent ensure the business operates with integrity.

There is further guidance contained within section 7 of the Compliance Manual which all members of staff must be familiar with.

**If at any time you are in doubt as to how to act in a given situation where you are faced with an actual or potential conflict of interest, you should contact the Compliance Department immediately.**

## **WHO THIS POLICY APPLIES TO**

This policy applies to all Slater Investments's staff which includes members, directors, employees, interns and any permanent or temporary contractors.

## **CONFLICTS OF INTEREST COMMITTEE**

Slater Investments's Compliance and Risk Committee will act as the Conflicts of Interest Committee and will deal with any related matters as well as the annual review of conflicts register. The Committee meets weekly. It reports directly to the Board who review the weekly Committee minutes.

## **CONSUMER DUTY AND CONFLICTS – EVIDENCE OF EFFECTIVENESS**

Slater Investments assesses conflicts of interest not only by reference to the existence of controls and governance arrangements, but by evaluating whether those mitigations are effective in delivery good outcomes for Clients, in accordance with PRIN 2A.8 and PRIN 2A.9.

Identified conflicts are assessed against the four Consumer Duty outcomes (Products and Services, Price and Value, Consumer Understanding and Consumer Support) to determine whether the conflict, if inadequately mitigated, could result in foreseeable harm.

The firm periodically tests the effectiveness of its conflicts management framework by reviewing relevant outcome-based indicators, which may include MPS and fund performance reviews, value assessments, complaints and Client feedback, product closures or mergers, distribution practices and monitoring results.

Findings from this testing are documented and reported to the Compliance and Risk Committee, with material issues or emerging risks escalated to the Board. Where mitigations are found to be ineffective, remedial actions are defined, implemented and monitored.

## **ANTI-BRIBERY AND CORRUPTION**

Under the Bribery Act 2010 it is a criminal offence to:

- Offer, promise or give a financial advantage to another person whether within the UK or overseas, for the purposes of inducing or rewarding improper conduct;
- Request, agree to receive or accept a financial or other advantage (i.e. gifts or hospitality) for or in relation to improper conduct;
- Bribe a foreign public official where the intention is to influence them and obtain or retain business.

Instances where bribery or corruption may have common factors to circumstances where conflicts of interest may arise and therefore both are dealt with in the policy that follows.

Members of staff are reminded that the Bribery Act relates to all business, whether conducted in the UK or overseas.

The majority of Slater Investments's business is UK based. For business conducted outside of the UK, members of staff are reminded that, in addition to complying with the Bribery Act, they should also comply with the anti-bribery and anti-corruption legislation in the relevant jurisdiction.

For more information, please refer to the Anti-Bribery Policy and Procedures Statement.

## **POTENTIAL CONFLICT OF INTEREST**

Below are some of the most commonly identified conflicts of interest within a firm like Slater Investments including, where relevant, how to disclose in line with our systems and controls and where to find more information. This is not an exhaustive list.

### **❖ SENSITIVE INFORMATION**

Occasionally Slater Investments will receive sensitive information regarding companies in which it invests in on behalf of clients or the funds we manage. Should such information be received it is logged on the Embargo List, which then is monitored by Compliance against any transactions entered to ensure compliance with the regulations.

### **❖ DECLARATION OF INTERESTS IN THIRD PARTY COMPANIES**

All members of staff must declare any interest in any third-party company that Slater Investments is involved with (or conducts business with) – this includes (but is not limited to) Financial Advisers/Wealth Managers, Corporate Relationships, IT Providers, and any other business relationships or outsourced services used by Slater Investments.

In circumstances where the Compliance and Risk Committee consider a conflict (which may arise) to be unmanageable, they may request the employee to relinquish that interest.

In the event of a decision as to whether an interest in which a member of staff is involved in is a conflict, this matter will be discussed by the Compliance and Risk Committee. All decisions relating to a Conflict of Interest are recorded.

### **❖ PRODUCT AND SERVICE APPROVAL**

Slater Investments is the ACD/Manager of the Slater OEICs, Unit Trusts and Slater MPS respectively. We maintain, operate and review the process for the approval of each Fund (and any new Funds we may launch) and service before the product or service is marketed or distributed in order to prevent conflicts of interest or other foreseeable harms from adversely affecting the interests of our clients. This includes any conflicts which may arise as a result of the integration of sustainability risks into the investment processes, systems and internal controls. This also includes identifying the target market of end clients and ensuring that all relevant risks to that target market are assessed and the intended distribution strategy is consistent with the target market. We review the Funds and Slater MPS on an ongoing basis to take into account any event that could materially affect the potential risk to the identified target market, to assess whether the Funds remain consistent with the needs of the market and whether the intended distribution strategy remains appropriate. Annually we undertake an assessment of value in compliance with COLL (Funds) and PRIN 2A (the Slater MPS).

Prior to launching a new Product or Service, Slater Investments undertakes a conflicts of interest assessment and review. In the case of retail Products and Services, this review includes consideration of foreseeable harms, as required by Principle 12 and the Consumer Duty

#### ❖ NEW SEGREGATED ACCOUNTS

Before opening a new segregated account, a conflicts of interest assessment and review of the proposed Client is undertaken and recorded to ensure that there are no conflicts of interest in respect of the service to be provided to the Client. If there is an identified conflict, this is disclosed to the Client before undertaking business in sufficient detail to enable the Client to make an informed decision about the service in the context in which the conflict has arisen. It is not always possible to prevent actual conflicts of interest from arising. If this is the case, Slater Investments will try to manage the conflict by disclosing it to the affected Client, establishing an information barrier (if appropriate) or declining to provide the service. For any retail segregated accounts, we undertake an annual assessment of value in compliance with PRIN 2A.

#### ❖ DEALING IN OWN FUNDS

Slater Investments may, through its provision of investment management activities, provide discretionary management services to its Clients who may invest directly into funds managed by Slater Investments. Any such investments would be in accordance with the relevant fund documentation. Slater Investments (or its parent company) may from time-to-time seed new funds or class launches. It only uses seed investments in order to initially launch funds or share classes so does not invest for strategic investment reasons. In addition, Slater Investments (or its parent company) receives the same standard terms as all other investors in the fund. Our employees may also invest in our own funds. Please see section 'PERSONAL ACCOUNT DEALING' below.

#### ❖ FUND LAUNCH TIMING AND SEEDING

A potential conflict of interest may arise where Slater Investments launches a new fund with low assets under management, particularly where the fund is seeded by Slater Investments or its affiliated entities. In such circumstances, early investors may be exposed to higher relative costs, reduced liquidity or operational constraints associated with a small fund size. There is also a potential incentive for the Firm to launch funds before they achieve sufficient scale, or to maintain funds that may not be commercially viable, in order to establish a track record or pursue strategic objectives.

To mitigate these conflicts, Slater Investments has established a number of safeguards and operates a Seed Capital Policy. All seed capital arrangements are formally documented and reviewed to ensure they do not disadvantage other investors. Minimum viable fund-size thresholds are set and reviewed prior to launch, and full disclosure of seed arrangements and expected costs is made in the relevant fund documentation. Fund launch decisions are subject to independent governance oversight, including assessment of commercial viability and investor suitability.

Ongoing reviews of fund size and viability are undertaken, including consideration of whether a fund should continue, merge, or close where it does not meet established thresholds. During the early stages of a fund's life, fee waivers or caps may be applied to ensure early investors are not subject to disproportionate charges. These controls ensure that fund launches and seeding arrangements are conducted in a manner that protects the interests of all investors and mitigates potential conflicts.

#### ❖ SEED CAPITAL IN SLATER FUNDS AND WITHDRAWAL OF SEED CAPITAL

A potential conflict of interest may arise where owner-directors or the MPS manager provide seed capital to Slater-managed funds, or when such seed capital is later withdrawn. Seed capital investments create a financial interest that could influence fund-related decisions, particularly where the investment is significant relative to fund size. Withdrawal of seed capital may also give rise to conflicts if the timing or scale of redemptions could negatively affect fund liquidity or disadvantage other investors.

To mitigate these conflicts, Slater Investments applies a number of controls including operating a Seed Capital Policy. All seed capital arrangements, including any proposed withdrawals, are clearly disclosed in the relevant fund documentation. Material decisions relating to funds with seed capital—including redemption of seed capital—require independent governance oversight to ensure they are made in the best interests of all investors. Where seed capital is to be withdrawn, board approval is required and consideration is given to liquidity, market conditions and the potential impact on remaining investors. Withdrawals may be staged to minimise disruption to the fund.

Investment decisions must be supported by documented rationale demonstrating that strategies remain appropriate for the fund's objectives and that no investor receives preferential treatment. Seed capital providers are not afforded preferential liquidity or redemption terms. Regular reviews are undertaken to confirm that funds with seed capital continue to operate on terms consistent with comparable products and that investor outcomes remain fair. These measures ensure transparent and effective management of conflicts associated with both the provision and withdrawal of seed capital.

#### ❖ USE OF IN-HOUSE FUNDS WITHIN THE SLATER MPS

A potential conflict of interest arises where the Slater MPS invests in funds managed by Slater Investments. The inclusion of in-house funds will generate additional revenue for Slater Investments and therefore could create an incentive to favour in-house products over external alternatives.

To mitigate this conflict, Slater Investments operates a Policy on the Use of In-house Funds which sets out clear safeguards and governance requirements. In-house funds may only be selected where they meet the same due diligence standards applied to external funds and can be demonstrated to be in the best interests of Clients. The Policy also imposes a strict limit whereby no more than 10% of any MPS portfolio may be invested in Slater-managed funds.

Inclusion of an in-house fund requires approval from the MPS Committee, with additional oversight from the Compliance and Risk Committee. All decisions are fully documented, including comparisons with external alternatives. Compliance undertakes periodic monitoring to ensure continued adherence to Policy requirements and to confirm that in-house fund usage remains appropriate and aligned with good Client outcomes. These controls ensure that any potential conflict arising from the use of in-house funds is identified, monitored and effectively managed, and that Client interests remain paramount.

The 10% portfolio-level cap on in-house fund usage has been set having regard to diversification, concentration risk, revenue neutrality considerations and the need to minimise conflicts of interest. Compliance periodically assesses whether this threshold remains appropriate in light of portfolio composition, market conditions and observed Client outcomes, with any proposed changes subject to governance approval.

#### ❖ MPS MANAGER DUAL ROLE

A potential conflict of interest may arise where the MPS manager also manages the underlying Slater funds used within the MPS portfolios. This dual role could create an incentive to favour Slater-managed

funds over appropriate external alternatives or influence asset allocation in a manner that benefits Slater Investments rather than MPS clients.

To mitigate this conflict, investment decisions involving Slater-managed funds are subject to enhanced governance and must comply with the Firm's Policy on the Use of In-house Funds, which sets out specific safeguards, including due diligence standards, suitability requirements and portfolio limits. All decisions to include or adjust allocations to in-house funds require documented justification demonstrating that they are in the best interests of Clients, together with comparison to external alternatives.

These decisions are reviewed by the MPS Committee and are subject to oversight from the Compliance and Risk Committee. Compliance conducts periodic monitoring to ensure adherence to the Policy and to confirm that fund selection within the MPS remains objective and aligned with fair Client outcomes. Clear disclosure is provided to MPS clients regarding the potential conflict and any fees earned by Slater Investments.

#### ❖ PERSONAL INVESTMENTS IN UNDERLYING FUNDS HELD WITHIN THE MPS

A potential conflict of interest may arise where the Manager of the Slater MPS and/or members of the MPS Committee hold personal investments in third-party funds which are also held within MPS portfolios.

This may create a perceived or actual incentive to favour or retain such funds within MPS portfolios, or to influence asset allocation decisions in a manner that could benefit those individuals rather than acting solely in the best interests of Clients.

Slater Investments recognises that these funds are externally managed, liquid investments over which the Firm has no influence or control, and accordingly, that no formal approval is required for such personal investments under the Slater Investments's Personal Investment Dealing Rules.

To mitigate this potential conflict, the Firm has implemented the following controls:

- All personal investments are subject to the Personal Investment Dealing Rules, including pre-clearance (where applicable), quarterly reporting of dealing transactions to Compliance, annual holdings declarations and ongoing monitoring;
- Investment decisions within the MPS are subject to collective decision-making and oversight by the MPS Committee, with documented rationale;
- Fund selection and allocation decisions are based on objective criteria, including performance, risk, cost and suitability, and are subject to independent challenge;
- Oversight is provided by the Compliance and Risk Committee to ensure decisions remain aligned with the best interests of Clients and deliver good Consumer Duty outcomes;
- The existence of this potential conflict is disclosed clearly, fairly and not misleadingly in relevant client-facing and marketing documentation.

These controls ensure that any potential conflict arising from personal investments in underlying funds is appropriately identified, managed and disclosed, and that Client interests remain paramount.

#### ❖ PERFORMANCE FEES

Slater Investments may receive a performance fee from a single share class of an in-house fund. This creates a potential conflict of interest, as the receipt of a performance fee could provide an incentive to

manage the fund in a way that increases fee income rather than acting solely in the best interests of its Clients. To mitigate this conflict, Slater Investments has a number of controls in place. Details of the performance-fee structure, including how it is calculated and when it may be charged, are set out clearly in the relevant fund documentation so that investors are fully informed prior to investing. The performance-fee arrangement is reviewed by the Compliance and Risk Committee as part of Slater Investments's product governance and conflicts oversight processes. Any changes to the structure must be approved by the Committee.

Investment decisions must always be made in line with the fund's stated investment objective, policy and risk parameters. These decisions are monitored by Compliance to ensure they remain consistent with Slater Investments's duty to act honestly, fairly and in the best interests of its Clients. As part of the annual assessment of value and the firm's conflicts review, independent cost benchmarking is conducted to ensure that the performance-fee mechanism remains appropriate and provides fair value.

As part of its conflicts and product governance oversight, Slater Investments considers whether performance-fee arrangements could create incentives for asymmetric risk-taking. This includes reviewing portfolio turnover, volatility, drawdowns and risk-adjusted performance, as well as benchmarking fee structures against comparable market practices.

Compliance also undertakes periodic monitoring to ensure that performance fees are calculated and applied correctly and in accordance with the relevant fund documentation. Any issues identified are escalated to the Compliance and Risk Committee.

These procedures ensure that any potential conflict arising from the receipt of performance fees is identified, monitored and effectively managed, and that Client interests remain paramount.

#### ❖ INVESTMENTS IN DISTRIBUTORS OF THE SLATER MPS

A potential conflict of interest may arise where Slater Investments, or shareholders with significant ownership in Slater Investments, hold an investment in a distributor of the Slater MPS. Such an arrangement could create a perceived or actual incentive for Slater Investments to favour that distributor, or for the distributor to promote the Slater MPS ahead of other suitable solutions, in a manner that may not be fully aligned with the best interests of clients.

To mitigate this conflict, any such relationships are recorded in the Firm's conflicts register and are subject to independent oversight by the Compliance and Risk Committee. The existence of these interests is disclosed to the relevant counterparties and, where appropriate, to affected clients. Where required, Clients are informed of any ownership links between Slater Investments and distributors involved in the provision or promotion of the MPS. Commercial and distribution arrangements with the distributor must be negotiated on arm's-length terms, and no preferential treatment may be given relating to access, pricing, or support. The distributor must provide written confirmation that its own recommendations are made in accordance with its regulatory obligations and not influenced by any ownership links.

Slater Investments ensures that all MPS marketing, due diligence materials and promotional activity remain generic and untailored, even where such materials may reference the name of a specific distributor in which the Firm or its shareholders hold an interest. Any materials provided are prepared on a standardised basis and are not adapted to favour, support, or promote that distributor over others. Ongoing monitoring is undertaken to confirm that no bias is introduced into the Firm's distribution

strategy. These controls ensure that any potential conflict arising from investments in a distributor is identified, monitored and effectively managed so that client interests remain paramount.

#### ❖ ALLOCATION OF TRADES

A potential conflict within the context of trade allocations would be where one client, a service or fund receives preferential treatment over another. To mitigate this conflict, Slater Investments has a number of controls in place such as the allocation of trades being done on a pro rata basis. Any allocations outside of the standard approach are monitored and recorded by Compliance and signed off by the fund manager of the client or the fund. Slater Investments ensures that no client, service or fund receives preferential execution timing or allocation that could disadvantage another. More information can be found in the Dealing and Allocation Policy.

#### ❖ RECEIPT OF INDUCEMENTS FROM THIRD PARTIES

Slater Investments does not receive any fee or commission or provide or are provided with any non-monetary benefit in connection with the provision of an investment service or ancillary service, to or by any party except our Client or on behalf of the Client, other than where the payment or non-monetary minor benefit is designed to enhance the quality of the relevant service to the client and does not impair compliance with our duty to act honestly, fairly and professionally in accordance with the best interests of the clients. Declarations are reviewed at least annually and updated promptly where circumstances change.

#### ❖ REMUNERATION AND OTHER INCENTIVE STRUCTURES

The Directors have a very clear Remuneration policy which ensures employees are not remunerated or have their performance assessed which may in any way conflict with their duty to act in the best interests of our Clients. In particular, it does not make any arrangements by way of remuneration, sales targets or otherwise that could provide an incentive to our employees to recommend a particular product to a client when we could offer another product that would better meet the Clients' needs. The structure of the remuneration packages for all staff are designed to be in line with the firm's business strategy, take account of conflicts of interests and the existing and future capital requirements of the business.

#### ❖ DECLARATIONS OF OUTSIDE DIRECTORSHIPS

If any member of staff holds or intends to hold an outside Directorship this must be reported to the Directors of Slater Investments on joining or before the directorship is undertaken. Details will be included in the conflicts register.

#### ❖ OUTSIDE DIRECTORSHIPS OF INDEPENDENT NON-EXECUTIVE DIRECTORS

A potential conflict of interest may arise where Independent Non-Executive Directors (iNEDs) of Slater Investments also hold directorships or governance roles particularly where those external entities have or may have commercial, advisory or distribution relationships with Slater Investments. This includes circumstances where two or more iNEDs sit on the same external board, which may give rise to perceived alignment of interests or reduced independence of challenge.

To mitigate these risks, all external appointments are recorded in Slater Investments's conflicts of interest register and assessed by the Compliance and Risk Committee. Where necessary, appropriate measures such as recusal from relevant discussions or enhanced oversight may be applied. Additionally, in circumstances where two or more iNEDs sit on the same external board, the iNEDs are

required to provide an annual independence attestation confirming that this external role does not impair their ability to act independently or in the best interests of Clients. These controls ensure that board oversight remains objective and effective. Independence of iNEDs is assessed at appointment and reviewed at least annually as part of the Board annual review, taking into account external roles, tenure and any other factors that could reasonably be perceived to impair objective challenge.

#### ❖ PERSONAL ACCOUNT DEALING

All members of staff are covered by the Slater Investments's Personal Investment Dealing Rules. The Rules have been designed to ensure Clients are not disadvantaged and that conflicts are extinguished at the earliest opportunity. Specific confirmation is sought from all new joiners that they have read, understood and agree to abide by the Rules. All staff, from commencement of employment/engagement with the firm, are required to complete and submit a list of current holdings and a list of personal brokerage accounts.

Pre-approval must be sought and facilitated through 'Leo' when wishing to conduct any personal dealing. Monitoring is conducted on monthly basis to ensure compliance with the rules and management are informed of any issues arising.

#### ❖ GIFTS AND CORPORATE HOSPITALITY

Clients and brokers, for a variety of reasons, may offer gifts to staff such as annual celebrations or to commemorate the completion of a large and/or complicated transaction. Care must be taken to ensure that such gifts cannot be construed as an inducement to provide a service more favourably to that client or broker ahead of another. We must at all times act in the best interest of the clients.

Slater Investments has an Inducements, Gifts and Hospitality Policy contained within section 7 of the Compliance Manual which all members of staff must be familiar with. There are very detailed rules around non-monetary benefits. These are set out within the FCA handbook at COBS 2.3A.19R.

All staff are required to record details of any gifts, entertainment or corporate hospitality given or received in 'Leo' (including those which have been refused). In some instances, these will require sign-off from the Compliance Department prior to the event taking place. Gifts above a certain amount cannot be accepted.

#### ❖ COMPLIANCE MONITORING PROGRAMME

In order to retain the integrity of the Slater Investments Compliance Monitoring Programme, employees should not review and assess their own work during the Compliance Monitoring Programme. A schedule of reviews will be prepared by the Compliance and Risk Committee to ensure reviews forming part of the Compliance Monitoring Programme are undertaken by staff who are independent of the function being reviewed and assessed.

### **WHAT SHOULD YOU DO?**

It is the responsibility of all Slater Investments staff to take all reasonable steps to ensure compliance with this policy and to prevent, detect and report any suspected bribery, fraud, corruption or breaches of this policy.

Any reports of suspicion should be directed to Compliance Department who will, where practical and appropriate, maintain confidentiality during the investigation.

If at any time you are in doubt as to how to act in a given situation where you are faced with an actual or potential conflict of interest, you should contact the Compliance Department immediately.

### **WHAT HAPPENS IF PROCEDURES ARE NOT FOLLOWED?**

A breach of any of the policies referred to above is considered a disciplinary offence and dealt with in accordance with Slater Investments's Code of Conduct, Disciplinary Policy and Dismissal Policy (contained within the Staff Handbook).

All staff are reminded that they can be held personally liable for offences under the Bribery Act. If it is suspected that an offence has been committed, Slater Investments may report this to the appropriate authorities which may include regulatory bodies such as the FCA and the police.

**If you are unsure of anything contained within this Policy or associated policies then you should contact Compliance for further training and guidance.**

### **TRAINING and ANNUAL DECLARATION**

We provide periodic training to our staff on relevant commercial and regulatory elements including the need to identify and manage actual or potential conflicts of interest. This training stresses the importance of employees escalating relevant issues they become aware of to the Compliance Department. All staff are required to undertake mandatory external Conflicts of Interest training. Internal training is also provided to new members of staff as part of their induction programme.

All staff must complete a conflicts of interest declaration annually.

### **WHISTLEBLOWING POLICY**

We also have a Whistleblowing Policy in place to ensure that staff can report any potential breach or conflict in a confidential manner according to our whistle blower framework.

### **MONITORING**

Conflicts of Interest are a standing agenda item at weekly Compliance and Risk Committee meetings. Formal reviews of the Conflicts Register, key mitigations and outcome testing are undertaken on a defined periodic and event-driven basis, including at least annually, and more frequently where material changes or emerging risks are identified. The Compliance and Risk Committee report directly to the Board of the Company, who review the Committee's minutes on a weekly basis. Conflicts of Interests are a standing item at Board Meetings.

This document does not intend to create third party rights or duties or form part of any contractual agreement between Slater Investments and any Client. This policy may be amended and updated at any time if any material change occurs and will be reviewed on at least an annual basis by the Compliance and Risk Committee.

### **HOW TO CONTACT US**

If you wish to contact us, please send an email to [operations@slaterinvestments.com](mailto:operations@slaterinvestments.com), write to: The Operations Department. Slater Investments Limited. Nicholas House, 3 Laurence Pountney Hill, London. EC4R 0EU or telephone 020 7220 9460.

### **DO YOU NEED EXTRA HELP?**

If you would like this Policy in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).