

# Conflicts of Interest Policy

## Overview

Stocktrade is a division of Alliance Trust Savings, a subsidiary of Alliance Trust PLC, which has set a Policy on the management of Conflicts of Interest which covers all Alliance Trust Group Companies ("Alliance Trust"), with the objective of ensuring that clients are not adversely affected by any conflicts of interest.

This document summarises Alliance Trust's Conflict of Interest Policy, which Alliance Trust Savings follows. Alliance Trust has established a Conflicts of Interest Policy setting out the procedures and controls to effectively identify and manage the conflicts and potential conflicts that may arise during the course of our business.

In addition to its Policy, Alliance Trust has a Conflicts of Interest Register which notes the conflicts of interest that have been identified for Alliance Trust Savings and its other companies and the controls in place to manage those conflicts of interest.

This Policy applies to all employees.

## Identification of Conflicts

Alliance Trust Savings has systems and controls in place to identify potential conflicts of interest. Once a conflict has been identified, procedures are implemented to ensure it is appropriately managed through Alliance Trust's Conflict of Interest Register.

Conflicts of interest are of particular concern if they give rise to actual or potential detriment to a client, and by way of example, may include where the company or any employee:

- is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
- has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;
- carries on the same business as the client; or
- receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service.

## Managing Conflicts of Interest

Alliance Trust Savings has established procedures which are designed to identify and manage conflicts of interests. The following are examples of conflicts and the arrangements for managing these conflicts (this is not an exhaustive list):

- The corporate governance structure/ organisational arrangements we have implemented provides for the segregation of duties and so prevents conflict arising through preventing and ensuring that no one individual can exercise undue or inappropriate influence over a particular process.
- Segregation of duties and supervision for persons engaged in different business activities including procedures for ensuring appropriate communication between businesses, for example separate dealing desks in Alliance Trust Savings and Alliance Trust plc.
- Personal account dealing restrictions are applicable to all employees and connected persons.
- Limitation and management of personal conflicts of interest which individual colleagues might face, including limits on gifts and hospitality which may be given or accepted.
- Employees are required to notify the company of any outside business interest and external directorships.

## Review

All policies and procedures for identification and management of conflicts of interest are subject to, as a minimum, an annual review and any significant issues will be reported to Senior Management and to the Board as necessary. Further detail on our Conflicts of Interest Policy can be provided on request.