

CONFLICTS OF INTEREST MANAGEMENT POLICY

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AIM OF THIS POLICY

Insight Investment Partners uses internal controls as part of the management of conflicts of interest. Internal controls on their own may not be adequate to manage a specific conflict of interest. Material conflicts of interest must also be disclosed or where significant, avoided.

Insight Investment Partners must comply with the obligation to manage conflicts of interest under Corporations Act 2001 (Cth) s812(1)(aa) and in accordance with ASIC RG 181 'Licensing: Managing Conflicts of Interest'.

Section 912(1)(aa) states that a licensee must:

Have in place adequate arrangements for the management of conflicts of interest that may arise wholly, or partially, in relation to activities undertaken by the licensee or a representative of the licensee in the provision of financial services as part of the financial services business of the licensee or the representative

WHAT YOU MUST DO

GENERAL OBLIGATIONS

The compliance manager will:

1. Identify conflicts through:

- Survey/forms to be completed by all Responsible Managers to be conducted initially on appointment, and annually;
- Annual compliance reviews.

2. Document conflicts by:

- Determining the materiality of conflicts.
- Creating, Maintaining and reviewing a Register of Conflicts

3. Manage conflicts as follows:

- Manage;
- Avoid; and or
- Disclose

4. Maintain the Register of Conflicts and manage the retention or records:

- Insight Investment Partners will maintain a record of conflicts management arrangements and issues identified/analysis undertaken, for at least seven years.

Title	Action
Monitoring:	Quarterly.
Assessment:	All material conflicts managed.
Reporting:	Compliance Manager to the Board of Directors
Documentation:	Conflicts of Interest Register Conflicts of Interest Declarations
Roles and Responsibilities:	Compliance Manager is to maintain conflicts register and records.

	Compliance Manager is to ensure that a risk analysis is performed at least annually.
Training Requirements:	All representatives.

EXAMPLES OF CONFLICTED REMUNERATION

Benefits may be monetary or non-monetary (or hard dollar and soft dollar). The following are examples of monetary benefits that are generally conflicted remuneration:

- Commissions, whether upfront or trailing, fixed or variable, paid by a product issuer to a licensee, where the payment is made directly or through other arrangements.
- Commissions received on the purchase of residential or commercial properties. Any recommendation for the purchase of residential or commercial property is to be approved by the Responsible Managers.
- Volume-based payments from product provider to a licensee or from a licensee to an adviser.
- Volume-based bonuses and payments, such as commission or one-off payment, to an adviser, which is calculated by reference to the number or value of financial products acquired by clients following the advice of the adviser.
- Discount on the fees paid by an adviser or practice to its licensee based on client funds held in a particular financial product.
- Fees received from stockbrokers linked to recommended buy/sell transactions.
- Sponsorship payments by a product provider due to the adviser's volume of sales of the product provider's products is prohibited.
- Remuneration from an employer to an adviser that could reasonably be expected to influence the product advice provided by the adviser.

The following are examples of non-monetary benefits:

- Free or subsidised business equipment or services (e.g. computers and other hardware, software, information technology support and stationery).
- Hospitality-related benefits (e.g. tickets to sporting events or concerts and subsidised travel).
- Shares or other interests in a product issuer or licensee.
- Sponsorship by a product provider (for example, speakers at a conference, rental property) due to the adviser's volume of sales of the product provider's products is prohibited.
- Marketing assistance.
- Promotion or other ways of recognising an employee based on product recommendations or sales.
- Any benefit based on the volume of business.