

*25 February 2025*

**This document summarises Brooks Macdonald Group's ('the Group') Conflicts of Interest Policy.**

Under the requirements set out in the Markets in Financial Instruments Directive (MiFID II) and by the Financial Conduct Authority, Brooks Macdonald is required to take all appropriate steps to identify and where possible, prevent, conflicts of interest that arise in the course of business. Our Conflicts of Interest Policy sets out how this is achieved for actual, potential, and perceived conflicts of interest. The overriding priority is that neither the Group, nor its employees or other individuals, obtain an advantage where there is a material risk that a client will be disadvantaged.

A conflict of interest is a situation in which a person or entity has multiple interests, financial or otherwise, and serving one interest could adversely affect another.

Brooks Macdonald categorises conflicts of interest as follows:

- The Group's interests may conflict with those of Clients
- Interests between clients of the Group
- Interests between entities of the Brooks Macdonald Group
- Personal Conflicts of Interest are where an individual's personal interests' conflict with those of the Group.

**How does Brooks Macdonald manage conflicts of interest?**

The Group maintains and operates effective organisational and business arrangements taking all reasonable steps to prevent, identify, monitor, manage and record conflict of Interests and avoid the materialisation of personal and business risks.

Colleagues are provided with training and support materials to ensure they maintain strong awareness and understanding of conflicts of interest and what action they should take.

If the Group determines that it is unable to manage a conflict of interests, or if it feels that disclosure to relevant parties is an inadequate way of managing a particular conflict, it may decline to act on behalf of the client(s) concerned.

**Governance and oversight arrangements**

The Group's governance structure provides effective oversight of its management of conflicts of interest. This includes review and challenge of relevant policies and procedures to ensure they prevent conflicts of interest from causing harm to our clients, business, and/or colleagues. Our Conflicts Register is reviewed on a regular basis to ensure that any potential issues are identified and resolved efficiently.

Brooks Macdonald is committed to ensuring the highest standards of conduct throughout the business, these are standards which underpin our Conflicts of Interest Policy.