

‘our conflicts management policy’

A Conflicts Management Policy has been put in place to ensure that Guild Trustee Services (Trustee) complies with all regulatory requirements.

What is a Conflict?

A conflict may arise when the Trustee, any of its officers, employees or representatives have an interest or duty that impairs or interferes with, or could be reasonably seen to impair or interfere with, their ability to exercise independent judgement in the best interests of members and other beneficiaries.

Who does the Conflict Management Policy apply to?

The Conflict Management Policy applies to all Trustee officers, employees and representatives, with the Trustee ensuring that all relevant persons receive training on conflicts of interest and duties.

Reporting Conflicts

All employees and representatives must report any potential and actual conflicts of interest or duty, with enhanced disclosure requirements applying to the Trustee Directors and relevant senior managers. The Trustee’s Register of Relevant Duties and Interests is listed above.

In addition, specific policies have been put in place in relation to the acceptance and reporting of gifts & entertainment and external appointments to ensure these are managed in line with the Conflicts Management Policy.

Managing Conflicts

The Trustee acknowledges that from time to time conflicts will arise and have put procedures in place to ensure that identified conflicts are handled appropriately by:

- managing the conflict of interest or duty;
- avoiding the conflict of interest or duty where required to do so; and
- disclosing the conflict of interest or duty.

All conflicts will be handled by giving priority to the duties owed to, and interests of, members and other beneficiaries. Identified conflicts and how they are managed are recorded in a Conflicts Register which is maintained on an ongoing basis and formally reviewed annually, together with a review of the Conflicts Management Policy.

The Trustee also complies with the Guild Group Fraud & Whistleblower Policy to ensure any employee who reports a suspected breach in good faith is treated fairly.