



Newcourt Retirement Fund Managers Limited

Father Mathew Hall, 131 Church Street, Dublin 7

CONFLICTS OF INTEREST POLICY – NEWCOURT RETIREMENT FUND MANAGERS LIMITED (the “Company”)

Activities of the Company

The Company provides the service of receiving and transmitting orders pursuant to the European Union (Markets in Financial Instruments) Regulations 2017 (the “Regulations”).

Potential Conflicts of Interest

While it is unlikely that the provision of these services would result in a conflict of interest, the Company recognises that in general, a conflict of interest may arise when a person is in a position of trust which requires him/her to exercise judgement on behalf of others and where he/she has interests or obligations that may influence the exercise of his/her judgement. Conflicts of interest may arise between the Company and the client or between two or more clients

While potential conflicts may not be predictable in all instances and may be specific to the particular client situation, the Company recognises this and accordingly will identify, manage and disclose any conflicts of interest as they arise. The Company follows a conflict management procedure to eliminate potential risks of damage to client interests. Where this is not possible the Company will notify and disclose any conflicts to clients and ensure clients are treated fairly.

The following criteria assist in identifying potential conflicts of interest but this is not an exhaustive list:

- a. the Company or that person is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- b. the Company or that person 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;
- c. the Company or that person has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;
- d. the Company or that person carries on the same business as the client;
- e. the Company or that person 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;
- f. the Company, any of the directors or employees or those of an associate is a director or employee of a sister firm where investment services are provided;

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- g. the Company or a sister firm 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;
- h. the Company or an associate or sister firm receives remuneration or other benefits by reason of a sister firm acting as financial adviser;
- i. the Company may benefit from such advice as provided by an associate or sister firm in the form of a commission, fee, mark up or mark down payable otherwise than by the client, may be remunerated by the counterparts to the transaction and / or have arrangements relating to marketing or otherwise.
- j. is in a personal situation, as employee or director, where there may be a perception or real danger that confidential information regarding actions within one company that may be used improperly by another related company if shared.

Conflict of interest obligations on the Company

1. Identify conflicts of interest and management of any conflicts of interest arising
2. Establish conflicts of interest policy
3. Disclosure
4. Record of conflicts

1. Identifying and managing conflicts of interest

The Company will take all reasonable steps to identify conflicts of interest within the Company between the Company and third parties, between our clients and the Company and between one client and another. Procedures are in place to ensure risks of damage to client interests are eliminated. Where conflicts cannot be managed they will be disclosed to clients.

2. Conflicts of Interest Policy

The Company maintains and operates effective organisational and administrative arrangements to prevent conflicts of interest from adversely affecting the interests of our clients.

3. Managing Conflicts

The following procedures are used to prevent or manage conflicts of interest that could arise:-

- (a) Internal information barriers to prevent or control exchange of confidential information that may harm the interests of clients;
- (b) Appropriate level of independence between persons engaged in business activities involving a conflict of interest;

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- (c) Ensuring that staff adhere to all internal codes of conduct with regard to share dealing, company directorships, outside interests and rules around giving or receiving gifts, benefits or inducements;
- (d) Disclosure of information on all fees, commissions or other fee sharing agreements in place, where relevant.

4. Disclosure

The Company will disclose to clients the nature and source of any conflicts of interest and the risks arising from them, should they arise, before undertaking business on behalf of a client. The Company will endeavour to manage such conflicts or prevent them from occurring before considering disclosure.

5. Record of Conflicts

The Company maintains an updated record of investment activities and ancillary services carried out by us where a conflict of interest has arisen or where it might arise.

If you would like additional information on our conflicts of interest policy or if you have any queries or concerns, please do not hesitate to contact us.

This Policy will be reviewed annually.

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Newcourt Retirement Fund Managers Limited is regulated by the Central Bank of Ireland.
Registered Address: Father Mathew Hall, 131 Church Street, Dublin 7. CRO 395396. A private company limited by shares and having a share capital.
Directors: Gerard Keane, Mark Keane, Robert Millard and Daniel McGill.