



## Newcourt Retirement Fund Managers Limited

Father Mathew Hall, 131 Church Street, Dublin 7

### CONFLICTS OF INTEREST POLICY

#### NEWCOURT RETIREMENT FUND MANAGERS LIMITED (the “Company”)

##### Introduction

Newcourt Retirement Fund Managers is authorised as an Investment Firm under Regulation 8 (3) and deemed authorised under Regulation 5 (2) of the Statutory Instrument No. 375/2017 European Union (Markets in Financial Instruments) Regulations 2017. The Company is also authorised as a Product Producer who produces financial products (PRSA pension product) and issues appointments to intermediaries or an intermediary which may issue appointments to other intermediaries.

The Company specialises in regulated and unregulated self-invested pension contracts and is one of a small number of companies approved by the Pensions Authority and Revenue Commissioners to provide self-invested PRSA contracts.

##### 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 (“that person”). 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 mitigate the risks of damage to client interests. If the Company considers the arrangements we have in place to mitigate are not sufficient we will notify you as to the nature of the conflict, the risks that arise due to the conflict, and the steps we have taken to mitigate these risks so you may decide how to proceed.

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;



## Newcourt Retirement Fund Managers Limited

Father Mathew Hall, 131 Church Street, Dublin 7

- 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;
- 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. Situations where when acting as an employee or as a director, there may be a perception or real danger that confidential information regarding actions within one company may be used improperly by another related company if shared.

### **Conflicts of interest obligations on the Company**

1. Identify conflicts of interest and management of any conflicts of interest arising
2. Establish a conflicts of interest policy
3. Disclose where it considers the controls in place to mitigate the risk do not sufficiently mitigate the risk
4. Record any conflicts identified and the associated controls in place to mitigate the risk introduced by the conflict



## Newcourt Retirement Fund Managers Limited

Father Mathew Hall, 131 Church Street, Dublin 7

We monitor compliance with our conflicts of interest policy and related procedures. Should you have any queries as to how Newcourt Retirement Fund Managers manages conflicts of interest please contact our compliance department, at [info@nrfm.ie](mailto:info@nrfm.ie)

---

Newcourt Retirement Fund Managers Limited