

Conflicts of Interest

Alliance Trust Savings

Alliance Trust Savings is part of Alliance Trust PLC, which has set a Policy on the management of Conflicts of Interest which cover all Alliance Trust Group Companies, with the objective of ensuring that clients are not adversely affected.

This Policy includes:

- A requirement for all parts of the business to identify potential conflicts of interest, and document how they will be managed.
- Standards for the operation of 'Chinese Walls' (formal organisational arrangements for restricting the flow of confidential information).
- Procedures for monitoring the personal dealings of Alliance Trust colleagues who have access to certain kinds of 'inside information'.
- The limitation and management of personal conflicts of interest which individual colleagues might face, including limits on gifts and hospitality which may be given or accepted.

Within Alliance Trust Savings, the following specific arrangements are in place:

- Governance Policy and Framework
- Specific Chinese Walls in operation
- Client order handling and client order priority arrangements
- Aggregation or allocation arrangements
- Timely execution rules
- Staff Personal Account Dealing and Model Rules
- Market Abuse Policy
- Fees, Commissions and Non Monetary Benefits Policy
- Segregation of duties arrangements
- Internal Whistleblowing Policy
- Staff remuneration arrangements
- Procurement and outsourcing arrangements
- Inducements: Firm to firm and gifts and hospitality
- Relationships at Work Policy

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For security and compliance monitoring purposes telephone calls may be recorded.

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