

For customers

# Conflicts of interest policy

This policy covers Scottish Equitable plc (SE plc), Aegon Investment Solutions Limited (AISL) and Cofunds Limited.

A conflict of interest may arise where an action taken by us could be seen to compromise or conflict with the best interests of our advisers, intermediaries and customers. We're completely transparent about where conflicts of interest can arise and our policy to deal with them.

## Business entertainment and gifts

From time to time we may receive or provide corporate hospitality and gifts from/to advisers/intermediaries, service providers and suppliers. We have a strict policy regarding the receipt or provision of gifts and business entertainment and you can find more details about this in our **Anti-Bribery and Corruption** policy. A disciplinary process may be enforced if this policy isn't strictly adhered to.

## Client data

We expect high standards of performance and integrity from our staff. This is embedded in our way of working and is detailed in our procedures. Any breaches of our procedures are investigated and managed through our **Disciplinary** policy.

## Product provider and fund manager benefits

Parts of Aegon may receive non-monetary benefits from fund managers for distributing and administering their funds. These benefits are disclosed when required, for example, if such benefits could create perception of a conflict of interest. Examples could include promoting Aegon in their conferences or providing systems to help our business. They don't influence how funds are provided by advisers/intermediaries. When selecting fund providers, the relevant business will always try to ensure that the customer experience is right and the price is competitive. We have around 4,500 funds across different sectors and seek to offer best value for all funds.

## Third party fees

To enable our investment services, parts of Aegon may pay fees to third parties for services relating to the maintenance of investor accounts. Fees may also be paid to third party technology providers who offer investors access to trade on our platforms through their **advisers'/intermediaries'** website.

## Adviser/intermediary benefits

We may provide certain monetary and non-monetary benefits to advisers/intermediaries who use our platforms. These benefits are provided on the strict understanding that they'll enable advisers and intermediaries to:

- improve and extend the range of services provided to customers, and
- provide greater opportunity to pass savings on to customers by discounting funds, rebating commissions or reducing fees.

We have a strict **'gifts, hospitality and inducements'** policy regarding the frequency and cost of the benefits provided to each adviser/intermediary firm.

### 1. Monetary

We may contribute towards advisers'/intermediaries' marketing costs to promote our platforms and their services. Consideration may be given to integrate your adviser/intermediaries technology systems with the relevant part of Aegon, where appropriate.



## 2. Non-monetary

Minor non-monetary benefits may also be provided to advisers/intermediaries at no charge. These can include:

- tools to help them provide financial advice on our service and the products we distribute;
- technical training on the use of our platform and their associated facilities;
- integration of their computer systems and websites with our platforms;
- offsite meetings including reasonable and appropriate entertainment, round table discussions and marketing support, and
- exposure to market updates and fund manager commentary at conferences and other events.

## Further information

If you have any questions about our **Conflicts of interest** policy or **Anti-Bribery and Corruption** policy please get in touch. Our contact details are below.

ARC, One Retirement and Retiready

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The Aegon Platform

Customer Experience

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**For Aegon Retirement Choices, One Retirement and Retiready** – Aegon is a brand name of Scottish Equitable plc (No. SC144517) and Aegon Investment Solutions Ltd (No. SC394519) both registered in Scotland, registered office: Aegon, Lochside Crescent, Edinburgh Park, Edinburgh EH12 9SE. Both are Aegon companies. Scottish Equitable plc is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Aegon Investment Solutions Ltd is authorised and regulated by the Financial Conduct Authority (FCA). Their FCA Financial Services Register numbers are 165548 and 543123 respectively.

**For Aegon Platform** – Aegon is a brand name of both Scottish Equitable plc (No. SC144517) registered in Scotland, registered office: Aegon, Lochside Crescent, Edinburgh Park, Edinburgh EH12 9SE, and Cofunds Limited, registered in England and Wales (No.3965289), registered office: Level 43, The Leadenhall Building, 122 Leadenhall Street, London, EC3V 4AB. Both are Aegon companies. Scottish Equitable plc is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Cofunds Limited is authorised and regulated by the FCA. Their FCA Financial Services Register numbers are 165548 and 194734 respectively. © 2018 Aegon UK plc  
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