

## **Our Conflicts of Interest Policy**

### **Who We Are**

When we refer to “we”, “our” or “us”, we mean the Clifton Asset Management Group of companies, which includes:

- Clifton Asset Management Ltd (CAML)
- Clifton Wealth Partnership Ltd (CWP), FCA Firm Reference Number 541273, its Appointed Representatives, and all registered trading styles listed on the Financial Services Register
- Morgan Lloyd SIPP Services Ltd (MLSS), FCA Firm Reference Number 516447
- Morgan Lloyd Invest (MLI), FCA Firm Reference Number 820737
- Eden Park Investment Management Ltd (EPIM), FCA Firm Reference Number 820967

### **What is a Conflict of Interest?**

A conflict of interest can occur when different parties’ interests compete or could be seen to compete, for example:

- Between different groups of clients,
- Between different companies within our Group,
- Between the interests of our clients and those of third parties,
- When individuals providing services have another relationship with a client (e.g., personal, professional or trustee roles)

We take these situations seriously and aim to ensure all clients are treated fairly and consistently.

### **Our Commitment to You**

We are committed to:

- Being clear and transparent in how we operate
- Acting with honesty, fairness and integrity
- Applying fair and objective criteria when selecting business partners
- Providing impartial advice and managing potential conflicts proactively
- Ensuring ethical handling of gifts, hospitality and confidential information

Where conflicts cannot be completely avoided, we take steps to manage, monitor and, where necessary, disclose them to ensure they do not negatively impact our clients.

## How We Identify and Manage Conflicts

When providing a service or carrying out an activity, we consider whether we may:

- Make a financial gain or avoid a loss at a client's expense
- Have an interest in the outcome of a service that differs from the client's interests
- Be incentivised to favour one client or group over another
- Be carrying on the same type of business as a client
- Receive inducements from third parties other than standard fees or commissions

Any new conflict identified is assessed by the Head of Compliance, and where appropriate, by our Board, to determine whether:

- Existing controls are sufficient
- Additional controls are required
- The conflict should be disclosed to the affected client(s)

### Our Controls Include:

- A suite of policies including our Conflicts of Interest Policy, Anti-Bribery Policy and Gifts & Hospitality Policy
- Conduct standards requiring all colleagues to act with integrity
- Remuneration structures designed to avoid conflicts
- A Personal Account Dealing Policy governing staff investment activity
- Restrictions and monitoring of outside business interests (e.g., directorships)
- Regular assurance checks to confirm adherence to policy and process

### Disclosure

If a conflict cannot be fully managed or avoided, we will disclose it to the relevant client(s) before conducting any business on their behalf, ensuring they can make an informed decision.

### Record Keeping and Monitoring

We maintain a Conflicts of Interest Register, which records any actual or potential conflicts arising from the services we provide. This register is reviewed regularly, and the Conflicts of Interest Policy is reviewed at least annually, or whenever else required.

Compliance monitors adherence to this policy and reports under our corporate governance framework.

### **Conflicts associated with the Morgan Lloyd Invest Platform**

Morgan Lloyd Invest Limited is an Appointed Representative of Morgan Lloyd SIPP Services Limited. Both companies are wholly owned by Clifton Asset Management Ltd.

The Morgan Lloyd Invest Platform is made available to clients of:

- Clifton Wealth Partnership
- Its Appointed Representatives
- Other subsidiary advice firms within the Group

The platform sits within a panel of platforms subject to due diligence and oversight by Clifton Wealth. Importantly:

- No adviser within the Group has any direct financial interest in MLSS, MLI or the Morgan Lloyd Invest Platform.

Your adviser will only recommend the Morgan Lloyd Invest Platform where:

- It is in your best interests
- It aligns with your agreed objectives and needs
- It is suitable following our robust advice and quality control processes

### **Eden Park Investment Management Model Portfolios**

Where appropriate, your adviser may recommend a solution from the Eden Park range of model portfolios. These are managed by Eden Park Investment Management Ltd and subject to a discretionary management charge. These portfolios form part of the Clifton Wealth Partnership investment matrix and are overseen by the firm's Investment Committee.

### **Our Advice Approach**

Clifton Wealth Partnership Ltd and its Appointed Representatives provide restricted advice. This means:

- Recommendations are made from a curated panel of providers
- Where suitable, products may be recommended from companies within the Clifton Group

Across all recommendations, whether Group products or external solutions, our governance framework ensures your adviser only acts where it is:

- In your best interests
- Aligned to your objectives
- Suitable for your needs

- Supported, where required, by independent third-party oversight

As all Group companies are subsidiaries of Clifton Asset Management Ltd, the parent company ultimately benefits where Group products are recommended. However, our controls and oversight processes ensure that any such recommendation is based solely on suitability and client best interests.