

Conflicts of Interest Policy Summary

Introduction

IntegraLife UK Limited, Integrated Financial Arrangements Ltd, IntegraLife International Limited and IntegraFin Services Limited (together collectively referred to as 'we', 'our', 'us') operate and comply with a Conflicts of Interest Policy (our 'Policy'). Our Policy sets out our requirements for identifying, preventing, managing, mitigating and, where they cannot be mitigated or prevented, disclosing conflicts of interest to our clients ('you', 'your').

Conflicts of interest include conflicts between your and our interests or between your interests and the interests of our other clients or between your interests and the interests of our staff, contractors or agents.

We recognise the importance of identifying those aspects of our service, including how we interact with our third party service providers, which might give rise to conflicts of interest and so present a material risk to your interests.

At the date of this document there are no identified conflicts of interest we have not been able to manage or mitigate. If any conflicts are identified that cannot be managed or mitigated, we will provide you with full details in your periodic statement and/or on our website (www.transact-online.co.uk – see the 'Legal & Regulatory Information' section). **A full copy of our Policy is available upon request.**

Summary of our approach to conflicts of interest

Our Policy provides the framework within which we aim to meet clients' expectations and deliver fair outcomes in the context of conflicts of interest. We believe that our current organisational structure together with our systems and controls for managing conflicts of interest provide an effective way of preventing conflicts of interest and avoiding your interests being unfairly affected.

We will always seek to manage any conflict of interest that arises. In the event that we are not able to manage a conflict with reasonable confidence, we will disclose, in writing to you, the nature and source of the conflict before we undertake any further business for you. This will help you decide whether you want to do (or continue to do) business with us.

Any Personal Data used in the operation of our Policy is used fairly, responsibly and in accordance with applicable law and regulation.

In particular our approach includes:

Organisational structure – Where practical to do so, we arrange our business model and services to avoid conflicts of interest; for example, we segregate duties so that no one person has inappropriate influence over a particular process and we do not carry out proprietary trading.

Training – We provide all staff, including our board members, with training and support materials to help them recognise conflicts of interest and understand that they are expected to take all reasonable steps to avoid or manage those conflicts and to record and disclose them.

Account dealings – Our order execution policy sets out the criteria by which we manage our aggregated customer orders and details how we try to ensure the best possible results for you at all times. To prevent any conflicts arising from the use of information obtained by clients and market abuse in general, we have a personal account dealing policy and associated procedures in place which all staff are expected to follow.

Personal conflicts – Our staff must disclose any business or other relationships which might give rise to a conflict of interest while they are employed by us. When required, individuals may be asked to resign from external positions or make other arrangements to ensure that they are not conflicted.

Inducements – We only accept new business from UK authorised financial adviser firms and in our business relationships with them, we ensure that, any training and support we give them is appropriate, not paid for by your fees and is always provided so as to improve the quality of our service to you and not to conflict with your best interests. Our staff are not permitted to accept, or offer any gift or other benefit which would be likely to conflict with your best interests or which, in any event, is more than moderate in value. All gifts and hospitality must be reported and recorded.

Whistleblowing – Our whistleblowing arrangements ensure that staff can report confidentially any wrongdoing by others.

Selection of suppliers – We do not permit personal relationships with third party service providers. During the selection process, due diligence and a risk assessment are conducted before any relationship is formed. We have a supplier management policy and procedures in place which all staff must follow.

Annual reviews and monitoring – We keep all of our policies and procedures, including our Policy, under review and monitoring is in place to confirm our Policy is being followed.



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