

CONFLICTS OF INTEREST POLICY

Authorisation

Exclusive Mortgage Advice Services Ltd is a firm of national Financial Advisers. It is also a "network" and authorises Appointed Representative firms. Exclusive Mortgage Advice Services Ltd is authorised and regulated by the Financial Conduct Authority (FCA) under registration number 970249.

The FCA requires Exclusive Mortgage Advice Services Ltd to take all reasonable steps to manage its conflicts of interests appropriately. Principle 8, of the FCA's Principles for Business state that a firm must manage conflicts of interest fairly, both between itself and its customers and between a customer and another client.

Conflicts of Interest Definition

A conflict of interest arises where a person or organisation is involved in multiple interests, one of which could mean the client's best interests are not put first, or are different from the interests of the person or organisation.

Exclusive Mortgage Advice Services Ltd is committed to ensuring its decisions and decision making processes are, and are seen to be, free from any bias and do not unfairly favour any individuals and clients.

At all times, Exclusive Mortgage Advice Services Ltd conducts its business in accordance with FCA rules and principles, and is committed to effectively managing conflicts of interest fairly between itself and its clients.

At Exclusive Mortgage Advice Services Ltd, The Board and Senior Management Team are responsible for ensuring that systems, controls and procedures are adequate to manage any conflicts of interest.

Conflicts of Interest Policy

All staff, advisers, and management of Exclusive Mortgage Advice Services Ltd will strive to avoid any conflict of interest between the interests of Exclusive Mortgage Advice Services Ltd on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

The purpose of this policy is to protect the integrity of Exclusive Mortgage Advice Services Ltd's decision-making process, to enable our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of staff, advisers and management.

In the course of meetings or activities, advisers will disclose any interests in a transaction or decision where there may be a conflict between Exclusive Mortgage Advice Services Ltd's best interests and the client's best interests or a conflict between the best interests of any organisations that the adviser is involved with.

This policy is meant to supplement good judgment, and staff, advisers and management should respect this.

Disclosure to Clients

Clients are provided with the Exclusive Mortgage Advice Services Ltd disclosure document before commencing any business relationship. This document is known as the Personal Client Agreement (PCA) and provides notification to clients as to what the process is should any conflict(s) of interest arise.

Remuneration

Exclusive Mortgage Advice Services Ltd clients are given a choice of how they wish to pay for services from a given menu of options. Both the level of service and the cost is agreed at outset prior to any work commencing.

For investment and pension business payment can only be made by way of a fee, be this fixed, a percentage of the investment amount or an hourly rate. This ensures that there is no bias towards a particular provider or platform.

Alternatively, for an insurance product payment can be made by either commission from the insurance provider, a fee or a combination. Similarly with mortgage cases, a procuration fee would be paid by the lender. These commissions and procuration fees will be disclosed to clients before they proceed.

Compliance Procedures

The Exclusive Mortgage Advice Services Ltd compliance procedures manual confirms that advisers must provide notice of any other business activities they have or wish to become involved with, whether these are a conflict of interest or not.

Advisers and principals (of Appointed Representative forms) must seek approval from Exclusive Mortgage Advice Services Ltd in writing before commencing engagement or with any other business activity or intend to sign any agency agreements, introducer agreements, or set up any other businesses whether financial services related or not.

This ensures that Exclusive Mortgage Advice Services Ltd are aware of any activities that could cause potential conflicts of interests. If potential conflicts of interest may arise then these other business activities will not be authorized by Exclusive Mortgage Advice Services Ltd.

Examples of Conflicts of Interest

Examples noted below of what could be considered conflicts of interest

- A product provider may offer gifts or entertainment that may influence the placement of a product with that particular product provider
- An employee is to make financial gain, or avoid financial loss, at the expense of a client
- An adviser receives a payment from a third party in relation to services provided to the client that is outside the normal commissions or fees for the agreed service
- Advising a client on investments that are not regulated
- An adviser who is also on the board of another organisation that is competing for a client
- An adviser who has shares in a business that may profit from unregulated advice
- An adviser passing large amounts of business to a particular insurer because they previously worked at the insurer and still have friends there
- A mortgage adviser passes large amounts of business to a lender because they have a relative working at that lender
- A product provider may offer a loan and cash gift in the expectation of getting more business in return
- An adviser has a financial or other incentive to benefit the interests of one customer over another
- An adviser dealing with both divorced clients

Register

Exclusive Mortgage Advice Services Ltd maintains an internal conflicts of interest register within which any conflicts are noted.

Identifying Conflicts of Interest

Exclusive Mortgage Advice Services Ltd has developed a number of processes to identify potential conflicts of interest.

These include at least an annual analysis of the products and providers recommended and the types and amount of remuneration received, in addition to reviewing internal procedures and processes to ensure these remain suitable to ensure any potential risks can be identified.

A central record is also held to log details of where a third party, product provider or fund management group provides training and seminars to advisers.