

# Financial Planning Conflicts of Interest



## What is conflict of interest?

Nationwide expects all of its employees and those of its third parties to operate with honesty, integrity and transparency in all business activities. A conflict of interest can occur:

- Where activity doesn't act in the interests of Nationwide and/or our members.
- Where a member has an interest, which is actually or potentially distinct, incompatible or competes with the interest of another member.

Nationwide is committed to promoting a culture across the organisation where conflicts of interest are identified and managed to eliminate the risk of detriment to our members and to protect our society.

Nationwide adheres to a conflicts of interest policy, that includes the following key points:

### • **Gifts and Hospitality Policy - Business entertainment and gifts**

The giving and receiving of gifts and hospitality is considered to be a commonplace part of business relationship building, however such activities between third parties and individuals should be fair and even handed.

The actions of individuals should never give the impression that they might have been influenced by a gift or other consideration to show favour or disfavour. Within the Nationwide gifts and hospitality group policy, all gifts and hospitality, offered or received, follow an approval and recording process.

### • **Anti-Bribery and Corruption**

Bribery and corruption is a risk for organisations across the world, and a collaborative approach across Governments, Law Enforcement Agencies and businesses is taken to tackle the issue. The Nationwide Group is bound by the laws of the UK, including the Bribery Act 2010 which concerns conduct both at home and abroad.

Nationwide takes a zero tolerance approach to bribery and is committed to implementing and enforcing effective systems to counter bribery and corruption. The Nationwide Board is committed to operating with honesty and integrity in all of its business activities and to promoting an Anti-Bribery and Corruption culture across the Group.

The Nationwide Group anti-bribery and corruption policy sets out preventing bribery and corruption and explains the behaviour.

### • **Market Abuse**

Nationwide sets out a market abuse policy regarding situations involving transactions entered into in a personal capacity relating to shares or any regulated products including Nationwide listed securities. Additional guidance on these situations can be obtained from the Group General Counsel, Legal and Compliance division.

### • **Provider & Fund Manager Benefits**

Nationwide may receive non-monetary benefits from fund managers and product providers for selling their products. These benefits are disclosed where required.

## How conflicts are managed

Nationwide manages conflicts of interest by having in place appropriate systems and controls. These take the form of individual policies and processes. The aim is to ensure that accurate records are maintained of all situations where the potential for a conflict could arise.

## Important Information

Cofunds Limited provide Stocks & Shares ISAs, General Investment Accounts, the Aegon Platform and the Aegon Dashboard, and make trades on your behalf.

Nationwide Building Society is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority under registration number 106078. You can confirm our registration on the FCA's website [fca.org.uk](http://fca.org.uk)

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