

Gifts and inducements policy

Overview

Both the Financial Conduct Authority (FCA), which regulates our firm, and the Bribery Act aim to prevent firms and people from gaining improper advantage over others by inducing someone to do something they would not otherwise do. Offering such an inducement could constitute a criminal offence under the Bribery Act.

Payment for services

It is a regulatory requirement that we are paid through adviser charges. The rules state we must:

- Only be remunerated for the personal recommendation (and any other related services provided) by adviser charges; and
- Not solicit or accept any other commissions, remuneration or benefit of any kind in connection with advising or any other related services, regardless of whether we intend to refund the payments or pass the benefits on to the retail client; and
- Not solicit or accept (and ensure that none of our associates solicits or accepts) adviser charges in relation to the retail client's retail investment product which are paid out or advanced by another party over a materially different time period, or on a materially different basis, from that in or on which the adviser charges are recovered from the retail client.

The exceptions to these rules are:

- Where the personal recommendation was made on or before 30 December 2012 as this was permitted in the rules prior to this date
- Where we enter into an arrangement under which the right to receive the commission, remuneration or benefit of any kind is transferred to us from a previous adviser
- Where the commission is payable for a recommendation for a protection policy

We may offset against any adviser charges which are payable by the client against any allowable commission we receive.

Acceptable minor non-monetary benefits

We may accept minor non-monetary benefits which are in relation to the provision of investment services or in relation to other business.

An acceptable minor non-monetary benefit is one which:

- Is clearly disclosed prior to the provision of the relevant service to the client;
- Is capable of enhancing the quality of service provided to the client;
- Is of a scale and nature that it could not be judged to impair the firm's compliance with its duty to act honestly, fairly and professionally in the best interests of the client;
- Is reasonable, proportionate and of a scale that is unlikely to influence the firm's behaviour in any way that is detrimental to the interests of the relevant client; and
- Consists of:
 - Information or documentation relating to a specific retail investment product or a service provided in the course of carrying on related designated investment business, that is generic in nature or personalised to reflect the circumstances of an individual client;
 - Written material from a third party that is commissioned and paid for by a corporate issuer or potential issuer to promote a new issuance by the company, or where the third party firm is contractually engaged and paid by the issuer to produce such material on an ongoing basis, provided that the relationship is clearly disclosed in the material and that the material is made available at the same time to any firms wishing to receive it, or to the general public;

- Participation in conferences, seminars and other training events on the benefits and features of a specific retail investment product or a service provided in the course of carrying on related designated investment business; and
- Hospitality of a reasonable de minimis value, such as food and drink during a business meeting or a conference, seminar or other training event

A fee, commission or non-monetary benefit is designed to enhance the quality of the relevant service to a client only if:

- It is justified by the provision of an additional or higher level service to the client and is proportional to the level of inducements received;
- It does not directly benefit the recipient firm, its shareholders or employees without tangible benefit to the client;
- It is justified by the provision of an ongoing benefit to the client in relation to an ongoing inducement; and
- The provision of the service by the firm to the client is not biased or distorted as a result of the fee, commission or non-monetary benefit.

We will fulfil these conditions on an ongoing basis as long as the firm continues to pay or receive the fee, commission or non-monetary benefit.

Reporting

All gifts, whether given or received, are recorded in our gift and inducement register.