

## **CONFLICTS OF INTEREST POLICY**

Stephen P Healy t/a **Brindle Financial Services** ('the Business') is regulated by the Central Bank of Ireland.

### **Our best endeavors**

It is the policy of our firm to avoid conflicts of interest in providing services to you.

*Such conflicts might arise where Brindle Financial Services or one of its employees, for example, **(Please note: these are for example purposes)***

- Is in receipt of commission/intermediary remuneration from a provider which business is placed with.
- Is likely to make a financial gain, or avoid a financial loss, at the expense of the client.
- Has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome.
- Has financial interest or other incentives to favour the interest of another client or group of clients over the interest of the client.
- Carry on the same business as the client.
- Receive or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service.

The concern would be that such relationships would allow a reasonable person to question whether the parties can act at all times at arms length with each other and whether their commercial or personal interests could be conflicted.

### **The firm mitigates these risks by:**

- A Terms of Business is provided to clients providing an overview of the firms services and remuneration policy.
- Completing a full Factfind with clients.
- A detailed statement of suitability will be issued to the client on the product/service recommended.
- Use of the research guidelines and checklist completed and retained on file.
- Review carried out to determine the ongoing suitability of products for clients **(on applicable products)**
- A copy of the Factfind will be provided to the consumer for their records.
- The firm ensures that products sold are suitable to client's needs, circumstances, financial situation, risk and are not commission driven.
- Where an unavoidable conflict of interest arises, the conflict of interest will be disclosed to the client, and client must acknowledge in writing that they are happy to proceed.

To monitor potential conflicts, we review all instructions to our firm on a regular basis to assess and seek to identify circumstances which may give rise to a potential conflict of interest, entailing a risk of damage to your interests or the interests of any of our clients.

However, where an unavoidable conflict of interest arises, we will disclose the general nature and/or source of the conflicts of interest to you and advise you of the procedures to be followed in order to manage any such conflict before providing you with any service.

In such cases, the consumer must acknowledge, on paper or on another durable medium, that he or she is aware of the conflict of interest and still wants to proceed.

It is our policy that none of our officers or employees offer, give, solicit or accept gifts or rewards (monetary or otherwise) which are likely to conflict with any of their duties or activities.

### **Employer Obligations**

- As employers our firm is aware that the remuneration arrangements in place with employees in respect of providing, arranging or recommending a product or service to our client, are not structured in such a way as to potentially impair our obligations to act in the clients' best interests at all times.

### **Soft Commission Arrangements**

- Where we enter into a soft commission agreement this will be in writing. Any business transacted under a soft commission agreement will not conflict with the best interests of our clients.
- If we think that a client may be affected by such an agreement we will make them aware of the agreement and how it may affect them, giving them the option to proceed with the transaction or not. A copy of the soft commission agreement(s) is available to a client on request.
- We are aware that all goods or services received under a soft commission agreement must be used to assist in the provision of services to our clients
- Where changes in a soft commission agreement affect a client, we will notify the client promptly after implementation of any such changes.

We shall at all times ensure that our duty to act in your best interests is not impaired.

### **Reviews**

It is our policy to undertake a review at least on an annual basis of the conflicts of interest policy to identify any deficiencies and we will make changes to the policy as required.

Evidence of this review will be maintained by the firm.