

CONFLICTS OF INTEREST POLICY SUMMARY FOR CUSTOMERS

What is a Conflict of Interest

A Conflict of Interest is when someone's judgement at work is, or could be, affected by something not connected to their role. This could impact how they reach decisions as they could be influenced on how they make those decisions. This could affect our customers, other employees or our business overall. This is why we have a policy and framework in place to deal with and manage Conflicts of Interest. It outlines how we can safeguard the interests of our customers.

Conflicts of Interest within Just Group

Conflicts of Interest could affect any area in the Just Group and/or a company we have an association with.

The Just Group includes the following UK regulated firms:

- Just Retirement Limited;
- Just Retirement Money Limited;
- Partnership Life Assurance Company Limited;
- Partnership Home Loans Limited;
- HUB Financial Solutions Limited, trading as:
 - HUB Financial Solutions;
 - HUB Pension Consulting; and
 - Destination Retirement.

Known going forward as “Just”, or where we use “we”, “our” or “us”.

A Conflict can be due to many different influences, such as working with lots of different companies, or the presence of harmful ones such as personal gain. We may, from time to time, have interests that conflict with our customers' interests or with the duties that we owe to our customers.

Conflicts can arise between:

- one company and another;
- Just and a customer;
- an employee and a customer;
- an employee and Just; and / or
- one part of Just and another.

How we deal with Conflicts

We design our organisational structure so that behaviour that could lead to Conflicts is not incentivised or rewarded. Where necessary, we restrict the flow of information to certain employees to protect our customers' interests. We have procedures in place to:

- identify potential Conflicts;
 - maintain a register of all potential Conflicts;
 - prevent or manage Conflicts;
 - disclose Conflicts, where appropriate; and
 - document occurrences of Conflicts that can't be managed.
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Identifying Conflicts

Each of our companies consider the types of potential Conflict relevant to the specific services and activities they carry out. For example, we consider potential Conflicts when we are:

- Recruiting new employees or they are changing roles;
- Developing a new product or service;
- Establishing or amending joint venture arrangements; or
- Transferring businesses, activities or operations, or parts thereof, to another part of the Group.

When potential Conflicts involve customers

When assessing conflicts, we also consider whether the Group and / or any employee:

- is likely to make a financial gain or avoid a financial loss at the expense of any customer;
- has an interest in the outcome of a service provided to a customer, or of a transaction carried out on behalf of the customer, which is distinct from the customer's interest in that outcome;
- has a financial or other incentive to favour the interest of one customer, or group of customers, over another;
- receives or will receive an inducement in relation to a service provided to the customer from a person other than the customer.

We have an internal Conflicts of Interest Register, where we record potential Conflicts. The Register details the controls in place to prevent or manage Conflicts and is subject to oversight and review by our Compliance function.

Preventing or managing Conflicts

We structure the reward, deployment and management of employees in a way that minimises Conflicts. Our procedures ensure that, where necessary, potential Conflicts are escalated and managed before we commit to a transaction. In some cases, we'll consider declining to act for one or more customers. For example, if:

- A Conflict is too great;
- Confidentiality obligations prevent adequate disclosure; and / or
- Informed consent can't be obtained or is an insufficient control to manage a Conflict.

The Compliance function present material Conflicts, as appropriate, to Just's governance committees.

Our commitment to you

We're committed to treating our customers fairly and ensuring they receive good outcomes. If we know of a Conflict of Interest that could affect you, we'll let you know as soon as possible. We'll also keep you updated with how we're managing that conflict and when it has ended. We support our customers by:

- providing training for employees to be able to identify and raise concerns about Conflicts of Interest;
- not allowing employees to advise customers on any matter in which they have a personal interest, take commercial decisions on behalf of the Group if those decisions are connected to their personal or external business affairs. We'll put steps in place to manage this conflict before any further advice can be given to a customer;
- dealing with complaints fairly and objectively, and if we've caused a financial loss, we'll deal with this accordingly;
- having a whistleblowing policy. This is where employees can anonymously report any concerns about any matters in the public interest including any Conflicts of Interest;
- having a gifts and hospitality policy and register. This is where employees can register any gifts and hospitality they give or receive. This is reviewed by our independent Compliance function to make sure our employees aren't influencing others or being influenced.

We review our Conflicts of Interest Policy and Framework at least once a year to make sure everything is still up-to-date and working for us and our customers. If you have any questions about how we manage Conflicts of Interest, then do please get in touch.

If you are a Just customer, please visit
www.wearejust.co.uk

If you are a HUB customer, please visit
www.hubfinancialsolutions.co.uk