SUMMARY OF CONFLICTS OF INTEREST POLICY

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This document summaries HL's Conflicts of Interest Policy.

It is important for our clients to understand how we manage our Conflicts of Interest, and our Conflicts of Interest Policy sets out how this is achieved for actual, potential, and perceived Conflicts of Interests. It is important we do this as Conflicts of Interest which are not managed properly could cause harm to our clients, our business, or our colleagues.

WHAT IS A CONFLICT OF INTEREST?
A Conflict of Interest is a situation in which a person or entity has multiple interests, financial or otherwise, and serving one interest could involve detriment to another. HL categorises its Conflicts of Interest as either business or personal.

Business Conflicts of Interest
are where:

- HL's interests may conflict with those of Clients.
- Interests within HL between entities, departments or groups of colleagues are conflicted; or
- Those of HL Business Partners or Suppliers conflict with HL interests.

Personal Conflicts of Interest are where an individual's personal interests' conflict with those of
HL through:

- Outside positions or financial interests, they have or
- Relationships they have with other HL colleagues, HL business partners, suppliers, competitors, or people who work for these organisations.

HOW ARE OUR CONFLICTS OF INTEREST MANAGED?
HL has robust procedural and administrative arrangements in place to help identify and declare Conflicts of Interest, assess, and record them, control their potential impact, and monitor their effective management.

Colleagues are provided with appropriate training and support materials to ensure they maintain strong awareness and understanding of Conflicts of Interest and what action they should take.

GOVERNANCE AND OVERSIGHT
HL's governance structure provides effective oversight of its management of Conflicts of Interest. This includes review and challenge of our policies and procedures to ensure they prevent Conflicts of Interest from causing harm to our clients, business, and colleagues.

It promotes the highest standards of integrity and ethical conduct from HL's colleagues through the HL Way which helps to underpin our effective management of Conflicts of Interest.