

# Conflicts of Interest Policy

## UK Investment

June 2020

This document sets out how Aon's UK investment business works with its clients. Aon is authorised and regulated by the Financial Conduct Authority (FCA), which sets out rules for managing potential conflicts of interest. Our approach to this is more than a requirement, it is the way we work with our clients every day.

Our approach is an extension of our [Code of Business Conduct](#), and our global policy on the management of actual and potential conflicts of interest. This requires all colleagues to:

- Recognise and address potential conflicts of interest;
- Avoid doing anything that could create the appearance of failing to act in the best interest of our clients or business partners; and
- Manage actual conflicts of interest that arise.

Our approach is at the heart of our culture. Our training and processes ensure they are reflected in our dealings with clients. We always welcome the opportunity to discuss our approach, the training we provide to our colleagues and the surrounding processes with clients, potential clients, regulators and other interested third parties.

## How we manage conflicts

### Our people

All colleagues have regular training on the importance of managing conflicts of interest in the services they provide to their clients.

Our colleagues must always consider and act in their clients' best interests, and ensure they are following FCA principles. It is their duty to seek to identify and manage actual or potential conflicts.

Where a colleague has a concern regarding an actual or potential conflict of interest, there is an easy process to obtain support. In the first instance, a colleague will raise the issue with the Investment Professional Standards Group for guidance.

We ensure that reward and remuneration policies do not put pressure on colleagues to provide anything other than the most suitable and appropriate recommendations to their clients.

### Our approach

First and foremost, we take steps to avoid any conflicts arising. We will not knowingly enter into any engagement that is likely to result in a conflict of interest between ourselves and clients, unless it is possible to take appropriate steps to manage the conflict so that we can protect our clients' interests.

We do not place over reliance on disclosure – our primary aim is to avoid conflicts whether actual or potential and to manage those we cannot avoid altogether.

**Our processes and systems ensure and demonstrate our approach is followed.**



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