

Conflicts of interest policy

Introduction

This policy applies to Premier Fund Managers Ltd (PFM) and Premier Portfolio Managers Ltd (PPM) which are subsidiaries of Premier Miton Group plc. It also applies to Premier Miton Group plc and any other subsidiaries of Premier Miton Group from time to time (together “Premier Miton”). This policy describes the identification and effective and equitable resolution of conflicts of interest that exist, or could arise between:

- Premier Miton and its clients
- One client and another
- Two or more of the Premier Miton group of companies
- One or more employees and Premier Miton

The boards of Premier Miton define, oversee and are accountable for the implementation of governance arrangements that ensure effective and prudent management, including taking all reasonable steps to prevent conflicts of interest adversely affecting the interests of its clients and avoiding causing them foreseeable harm.

Premier Miton arranges its business to minimise the potential for any conflicts of interest arising between different clients, between Premier Miton and its clients or between Premier Miton and its employees. However, occasionally they do arise and when this happens, and they cannot be prevented, Premier Miton will act in good faith towards its clients and manage the conflict to ensure that the clients’ interests are always put ahead of its own and that all groups of clients are treated fairly.

Premier Miton also considers conflicts of interest which relate to stewardship activities or ESG and sustainability matters where conflicts may exist and manages them to ensure that appropriate action is taken to resolve the conflict or disclose it where it cannot be resolved.

Identifying a conflict

Premier Miton has established appropriate procedures and controls to identify, prevent or manage, on an on-going basis, any conflicts of interest that may arise, with the aim of ensuring that the interests of the client are not compromised. These controls include a

number of policies such as the ‘Order Execution Policy’, Personal Account Dealing Policy and ‘Gifts, Entertainment and Benefits Policy’ and board oversight of actual or potential conflicts.

Examples of potential conflicts

Below are examples of potential conflicts of interest and how they are managed.

- **Conflict:** A transaction is effected in units or shares of a connected investment trust, unit trust or open-ended investment company of which Premier Miton or an affiliated company is the manager or authorised corporate director.
- **Resolution:** All investments are assessed to ensure that by including them in a portfolio they will help to meet the objectives of the portfolio. If a client is invested in a Premier Miton fund, which invests in another Premier Miton fund, we will take steps to avoid double charging.
- **Conflict:** Premier Miton purchases units and shares in unit trusts and open-ended investment companies (OEICs) managed by other asset management firms for inclusion in some of the Premier Miton funds; where possible Premier Miton will purchase institutional share classes, however, where institutional share classes are not available, a rebate of the annual management charge may be negotiated on such external unit trusts and OEICs, in accordance with applicable FCA rules.
- **Resolution:** Rebates of the annual management charge received by Premier Miton are credited to the account of the relevant Premier Miton fund to which it applies, in compliance with applicable FCA rules. Premier Miton does not benefit directly from such rebates.

Rebates of the annual management charge received on the SEI Platform for the Premier Portfolio Management Service are allocated directly to clients with tax wrapped accounts. Anything else is returned or donated to charity. Premier Miton does not benefit directly from such rebates.

- **Conflict:** Member of staff may engage in trading of securities or other instruments for their own account. Such trading activities may put those members of staff, in conflict with the interests of client portfolios or a Premier Miton fund (for example, by having a personal interest in a transaction with a Premier Miton fund or client portfolio).
- **Resolution:** All directors and employees of Premier Miton are subject to the Premier Miton Personal Account Dealing Policy. This policy ensures that all dealing on behalf of client portfolios or Premier Miton funds takes precedence over personal account dealing and that no personal account dealing would be to the detriment of a client. The policy requires all members of staff to obtain prior approval before they are allowed to transact in a security. Approval for a personal account transaction will not be granted if such a transaction may cause a conflict with Premier Miton's duty to act in the best interests of its clients.
- **Conflict:** Premier Miton might seek to allocate costs to a fund, which it should cover itself.
- **Resolution:** The types of costs which may be charged directly to a fund are outlined in the Prospectus and may include, among others, the annual management charge, depositary fee, transaction costs, investment research and custody fees. Whilst the fund's Depositary is responsible for ensuring that only allowable costs are allocated to the fund, Premier Miton will review and approve all fees prior to payment and in doing so, will check to ensure they are reasonable and appropriate. To introduce a new fee or a material increase to an existing fee, Premier Miton would, following approval from the FCA, either seek investor approval or give reasonable notice to investors as required. Premier Miton actively

seeks the view of the Depositary as to the appropriateness and fairness of costs to the funds prior to any changes.

- **Conflict:** The possibility exists for an in-house analyst or investment manager to be influenced in their research findings or investment decisions by the offer of gifts or other inducements from a broker, company or other financial institution.
- **Resolution:** Premier Miton has an 'Anti-Bribery Policy', a 'Gifts, Entertainment and Benefits Policy' and a 'Distributor Expenditure Policy' which prohibits staff from accepting gifts, hospitality or other benefits which have the potential to cause a conflict of interest with Premier Miton's regulated business.
- **Conflict:** Premier Miton may manage portfolios for clients which have the same or overlapping investment strategies, but which have different individuals responsible for the portfolio management activities. Where one such individual manager is aware of investment decisions made by the other individual manager, there is a risk of that manager using the information to front-run the other manager's clients ("Front-Running Conflict").
- **Resolution:** Premier Miton has an 'Order Execution Policy; and an 'Order Allocation Policy', which prohibits any form of front running by fund managers and sets out arrangements for the fair aggregation and allocation of orders in the same security.

Premier Miton does not conduct proprietary trading (trading on securities for its own account to make a profit) nor does it issue securities or provide corporate finance advice, all of which may lead to conflicts of interest with clients.

Occasionally Premier Miton does need to buy or sell stock into a correction account to correct an administrative error, such as purchasing too much stock on a client's behalf. Such dealing is infrequent and usually small in nature and is only conducted to the extent required to put the client in the position they should have been in, with any shortfall covered by Premier Miton.

Remuneration and incentive structures are designed with the aim not to create any inducement for a director or employee to act contrary to a client's interests. Remuneration including any discretionary bonus payments is overseen by the Premier Miton Remuneration Committee, and an annual disclosure is made in accordance with FCA rules.

Personal conflicts of interest may arise between an employee and Premier Miton and its clients, for example through the personal association or personal interest or association of an employee, close family or close friends. Premier Miton requires all employees to disclose actual or potential conflicts of interest that may arise as a result of such an association. This policy does not serve as an exhaustive list of all conflicts of interest that may be encountered by Premier Miton. In the event that a new conflict of interest arises, Premier Miton will identify and manage such conflicts in accordance with its procedures.

Disclosure

Situations may arise where Premier Miton's procedures and controls to prevent or manage conflicts of interest are not sufficient to ensure that risk of damage to a client's interests will

be prevented. Before undertaking business for the client in those circumstances, Premier Miton must disclose the general nature or sources of the conflict alongside steps to mitigate any associated risks. Premier Miton treats such disclosures as a measure of last resort to be used only where the procedures and controls are insufficient to ensure, with reasonable confidence, that risks of damage to the interests of the client will be prevented. Premier Miton may also look to obtain the client's formal consent to proceed with a course of action or decline to act in circumstances where there is the risk of adversely affecting the interests of any client.

Recording and monitoring conflicts of interest

Records of actual and potential conflicts, and the procedures in place to manage them, are regularly reviewed and kept on file.

The effectiveness of the above controls is routinely monitored by the Compliance Team. Any notable findings arising from the monitoring process will be reported to the regulated Board of Premier Miton where applicable. There is also Committee and board oversight of all known actual or potential conflicts of interest.

Frequency of review

Premier Miton will assess and review this policy and its effectiveness on at least an annual basis. This will enable Premier Miton to identify and, where appropriate, make any improvements or enhancements and to address any deficiencies.

Should you require additional information on how Premier Miton manages conflicts, please contact us.

Issued by Premier Miton Investors. Premier Portfolio Managers Limited is registered in England no. 01235867. Premier Fund Managers Limited is registered in England no. 02274227. Both companies are authorised and regulated by the Financial Conduct Authority and are members of the 'Premier Miton Investors' marketing group and subsidiaries of Premier Miton Group plc (registered in England no. 06306664). Registered office: Eastgate Court, High Street, Guildford, Surrey GU1 3DE.