



Conflicts of Interest Policy

Introduction

We ("Plum") are Plum Fintech Limited and Saveable Limited, both firms are authorised and regulated by the Financial Conduct Authority, (FRN 836158 and FRN:739214, respectively).

This Policy addresses how Plum will identify, prevent and manage conflicts of interest in respect of its business activities.

Conflicts of Interest Policy

Plum, being a regulated entity, is required to establish, implement and maintain an effective Conflicts of Interest Policy set out in writing, which is appropriate to the size and organisation of the firm and the nature, scale and complexity of their business.

The Policy is aiming to meet the Plum's obligations to maintain and operate effective organisational and administrative processes and controls for the identification and management of actual, potential or perceived conflicts of interest as well as any personal, professional, and business interest of employees, Relevant Persons and others. The Policy takes into account *inter alia* circumstances that may give rise to a conflict of interest arising as a result of the structure and business activities of other members of Plum Group.

This Policy is not intended to cover all eventualities and all circumstances that may be encountered. Employees of Plum should be alert to potential conflicts of interest and immediately contact their manager and the Compliance Officer, should an actual or potential conflict of interest arise.

Applicability

All employees and management of Plum should be aware of the provisions of this Policy and understand the role and importance of conflicts of interest relevant to their operations. This includes making appropriate declarations of interests, identification and management of actual, potential or perceived conflicts of interest.

Plum values

The principles of the Policy align with Plum values and employees and management must:

- A. Always act with honesty and integrity;
- B. Be open about the relationships and personal interests that could be seen as influencing their independent judgement;
- C. Always alert reporting lines of any actual or potential conflict of interests and agree with them how they should be managed. Declarations should be made on appointment, as and when they arise throughout the year, as well as during the annual attestation process;

- D. Do not seek a profit (or avoid a loss) for themselves or others by making personal use of information acquired during their duties;
- E. Ensure they do not leave themselves open to (or perceived to be open to) improper influence through the acceptance of gifts and hospitality, or otherwise; and
- F. Exercise caution in managing their finances and do not undertake transactions that, by their nature or purpose, would be improper.

Definition and Types of Conflicts of Interest

Conflicts of interest are defined in the context of any conflicts which arise between:

- Plum (including an employee of Plum) and a Customer; or
- Plum (including an employee of Plum) and a third party; or
- A Customer and another Customer.

To **identify** potential conflicts of interest Plum takes into account as a minimum the below:

1. a person likely to make a financial gain, or avoid a financial loss, at the expense of the Customer;
2. has an interest in the outcome of a service provided to the Customer or of a transaction carried out on behalf of the Customer, which is distinct from the Customer's interest in that outcome;
3. has a financial or other incentive to favour the interest of another Customer or group of Customers over the interests of the Customer;
4. carries on the same business as the Customer; or
5. receives or will receive from a person other than the Customer an inducement in relation to a service provided to the Customer, in the form of monies, goods or services, other than the standard commission or fee for that service.

Identifying, Managing and Preventing Conflicts of Interest

Plum takes all necessary measures and establishes the necessary procedures in order to prevent the occurrence of conflicts of interest or manage any actual, potential or perceived conflict of interest between Plum and its Customers.

Plum has reviewed its business model and has identified the following potential conflicts of interest, which are related to the service of **Reception, Transmission and/or Execution of Customer orders (i.e. Stock Investing services)**:

- Employee roles and responsibilities
- Management of employees
- Remuneration

- Business interests
- Connected persons
- Inducements including gifts and hospitality
- Customer orders versus other Customers orders
- Intra-group counterparty relationships
- Fees & commissions
- Personal transactions

Plum will regularly review its business model to ensure any new potential conflicts of interest are noted and managed or prevented effectively.

Situations that may give rise to conflicts

The situations / events set out below represent a non-exhaustive list of situations / events where conflicts of interest may arise:

- where an employee engages in personal dealing in respect of **securities/ Financial Instruments**, and Plum has a Customer with a same interest that potentially conflicts with such dealing;
- where Group Companies provide or may provide different services to the same Customer;
- where Plum uses an affiliated firm which owes fiduciary obligations to another person (e.g. a broker dealer executing orders for an affiliated investment manager that is acting on behalf of an investment fund);
- where Plum or its employees have a financial or other incentive that may lead to favour the interests of one Customer over the interests of another Customer;
- where Plum or its employees receive a monetary or non-monetary benefit from a person other than the Customer in relation to an investment service provided to that Customer;
- where Plum or its employees misuse Inside Information, engage or attempt to engage in Insider Dealing and Market Manipulation with the purpose of deriving personal benefit or benefit of Plum or a Customer / third party;
- where an employee recommends more trades to a Customer in order to meet the employee's or the Plum revenue targets, as opposed to acting in the Customer's best interest;
- where the Customer requests Plum or an employee to facilitate non-compliance with relevant laws or Company policies including tax evasion, fraud or other illegalities;

- where Plum receives inducements i.e. fee, commission or non-monetary benefit for services provided to Customers;
- where Plum enters into agreements with Customers in return for preferential allocations;
- where the management of Plum, provide exertion of influence resulting in the use of inappropriate criteria in the selection of external service providers;
- where the remuneration of the employees is closely related to the profit derived from the execution of the provided investment services.

Supervision and Management of Staff

It is considered that access to sensitive data may give rise to conflicts of interest, thus access rights are always provided based on the assigned tasks and responsibilities of each employee by their direct manager/team leader. In this way, unreasonable and excessive access to sensitive data is prevented. When employees request access to new folders/data, they should always state the reason for which that access is required. Each employee is responsible to disclose any potential conflict of interest to senior personnel and the senior management should take all reasonable steps to updating access rights. Also, employees shall take care to maintain client confidentiality and are prevented from exchanging information that could lead to conflicts of interest.

Employees and other Relevant Persons with access to sensitive data that may give rise to conflicts of interest will be physically segregated in order to prevent the occurrence of conflicts of interest.

Business Interests

Plum recognises that our current and future employees may have an interest, relationship or arrangement whereby they act as a trustee, hold a power of attorney or have a directorship or shareholding interest that may potentially create a conflict of interest. Plum requires its employees to declare any such interests and will take the appropriate steps to manage or prevent any conflicts of interest that are identified. To manage such conflicts Plum requires its employees to disclose directorships and interests in other companies and to disregard the interests, relationships or arrangements concerned when acting on behalf of Plum.

Connected Persons

Group of Connected Persons means:

- a) Two or more natural or legal persons who, unless it is shown otherwise, constitute a single risk because one of them, directly or indirectly, has control over the other or others; or

- b) Two or more natural or legal persons between whom there is no relationship of control as described in point (a) but who are to be regarded as constituting a single risk because they are so interconnected that, if one of them were to experience financial problems, in particular funding or repayment difficulties, the other or all of the others would also be likely to encounter funding or repayment difficulties.

Plum is aware of its duty to avoid a conflict of interest arising where an employee has an indirect interest through a connected person (e.g. adult child or spouse). Relevant employees are required to disclose any potential conflicts of interest through connected persons. A register of these interests will be kept and will be updated regularly.

Personal Transactions

When a personal account dealing is performed by an employee, it may expose Plum and its employees to market abuse (e.g. Insider Dealing, misuse of Inside Information) as well as to situations that could give rise to conflicts of interest.

Employees should avoid any personal account transactions that may place them in conflict with the interests of either Customers or Plum. If in doubt, advice should be sought from the Compliance Officer of Plum.

Watch List

The principle of the “Watch List” permits the Compliance Officer to monitor the trading of securities / Financial Instruments as well as the cancelling or amending of an order concerning a Financial Instrument of companies on the Watch List, including trading of its Customers and its employees, during the period before a Company is placed on the Watch List.

The Watch List does not restrict sales/trading activity. The contents of the Watch List are confidential and known only by the Compliance Officer. Regardless of whether a company or a security / Financial Instrument is placed on the Watch List, the Chinese Walls procedures must be strictly observed until the Inside Information has been disclosed publicly by Plum and broadly disseminated.

Inducements including Gifts and Hospitality

Plum has a strict policy, which specifically prohibits employees from soliciting or accepting any inducements to conduct business in a specific manner that would give rise to a detriment to a partner /client or to favor the interests of one partner/client over another.

Plum recognises that Gifts and Hospitality, irrespective of their value, may influence or appear to influence the decision-making and the handling of the business, and can lead to potential conflicts of interest. Employees are not permitted to accept, or give to, any person any gift or other benefit that cannot properly be regarded as justifiable in all circumstances

or may give rise to the perception that in doing so, decisions may be influenced or may not be impartial.

Plum requires any employee who is offered any kind of gift or payment over an agreed limit from either side or outside Plum to report this to the Regulatory Compliance team for recording to the Gifts and Hospitality Register.

The Regulatory Compliance team will regularly review the Gifts and Hospitality Register to identify any conflicts of interest that may be occurring.

Order handling and Best Interests

Plum provides a non-advised order transmission service in shares and fractions of shares and therefore does not offer any advice or provide any recommendations regarding the appropriateness of any particular Instrument. Plum will transmit Orders to a Third Party Broker for execution or onward transmission. Plum's primary obligation is to ensure that Customer Orders are transmitted to the Third Party Broker promptly and fairly.

Plum is under a duty to act in a Customer's best interest when transmitting an Order to another entity for execution or onward transmission. Therefore, in selecting the Third Party Broker Plum has considered industry guidance and believes best execution for orders is best obtained by only using the Third Party Broker who has the necessary expertise in the instruments in which Orders are executed. Plum conducts due diligence on the Third Party Broker to ensure that it has the necessary expertise in the relevant instruments and to satisfy itself that the Third Party Broker delivers fair outcomes.

Plum does not engage in principal trading or trading for its own account (i.e. proprietary trading) and as such no conflicts arise between Plum and its Customers. The selected Third Party Broker is fully independent of Plum and Plum has no association with the Third Party Broker except for the business services provided by the Third Party Broker.

Disclosure of Conflicts of Interest

Relevant Persons are required to disclose any actual, potential or perceived conflicts of interest in accordance with the following principles.

Internal disclosure

Relevant Persons must declare any circumstances which may give rise to a conflict of interest as soon as they become aware of it, including where the matter may result, or has already resulted, in non-compliance with the Policy. An alternative way to disclose a potential or actual conflict of interest is through the provisions of the Whistleblowing Policy.

Disclosure to Customers

In cases where the measures taken to prevent or manage conflicts of interest are not sufficient and conflicts of interest will occur, Plum shall clearly inform Customers prior to undertaking any action on behalf of the Customer regarding the nature and source of such conflicts of interest. This update shall be made by any tangible means, unless the Customer has not consented to any other means of communication, and include sufficient details, taking into account the Customer's classification, in order for the Customer to be in the position to take a substantiated decision with respect to the provided investment or service in the context of which the conflicts of interest have emerged.

Plum shall ensure that disclosure of conflicts of interest to Customers is used only as a means of last resort, which shall only be used where the effective organizational and administrative arrangements established to prevent or manage its conflicts of interest are not sufficient to ensure, with reasonable confidence, that the risk of damage to the Customers' interests will be prevented or eliminated. This shall be clearly stated as part of the disclosure, which shall:

- Be made in a Durable Medium; and
- Include sufficient detail, taking into account the nature of the Customer, to enable that Customer to take an informed decision with respect to the service in the context of which the conflict of interest arises.

The disclosure shall include a specific description of the conflicts of interest that arise in the provision of investment and/or ancillary services, taking into account the nature of the Customer to whom the disclosure is being made.

The description shall explain the general nature and sources of conflicts of interest, as well as the risks to the Customer that arise as a result of the conflicts of interest and the steps undertaken to mitigate these risks.

Over-reliance on disclosure of conflicts of interest is considered a deficiency and appropriate controls and measures are followed to identify the conflicts prior disclosure such as in place measures of information barriers or physical separation of certain departments.

Definitions

Customer – means any natural or legal person to whom Plum provides investment and/or ancillary services.

Close links - means a situation in which two or more natural or legal person are linked by:

- participation in the form of ownership, direct or by way of control, of at least 20% of the voting rights or capital of an undertaking;
- control which means the relationship between a parent undertaking and a subsidiary or a similar relationship between any natural or legal person and an undertaking, any subsidiary of a subsidiary undertaking also considered to be a subsidiary of the parent undertaking which is at the head of those undertakings;
- a situation in which two or more natural or legal persons are permanently linked to one and the same person by a control relationship.

Durable Medium – means any instrument which:

- a) enables Plum to store information addressed personally to that Customer in a way accessible for future reference and for a period of time adequate for the purposes of the information; and
- b) allows the unchanged reproduction of the information stored.

Inside Information – means, in accordance with the Market Abuse Regulation, information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more issuers or to one or more Financial Instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those Financial Instruments or on the price of related derivative Financial Instruments.

Personal Transaction - means a transaction in Financial Instruments, which is conducted by or on behalf of a Relevant Person, if and only if, at least one of the following conditions are met:

- The Relevant Person is acting outside the scope of the activities he/she carries out in his professional capacity;
- The trade is carried out for the account of any of the following persons:
 - a) the Relevant Person;
 - b) any person with whom he has a family relationship, or with whom he has Close links;
 - c) a person in respect of whom the Relevant Person has a direct or indirect material interest in the outcome of the trade, other than obtaining a fee or commission for the execution of the trade.

Order – means any instruction given by you to us under the Plum App in relation to a Security and includes a Market Order, a Manual Order and an Automated Order.

Relevant Person – means a member of staff or a person engaged by Plum whose functions and/or responsibilities in Plum provide him/her on an ongoing basis with information of a confidential and/or of an inside nature concerning companies/entities, the Financial Instruments of which are traded on a Regulated Market, MTF or OTF and/or can place him/her in a position of conflict of interest.

In particular, Relevant Person means any of the following persons:

- A director, partner or equivalent person, manager or tied agent or manager of any tied agent of Plum;
- An employee of Plum as well as any other natural person whose services are placed at the disposal and under the control of Plum who is involved in the provision by Plum of investment services or/and the performance of investment activities;
- A natural person who is directly involved in the provision of services to Plum under an outsourcing arrangement for the purpose of the provision by Plum of investment services or/and the performance of investment activities;
- Third Party Broker - means any third party broker to which Plum has received and transmitted Customer Orders for execution.