

Netwealth

Conflicts Management Policy Summary

Netwealth Group Limited

Prepared 10 January 2018

Netwealth Group Limited

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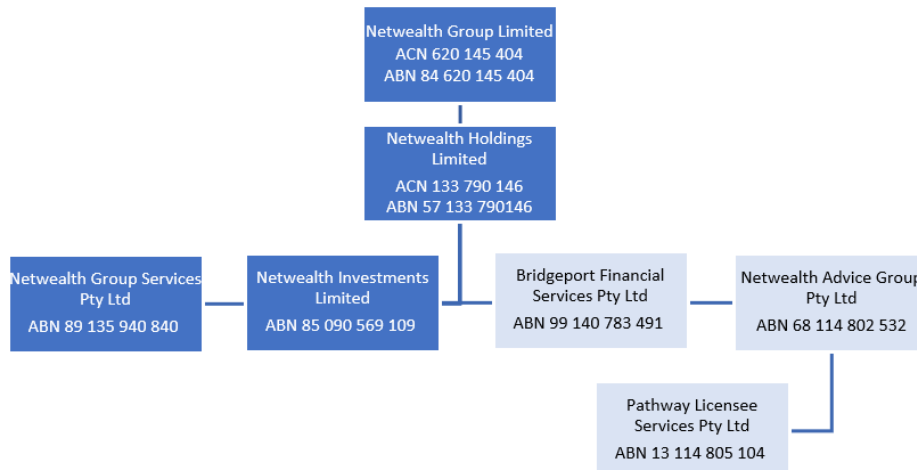
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1 About Netwealth

1.1 Netwealth entities

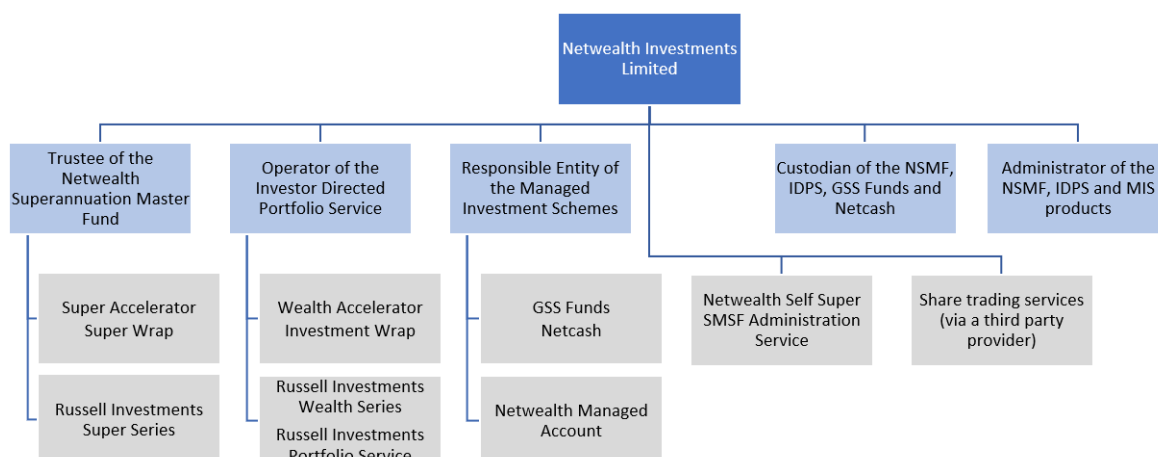
Netwealth Group Limited is the parent entity of the Netwealth Group of entities (**Netwealth Group** or **Netwealth**). The Netwealth Group’s current entity structure is reflected below.



As part of Netwealth’s strategic direction, Netwealth has committed to providing wealth solutions to financial intermediaries and clients, as such, Netwealth is proceeding with a divestment of its non-core businesses. It is expected that Bridgeport Financial Services Pty Ltd (**Bridgeport**) and Pathway Licensee Services Pty Ltd (**Pathway**) will be sold in late 2017 or early 2018. Netwealth Advice Group Pty Ltd will either be sold or wound up. Netwealth’s conflicts management policy applies all Netwealth entities while they are owned by Netwealth.

1.2 Netwealth’s business activities

Netwealth Investments Limited (**NIL**) conducts the following business activities:



Note: the grey boxes indicate products and services offered by NIL to clients in its various capacities.



Bridgeport provides financial services (primarily personal financial advice) to their clients as a corporate authorised representative of Australian Planning Services Pty Ltd (APS) AFS Licence No. 225982. Pathway provides Xplan technology solutions to AFS licensees and their authorised representatives including Bridgeport.

Netwealth Group Services Pty Ltd (NGS) provides business, finance, technology and employee services to the Netwealth Group.

2.0 Netwealth's conflicts management policy

Netwealth has established a Conflicts Management Policy and Framework to put in place controls and processes to identify, assess, monitor and manage (including to avoid if appropriate) any actual or potential conflicts between relevant duties and relevant interests of Netwealth and Netwealth's clients.

2.1 Guiding principles for conflicts management

In the course of Netwealth Group entities conducting their respective businesses, conflicts of interest will arise. Conflicts management arrangements, including the conflicts management policy, help minimise any potential adverse impact of conflicts of interest on Netwealth clients or on Netwealth's businesses and brands.

2.2 Summary of our policy

The Conflicts Management Policy is a key component of Netwealth's Conflicts Management Policy and Framework. Our conflicts management policy covers:

- Roles and responsibilities of Directors and employees to identify and disclose conflicts, for the management and monitoring of conflicts, for the development of the policy, and for oversight of compliance with the policy
- How relevant duties and relevant interests are defined
- How conflicts or potential conflicts identified are to be assessed
- Examples of the types of conflicts that may arise for Netwealth, and requirements for the management of different types of conflicts
- Netwealth's policy on the giving and receiving of gifts and entertainment and other non-monetary benefits
- Maintenance of a Conflicts of Interest Register, Gifts and Entertainment Register and Conflicted Remuneration Register
- Maintenance of the register of Relevant Interests and Duties for NIL (available [here](#))

Each Director and other Responsible Person must disclose all relevant duties and relevant interests prior to appointment, and is responsible for identifying, assessing and treating any conflicts of interest within their respective business unit.

The Board regularly considers conflicts of interest and perceived conflicts of interest, particularly when dealing with third party or related party transactions or arrangements. These are managed in accordance with the Policy and Framework.

All employees are required to disclose actual or perceived conflicts of interest prior to commencement, and on an ongoing basis to bring to their manager's attention any suspected conflict of interest for their manager's consideration and referral to their Responsible Person.

Netwealth's Conflicts Management Policy and Framework is regularly reviewed, and compliance under the policy is monitored, in order to ensure that the conflicts management arrangements in place continue to operate effectively.