

Conflicts Management Framework- Summary

The Linear Group has adopted and implemented a Conflicts Management Framework across its businesses. The purpose of the Framework is to comply with its legislative requirements and to set out a formal process to assist Linear to identify, manage and monitor all conflicts (including related party transactions).

The Framework relates to any “conflicts” of interest or duty, that are actual, apparent, perceived or that may arise (i.e., potential conflicts) in relation to the Linear group.

The Framework includes Linear’s policy on managing conflicts of interest which includes a systematic approach to identifying, assessing and evaluating conflicts, and deciding upon and implementing an appropriate response to those conflicts.

The Framework sets out Linear’s policy on avoiding conflicts, including where there is a material conflict that cannot be adequately managed via a combination of internal controls and disclosure. It also sets out Linear’s policy on when and how Linear may choose to control conflicts, and states that Linear will disclose conflicts where a conflict has the real potential to have a material adverse effect on the members or the financial service they receive.

The Framework also sets out how Linear documents all stages of the conflicts management process by maintaining the various conflicts registers.

Linear has established a number of control processes to properly consider conflicts under the Framework, including the use of sub committees and/or supervisory committees to oversee and monitor any related party transactions or conflict situations if it determines the circumstances require. Linear may also obtain independent legal advice if it deems independent advice to be appropriate.

The Framework also sets out the various conflict management roles and responsibilities. While the Board maintains overall responsibility for the development and maintenance of the Framework, the day to day management of Conflicts arising within the Trustee, including reporting on this Framework and making recommendations to the Linear Board, sits with the CEO - Trustee Services.

The administration and monitoring of the Framework is carried out by the Compliance Manager who must also ensure the Framework is reviewed regularly (and at least annually) and updated to take into account any changes in the Linear group or its business, practices or procedures.