

Conflicts of Interest

Conflicts of interest can cause real harm if not properly managed. They can have a detrimental impact on our customers and the trust they have in us. Plus they can erode the trust that exists between colleagues, as well as lead to regulatory issues.

Keeping us on the right track

Our Conflicts of Interest Policy Standard helps us understand relevant laws and regulations, and how we should follow them.

The Standards we uphold

To ensure all our colleagues understand their roles and responsibilities in managing conflicts of interest, we have what we call Standards.

These are supported by Group-wide Policy Breach & Exemption Guidance, and apply to the entire Virgin Money Group. That includes our employees, contractors, agency workers, and directors. To help colleagues stay up-to-date, all must complete conflict of interest training at least once a year.

We have minimum control requirements that we aim to stick to. Here's a summary:

- We review, assess and, where appropriate, escalate conflicts recorded in our Gifts & Conflicts of Interest Register.
- We review conflicts to ensure an appropriate management response.
- We minimise the risk of conflicts of interest arising where an employee holds a role in more than one regulated entity at any given time.
- We identify any risks relating to conflicts of interest, and reflect them within our Business Unit risk profiles. These are reviewed at least semi-annually.
- We ensure conflicts of interest are considered when implementing change in accordance with the Change Management Policy Standard. Any conflicts identified are reflected in Business Unit risk profiles.
- We test and review our activities to ensure we're in line with our Conflicts of Interest Policy Standard.
- We carry out frequent assurance testing for high-risk areas. This ensures that potential breaches are identified, and pre-emptive action is taken.
- We manage any failure by colleagues to record gifts or conflicts of interest in line with our performance management framework.
- We consider conflicts of interest when proposing a strategic decision to undertake activities, or to offer products from entities outside of the ring-fenced banking Group, in line with regulatory requirements. Detailed analysis must be carried out, including proposals for resolving a potential conflict. A summary of the assessment must be provided to the Board for consideration prior to approval of the change.