

SUMMARY OF CONFLICTS MANAGEMENT POLICY

Overview

CCSL has developed a conflicts management policy to assist in providing reasonable assurance that all conflicts, potential or actual, are being clearly identified and that CCSL takes all reasonably practical actions to ensure they are avoided or prudently managed. The policy adopted applies to all directors and staff and aims to ensure that priority is given to duties to and the interests of beneficiaries. The CCSL Board has responsibility for ensuring the effective operation and oversight of conflicts management within its business operations. CCSL will review its conflicts management policy on a regular basis to ensure the currency of the document and the validity of the framework that has been adopted by CCSL.

Mechanisms to Manage Conflicts

As part of the policy, the mechanisms that are generally used to manage conflicts of interest are:

- identifying and controlling conflicts of interest;
- avoiding conflicts of interest;
- disclosing and managing conflicts of interest; and
- ensuring that appropriate action is taken in the event of a conflict arising, including ongoing management of the conflict.

In all considerations of any interests, duties and conflicts, CCSL will ensure priority is given to the duties to, and interests of, beneficiaries. This priority is a fundamental aspect of the conflicts management methodology adopted by CCSL.

Registers of Relevant Interests & Duties

CCSL maintains a Register of Relevant Duties and a Register of Relevant Interests, copies of which are available on the website. A key aspect of the conflicts management policy is the process for CCSL to determine whether an interest or duty is relevant. Per the definitions, a relevant duty or a relevant interest is one that might reasonably be considered to have the potential to have a significant impact on the capacity of CCSL, an associate of CCSL or the responsible person with the relevant duty or holding the relevant interest, to act in a manner that is consistent with the best interests of beneficiaries.