

CONFLICTS OF INTEREST POLICY – SUMMARY

1. Introduction

Metro Bank PLC (the 'Bank') is required to implement and maintain an effective conflicts of interest policy (the 'Policy'). This is a summary of the Policy, as relevant to our customers.

2. What is a conflict of interest?

The following might be considered to give rise to a risk of a conflict of interest where an employee of the Bank is providing financial services to a customer and:-

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

3. Management of Conflicts of Interest

The Bank expects all of its employees to maintain the highest standards in carrying out their responsibilities. Potential conflicts are managed by:-

- appropriate supervision and monitoring;
- disclosure of any connection which could, or could be seen to, have the effect of compromising the judgment of any of the Bank's employees;
- the requirement to seek approval before accepting gifts/hospitality that might be perceived as more than a token;

4. The Bank's Policy

The Bank has a clear policy on conflicts of interest, they:-

- should always be avoided;
- actual, perceived or potential conflicts must always be disclosed