

FINANCIAL RELATIONSHIPS

All of us face the same decisions as other people about managing our finances, including where to save or invest our money. Those of us who join the Bank mid-way through our career may also retain connections with a previous employer, for example through membership of a company pension scheme. But the information that we have access to is often not in the public domain and our role as a regulator and policy maker opens up a risk that we could be perceived as using the Bank's information to further our personal interests if we do not take appropriate steps to guard against this.

The Bank needs to know about any ongoing relationships with financial institutions that might be perceived to influence your judgement or affect your decisions.

You must disclose if you have any of the following financial relationships:

- a. direct holdings of securities or related investments in a Bank-regulated firm or its financial holding company, including stock options and share related reward schemes;
- b. holding a balance or deposit in a Bank-regulated¹ firm of a value greater than the FSCS limit (currently £85k per person per firm);
- c. holding an investment or pension product with a Bank-regulated insurer whose return depends in part on the profits of the insurance company – for example a 'with profits' policy;
- d. any other financial relationship that could reasonably be considered to be a potential conflict of interest. This would include deferred remuneration arrangements.

You are required to disclose these financial relationships on joining the Bank and update them if / when they change. Disclosures should be made via the Our Code Compliance system. (Your disclosure will go to your manager). Similarly, you are required to disclose the above types of financial relationships held by an individual or organisation where you direct or advise on their financial arrangements.²

If a potential conflict of interest relating to a financial relationship arises in the course of your day-to-day work, you should bring this to the attention of your manager. Your general disclosure in the Our Code Compliance system is not a substitute for this responsibility. If you are unsure about whether to disclose a particular financial relationship, please seek guidance from the Deputy Secretaries.

¹ For a list of PRA regulated firms please follow this link: <https://register.fca.org.uk/> to The Financial Services Register.

² This may also include where you are acting as an executor, trustee, director or a shareholder if you take or advise on financial decisions.

Data retention and monitoring

All notifications to your manager will be treated as strictly confidential.

Internal Audit Division, Compliance Division, and Secretary's Department may inspect local records and procedures, and under certain circumstances it may also be necessary for information to be made available to HR, Legal Directorate and relevant senior management.

You will be asked for an annual confirmation that you have read, understood and complied with the rules, and that your financial relationship data are up to date.

Questions

Any questions about the content and application of this policy should be referred to the Deputy Secretaries.