

## Ensuring Total Impartiality

We believe it is very important that our clients know that any investment funds or products we recommend in conjunction with our advice are selected purely on merit and free from any other influence.

A key component of this is that Candid Financial Advice takes a very clear stance that it does not accept corporate hospitality from fund managers, product providers or indeed any suppliers. While such hospitality is commonplace across the financial services industry, we believe it creates potential for bias - an issue we don't want hanging over our heads. And, in any case, we are too busy working for clients to spend time on such frivolities!

Since a certain amount of interaction with suppliers is necessary (and indeed beneficial) to act in the best interests of clients, we have set out our position in more detail below.

### Corporate Hospitality

We accept no form of corporate hospitality to include areas such as sporting events, theatre evenings, driving days or any form of 'experience' days.

### Training

We do accept training offered by providers when we feel it will be truly worthwhile. In such instances we might receive light refreshments. We decline all offers where there is any question that the event is hospitality dressed up as training - for example overseas trips, overnight stays and leisure activities bolted onto training.

### Industry events

These typically include awards dinners and industry gatherings. It is very rare that we accept any such invitations. If we feel attending such an event would benefit our business and clients then we might accept, subject to declining offers of overnight accommodation and any extra-curricular hospitality.

### Product provider payments

We receive no funding from product providers, period. This means we do not charge providers for things like being considered for research, 'preferential partner' status (as practiced by some advisers), in-house training, conferences or client seminars we may arrange.

### Ownership

Candid Financial Advice Limited is wholly owned by Justin Modray and Ian Millward.

### Justin Modray's other business interests

Justin wholly owns Candid Money Limited, which operates the candidmoney.com and comparefundplatforms.com websites. Both sites are free services aimed at DIY investors. As such, they are partly funded by advertising revenues. Any such interests are clearly disclosed on both sites (in the 'About Us' sections).

### Ian Millward's other business interests

Ian is a joint owner of Conduit Financial Solutions Limited. Conduit acts as an outsourced sales function for fund managers and introduces their products to UK IFA's. Conduit currently represents Morgan Stanley Bank, Jonathan Fry Cash Management Service and Highgate Tech EIS. Conduit does not introduce products to Candid Financial Advice and receives no payment whatsoever if any of the aforementioned product providers are used for clients.