Conflicts of Interest Policy Statement

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Policy Statement

As a financial institution that offers a range of products and services to clients, situations may arise where its interests and those of its clients are not aligned, for example in cases where a client is also a competitor, vendor or trading counterparty.

A conflict of interest is defined as a circumstance where State Street or its employees have interests or relationships that could raise questions about State Street's objectivity, judgement, or ability to perform services for a particular client or group of clients.

Whenever a potential conflict is identified, State Street responds with a combination of disclosure, mitigating controls, or conflict avoidance. All State Street employees are responsible for understanding what could constitute a conflict of interest and for appropriately escalating potential conflicts of interest that come to their attention.