

Credit Europe Bank N.V. (hereinafter "Credit Europe") holds its customers' interests as a central and primary concern and this is reflected in the way Credit Europe conducts its business. Credit Europe being a provider of a wide range of services may from time to time have interests which conflict with its customers' interests or with the duties that it owes to its customers. Therefore, Credit Europe is required to take all reasonable steps to maintain and operate effective organisational and administrative arrangements to identify and manage conflicts of interest which entail a material risk of damage to customers' interests. In this respect, Credit Europe has drawn up a Conflicts of Interest Policy (hereinafter "Policy"). This information sheet gives information on the Policy.

Identification and Management of Conflicts of Interest

A conflict of interest may arise between:

- the interests of Credit Europe and the customer;
- the interests of one customer and another;
- the interests of a customer and those of individual staff members of Credit Europe;
- the interests of Credit Europe and those of individual staff members of Credit Europe;
- the interests of Credit Europe and a provider of services to Credit Europe;
- one office of Credit Europe and another office of Credit Europe;
- one office of Credit Europe and another member of the Credit Europe Group.

For the purpose of identifying conflicts of interest, Credit Europe will consider all actual circumstances and will take into account, whether Credit Europe, staff or office of Credit Europe:

- is likely to make a financial gain, or avoid a financial loss, at the expense of a customer;
- has an interest in the outcome of a service provided to the customer which is distinct from the customer's interest in that outcome;
- has a financial or other incentive to favour the interests of one customer over another;
- carries on the same business as the customer;
- receives from a third party not being a customer, any inducement other than the standard commission or fee for that service.

The above is not exhaustive, but it gives a broad indication of how to assess whether a conflict has arisen or is likely to arise.

Each conflict of interest must be managed promptly and fairly. As a minimum standard Credit Europe has in place arrangements suitable for managing conflicts of interest. The arrangements mentioned below are not an exhaustive list and all offices of Credit Europe are advised to consider other appropriate arrangements for managing conflicts of interest.

- *Control of information.* Preventing/controlling the exchange of information between parties engaged in activities involving a risk of a conflict of interest by implementing for example a Chinese Wall.
- *Separate supervision.* Subjecting staff on opposite sides of a conflict of interest to separate supervision where necessary.
- *Control over inappropriate influence.* Preventing any staff member from exercising inappropriate influence over another staff member, e.g. where the staff member who decides or influences the other's bonus may exert undue influence over the way the other staff member carries out services. A means of control would be, for example, establishing different reporting lines.
- *Segregation of duties.* Preventing/controlling the involvement of staff in simultaneous/sequential tasks where such involvement may impair the proper management of conflicts of interest.

Proper management of conflicts of interest requires that all information on mandates or orders which may lead to (potential) conflicts of interest is treated with strict confidentiality.

Information Barriers

Credit Europe has established information barriers, i.e. "Chinese Walls", to control or prevent the flow of information between different areas of Credit Europe where the interests of a customer of one business unit may conflict with the interests of a customer of another business unit or with Credit Europe's own interests.

Disclosure of Conflicts of Interest

In some cases, Credit Europe's arrangements may not be sufficient to ensure that a potential conflict of interest does not damage a customer's interest. In these circumstances, Credit Europe shall clearly disclose the general nature and/or source of conflict of interest to the customer before undertaking business on its behalf. The disclosure to customers is made in a durable medium and includes sufficient detail, taking into account the nature of the customer, to enable that customer to take an informed decision with respect to the service in the context of which the conflict of interest arises.

Where there is residual risk of damage to the interests of any customer, Credit Europe may refrain from acting on behalf of a customer.

Private Investment Transactions

Credit Europe's staff are subject to Credit Europe's rules on private investment transactions. Such transactions should not conflict with the interests of customers or with the interests of Credit Europe. In the event of unavoidable conflicts of interests, the interests of customers and the interests of Credit Europe take precedence.

Inducement

Credit Europe does not accept, solicit or offer any inducements other than the following fee or commission paid or provided to:

- The customer or a person/entity acting on behalf of the customer;
- A third party or a person/entity acting on behalf of the third party, where the following conditions are satisfied:
 - the fee, commission or benefit is clearly disclosed to the customer prior to the provision of the relevant service;
 - the payment of the fee or commission, or the provision of the non-monetary benefit is designed to enhance the quality of the relevant service to the customer and not impair compliance with Credit Europe's duty to act in the best interest of the customer;
- Standard fees for the provision of services in financial instruments, such as custody costs and settlement fees which are in accordance with customer fair treatment.

Credit Europe Bank N.V.

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Credit Europe Bank N.V. has been entered in the Trade Register of the Amsterdam Chamber of Commerce under no 33256675. Credit Europe is subject to the supervision of and is registered with the Dutch Central Bank (De Nederlandsche Bank N.V.) and the Authority for the Financial Markets (Autoriteit Financiële Markten).

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