

POLICY FOR MANAGING CONFLICTS OF INTERESTS

In accordance with the Directive, the present section provides you with information on the Degroof Petercam Asset Management S.A.'s policy (hereinafter "DPAM" and "Policy") on managing conflicts of interests. Additional information can be obtained from DPAM upon request.

Conflicts of interests

DPAM offers its clients a full and integrated range of services in personal asset management, investment advice and collective investment funds management. Its clients are retail or professional investors, listed and private companies and public investors.

The possibility of conflicts of interests between DPAM (its representatives, managers or other group companies) and its clients, or between clients of DPAM, is inherent in the fact that the Group Degroof Petercam (hereinafter "the Group") develops, in parallel, concurrent services directed towards a variety of clients having at times diverging interests.

For example, the Bank Degroof Petercam may find itself in the situation of granting loans to or advising companies whilst at the same time investing for the account of its private asset management clients in financial instruments (shares, bonds, etc.) issued by the same companies. In certain cases, the Bank could also advise its clients to invest in financial instruments issued by companies in which it has an interest, *inter alia* precisely because it itself has a shareholding in these companies, or because these companies are clients of the Bank or, in the case of Collective Investment Funds, because the assets of the latter are managed by DPAM or by other companies in the Group. The Bank Degroof Petercam's financial analysis department could also, in certain cases and where certain conditions are met, publish recommendations concerning companies that are being advised by another company in the Group, for example in the context of investment activities.

The development in parallel of such activities in favour of clients having at times diverging interests requires specific measures to be taken to prevent and, where applicable, manage potential conflicts of interests in a manner that respects equitably the interests of the parties in question.

Principal measures for preventing and, where applicable, managing conflicts of interests

The Group's policy on conflicts of interests is based, in general, on a separation of any activities that could potentially generate mutual conflicts of interests.

To this end, the Group's activities are exercised in different departments, and in certain cases in legally distinct entities.

This departmentalisation, or use of separate subsidiaries, can be expressed in particular by the physical separation (different premises) of the persons exercising the activities in question, as well as strict rules governing the confidentiality, transmission and use of information between and within departments (or group entities).

The management of each department (or distinct subsidiary) lies with a member of the management team or, in certain cases, with a separate decision-making committee, allowing for autonomous decision-making¹.

Where activities undertaken within a particular department can potentially generate mutual conflicts of interests, specific measures can also be introduced inside this department in order to manage to fence off specific activities or transactions.

Specific measures are also taken to ensure that DPAM's representatives (managers, employees, delegated agents) exercise their activities in the interest of clients. These representatives receive regular and specific training in business ethics, in particular on entering DPAM. Specific limits are imposed on transactions in financial instruments for the account of representatives of DPAM and their immediate families. Also, certain operations which can potentially jeopardize the independence of the DPAM's representatives in exercising their function (for example due to benefits received from third parties) are forbidden.

Other measures may also be adapted at individual department level, in order to forestall or manage specific potential conflicts. This applies for example, to the financial analysis department, which is subject to special rules and its own code of ethics, aimed *inter alia* at ensuring the independence and objectivity of this department's members.

Our Group's Policy is not opposed to the Group receiving in certain cases remuneration or benefits from third parties, within the meaning of the Directive, in relation to the rendering of certain services to its clients.

The Bank Degroof Petercam may, more specifically, be remunerated by the issuer or distributors when placing financial instruments (primary market) or receive analysis reports when it entrusts orders for execution to third party intermediaries.

Specific conditions can apply for certain financial instruments, in particular Collective Investment Funds (generally from 0.15% – monetary Collective Investment Funds – to 1% - equity Collective Investment Funds – a year).

DPAM may also remunerate, where applicable, third parties which have contributed to concluding or maintaining business relations between a client and DPAM.

¹ It being understood that any collegiate body assumes management at the highest level, this being inherent in the management of any company.