



KBC Bank Ireland Conflicts of Interest Policy

KBC Bank Ireland (KBCI) and related group companies provide a range of financial services and we recognise the potential for conflicts of interest to arise between ourselves and our clients or other group companies and our clients, or between the interests of different clients.

Conflicts may arise where KBCI or a Group Company:

- Is likely to make a financial gain or avoid a financial loss, at the expense of the customer;
- Is interested 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 interest of another customer or group of customers over the interest of the customer;
- Carries on the same business as the customer;
- Receives an Inducement from a person other than the customer in relation to a service provided to the customer, other than the standard commission or fee for that service.

KBCI has put in place a Conflicts of Interest Policy to protect the interest of our clients. This is to ensure that all parties are treated honestly and fairly and in accordance with the best interests of customers.

KBCI will take sufficient steps to manage its conflicts of interest. If these reasonable measures for the mitigation of conflicts of interest are not sufficient to ensure that the risk of damage to the interests of a customer will be prevented, the general nature and / or source of the conflict will be disclosed to the customer, before undertaking business with the customer. These measures include the following:

- Information barriers/Chinese Walls;
- Establishment and maintenance of a confidentiality list;
- Implementation of separate supervision and reporting lines;
- Implementation of a remuneration policy;
- Implementation of measures to prevent undue influence;
- Implementation of measures to prevent certain combinations of activities;
- Disclosure of conflicts to customers;
- Implementation of a procedure for handling unresolved conflict of interest;

The Conflicts of Interest Policy and related policies and procedures are subject to our standard monitoring and review processes.

On request, you can obtain further information on our Conflicts of Interest Policy from KBC Bank Ireland.