

Policy of Conflicts of Interest

Introduction

KBC Financial Products UK Limited (“FPUK”), part of KBC Group N.V (“Group”), is a multi-service institution providing a range of financial services across financial instruments and markets. FPUK operates its business on the principle that it must manage any conflicts of interest between itself, including employees, associates and other Group companies, and clients, and between one client and another, in a fair and commercial manner.

This document is designed to provide clients with a high level summary of the underlying conflicts of interest policies and arrangements within FPUK.

Conflicts Management

FPUK maintains and operates organisational, procedural and administrative arrangements designed to identify and manage actual and potential conflicts. These arrangements form part of the reasonable steps FPUK has taken to prevent conflicts of interest from adversely affecting the interests of clients. For the purposes of conflicts management, clients include existing clients of FPUK and may include potential clients seeking to conduct specific services or activities with FPUK.

Specific conflicts management arrangements include, but are not limited to:

- **Information Barriers:** FPUK has physical arrangements and procedural policies restricting the flow of information (“Chinese Walls”) between different areas within FPUK and other entities and affiliates within KBC Group N.V. These Chinese Walls are designed to prevent improper access to client information or other types of sensitive information e.g. Inside Information. The Chinese Walls are also designed to enable FPUK to conduct client business without being influenced by information held within other parts of FPUK, or KBC Group N.V, that could result in a potential conflict of interest.
- **Order Management:** FPUK has a policy in place governing client order priority, whereby all trading on behalf of FPUK, including principal and proprietary trading, and on behalf of its clients should take place fairly and in due turn so as to avoid a potential conflict of interest.
- **Personal Account Dealing (“PAD”) and Outside Business Interests:** Relevant employees of FPUK are subject to FPUK’s PAD policy. A key feature of the policy is to ensure that there are no potential conflicts of interests between the employee’s PAD and that of FPUK’s clients or FPUK itself. FPUK employees are also required to declare certain Outside Business Interests.
- **Management of Security Offerings:** FPUK has a policy to address the various conflicts of interest that can arise during the management and distribution of a securities offering on behalf of an issuer. The policy deals with conflicts of interest present in such transactions by covering, for example, FPUK’s dealings with the issuer and allocation principles for investor clients.
- **Research Independence and Dealing Ahead Restrictions:** FPUK has a policy in relation to the publication of impartial investment research i.e. research that FPUK holds out as being an impartial assessment of the value or prospects of its subject matter. FPUK has implemented various measures to ensure the integrity of research production wherever it is

- produced by investment analysts. FPUK has also implemented arrangements designed to prevent dealing ahead of the publication of such research.
- **Internal and Group Organisation:** FPUK's activities are organised in a manner so that various business areas within FPUK operate with an appropriate level of independence from one another. The level of independence also extends to FPUK's activities and structure within the Group. The internal and Group reporting lines and supervisory oversight regime in FPUK and the Group also ensures the appropriate structure is in place for the management of any conflicts of interests and, where appropriate, the escalation of conflicts to senior management.
- **Record Keeping:** FPUK maintains adequate records for actual and/or potential conflicts of interest and other relevant information identified.

There may be circumstances where the arrangements that FPUK has in place with respect to conflicts management are insufficient to entirely cure a particular conflict of interest. In these circumstances FPUK may, in the best interests of a client, disclose the potential or actual conflict of interest to the client. In some situations, FPUK may decline to act where a conflict of interest may damage the interests of a client.