

## CONFLICT OF INTEREST POLICY

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in order to comply with its legal and regulatory obligations, Banque Internationale à Luxembourg S.A. (hereinafter "BIL") has established a Conflict of Interest Policy, the aim of which is to detect conflicts of interest that may arise in connection with services it renders to its clients. Measures have been taken to prevent, identify and manage such conflicts.

### Definition of a conflict of interest

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A conflict of interest can be defined as a situation in which:

- The interests of a financial institution, its directors or employees may be contradictory or may differ from the interests of a client or group of clients; or
- The interests of two or more clients or groups of clients differ, as the financial institution has obligations towards each and every one of its clients.

### Situations that may give rise to conflicts of interest

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The various situations that may give rise to conflicts of interest can be summarised as follows:

- BIL could make a financial gain or avoid a loss at a client's expense.
- BIL has an interest in the result of a service provided to a client or of the trades executed on a client's behalf, and this interest differs from that of this client.
- BIL has a financial or other incentive to prioritise the interests of one client or group of clients over the interests of another client or group of clients.
- BIL is in the same business as the client.
- BIL receives or will receive from a person other than the client a benefit relating to the service provided to the client in the form of services or financial or non-financial benefits.

### Fundamental values of BIL's Conflict of Interest Policy

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The Conflict of Interest Policy implemented by BIL is based on five fundamental values:

- Integrity: BIL acts with integrity in its professional and commercial relations. Services and transactions must not be tainted by personal interests or influenced by the interests of other parties.
- Objectivity: BIL does its utmost to be objective in its professional and commercial judgements.
- Competence: BIL only takes on tasks if it has the competence required to complete them successfully.
- Fairness: BIL takes into account the interests of its clients and treats them fairly.
- Transparency: BIL always takes its clients' interests into account and deals with them transparently. If applicable, it informs them of the existence of conflicts of interest.

## Objectives and measures in place for the purposes of this Policy

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The objectives of this Conflict of Interest Policy are notably to:

- develop a global approach and methodology concerning the identification, prevention and handling of potential conflicts of interest;
- establish principles and rules to be followed by staff members so that conflicts of interest are identified, prevented and handled at each level;
- define the roles and responsibilities of each staff member in relation to the aforementioned rules;
- highlight the main conflicts of interest identified and the measures taken to alleviate them.

The measures taken can be divided into three levels:

- Level one measures apply to all members of staff.
- Level two measures apply to certain departments and staff members at BIL in order to take into account the specific risk factors associated with their activities.
- Certain staff members may be subject to specific measures with respect to the potential conflicts of interest identified.

If the preventive measures implemented are not enough to ensure that clients' interests are not harmed, then before acting on behalf of its clients, BIL must ensure that they are properly notified of the nature and, where applicable, the source of conflicts of interest that remain.