

OUR POLICY ON CONFLICT OF INTEREST

Our company's top priority is our willingness to act honestly, fairly and professionally in the best interests of our customers.

In this context, and in accordance with the current legislation (*), our company has taken appropriate steps to identify, prevent and manage conflicts of interest that may arise in the context of our activities.

In view of the above and the characteristics of our activities, our company has written a policy on the management of conflicts of interest, which is summarised in this document. On request you can receive additional information, which will be provided on a durable medium.

(*) REFERENCE TO THE APPLICABLE LEGAL FRAMEWORK:

- Article 26, section 5 of the Law of 2 August 2012
- Article 12 sexties, §3 of the Law of 27 March 1995
- Articles 17 to 23 of Royal Decree No. 2
- Point 6 concerning conflicts of interest in circular 2014 02 dated 16 April 2014 on the amendment of the Law of 27 March 1995 and the extension of the MiFID rules to the insurance sector
- The Law of 4 April 2014.

• IDENTIFICATION OF POTENTIAL CONFLICTS OF INTEREST:

Conflicts of interest may occur between:

- Our company (including all individuals associated with it such as the directors, managers, those who exercise control over the company, employees involved in the provision of insurance mediation services and agents - referred to hereinafter as "associated persons") and customers.
- Between customers.

Taking into account the characteristics of our company, we have identified the potential cases of conflicts of interest. Here are a few examples:

- A situation where a financial gain can be made or a financial loss avoided at the customer's expense.
- Our company has an interest in the result of an insurance mediation service or of a transaction carried out which differs from the client's interests.
- Our company is encouraged, for financial or other reasons, to give priority to the interests of another customer or group of customers over those of the customer in question.
- Our company is engaged in the same professional activity as the customer.
- Our company receives a benefit from a person other than the customer in relation to the insurance mediation service provided to the customer in the form of money, goods or services, other than the normal commission or charges for this service.

- **POLICY ON MANAGEMENT OF CONFLICTS OF INTEREST**

Our company has taken a number of steps to manage conflicts of interest that may arise. These steps are specifically as follows:

- The employees and all other persons associated with the company must comply with an internal memo setting out the principles and steps that must be followed in the context of managing conflicts of interest.
- An appropriate policy concerning remuneration of employees and all other persons associated with the company.
- A policy on gifts or other benefits.
- Other organisational steps to guarantee the confidentiality of data communicated by customers.
- Organisational measures in the form of separated management where these are shown to be necessary.
- A policy on arbitration boards.
- A policy to ensure that associated individuals act only as intermediaries for the insurance contracts whose key features they know and are able to explain to customers.
- A policy stating that if a specific conflict of interest cannot be resolved, our company reserves the right to refuse the request from the customer in question, with the sole aim of protecting the customer's interests.
- A policy to ensure that all information provided by individuals associated with us is correct, clear and not misleading.

- **INFORMATION GIVEN TO CUSTOMERS**

When the organisational or administrative steps taken by our company to manage conflicts of interest are insufficient to guarantee with reasonable certainty that the risk of harming the customer's interests will be avoided, our company will inform them in writing or on any other durable medium, before acting on their behalf, of the general nature and/or the source of these conflicts of interest. The final decision on how to deal with the situation giving rise to the conflict of interest is up to the customer.

If a specific conflict of interest cannot be resolved, our company reserves the right to refuse the request from the customer in question, with the sole aim of protecting the customer's interests.

- **MONITORING THE POLICY ON MANAGEMENT OF CONFLICTS OF INTEREST**

In accordance with the regulations, our company maintains and regularly updates a register of conflicts of interest that arise and present a significant risk of harming the interests of one or more customers. When conflicts of interest are entered on the register, this may lead to the list of potential conflicts of interest being updated, and vice versa.

If it is found to be necessary, our company will update/amend its policy on the management of conflicts of interest.

Persons associated with our company are obliged to follow internal memoranda relating to the policy on conflicts of interest.