

Summary of conflicts of interest policy KAS BANK N.V.

Introduction

In exercising (investment) services or activities, the Bank should always act in the best interest of the client. However, there could be a situation whereby the interest of another client, or the interest of the Bank, or the personal interest of an employee could give rise to a conflict of interest.

KAS BANK identifies the following conflicts:

- Business conflicts of interest:
 - conflicts of interest between the Bank and one or more clients of the Bank
 - conflicts of interest between two or more clients of the Bank
- Personal conflicts of interest
 - conflicts between the personal interest of the employee and the interest of the Bank or the interest of clients.

Potential conflicts of interest

KAS BANK is not involved in individual asset management or investment advice (other than passive asset management as part of institutional risk management), public investment recommendations or investment research, market making, underwriting or placing of financial instruments, or corporate finance business.

KAS BANK is involved in other (investment) services or activities which (in combination) may give rise to a conflict of interest. This could include dealing for own account, the reception and transmission of orders of clients, the execution of orders on behalf of clients, safekeeping and administration of financial instruments for the account of clients, clearing and settlement and the granting of credit.

KAS BANK has identified the business areas which could involve the risk of conflicts of interest; these include:

- dealing for own account while the Bank may also receive or transmit orders of clients, may execute orders on behalf of clients and may conduct passive asset management as part of institutional risk management for clients
- the reception and transmission of orders for more than one client, the execution of orders on behalf of more than one client, passive asset management for more than one client, securities lending for more than one client
- receiving fees or commissions from third parties in relation to (investment) services to the client
- the existence of price sensitive information
- receiving or offering gifts or invitations for entertainment by employees
- additional activities and functions undertaken by employees (not forming part of the KAS BANK employment contract).

Measures to manage conflicts of interest

Firstly, conflicts of interest should be avoided where possible. Conflicts of interest which may not be avoided, should be managed appropriately. KAS BANK has adopted several measures designed to prevent conflicts of interest from adversely affecting the interests of the client:

- the administrative organisation and organisational arrangements ensure a sufficient degree of independence between the different services and activities exercised by the Bank
- policies and procedures are in place to manage potential conflicts of interest; these policies and procedures are maintained on a regular basis and compliance is monitored
- fees or commissions from third parties in relation to (investment) services to the client are only allowed if these have been clearly disclosed to the client beforehand and if the fee or commission enhances the quality of the relevant service and does not impair compliance with the Bank's duty to act in the best interest of the client
- all employees of KAS BANK are subject to internal rules for treatment of price sensitive and other confidential information
- all employees of KAS BANK are subject to rules of conduct with respect to personal account dealing; in addition, a restricted list is applicable and all personal account transactions should be reported
- all employees are subject to rules of conduct with respect to accepting and offering gifts and invitations for entertainment. The receipt of gifts and invitations should be reported. The receipt of gifts should be limited to gifts where the commercial value is small
- additional activities and functions of employees (not part of their employment with KAS BANK) are subject to restrictions; specific functions are subject to prior written approval of the managing board.

If the Bank's arrangements for managing conflicts of interest can not prevent the risk of damage to the client's interest then the Bank shall disclose the general nature and/or source of those conflicts of interest to the client before undertaking the business. The client can then may a conscious decision whether to proceed.