

Conflicts of Interest Policy

This document summarises KVB Prime (UK) Limited's (hereafter known as "KVB PRIME") conflicts of interest policy.

KVB PRIME has set out a framework to manage conflicts of interest fairly. This ensures that KVB PRIME is able to identify and effectively deal with any conflicts of interest that are either realised or have a significant potential to become realised.

Our Objective

The objective of the Policy is to ensure that conflicts of interest within KVB PRIME are identified, managed appropriately and, where necessary, disclosed in order to ensure the fair treatment of clients and compliance with the rules and principles of the Financial Conduct Authority ("FCA").

Application

This policy applies to all regulated activities, and activities in connection with or for the purposes of such regulated activities, including those outsourced activities provided by a third party. All employees are required to comply with the Policy.

Conflicts of Interest Identification

KVB PRIME has processes in place to identify potential conflicts of interest. Once a conflict has been identified, procedures are implemented to ensure it is appropriately managed. A potential conflict occurs where competing obligations result in, or are likely to result in, risk of damage to the interests of a client, including where:

- KVB PRIME is likely to make a financial gain, or avoid a financial loss, at the expense of the client; or
- An employee of KVB PRIME is likely to make a financial gain, or avoid a financial loss, at the expense of the client; or
- A client of KVB PRIME is likely to make financial gain or avoid a financial loss at the expense of another client.

Arrangements to Manage Conflicts

KVB PRIME has established procedures which are designed to identify and manage conflicts of interests. These include a number of organisational and administrative arrangements to safeguard the interests of clients and minimise the potential for conflicts to arise.

KVB PRIME adopts a number of approaches to manage conflicts; the following is a non-exhaustive list of these controls:

- Segregation of duties for persons engaged in different business activities, including procedures for ensuring appropriate communication between business units;
- Personal account dealing restrictions applicable to all staff, and their associates, regardless of seniority;
- Control over sources of remuneration of relevant persons;
- Protocols to ensure that no improper inducements are given or received and proper inducements are disclosed appropriately;
- Gifts and personal benefits procedures including a gift register recording the solicitation, offer or receipt of certain benefits;
- External directorship policy, including the requirement for all external directorships and outside business interests to be declared; and
- Training to directors and employees of KVB PRIME on conflicts of interest management.

Conflicts Disclosure

Where KVB PRIME considers that the arrangements in place to manage potential and/or actual conflicts of interest are not sufficient to avoid material risk of damage to a client's interest, KVB will disclose the general nature and/or sources of the conflict of interest to the client before undertaking any business for the client.

Further information on KVB PRIME's conflicts policy, including a full version, can be provided upon request. Alternatively, please address any questions to your usual KVB PRIME contact.