

Information on the Conflicts of Interests Policy of Credendo – Short-Term Non-EU Risks

1. In general

The legislator compels the insurer, when offering insurance services to clients or potential clients, to ensure to preserve the interests of his clients in a loyal, fair and professional way.

As with any other insurer, when insurance intermediaries' services are executed, conflicts of interests which can harm the interests of the client may however arise. These conflicts can arise between the client and the insurance company, including the directors and employees, but also between the client and the insurance intermediary, as well as between the clients themselves.

Credendo – Short-Term Non-EU Risks (hereafter also referred to as 'the Company') has elaborated a Conflicts of Interests Policy which forms an essential part of its Integrity Policy and the Code of Conduct, which are approved by the Board of Directors and the Executive Committee, and evaluated on a regular basis. This policy is applicable to everyone who is working for the Company and aims at identifying the existing and potential conflicts of interests as well as taking all reasonable measures to avoid and control the possible conflicts of interests.

The basic principle being used is that the persons working for the Company should always act in a loyal, fair and professional way in order to preserve each of its client's interests.

2. Different types of conflicts of interests

In order to determine the types of conflicts of interests that could occur during the performance of the services, the following specific situations are taken into account:

- > the Company or an employee may obtain a financial gain or avoid a financial loss at the expense of the client, for example by concluding transactions in a personal capacity with clients of the Company or by having knowledge of confidential information related to a certain client which can be relevant in the relationship with another client;
- > the Company or an employee may have an interest regarding the outcome of the insurance services provided or regarding the outcome of the transaction carried out on behalf of the client, that may differ from the client's interest, for example when an employee would also be acting as an insurance intermediary for a client of the Company besides being an employee of the Company;
- > the Company or an employee has a financial or other motive to let the interest of a client or a group of clients prevail over the interest of the client in question, for example when the Company or an employee would possess a significant financial participation in certain clients of the Company;
- > the Company or an employee practices the same activity as the client or, for example also in case of taking up an external mandate or a position at a client of the Company which can lead to a conflict of interests between both parties;
- > the Company or an employee receives a benefit in the form of money, goods or services that differs from the normal commission or remuneration for this service, which could influence the attitude or the behaviour, to such an extent that the interests of the client may be harmed .

The situation where the Company, in the performance of an insurance policy, would let the interest of a company belonging to the same group as the Company prevail over the interests of a client, is considered a potential conflict of interest.

3. Internal measures to control conflicts of interests

The Company has elaborated procedures and measures that should enable it to prevent and control possible conflicts of interests.

First of all, potential conflicts of interests should always be submitted to the Compliance Officer, who is responsible for maintaining the observance of the Integrity Policy of the Company. This obligation is included in the Code of Conduct of the Company and is among others, applicable on the execution of personal transactions, accepting external positions and mandates as well as holding financial participations.

The Gift Policy is also included in the Code of Conduct. This code sets out the rules and procedures for the correct handling of gifts or invitations.

If there is any uncertainty regarding the conformity with these principles, this needs to be reported to the Compliance Officer for further instructions, before accepting any gifts or invitations. If a gift or invitation does not meet the conditions, it should be refused immediately.

The Company also has a Whistle-Blowers Policy, which allows the employees to anonymously report possible violations of the Code of Conduct to the Compliance Officer. Furthermore, there is a procedure which aims at handling complaints filed by the insured or by a third party within the framework of the performance of the insurance policy, in a timely, structured and objective manner.

Operational decisions within the Company are taken on the basis of the four-eyes principle, which is further elaborated in specific subdelegation rules and a clear separation of functions. Potential conflicts of interests of certain employees can thus be timely handled, without undermining the professional services of the Company towards the client.

The employees of the Company are being trained and sensibilised regarding the respect and observance of this policy and the elaborated procedures.

4. Handling conflicts of interests

Should the existing measures to avoid conflicts of interest be insufficient, and a conflict of interest arises between the Company and a specific client, the Company will always take the interests of the client into consideration.

If there is no adequate way to handle the conflict of interests, or if the measures taken do not provide sufficient safeguard to reasonably protect the interests of the client, the Company will inform the client as soon as possible.

The Company keeps a specific register of the treated conflicts of interests.

If you wish to receive more information about the Conflicts of Interests Policy, you can always contact the Compliance Officer (compliance-stn@credendo.com).