



CONFLICTS OF INTEREST POLICY FACTSHEET

The purpose of this section is to inform that Banque Havilland (Switzerland) S.A. (the “**Bank**”) has in place strong procedures in order to prevent, detect and manage conflicts of interests that could arise under or in connection with the provision by the Bank of its investment and/or ancillary services (the “**Services**”) to clients (each a “**Client**”).

Such procedures are laid down in the Bank’s internal conflict of interest policy (the “**Conflict of Interest Policy**” or the “**Policy**”), the principles of which is provided below.

This summary is provided to the Client to enhance transparency and confidence in the Bank’s Services.

The present Conflicts of Interest information is available online on the Bank’s website and the Client may obtain further information on request.

A “**conflict of interest**” is a situation in which, in the context of the performance of the Bank’s Services, the objectives directly or indirectly pursued by the Bank (including those of its managers, employees, tied agents and/or those of the persons who are directly or indirectly linked to the Bank by control) conflict with the objectives of a Client, or where the objectives of a Client conflict with those of another Client, to the potential detriment of those clients.

An “**interest**” shall refer to any type of benefit, whether of a material, immaterial, professional or personal nature.

The Bank has business interests in many different jurisdictions and offers a wide variety of products and services to a broad and diverse client range.

From time to time, the Bank could find itself in a position where the interests of one Client may compete with the interests of the Bank (including a manager, employee, tied agent and/or any person who is directly or indirectly linked to the Bank by control) or the interests of another Client. The Bank is therefore conscious that it is crucial to implement and comply with appropriate measures to prevent conflicts of interests.

Accordingly, the Policy lays down rules and guidelines to be followed by the Bank to:

- (i) prevent conflicts of interests through identification of potential conflicting situations, planning of regular dedicated trainings for employees, specific organizational and governance measures and many other various internal processes;
- (ii) detect conflicting situations, if any;
- (iii) assist the management of [potential] conflicts of interests in situations where these prevention measures are likely) to prove insufficient;
- (iv) keep the client duly informed, when necessary.

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