

# Summary of ABN AMRO policy on conflicts of interest

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## Why does the bank have a policy on conflicts of interest?

The various financial services that the bank offers can give rise to situations where the customer's interests conflict with the bank's interests. This may lead to a disadvantage for customers. We call such situations conflicts of interest, and the bank has a policy to deal with these situations.

## What conflicts of interest can occur?

- ▶ Conflicts of interest between customers and the bank or its employees.
- ▶ Conflicts of interest between the customers of the bank.

These conflicts of interest can occur in each area of the services provided by the bank.

## What is the focus of the bank's policy?

- ▶ Preventing customers from suffering any damage or loss as a result of conflicts of interest.
- ▶ Preventing and managing conflicts of interest.
- ▶ Identifying conflicts of interest.

## What measures does the bank take?

The bank has taken important measures to identify, prevent and manage conflicts of interest. These include the following:

- ▶ **Administrative procedures and systems**  
The bank has administrative procedures and systems for controlling and managing conflicts of interest.
- ▶ **Awareness and training programmes**  
The bank's employees act according to guidelines and instructions on how to deal with conflicts of interest. Employees are also obliged to attend special training courses in which they learn what they must do to prevent conflicts of interest.
- ▶ **Internal rules and separation of functions**  
The bank has rules to prevent and manage the exchange of information between departments and employees wherever necessary. Separation of functions is also in place.
- ▶ The bank does not accept any gifts from third parties in the course of its investment services to customers,

neither in the form of money nor as any other item of value. Some gifts that enhance the quality of the bank's services and cannot harm customer interests are legally permissible and the bank can therefore accept them. Thus the bank accepts, when providing investment services, small, reasonably non-expensive gifts.

Examples are:

1. attendance at a seminar or conference on investment services or investment products that has been organised by a third party, including the consumption of refreshments during these meetings, and
2. the receipt of information material on investment services and/or investment products from a third party.

When providing investment services, the bank can also act as placement agent in the case of a share issue. The bank can receive a fee for this from the issuing institution. The bank can furthermore accept a fee for providing investment services in relation to crowdfunding platforms.

## ▶ Notification of a conflict of interest

If a conflict of interest has become inevitable despite the measures taken by the bank, the bank will inform its customers of this. This enables customers to form their own opinion as to what they think of the bank's services. They are also better able to decide whether they want to continue receiving banking services from the bank.

## ▶ Discontinuation of services by the bank

If the measures that the bank has taken are not good enough to adequately protect the interests of customers, the bank can decide not to provide services to these customers.

## Would you like more information?

If you would like more information about the bank's policy on conflicts of interest, you can contact your advisor. We would be happy to assist you.

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