

Conflicts of interest policy – investment services

Keytrade Bank is the Belgian branch of Arkéa Direct Bank SA (France) (hereafter «Keytrade Bank») and is part of the Groupe Crédit Mutuel Arkéa. In accordance with the terms and conditions stipulated in its General Terms and Conditions, Keytrade Bank provides its clients with receipt/transmission and order execution investment services on financial instruments, as well as portfolio management according to the terms and conditions set out in the Portfolio Management Agreement and the Specific Terms and Conditions of the Portfolio Management Service.

In accordance with the applicable regulations, Keytrade Bank has implemented a mechanism to detect and manage situations where conflicts of interest may arise, either between Keytrade Bank and the client or between two clients during the aforementioned provision of investment services or related services and whose existence may jeopardise a client's interests.

The purpose of this document is to inform Keytrade Bank clients of this mechanism.

> 1. Potential conflicts of interest and the measures implemented to prevent them

In particular, a conflict of interest may occur when:

- Keytrade Bank is likely to achieve a financial gain or avoid a financial loss at the expense of the client;
- Keytrade Bank has an interest in the result of a service provided to the client or a transaction carried out on the client's behalf, which is different to the client's interest in the result;
- Keytrade Bank, for financial reasons or any other reason, has prioritised the interests of another client or a group of clients above the interests of the client to whom the service is provided;
- Keytrade Bank undertakes the same professional activity as the client;
- Keytrade Bank receives, or will receive from someone other than the client, a benefit in relation to the service supplied to the client, in any form whatsoever, other than the commission or fees normally invoiced for this service.

Keytrade Bank has established a list of situations that may lead to conflicts of interest, which includes the measures implemented in order to prevent such conflicts of interest.

> 2. The mechanism for detecting and preventing conflicts of interest

The mechanism implemented by Keytrade Bank is integrated into the system established by the Groupe Crédit Mutuel Arkéa to which it belongs, for all entities that are part of the Group. Firstly, this mechanism is based on the organisation of the Groupe Crédit Mutuel Arkéa, resulting in a clear distinction between the Group's various financial activities: managing its own accounts/managing third-party accounts (institutional Chinese walls). Secondly, Keytrade Bank organises its various functions separately (negotiation/validation/control, commercial relationships/financial management, etc.) as well as those individuals involved in these functions (operational Chinese walls). Furthermore, in carrying out their roles, the employees of each Groupe Crédit Mutuel Arkéa entity are required to comply with a rigorous framework of rules and guidelines (code of conduct, code of ethics, etc.) designed to prevent conflicts of interest and, more generally, to combat any financial corruption. This framework, of which the Groupe Crédit Mutuel Arkéa employees are made aware, concerns both their personal behaviour in carrying out their roles and using tools and implementing procedures for detecting and monitoring the transactions carried out. Finally, at each procedural level of the Groupe Crédit Mutuel Arkéa entities, periodic or continuous compliance checks are carried out on completed transactions in order to ensure the mechanism's effectiveness.

> 3. Managing conflicts of interest

Keytrade Bank's core principle is its relationship with its clients, which is based on loyalty, honesty as well as the equal and professional treatment of all its clients. These principles go hand in hand with the will to act in the clients' best interests. Should there be a conflict of interest between Keytrade Bank and a client, Keytrade Bank must refer to the principle that the client's interest shall take precedence over that of Keytrade Bank, or of any individual person directly or indirectly associated with them via a controlling relationship; should there be a conflict between two Keytrade Bank clients, Keytrade Bank must refer to the principle of proportionality and seniority of its commitments towards these clients.

The Keytrade Bank Compliance Officer shall be made aware of any potential conflicts of interest (either after reporting by the employees in question or by checks through the aforementioned procedures). The Compliance Officer shall investigate and deal with potential conflicts of interest in accordance with the principle of ethics outlined above, by proposing a fair solution based on the client's interest. The Compliance Officer shall document any conflicts dealt with in a specific log, stating the conflicts of interest that occurred in relation to investment services or related services.

> 4. Development of the policy regarding managing conflicts of interest

This document was created in October 2007 and was last updated in September 2019.

> 5. Requests for information

All Keytrade Bank clients may obtain additional information about our policy regarding managing conflicts of interest by sending an e-mail to info@keytradebank.be.