INFORMATION NOTE - DESCRIPTION OF THE PREVENTION AND MANAGEMENT OF CONFLICTS OF INTERESTS POLICY

1. Introduction

As a player in the life insurance market, WEALINS S.A. seeks, within the services and products offered to its clients, to protect their interests in a loyal, fair and professional manner.

In the context of its obligations, the purpose of this information note is to describe the measures implemented in order to prevent and manage conflicts of interests within WEALINS S.A.

2. Scope of application

A conflict of interests can be defined as follows:

- any situation in which WEALINS S.A.'s interests are incompatible with those of one of its clients
- any situation where the interests of one client, one particular group of clients or one partner of WEALINS S.A. are incompatible with those of another client or group of clients

3. Implementation of the policy

The policy on the prevention and management of conflicts of interests aims at ensuring the respect of the following obligations:

- Identifying potential and actual conflicts of interests
- Preventing potential conflicts of interests
- Handling current conflicts of interests
- Informing clients in a transparent manner if conflicts of interests cannot be avoided or managed
- Listing in a register the conflicts of interests which have been found
- Ensuring that the procedures comprise measures to implement for the prevention, the management of and the information on conflicts of interests
- Training the employees to identify, prevent and manage conflicts of interests

The management of WEALINS S.A. ensures that this prevention and management of conflicts of interests policy is practiced within the company by all employees.

The compliance department ensures the implementation of procedures and the monitoring needed for the application of the policy.

4. Measures of prevention and management of conflicts

4. 1. Principle of separation of duties

The execution of operations is assigned to different employees or must be validated by another employee, under the principle of «four eyes» and of the double signature.

For any operation regarding the contract of an employee or one of his relatives, the processing cannot be done by the employee himself.

4. 2. Data protection

Data concerning clients of WEALINS S.A. are treated in strict compliance with the Luxembourg laws on confidentiality and the protection of personal data.

Organisational measures are implemented within WEALINS S.A. to ensure a secure and confidential processing of sensitive data.

4. 3. Register of conflicts of interests

When any actual or potential conflict of interests is detected, it is recorded in the register of conflicts of interests maintained by the compliance department.

This register is regularly updated by the compliance department.

4. 4. Training for employees

Employees of WEALINS S.A. receive regular training which allows them to detect potential conflicts of interests and to react in accordance with the present policy.

4. 5. Information of the clients

If a conflict of interests cannot be avoided and if the interests of a client cannot be protected with the necessary guarantees, WEALINS S.A. shall immediately inform the client concerned to enable him to decide in full knowledge of all facts.

4. 6. Possibility to decline

WEALINS S.A. reserves the possibility to decline a subscription or a service to the client in order to protect the interests of the latter.

4. 7. Handling of complaints

Complaints are handled impartially, independently and transparently.

The compliance department is systematically informed of all complaints.

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