

# **Monument Assurance Belgium ("MAB") Conflicts of Interest Policy**

**V.4.4**

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## Document Control Sheet

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## **1 Introduction**

### **1.1 Context**

1.1.1 We expect our business activities to be conducted honestly and with integrity, and in good faith. We also expect that any interaction with our customers and other third parties is in accordance with ethical principles and we do not abuse our position to seek to gain unfair or unethical advantage.

1.1.2 The National Bank of Belgium's ("NBB") overarching Corporate Governance Circular for insurance undertakings sets out minimum statutory requirements on how insurance companies should organise the governance of their institutions. It stipulates, among other things, that the objectives of such companies regarding the management of conflicts of interest must be set out in a Conflicts of Interest Policy that must be part of their Integrity Policy.

1.1.3 It is crucial for good business practice that all (potential) conflicting interests are either completely avoided or properly managed if allowed to exist. Identifying and managing conflicts of interest is fundamental to the conduct of our business, our relationship with customers and the markets in which we operate. Understanding the conflicts of interest that potentially impact the business, enables us to handle them appropriately.

1.1.4 The risk when a conflict of interest is not properly managed and controlled, is that Monument's integrity may be compromised and customers and business partners may lose confidence in us. In addition, Monument may be subject to regulatory censure or fines or both as a consequence of failing to have appropriate systems and controls in place to provide adequate management of any conflict of interest.

1.1.5 Conflicts of interest may arise in the following relationships:

- between shareholders and the Company;
- between directors and the Company;
- between employees and the Company;
- between the Company and its customers, due to the business model implemented and/or the different services and activities offered by the Company;
- between different customers;
- between the Company and its parent company, its subsidiary or other related companies, in the context of intra-group transactions.

### **1.2 Policy Purpose and Objectives**

1.2.1 The purpose of this document is to set out a policy for the identification, avoidance, mitigation, and management of conflicts of interest and how to report them.

1.2.2 In the course of business, Monument directors and staff may have the opportunity to advance their own personal interests with or against the interests of the Company. Such behaviour will not be tolerated and any staff member who acts outside the agreed-upon values may be subject to disciplinary action.

1.2.3 This Policy is designed to ensure that Monument and its staff know how to identify any potential conflict of interests risks and know how to report them.

1.2.4 The Policy is part of a set of Monument Assurance Belgium's ("MAB") Governance Policies and should not be considered in isolation but as part of the overall governance framework.

### **1.3 Policy Scope**

1.3.1 This Policy is applicable to the Belgian insurance company, i.e. Monument Assurance Belgium NV ("MAB"), as well as its service companies affiliated by an outsourcing agreement, i.e. Monument Insurance European Services ("MIES"). For reasons of readability, they shall be referred to as "MAB" or "the Company" hereinafter in the document.

1.3.2 The principles set out in this Policy apply to all relevant persons of Monument, irrespective of their location, function, grade or standing.

### **1.4 Definitions**

1.4.1 **"Conflicts of interest"** occur when (i) the concerns of aims of an individual are or might become incompatible with those of MAB or when (ii) they are or could potentially be in a position to derive personal benefit from actions or decisions made in their capacity as a staff member, director or other person acting on behalf of the Company, which in turn leads to a material risk of damage to the interests of one or more parties.

1.4.2 **"Insurance distributor"** refers to insurance companies, insurance intermediaries and non-exempt ancillary insurance intermediaries.

1.4.3 **"Relevant persons"** are the directors, staff, appointed representatives, tied agents and contractors of and those providing services to MAB on the one hand, or its appointed representatives under an outsourcing arrangement on the other hand. For the purpose of this Policy, when identifying conflicts, the interests of MAB include those of its relevant persons.

### **1.5 Legal and Regulatory Framework**

1.5.1 The legal and regulatory framework for this Policy incorporates, among others, the following:

- Article 258, §5 of the EU Delegated Regulation 2015/35;
- Articles 7:96, 7:115 and 7:117 of the Belgian Companies and Associations Code of 23 March 2019;
- Article 45*bis* of the Belgian Law of 13 March 2016 on the legal status and supervision of insurance or reinsurance companies;
- NBB Circular NBB\_2016\_31 of 5 May 2020 on the NBB's prudential expectations concerning the governance system in the insurance and reinsurance sector;
- Articles 283 and 288 of the Belgian Insurance Law of 4 April 2014, which includes the transposition of Directive (EU) 2016/97 (the Insurance Distribution Directive or "IDD"); and
- Articles 2 of the Commission Delegated Regulation (EU) 2021/1257 of 21 April 2021 amending Delegated Regulation (EU) 2017/2358 and (EU) 2017/2359 as regards the integration of sustainability factors, risks and preferences into the product oversight and governance requirements for insurance undertakings and insurance distributors

and into the rules on conduct of business and investment advice for insurance-based investment products.

## **1.6 Related Documents**

1.6.1 The following documentation is approved on the Group's (Monument Re) level:

- Group Financial Crime Policy;
- Group Fit and Proper Policy;
- Group Whistleblowing Policy;
- Group Code of Business Conduct and Ethics.

1.6.2 The following documentation is approved on the Company's level:

- MAB Integrity Policy;
- MAB Code of Business Conduct and Ethics;
- MAB Terms of Reference of the Board and Committees;
- MAB Anti-Bribery and Corruption Policy;
- MAB AML/CTF Policy;
- MAB Fiscal Prevention Policy;
- MAB Whistleblowing Policy;
- MAB External Functions Policy;
- MAB Remuneration Policy.

## **2 Ownership and Review Information**

### **2.1 Policy Ownership**

2.1.1 The Compliance Officer ("CO") is responsible for the implementation, review and maintenance of this Policy.

2.1.2 The Policy should be reviewed at least annually by the Compliance Officer, who recommends it for review and approval by the MAB Board of Directors at least once a year. In the event of changes to applicable regulations and/or the nature, scale or complexity of the Company's operations, more frequent review and updates may be required.

2.1.3 The Compliance Officer may, if he deems it useful, submit this Policy to the Management Committee prior to the Board meeting.

### **2.2 Non-Compliance with the Policy**

2.2.1 Compliance with this Policy is mandatory. Any deviation from the principles outlined therein shall be communicated in writing to the Compliance Officer with the supporting rationale. In addition, reference is made to the provisions under **Section 5.3**.

2.2.2 Any breaches of this Policy must be reported to the Compliance Officer for the performance of their independent control duty. Should a relevant person detect any non-compliance, they must raise the matter with the Compliance Officer.

- 2.2.3 A breach of the Policy may result in disciplinary action, which could lead to dismissal and/or legal action. For certain risks, failure to follow defined procedures could result in individual colleagues being directly liable to prosecution or regulatory penalties.
- 2.2.4 Failing to comply with this Policy can result in increased costs, wasted management time, missed opportunities, regulatory or legal sanctions against Monument and individual colleagues, loss or harm to customers and colleagues, and damage to the company's reputation.

### **3 System of Governance**

#### **3.1 Board of Directors**

- 3.1.1 The MAB Board is ultimately accountable for ensuring that the Company maintains high standards of ethical behaviour and professional conduct at all times. The key responsibilities of the Board include:
- reviewing and approving this Policy on a minimum annual basis;
  - taking receipt of the report on material conflicts of interests provided by the Compliance Officer on an annual basis at minimum; and
  - overseeing key controls with respect to decision-making where potential conflicts may preclude Board members or other staff from participating in decisions.
- 3.1.2 The Board nominates the Compliance Officer to be responsible for the implementation and maintenance of the Policy. The Compliance Officer carries out these responsibilities in accordance with the laws and regulations applicable in Belgium.

#### **3.2 Management Committee**

- 3.2.1 The Management Committee supports the Board of Directors in effectively discharging its responsibilities by:
- reviewing this Policy upon request of the Compliance Officer; and
  - challenging the effective development and implementation of the Policy in light of the Company's and the Group's strategy.

#### **3.3 Compliance Officer**

- 3.3.1 The Compliance Officer is responsible for:
- ensuring that the Company has taken reasonable steps to prevent conflicts of interest from giving rise to material risks or damage to Monument, and is mitigating actions to manage such conflicts;
  - implementing controls to manage conflicts of interest, as well as monitoring the effectiveness thereof;
  - maintaining all written conflicts of interest as part of the Company's books of record at Monument's registered office;
  - maintaining records of all material conflicts of interest that occur and reporting the same to the Board of Directors on a yearly basis;
  - escalating any material breaches of the Policy to the Board; and
  - organising trainings and sensibilisation campaigns for Monument's staff.

## **4 Policy Principles and Requirements**

- 4.1.1 Monument does not abuse its position to seek to gain unfair or unethical advantage.
- 4.1.2 Governance mechanisms and reporting processes shall be in place to ensure that conflicts of interest are managed in line with the Group's and the Company's strategy and reported in accordance with the reporting obligations.
- 4.1.3 Each (potential) conflict of interest shall be:
- identified on a timely basis,
  - effectively managed,
  - mitigated,
  - reported,
  - recorded in a conflict of interest register, and
  - monitored in adherence to applicable legal and regulatory requirements.
- 4.1.4 Monument acts with integrity and in the interest of the customer. This implies that:
- the Company ensures that a (potential) conflict of interest does not prevent it from acting loyally, fairly and professionally towards the customer;
  - the remuneration that the Company receives or pays, and the performance review of its staff cannot create conflicts with its duty to act in the best interest of the customer;
  - the Company's remuneration practise and commercial goals<sup>1</sup> may not entail a scheme that may induce it or its staff to recommend a particular insurance product to a customer when the insurance distributor could offer another insurance product that would better meet the customer's needs. Furthermore, the client's sustainability preferences are one of the client's interests that may not be adversely affected;
  - when there is a risk of damage to the customer's interest or an adverse impact on the customer, the customer is informed clearly when the steps taken to manage conflicts of interest are not sufficient to ensure, with reasonable confidence, that his interests will not be adversely affected.

## **5 Management of Conflicts of Interest**

### **5.1 Prevention**

- 5.1.1 The Company maintains and applies appropriate organisational and administrative measures to take all reasonable steps to prevent conflicts of interest from resulting in a material risk of harming the interests of others.
- 5.1.2 The abovementioned measures ensure that relevant persons carry out their tasks with the appropriate level of independence when undertaking activities that involve a conflict of interest. Examples of said measures include:
- i. Preventing or controlling the exchange of information where that exchange of information may harm the interests of one or more customers;
  - ii. Separate supervision of relevant persons whose principal functions involve activities that might give rise to a conflict of interest;

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<sup>1</sup> It should be noted that MAB is an insurance company in run-off, so no new products are commercialised.



- iii. Removing any direct link between the remuneration of different groups of relevant persons where there is an underlying conflict between the activities of those groups;
- iv. Preventing or limiting any person from exercising inappropriate influence over relevant persons;
- v. Preventing or establishing control measures where relevant persons are involved simultaneously or sequentially in separate services or activities where such involvement could impair the management of conflicts of interest;
- vi. Entrusting supervisory and reporting responsibilities relating to (potentially) conflicting activities to different persons;
- vii. Using “Chinese walls” (i.e. an information barrier) is an acceptable conflict management measure so long as reasonable steps are taken to ensure that the arrangement remains effective and is adequately monitored;
- viii. Limiting the external activities of relevant persons;
- ix. Providing that the members of the statutory governing body have a responsibility to abstain from voting on matters where they have or may have a potential conflict of interest, or where the objectivity or ability of the person concerned to perform the duties properly may be compromised;
- x. Duly recording the nature of the conflict of interest;
- xi. Applying the rules set in the Anti-Bribery and Corruption Policy, especially in regard to the gifts & hospitality.

5.1.3 If the organisational or administrative arrangements in place to deal with conflicts of interest are insufficient to reasonably assume that the risk of damage to the customer's interests will be prevented, the Company discloses the general nature or sources of conflicts of interest to the customer in a timely manner, especially before any contract is concluded<sup>2</sup>. Reference is made to the provisions under **Section 5.5**.

## 5.2 Identification

5.2.1 As stated under **Section 1.4**, a conflict of interest occurs when *(i)* the concerns of aims of an individual are or might become incompatible with those of Monument or when *(ii)* they are or could potentially be in a position to derive personal benefit from actions or decisions made in their capacity as a staff member, director or other person acting on behalf of the Company, which in turn leads to a material risk of damage to the interests of one or more parties.

5.2.2 Additionally, to speak of a conflict of interest within the meaning of the rules of conduct (IDD), there must be a risk of damage to the customer's interests or an adverse impact on the customer.

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<sup>2</sup> It should be pointed out that MAB operates in run-off and that the portfolios are closed book.

- 5.2.3 In identifying the circumstances which constitute or may give rise to a conflict of interest, the Company should ensure that the following points are taken into account at a minimum:
- whether a relevant person is likely to obtain a financial advantage or avoid a loss as a result of their position in the Company;
  - any interest that a relevant person may have in the outcome of a contract, transaction, and/or arrangement;
  - the business or body that a relevant person is involved in or connected with and whether conflicting interests may arise from that involvement; and
  - the receipt of any inducement by a relevant person.

5.2.4 To ensure that a culture of compliance is fostered within Monument and that, subsequently, conflicts of interest are managed in a suitable manner, staff must complete the periodic training provided, to enable them to understand this Policy and to identify, disclose and report conflicts of interest.

### **5.3 Internal Disclosure to the Compliance Officer**

5.3.1 Staff members and directors are obliged to disclose any known or potential conflicts of interest as soon as they arise to the Compliance Officer.

5.3.2 The Conflicts of Interest Attestation Form (see Appendix 2), is for staff who wish to report a new conflict, the removal or change in conflict, or is annually attesting to the knowledge that no change has occurred to a previous disclosure. Directors of the Board and members of the Management Committee should additionally adhere to, respectively, the provisions set out under **Sections 5.6** and **5.7**.

### **5.4 Monitoring**

5.4.1 The Compliance Officer reviews and monitors material conflicts of interest. Where a conflict of interest has been identified, the potential and/or actual impact is assessed and appropriate action is taken to address it in a timely manner. The reviews and assessments which have been performed in this regard are included in the conflicts of interest record. In addition, if applicable, clear evidence of Management Committee challenge of management information are retained, together with any actions taken as a result thereof.

5.4.2 Internal Audit undertakes periodic evaluations in order to assess the adequacy of governance and control mechanisms to identify, manage and mitigate conflicts or potential conflicts of interest.

### **5.5 External Disclosure to the Customer**

5.5.1 Monument and/or its relevant persons must disclose the nature of a conflict before undertaking work in cases where the measures to manage conflicts are not considered sufficient to ensure, with reasonable confidence, that risks of damage to the interests of another party will be prevented.

- 5.5.2 When it can reasonably be expected that any measures taken to manage a conflict of interest will not be sufficient to protect the customer's interests, the customer concerned shall be informed of the general nature and/or of the sources of the conflict of interest. The procedure for notification of unmanageable conflicts of interest to the customer must remain the exception; the Company should in first instance try to avoid or to manage the conflict of interest so that any damage to the customer is avoided.
- 5.5.3 The disclosure to the customer is subject to approval by the Management Committee.
- 5.5.4 The disclosure towards customers is made on a durable medium and contains the necessary details that allow the customer and any other party involved to make an informed decision regarding the activities to which the conflict of interest relates.
- 5.5.5 The disclosure must include the following elements:
- a specific description of the conflict of interest involved;
  - the general nature and sources of the conflict of interest;
  - the risks to customers arising from the conflict of interest and the steps taken to mitigate those risks;
  - a clear indication that the organisational and administrative arrangements put in place by the insurance distributor to prevent or manage the conflict of interest are not sufficient to ensure with a reasonable degree of certainty that risks of damage to customer interests will be prevented.

## **5.6 Specific Rules for the Board of Directors**

- 5.6.1 Directors do not participate in any decision-making where there is a reasonable potential conflict of interest on their part and shall abstain from voting on these decisions.
- 5.6.2 Directors of the Board of Directors whose interests conflict directly or indirectly with those of the Company upon confrontation with a contemplated decision or operation, must notify the other directors of the Board of the existence of this conflict and the nature thereof. This notification must be done at the beginning of the Board meeting and before the Board adopts its resolution in this respect.
- 5.6.3 The minutes of the Board meeting at which a decision is taken on the matter to which the reported conflict of interest relates, shall include:
- the statement of the director concerned and their explanation as to the nature of the conflicting interest; and
  - a description of the decision taken by the Board of Directors and the financial consequences thereof for the Company, as well as a justification for said decision.
- 5.6.4 The abovementioned description of the decision, the financial consequences and the provided justification will also be included in its entirety in the annual report or in a document filed with the financial statements.
- 5.6.5 The minutes of the Board meeting shall be communicated to the statutory auditor. The latter will assess the financial consequences for Monument of the resolutions of the Board in respect of which there is a conflict of interest and include this assessment in his report to the financial statements of the Company.

- 5.6.6 In the event that every director of the Board of Directors has conflicting interests in relation to a (contemplated) decision or operation by the Board, that decision or operation must be submitted to the General Assembly. Upon approval by the latter, the decision or operation may be executed.
- 5.6.7 The procedure described in provisions **5.6.4** and **5.6.5** is not applicable in the following 2 cases:
- in the case of an agreement concluded between companies that are directly or indirectly at least 95% related or at least 95% related to the same parent company;
  - when the decision relates to usual transactions under the usual conditions and securities for similar transactions.
- 5.6.8 Appointments of directors to the Board of Directors shall not proceed where possible conflicts of interest may emerge which are significant to the overall work of the Board.

## **5.7 Specific Rules for the Management Committee**

- 5.7.1 Members of the Management Committee do not participate in any decision-making where there is a reasonable potential conflict of interest on their part and shall abstain from voting on these decisions.
- 5.7.2 Members of the Management Committee whose interests conflict directly or indirectly with those of the Company upon confrontation with a contemplated decision or operation, must notify the other members of the Management Committee of the existence of this conflict and the nature thereof. This notification must be done, at the beginning of each Management Committee meeting and before the Management Committee adopts its resolution.
- 5.7.3 The minutes of the Management Committee meeting at which a decision is taken on the matter to which the reported conflict of interest relates, shall include a description of the decision taken by the Management Committee and the financial consequences thereof for the Company, as well as a justification for said decision.
- 5.7.4 A copy of the meeting minutes will be provided to the Board of Directors.
- 5.7.5 The abovementioned description of the decision, the financial consequences and the provided justification in provision **5.7.3** will also be included in its entirety in the annual report or in a document filed with the financial statements.
- 5.7.6 The minutes of the Management Committee meeting shall be communicated to the statutory auditor. The latter will assess the financial consequences for Monument of the resolutions of the Management Committee in respect of which there is a conflict of interest and include this assessment in his report to the financial statements of the Company.
- 5.7.7 In the event that every member of the Management Committee has conflicting interests in relation to a (contemplated) decision or operation by the Management Committee, that decision or operation must be submitted to the Board of Directors. Upon approval by the latter, the decision or operation may be executed.

- 5.7.8 The procedure described in provisions 5.7.4 to 5.7.6 is not applicable in the following 2 cases:
- in the case of an agreement concluded between companies that are directly or indirectly at least 95% related or at least 95% related to the same parent company;
  - when the decision relates to usual transactions under the usual conditions and securities for similar transactions.

## **6 Reporting and Escalation**

- 6.1.1 Reporting mechanisms in relation to the identification and management of material conflicts of interest within Monument shall be in place to enable timely communication of such conflicts and mitigating actions to appropriate stakeholders.
- 6.1.2 Procedures shall be in place to enable the identification, recording, reporting and rectification on a timely basis of breaches to the Policy, non-compliance with any relevant regulatory requirements or expectations and control failures.
- 6.1.3 Instances of material conflicts or potential conflicts of interest set out under **Section 5.2** are reported to the Compliance Officer by submitting Appendix 2. They are subsequently escalated to the Management Committee and the Board of Directors where necessary.
- 6.1.4 Breaches to this Policy shall firstly be reported and escalated to the Compliance Officer and subsequently to the Management Committee and the Board of Directors where necessary.
- 6.1.5 If staff members see something while working for Monument that may be wrongdoing, particularly in respect to conflicts of interest, they are required to report it. While they may report suspected wrongdoing confidentially in line with our Whistleblowing Policy, they are encouraged to discuss concerns in person to the Compliance Officer.

## **7 Record-Keeping**

- 7.1.1 The Compliance Officer keeps a record of the Company's (potential) conflicts of interest and reports the same to the Board of Directors at least annually. The record must be regularly updated as required, in particular where there are significant changes to the structure of the business. Copies of all registers, which can be anonymised, will be made available to Group Compliance so that they may review the registers for any systemic issues on group level as necessary.
- 7.1.2 This Policy and a record of the services and activities undertaken by the Company which might give rise to a conflict of interest, together with any changes to those documents, must be filed in accordance with the record retention schedule outlined in the MAB Data Retention and Deletion Policy.

## Appendix 1: Examples

### Common examples of conflicts of interest - General

*The list below is not exhaustive.*

#### **1.1 Business Conflicts of Interest**

1.1.1 Where a business arrangement might influence or be perceived as influencing a Monument member of staff or director in a way that could interfere with their ability to perform their job in an objective, impartial and effective manner.

1.1.2 Where members of staff or directors award or influence any supplier or outsourcing contracts or participate in negotiating contracts, they must avoid any actions that create the appearance of favouritism/nepotism.

#### **1.2 Personal Conflicts of Interest**

1.2.1 A conflict of interest may arise between a staff member/director and Monument, a client or a vendor, when said staff member/director deals with individuals who are family members or close personal relationships in the course of conducting business for or on behalf of Monument, as these dealings may compromise or otherwise call into question the employee's/director's judgment, ability to act objectively or properly discharge their duties and responsibilities owed to Monument and/or clients, or otherwise give rise to the risk of reputational damage to Monument, including the risk or appearance of impropriety how business is awarded to Monument or Monument having obtained an improper advantage or treatment.

#### **1.3 Outsourcing**

1.3.1 When selecting an outsourced service provider for critical or important functions or services, MAB must ensure that the service provider has adopted measures to ensure that no conflict of interest arises within the service provider and that the outsourcing does not entail the breaching of any law, in particular with regard to data protection rules, and that the service provider is subject to the same safety and confidentiality requirements of information relating to the undertaking, its policy holders or any beneficiaries as applicable to the undertaking.

1.3.2 A conflict of interest assessment is undertaken in:

- the risk assessment related to the outsourcing arrangement;
- the compliance memo related to the outsourcing arrangement.

1.3.3 The Conflict of Interest Policy should be exchanged with key critical outsourced service providers.

#### **1.4 Remuneration and Code of Conduct**

1.4.1 The remuneration received or paid by MAB may not create conflicts with its duty to act in the best interests of its customers.

1.4.2 In addition, MAB shall not judge the performance of its staff in such a way as to create conflicts with its duty to act in the best interests of its customers.

1.4.3 Further to the above, MAB may not, in terms of remuneration, sales targets or otherwise, adopt any scheme that may induce itself or its staff to recommend to a customer a

particular insurance product when the Company could offer another insurance product that would better meet the customer's needs and sustainability preferences.

- 1.4.4 It should be noted that Monument operates in run-off and with closed books portfolios. Therefore, there is no commercialization of new products.

## **1.5 Offering and Accepting Gifts and Hospitality**

- 1.5.1 The offering and accepting of gifts within this Policy applies to gifts from and to current or prospective insurance brokers/intermediaries, (re)insurers, clients, suppliers, outsourcing service providers, and others conducting (or proposing to conduct) business with Monument.
- 1.5.2 The occasional exchange of gifts is a common practice meant to create goodwill within business relationships. Staff and directors are nonetheless required to exercise good judgment before giving or accepting gifts and must never request personal gifts in exchange for business.
- 1.5.3 Offering hospitality must not be (nor appear to be) an attempt to gain any special advantage in Monument's business relationships and the onus is on individual staff and directors to exercise good judgment.
- 1.5.4 If, when offering hospitality, the material value threshold as set out in the MAB Anti-Bribery and Corruption Policy is exceeded, the hospitality and/or entertainment provided must be reported to the Compliance Officer.
- 1.5.5 A conflict of interest may arise between a staff member/director and Monument, a client or a third party if a staff member/director receives gifts and/or entertainment that may inappropriately incentivise them to act in a way that may conflict with the interests of Monument, the Client and/or a third party.
- 1.5.6 The receipt of gifts and hospitality must be dealt with in accordance with the Anti-Bribery and Corruption Policy.

### **Common examples of conflicts of interest – Concrete cases**

*The list below is not exhaustive.*

- An individual is responsible for operating a claims handling process and, at the same time, is responsible for carrying out quality control checks on the output of that process;
- Suppliers/outsourcers are selected on factors other than merit i.e. there could be incentives received or given by suppliers or selection may be based on personal or familial relationships;
- A company's remuneration structure drives the wrong behaviour resulting in a detrimental impact to MAB or its customers;
- A company has terms and conditions that contain indemnities or limits on liability that conflict with its general duties to its customers;
- An individual has access to confidential information of the Company that may include proprietary information, sensitive financial information or confidential information that is relevant to an investment being made by the Company, which, if disclosed or used by that individual, could result in such individual's personal gain and/or negative consequences for the Company;
- Delays occur in processing customer requests which could benefit the servicing company at the expense of the customer e.g. delay claim payments to maximise profit;

- Complaints compensation paid to customers does not fully recompense for the loss thus saving the Company money;
- Breach issues are identified that could be considered too costly to rectify and therefore could potentially disadvantage customers as the root cause isn't addressed;
- Employees may have shares or interests in another company with which their employer deals with or are proposing to enter into a transaction/contract with;
- An employee has dual responsibilities or interests which could cause a conflict of interest e.g. an employee has a relationship/interest in a third party provider that results in a decision/action that is not in the interests of the Company or the customer;
- An employee has a relationship with another employee or customer that could result in a decision/action that is not in the interests of the company that he or she works for;
- A director that holds a material interest in a contract or investment that is being considered by a company and does not take appropriate action in respect of such conflict;
- A director voting on a resolution for the payment of a dividend that could reasonably be perceived to be conflicted/interested;
- Engagement of the external auditor for non-audit services e.g. providing consultancy services;
- An executive director being appointed as Chair of any Board or Board Committee;
- The same individual being appointed as Chairman and CEO of a Group Company;
- Companies within the same group may have different strategic objectives, which can lead to conflicts of interest. For example, one company may prioritise short-term profitability, while another company may prioritise long-term growth;
- An individual hires, promotes or otherwise provides special treatment in the workplace to a person due to a personal or familial relationship;
- A human resources professional choosing not to investigate a claim of inappropriate behaviour because the person the complaint is against a person with whom they have a personal or familial relationship;
- An employee uses their work account on certain tools and programs to manage their own their personal business interests;
- An employee has a second job at an organisation that offers a service that is in direct competition with their other employer.



## Appendix 2: Conflicts of Interest Policy Attestation Form

<b>Name of staff member</b>				
<b>Business Title</b>				
<b>Business Function</b>				
<b>Manager</b>				
<b>Training received</b>	<b>Yes</b>	<b>No</b>	<b>If No, proposed date for training</b>	_/_/___

### Employee Attestation

**All staff members and directors must complete, date and sign this Attestation by selecting either Items 2 or 3, which ever section is applicable. Items 1, 4, 5, 6, 7 and 8 must be completed by all:**

1. By signing this document, I acknowledge receipt of the MAB Conflict of Interest Policy and certify that I have accurately completed this disclosure form to the best of my knowledge.
2. I hereby report that to the best of my knowledge, information and belief, no situation in which I am involved personally or professionally could be construed as a violation of the Conflict of Interest Policy, or as placing me in a position of having a conflict of interest.
3. I hereby (1) disclose the following circumstances that may constitute a conflict of interest, (2) disclose the following circumstances that may constitute a material change to a current conflict, or (3) attest that nothing has changed to a previous disclosure, as described in the Conflict of Interest Policy. **Please document the situation below that is or may be considered a conflict of interest:**

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4. This is to verify that I have full awareness of the Conflicts of Interest Policy which I last reviewed on:

Date:	_/_/___
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5. I have received the required training on conflicts of interest on:

Date:	_/_/___
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6. I have not yet received the required training for conflicts of interest and I have informed my Manager, who is arranging for this training to take place within three months of the signed date of this Attestation.
7. My next training session is due within at least one year from the date I received my original training, unless there are specific regulatory and/or industry market updates:

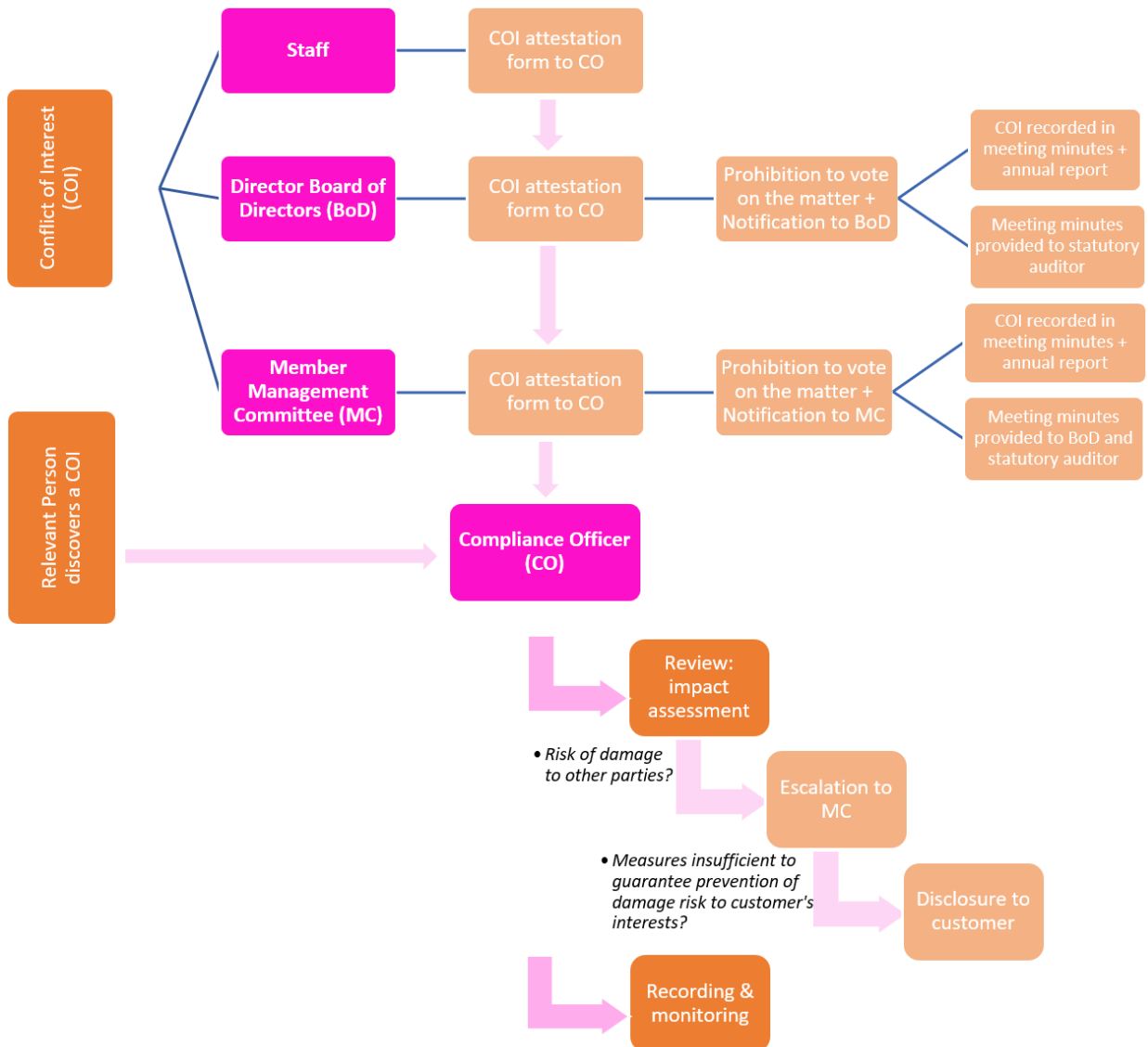
Date:	__/__/__
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8. The information provided on this Attestation form is factual and is validated by my Manager, who has co-signed this document.

Signed By	Print Name	Signature	Date:
Staff member			__/__/__
Manager			__/__/__

**N.B.**: Please ensure that a copy of this Attestation form signed by all parties is forwarded to the Compliance Officer for record-keeping.

## Appendix 3: Conflict of Interest Scheme



## Appendix 4: External Functions register

Persons concerned										
Surname	Name	Role	Function MAF	Function	Intragroup / Extragroup	Company, company number, registered address	Country	Sector / NACE code	Listed ?	If yes, which market
<b>Aoust</b>	<b>Jean-Philippe</b>	Executive director	CFO			Monument Assurance Belgium NV (0478.291.162) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium			
				director	Extragroup	Relais des Ingenieurs SC (0787.646.829) Rue de Mèves 2, 1325 Chaumont Gistoux, BE	Belgium	NACEBEL 68.201 Renting and operating of own or leased real estate, excluding social housing	No	/
				director	Intragroup	Monument Insurance European Services NV (0693.776.761) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium	NACEBEL 66.290 Other activities auxiliary to insurance and	No	/
				director	Extragroup	ASBIR SRL (0834.539.993) Tienne aux Clochers (WP) 130, 5100 Namur, BE	Belgium	NACEBEL 70.220 Business and other management consultancy	No	/
<b>Depaemelare</b>	<b>Koen</b>	Executive director	CEO			Monument Assurance Belgium NV (0478.291.162) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium			
				director	Intragroup	Le Travailleur Chez Lui SA (0402.439.340) Rue Sainte-Marie 5, 4000 Liège, BE	Belgium	NACEBEL 65.112 Activities of predominantly multi-branch insurance companies	No	/
				director	Extragroup	Azteca en/of Koen Depaemelaere NV (0460.845.416) Hertendreef 10, 2900 Schoten, BE	Belgium	NACEBEL 46.660 Wholesale trade of other office machinery	No	/
				director	Extragroup	Inclusio NV (0840.020.295) Herrmann-Debrouxlaan 40, 1160 Oudergem, BE	Belgium	NACEBEL 68.201 Renting and operating of own or leased real estate, excluding social housing	Yes	Euronext Brussels
				director	Intragroup	Monument Insurance European Services NV (0693.776.761) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium	NACEBEL 66.290 Other activities auxiliary to insurance and pension funding	No	/
				director	Intragroup	PI Distribution NV (0803.284.318) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium	NACE 64.200 Activities of holding companies	No	/
				director	Intragroup	PI Health NV (0803.284.516) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium	NACE 64.200 Activities of holding companies	No	/
				director	Intragroup	PI Logistic NV (0803.285.407) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium	NACE 64.200 Activities of holding companies	No	/
				director	Intragroup	PI Promotion NV (0803.285.011) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium	NACE 64.200 Activities of holding companies	No	/
				director	Intragroup	Monument Assurance Luxembourg SA (LU B73935) 29 Rue du Puits Romain, L-8070 Bertrange, LU	Luxembourg	LU NACE 65.110 Life insurance	No	/
<b>Delie</b>	<b>Natacha</b>	Executive director	CCO			Monument Assurance Belgium NV (0478.291.162) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium			
				director	Intragroup	Monument Insurance European Services NV (0693.776.761) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium	NACEBEL 66.290 Other activities auxiliary to insurance and pension funding	No	/
<b>Collinet</b>	<b>Adrien</b>	Executive director	CRD			Monument Assurance Belgium NV (0478.291.162) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium			
				director	Extragroup	ACT Consulting SRL (0742.647.539) Rue Père Damien 27, 4710 Lontzen, BE	Belgium	NACEBEL 70.220 Business and other management consultancy	No	/

<b>Elsinghorst</b>	<b>Carlo</b>	Non-executive director	Group CFO			Monument Assurance Belgium NV (0478.291.162) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium			
				Group CEO	Intragroup	Monument Re Ltd (51969) Clarendon House, 2 Church Street, Hamilton, HM 11 Pembroke, BM	Bermuda	Insurance	No	/
				Group CFO	Intragroup	Monument Re Ltd (51969) Clarendon House, 2 Church Street, Hamilton, HM 11 Pembroke, BM	Bermuda	Insurance	No	/
				director	Intragroup	Monument Life Insurance DAC (325795) Two Park Place Hatch Street, Dublin 2, IE	Ireland	Insurance	No	/
				director	Intragroup	Monument International Life Assurance Company Limited (027082C) St George's Court, Upper Church Street, Douglas, IM1 1EE, IM	Isle of Man	Insurance	No	/
				director	Intragroup	Monument Segregated Account Company Limited (49002) Clarendon House, 2 Church Street, Hamilton, HM 11 Pembroke, BM	Bermuda	Insurance	No	/
				director	Intragroup	Monument Insurance Group Ltd (51280) Clarendon House, 2 Church Street, Hamilton, HM 11 Pembroke, BM	Bermuda	Financial & Insurance Activities	No	/
				director	Intragroup	Monument MIDCO Ltd (51955) Clarendon House, 2 Church Street, Hamilton, HM 11 Pembroke, BM	Bermuda	Financial & Insurance Activities	No	/
				director	Intragroup	Monument FINCO Ltd (202202085) Clarendon House, 2 Church Street, Hamilton, HM 11 Pembroke, BM	Bermuda	Financial & Insurance Activities	No	/
				director	Intragroup	Monument Resources Limited (56627) Clarendon House, 2 Church Street, Hamilton, HM 11 Pembroke, BM	Bermuda	Insurance	No	/
				director	Intragroup	Monument Holdings Limited (48944) Clarendon House, 2 Church Street, Hamilton, HM 11 Pembroke, BM	Bermuda	Insurance	No	/
				director	Intragroup	Monument Segregated Account Company Limited (49002) Clarendon House, 2 Church Street, Hamilton, HM 11 Pembroke, BM	Bermuda	Insurance	No	/
<b>Mortelmans</b>	<b>Olivier</b>	Non-executive director	Independent director			Monument Assurance Belgium NV (0478.291.162) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium			
				iNED	Extragroup	All Square SA (LU B173716) 9 Avenue des Hauts-Fourneaux, L-4362 Esch-sur-Alzette, LU	Luxembourg	LU NACE 93.190 Sports activities	No	/
				director	Extragroup	BNP Paribas Real Estate Advisory & Property Management Luxembourg SA (LU B38058) 10 Rue Edward Steichen, L-2540 Luxembourg, LU	Luxembourg	LU NACE 68.320 Management of real estate on a fee or contract basis	No	/
				director	Extragroup	BNP Paribas Real Estate Investment Management Luxembourg SA (LU B151308)	Luxembourg	LU NACE 66.301 Management of investment and pension funds	No	/
				director	Extragroup	CaixaBank Wealth Management Luxembourg SA (LU B236788) 46B Avenue John F. Kennedy, L-1855 Luxembourg, LU	Luxembourg	LU NACE 64.191 Banks	Yes	London Stock Exchange
				observer	Extragroup	Cube Infrastructure Managers (LU B124233) 41 Avenue de la Liberté, L-1931 Luxembourg, LU	Luxembourg	LU NACE 66.301 Management of investment and pension funds	No	/
				director	Extragroup	European Property SICAV-FIS (LU B137555) 10 Rue Edward Steichen, L-2540 Luxembourg, LU	Luxembourg	LU NACE 64.302 Open-End Investment Company (OEIC)	No	/
				director	Extragroup	NB alternative funds SICAV SA (LU B253534) 80 Route d'Esch, L-1470 Luxembourg, LU	Luxembourg	LU NACE 64.302 Open-End Investment Company (OEIC)	No	/
				owner	Extragroup	DM Conseil SARL (SIRET 44912339700068) 8 Avenue Duval Le Camus, 92210 Saint-Cloud, FR	France	FR NAF 6202A Conseil en systèmes et logiciels	No	/
				director	Intragroup	Monument Assurance Luxembourg SA (LU B73935) 29 Rue du Puits Romain, L-8070 Bertrange, LU	Luxembourg	LU NACE 65.110 Life insurance	No	/

<b>Vanrijkel</b>	<b>René</b>	Non-executive director	Independent director			Monument Assurance Belgium NV (0478.291.162) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium				
				manager	Extragroup	JungleFish Comm.V. (0743.650.302) Kasteelbrakelsesteenweg 140, 1500 Halle, BE	Belgium	NACEBEL 70.210 Public relations and communication activities	No	/	
				senior executive	Extragroup	KPMG Advisory BV (0439.819.279) Luchthaven Brussel Nationaal 1K, 1930 Zaventem, BE	Belgium	NACEBEL 70.220 Business and other management consultancy	No	/	
<b>Flandre</b>	<b>Cécile</b>	Non-executive director	Independent director			Monument Assurance Belgium NV (0478.291.162) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium				
				director	Extragroup	MS AMLIN INSURANCE SE (0644.921.425) Koning Albert II-laan, 37, 1030 Schaarbeek, BE	Belgium	NACEBEL, 65121 Insurance and reinsurance activities	No	/	
				director	Extragroup	Synatom (0406.820.671) Simon Bolivarlaan, 36, 1000 Brussels, BE	Belgium	NACEBEL, 24460 - Processing of nuclear fuel	No	/	
				director	Extragroup	FLUXYS Belgium (402.954.628) Kunstlaan, 31, 1040 Brussels, BE	Belgium	NACEBEL, 35220 Distribution of gaseous fuels through pipelines activities	Yes	Euronext	
				director	Extragroup	Belgian Finance Center (0845.045.885) Louis Schmidlaan, 117, 1040 Etterbeek, BE	Belgium	NACEBEL, 82300 Organization of trade fairs and congresses	No	/	
<b>Lee</b>	<b>Stephen</b>	Non-executive director	Group CFO			Monument Assurance Belgium NV (0478.291.162) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium				
				Group CFO	Intragroup	Monument Pe Ltd (51969) Clarendon House, 2 Church Street, Hamilton, HM 11 Pembroke, BM	Bermuda	Insurance	No	/	
				director	Intragroup	Monument Life Insurance DAC (325795) Two Park Place Hatch Street, Dublin 2, IE	Ireland	Insurance	No	/	
				director	Intragroup	Monument Investment Funds ICAV (C191743) 5 Earlsfort Terrace, second floor, Dublin D02 CK83, IE	Ireland	Investment fund	No	/	
<b>Lens</b>	<b>Lionel</b>	Senior management	Outsourcing Manager			Monument Assurance Belgium NV (0478.291.162) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium				
				/	/	/	/	/	/	/	/
<b>Herremans</b>	<b>Pieter</b>	Senior management	COO			Monument Assurance Belgium NV (0478.291.162) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium				
				manager	Extragroup	PH Advisory BV (0831.168.353) Kerkplein 91, 9400 Ninove, BE	Belgium	NACEBEL 70.220 Business and other management consultancy	No	/	
				director	Intragroup	Monument Insurance European Services NV (0693.776.761) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium	NACEBEL 66.290 Other activities auxiliary to insurance and pension funding	No	/	
<b>Vandenabeele</b>	<b>Tim</b>	Senior management	Head of Actuarial			Monument Assurance Belgium NV (0478.291.162) Koning Albert II-laan 19, 1210 Sint-Joost-ten-Node, BE	Belgium				
				director	Extragroup	REBMS Construct BV (0684.466.939) Gaversstraat 136, 8530 Harelbeke	Belgium	NACEBEL 68.100 Buying and selling of own real estate	No	/	
				manager	Extragroup	Vandenabeele Consulting (0662.909.678) Gaversstraat 136, 8530 Harelbeke	Belgium	NACEBEL 70.220 Business and other management consultancy	No	/	