



# Conflicts of interest

SUMMARY OF OUR CONFLICTS OF INTEREST POLICY



# Introduction

Under the Markets in Financial Instruments Directive ('MiFID'), BNP Paribas Fortis is required to maintain and operate effective organisational and administrative arrangements with a view to taking all reasonable steps to identify, monitor and manage conflicts of interest. BNP Paribas Fortis has put in place a policy to safeguard its clients' interests. The key information is summarised below. Detailed information is obtainable on request from the client's advisor.

## Our Conflicts of Interest Policy

BNP Paribas Fortis is a multi-service banking group present in many countries, providing to its clients all forms of banking and investment services. Like any financial services group, BNP Paribas Fortis is potentially exposed to conflicts of interest in relation to various activities. However, the protection of our clients' interests is our number one concern and so our Policy sets out how:

- **we will identify** circumstances which may give rise to conflicts of interest entailing a material risk of damage to our clients' interests;
- **we have established** appropriate mechanisms and systems to manage those conflicts; and
- **we will maintain** systems in an effort to prevent damage to our clients' interests through identified conflicts.

## Conflicts of interest

'Conflicts of interest' are impossible to rule out. Our policy defines conflicts of interest as:

- **first**, conflicts of interest between BNP Paribas Fortis and you. For instance, if we are providing a service to you and, beyond that, we have a material interest, relationship or arrangement in the transaction or product or service; the decisive factor is whether we make a profit or avoid a loss to your disadvantage; or
- **second**, conflicts of interest between our clients if we are acting for you and for another client and your two interests conflict materially.

We have identified such conflicts of interest in our business. These could include:

- **providing services** in different capacities at the same time, e.g. credit services and services for the issue of financial instruments;
- **giving** to you investment advice or providing a portfolio management service;
- **selling** to you and buying from you financial instruments;
- **acting** as an agent for more than one client in a transaction;
- **selling** BNP Paribas Fortis products to you;
- **providing services** to issuers of financial instruments which we transact for you or about which we advise you;
- **trading or dealing** in financial instruments which we transact for you or about which we advise you;
- **holding confidential information** on other clients which, if we can disclose or use, would affect the services provided to you;
- **accepting gifts** or entertainment that could be construed as conflicting with our duties to our clients;
- **BNP Paribas Fortis employees** pursuing activities outside BNP Paribas Fortis or maintaining personal relationships potentially detrimental to the client;
- **personal relationships** between BNP Paribas Fortis employees and clients and additional activities of BNP Paribas Fortis employees outside BNP Paribas Fortis that could give rise to a conflict of interest.

## Our measures

The measures we have adopted to manage identified conflicts are summarised below. We consider them appropriate to our efforts to take reasonable care that, in relation to each identified potential conflict of interest, we act impartially to avoid a material risk of harming your interests.

### Policies and procedures

**We have adopted many policies and procedures throughout our business to manage potential conflicts of interests.** Our employees receive guidance and training in these policies and procedures, and they are subject to monitoring and review processes.

### Information barriers

**Our employees respect the confidentiality of client information and do not disclose it or use it inappropriately.** For particularly sensitive cases, we have established Chinese walls and adopted Chinese wall procedures to prevent unauthorised exchange of information between employees and to organise the separation of staff members concerned.

### Separate supervision/functions

**Two departments or businesses** which, if run together, could encounter conflicts of interest will be managed by different senior staff members.

## Pay

Pay and bonuses are linked to the profits of BNP Paribas Fortis or the business or department where an employee works. Pay and bonuses linked to the performance of another department, with possible conflicting interests, will be avoided at all times.

## Inducements

Inducements from third parties in relation to a service provided to you are acceptable to BNP Paribas Fortis only if (1) the inducement is disclosed to you and (2) it is either the payment of a normal fee or commission to continue the quality of our services to you and does not impair our duty to act in your best interests.

## Conflicts of interest involving employees

The bank has introduced policies intended to avoid conflicts of interest between the private interests of employees and those of customers. Certain conflicts of interest are the subject of specific codes. These include professional activities outside the bank and holding external mandates. Gifts, invitations and personal transactions in financial instruments also fall within this category.

### Employees' external activities

Our employees are required to respect the policies and procedures established to avoid conflicts of interest with any positions they hold or activities they pursue outside BNP Paribas Fortis.

### Gifts

Employees may only accept or offer gifts or invitations subject to certain conditions and provided that the commercial value and frequency of such gifts or invitations are commensurate with customary business relationships. If the gift or invitation offered to the employee fails to meet these conditions, he or she may not accept it.

### Personal transactions

To avoid conflicts of interest arising from use of information obtained via customers, and market abuse in general, all employees are bound by the rules of the policy on personal transactions.

## Disclosure

Where there is no other way of managing a conflict, or where the measures in place do not sufficiently protect your interests as a client, the conflict will be disclosed to allow you to make an informed decision on whether to continue using our service in the situation concerned.

## Declining to act

We may decline to act for a client in cases where we believe the conflict of interest cannot be managed in any other way.

### BNP Paribas Fortis

BNP Paribas Fortis: the leader in retail and private banking in Belgium in terms of customers and deposits, BNP Paribas Fortis also holds the largest financial services market share regarding medium and large enterprises. In the insurance sector, the bank works closely with AG Insurance, Belgium's largest insurer. Furthermore, BNP Paribas Fortis offers specialised solutions for wealthy individual customers, large companies and public and financial institutions, based on the skills and international network of BNP Paribas. It is organised around four business sectors: Retail & Private Banking, Corporate & Public Banking, Corporate & Investment Banking and Investment Solutions. .

The BNP Paribas Group is the European leader with a worldwide scope in terms of financial and banking services, with a broad international coverage and strengthened position in all the major financial marketplaces. BNP Paribas is the leading bank in the euro zone in terms of deposits and is one of the six most solid banks in the world according to Standard & Poor's. The Group benefits from leadership in Europe, a strong presence in the Americas, and a stable, high-growth presence in Asia. Ranked 11th in terms of worldwide companies by Forbes Global 2000 in 2011, it employs over 200,000 staff in 84 countries.

## Advice? Information? Financial transaction?

BNP Paribas Fortis is here for you.



**Visit your branch**  
(by appointment, Mo–Fr to 7pm; Sa 9–noon)



**Call us on 02 261 11 11**  
(Mo–Fr, 7am–10pm; Sa 9am–5pm)



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