

CONFLICTS OF INTEREST POLICY (SUMMARY)

Managing conflicts of interest is an essential part of ensuring and enhancing the integrity and reputation of Van Lanschot Kempen ¹. The basic principle is that Van Lanschot Kempen does everything it reasonably can to identify possible conflicts of interest within the organisation, and takes all possible organisational, administrative and operational measures needed to prevent and manage such conflicts of interest. Establishing a 'Information barrier' between two departments can be an operational as well as an organisational intervention. The obligation for employees to notify the organisation in advance about possibly taking on a secondary job is an example of an administrative measure.

Remit

Group regulation on managing conflicts of interest applies to all staff and management at Van Lanschot Kempen . Specific measures may be in force pursuant to local regulations for, or because of, certain activities of the business lines and/or subsidiaries. In that case, these additional measures also apply to the staff of these business lines and/or subsidiaries. Conflicts of interest may occur anywhere in the organisation, and they can also occur between Van Lanschot Kempen and its clients (existing or potential), or between its (existing or potential) clients.

Delineating conflicts of interest

The purpose of this regulation is to prevent the following situations:

- Mixing business and personal interests;
- Conflicts between the company's own interest and the interest of the client;
- The presence of a financial or other driver which would cause the interest of one client (or group of clients) to prevail over the interest of another client (or group of clients);
- Van Lanschot Kempen and the client operating the same type of business, creating a real or potential conflict;
- Van Lanschot Kempen receiving an unusual commission or reimbursement from a third party.

Van Lanschot Kempen 's approach to managing conflicts of interest

Van Lanschot Kempen has introduced an integrated and coherent set of measures. Erecting a 'Information Barrier' between two departments can be a physical as well as an organisational intervention. The obligation for employees to notify the organisation in advance about possibly taking on a second job is an example of an administrative measure.

The following are some of the measures that have been taken in the organisation:

- Drafting a Conflicts of interest Policy;
- Drafting a General Code of Conduct and other guidelines for each business unit;
- Drafting an organisation structure for conflicts of interest;
- Creating a conflicts of interest register;
- Introducing organisational, administrative and operational measures.

Managing conflicts of interest is an important activity for the management and all staff of every business unit. All staff at Van Lanschot Kempen should have the necessary awareness to recognise a conflict of interest when it occurs. When in doubt, further research needs to be done in order to decide whether there is a conflict of interest, and if so, what measures should be taken.

Moreover, Van Lanschot Kempen seeks to manage conflicts of interest by:

- Having managers act as role models (corporate culture);
- Educating and training staff to raise their awareness.

Whenever it proves impossible either to prevent or manage conflicts of interest, Van Lanschot Kempen will inform its existing or potential clients of their existence.

¹ Van Lanschot Kempen: Van Lanschot Kempen NV and Kempen Capital Management NV with its (foreign) subsidiaries and branches.

More information

If you would like to learn more about managing of conflicts of interest at Van Lanschot Kempen, please ask your regular contact at our bank. If you are not yet a client, you can contact our Compliance department.