

# **Conflict of interest management policy**

17 April 2014

## 1. Principles

This policy has been determined under articles 313-20 and 318-15 of the General Regulations of the AMF.

It sets out the system in place to detect potential conflicts of interest, to prevent their occurrence as far as possible and, in the event that the conflict of interests is not avoided or resolved, to inform the clients concerned.

## 2. Definition

A conflict of interests is defined as any professional situation in which the power of assessment or decision of a person, company or organisation may be influenced or altered, in terms of its independence or integrity, by personal considerations or by pressure from a third party.

The conflicts of interest likely to develop within a company notably include:

- conflicts of interest linked to the circulation of non-published information concerning listed companies,
- conflicts of interest between the principle of the overriding best interests of the client and the financial interests of the asset management company,
- conflicts of interest linked to transactions and agreements with other entities in the asset management company's Group,
- conflicts of interest between the personal situation of employees (or their loved ones, as the case may be) and the duties they carry out within the asset management company.

## 3. Employee rules of conduct

When carrying out his or her job or when engaged in external activities, notably market transactions or personal transactions, any SCOR Investment Partners employee may be placed in a conflict of interest situation as defined in this policy. Each employee must therefore respect the rules of conduct to which he/she is subject.

These rules are set out in SCOR Investment Partners' Code of Ethics.

## 4. Identifying conflicts of interest

The conflict of interest management policy is designed to protect clients and to ensure that their interests come first, whilst respecting the law and the regulations applicable to our company.

This policy rests on three principles:

- awareness and anticipation of risks relating to conflicts of interest, illustrated by risk mapping and by ensuring that risk controls are incorporated upstream of the decision process,
- a hierarchical organisational structure that ensures the separation of investment management or consulting functions and supervisory functions,
- ensuring that asset management company employees are aware of conflict of interest issues.

The situations likely to give rise to conflicts of interest are diverse in nature and may be difficult to identify.

Among the various real or potential conflict of interest situations, the following situations require particular vigilance given the risk of damaging the interests of clients:

- SCOR Investment Partners or one of its employees is likely to make a financial profit or to avoid a financial loss at the expense of the client,

- SCOR Investment Partners or one of its employees has a vested interest in the results of a service provided to a client or in the results of a transaction conducted on behalf of that client, which is different to the client's vested interest in the same results,
- SCOR Investment Partners or one of its employees is encouraged, for financial or other reasons, to favour the interests of another client or group of clients over the interests of the client for whom the service is provided,
- SCOR Investment Partners or one of its employees is engaged in the same professional activity as the client,
- SCOR Investment Partners or one of its employees receives or is due to receive, from someone other than the client, benefits linked to the service provided to the client, in any form other than the commission or fees normally invoiced for such service.

## 5. Conflict of interest prevention

In order to avoid the risk of conflicts of interest with regard to the circulation of sensitive and/or privileged information, and to ensure the respect of confidentiality, the non-use of privileged or sensitive information, the prevention of insider trading and the prevention of conflicts of interest within the asset management company, SCOR Investment Partners has implemented an organisational structure and procedures commonly known as "Chinese wall" procedures.

These facilities also entail a separation between the SCOR Investment Partners departments working on the basis of non-public information that could constitute privileged information, and other departments.

Moreover, SCOR Investment Partners employees undertake to respect the rules of the Code of Ethics dealing with these areas.

The CICM of SCOR Investment Partners makes an inventory of conflict of interest situations (both internal and intra-group) and draws up a map of risks that could damage the interests of the company's clients.

Each source of conflict of interest has a corresponding prevention tool and prevention procedures, and triggers 1<sup>st</sup> and 2<sup>nd</sup> level supervision.

## 6. Conflict of interest management methods

When a conflict of interests is identified, the CICM, in conjunction with the Chairman of the Management Board and the Deputy Chief Executive Officers, takes all the measures necessary to resolve the conflict as rapidly as possible.

When the risk of damaging the client's interests cannot be avoided despite the preventative procedures and measures, SCOR Investment Partners informs the client and they decide together on how to proceed.