

## Conflict of interest management policy (simplified)

### Legal framework

Directive (EU) 2016/97 of January 20, 2016, the so-called Insurance Distribution Directive (IDD), was transposed into Belgian law by the law of December 6, 2018, published in the Belgian Official Journal of December 18, 2018 and amending the law of April 4, 2014 on insurance. This law contains the obligations to inform and the rules of conduct applicable to all insurance distributors (insurance companies and insurance intermediaries).

In accordance with this code of conduct, our firm is in particular required to establish a system for the management of conflicts of interest related to the provision of insurance mediation services.

The management of conflicts of interest is an important subject of the general framework of European regulations and of the Belgian law of April 4, 2014 on insurance. These regulations provide for the protection of underwriters of insurance products, and are observed by our firm because of our commitment to act in a fair, loyal and professional manner in order to best serve the interests of the clients to whom information is provided.

Therefore This simplified policy includes a concise explanation of the circumstances that may give rise to conflicts of interest, as well as the measures taken to detect or avoid such conflicts of interest. It also provides an overview of how our firm manages and records a (potential) conflict of interest in a register provided specifically for this purpose.

This policy applies to all actions of our firm related to insurance mediation activities.

The priority of our firm is to act in a fair, loyal and professional manner in order to best serve the interests of our clients. In this context and in accordance with the law, our firm has taken adequate measures to identify, prevent and manage conflicts of interest that may arise in the performance of its activities.

Taking into account the above and the characteristics of our activities, our firm has established a written conflict of interest management policy, of which this document is a summary. Upon simple request, you may obtain additional information which will be provided to you on a durable medium.

### Identification of cases of potential conflicts of interest

Conflicts of interest may arise between our firm (including all persons affiliated with us such as, for example, directors, managers, persons exercising control over the firm, employees involved in the provision of services insurance mediation and subagents, hereinafter referred to as "affiliated persons" and clients, or even clients among themselves.

Taking into account the characteristics of our firm, we have identified possible cases of conflicts of interest.

Here are some of the most common examples:

- \* situation where financial gain can be realized or financial loss can be avoided at the expense of the client;
- \* our firm has an interest in the outcome of an insurance mediation service or transaction that differs from the client's interest;
- \* our firm is encouraged, for financial or other reasons, to prioritize the interests of another client or group of clients over those of that client;
- \* our firm has the same professional activity as the client;
- \* our firm receives a benefit from a person other than the client in connection with the insurance mediation service provided to the client, in the form of money, goods or services, other than commissions or fees normally charged for this service.

### Measures to prevent potential conflicts of interest

Our firm prepares an annual report that discloses all conflicts of interest that have arisen or may arise and how they were/will be managed. In this context, our internal procedures and instructions may be reviewed and adjusted, if necessary.

Our firm also makes organizational and administrative arrangements to be able to take all reasonable measures to prevent conflicts of interest from harming its clients' interests. These measures shall be proportionate to the activities carried out and the insurance products distributed.

Our firm takes all appropriate measures to identify conflicts of interest that may arise in insurance distribution activities between itself (including persons directly or indirectly related to the legal entity) and its clients or between its clients themselves.

These measures relate in particular to:

- The independence of our firm: our firm represents the client and has no contractual obligation to place all or part of our production exclusively with one or more insurance companies. On the other hand, our firm does not directly or indirectly own 10% or more of the voting rights or capital of any insurance company through direct or indirect participation. Nor does any insurance company or parent company of an insurance company hold 10% or more, directly or indirectly, of the voting rights or capital of our firm.
- the distribution of an internal instruction note regarding the obligation for all our employees to act at all times loyally, fairly and professionally to best serve the interests of clients;
- the implementation of an appropriate compensation and remuneration policy that safeguards the interests of our clients;
- a systematic notification procedure to clients of possible identified conflicts of interest and where the preventive measures do not appear to be sufficient for appropriate management.

In the event that the organizational or administrative measures for handling conflicts of interest are not sufficient, our office will clearly communicate to the client the general nature or sources of known conflicts of interest before the conclusion of the insurance contract . This communication shall be made on a durable medium and contain sufficient elements, taking into account the type of client, to make informed decisions.

On the other hand, we reserve the right to refuse the requested service in the absence of a concrete solution to a specific conflict of interest, with the ultimate goal of protecting the interests of the client(s) concerned. If necessary, our firm's conflict of interest policy will be modified and/or updated. This simplified policy also remains available in the latest version on our website at the following url:

[www.driesassur.com](http://www.driesassur.com).