HSBC Private Bank (Luxembourg) S.A

Conflicts of Interest Policy Summary

1. Introduction

In accordance with the applicable regulatory framework, HSBC Private Banking Luxembourg S.A. ("PBLU") and its Branch ("PBLU FR") are required to take **all reasonable steps to identify and to prevent or manage conflicts of interests. The key elements** of PBLU's Conflict of Interest governing **information are summarised in this document.**

2. Definition and scope

A conflict of interest is a situation or arrangement where PBLU and/or PBLU FR and/or any of its employees is subject to multiple influences, the competition of which might adversely affect decision-making while conducting business.

A conflict of interest can be due to the competition of legitimate influences (i.e., acting for multiple clients) or the presence of harmful ones (i.e., personal gain). Conflicts can be potential, actual, or perceived and can arise in various forms (i.e., client vs. client, PBLU/PBLU FR or HSBC vs. client, employee vs. client, employee vs. PBLU or PBLU FR or HSBC, HSBC vs. PBLU or PBLU FR, and PBLU or PBLU FR vs another GPB business).

The rules defined in the bank's **conflict of interest governing information apply to:**

- **(a) All PBLU (including its branch) employees, including contractors and other GPB or Group employees with functional responsibility for PBLU (including its branch), as well as its authorized management and supervisory body.**
- **(b) All PBLU activities (including its branch).**
- **(c) And their clients.**

3. Detection, prevention and management of conflicts of interest

All PBLU and PBLU FR employees must apply good judgement and take appropriate steps to proactively escalate actual, potential or perceived conflicts (either personal or those that arise in the performance of their duties), including cross Business Line conflicts, to their Line Managers and PBLU Regulatory Compliance.

In accordance with the regulatory framework, PBLU has implemented and documented measures, controls and procedures ensuring:

- **(a) The prevention or control of the exchange of information between relevant persons engaged in activities involving a risk of a conflict of interest where the exchange of that information may harm the interests of one or more clients.**
- **(b) The separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the firm.**
- **(c) The removal of any direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration of, or revenues generated by, different relevant persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities.**

(d) The prevention or limit of any person from exercising inappropriate influence over the way in which a relevant person carries out investment or ancillary services or activities.

(e) measures to prevent or control the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services or activities where such involvement may impair the proper management of conflicts of interest.

4. Conflicts of Interest Register

PBLU maintains and regularly updates a register of potential and actual conflicts of interest in connection with the performance of its activities.

5. Disclosure

Where PBLU has used all reasonable efforts to manage a conflict of interest but those efforts are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of a client will be prevented, PBLU will consider whether disclosure is appropriate and sufficient to address the conflicts at hand or whether, bearing in mind the risks and client's interests involved, it should refrain from acting for the client and inform the client of the reason of its decision.