

## Conflicts of Interest statement

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### Introduction

Under several regulations including the Markets in Financial Instruments Directive ('MiFID'), Triodos Bank Group is required to maintain and operate effective organisational and administrative arrangements with a view to taking all reasonable steps to identify and manage conflicts of interest.

### Identifying a conflict of interest

A conflict of interest arises where two or more parties (could) have competing interests that either are—or can be—conflicting with each other. These may arise due to Triodos Bank Group's various activities and roles. A conflict of interest can therefore arise between the interest of Triodos Bank Group, its customers or business partners and those of Triodos bank Group's co-workers, at all levels and in any combination.

Triodos Bank Group believes in conducting business honestly, professionally and fairly. This means behaving diligently and refraining from the misuse of knowledge that working at Triodos Bank Group offers. This intention could be compromised when a conflict of interest arises. Therefore, each co-worker continuously assesses whether he/she is in a situation which could be—or lead to—a conflict of interest.

### Examples of interests

- **Interests of Triodos Bank Group**
  - Triodos Bank Group's role as a merchant;
  - Triodos Bank Group's role as an investor;
  - Triodos Bank Group's role as executor of the financial transactions requested by the customer;
  - Triodos Bank Group's role in conducting independent financial investigations;
  - Triodos Bank Group's interest in realizing new business;
  - Triodos Bank Group's interest in maintaining good relationships with existing customers.
- **Interests of the customer**
  - the customer's interest as an investor/investor in financial products;
  - the customer's interest if Triodos Bank Group conducts research on the customer;
  - the customer's interest in obtaining investment advice;
  - the customer's interest as a user of Triodos Bank Group's services/facilities provided;

- **Interests of the co-worker**

- the co-worker's interest in the performance of her/his assignment/function;
- the co-worker's interest in the development of businesses;
- the co-worker's interest in achieving objectives;
- the co-worker's interest in the result of his own investments;
- the co-worker's interest in external trade/activities

### Managing a conflict of interest

Triodos Bank Group has organisational, procedural and administrative measures in place designed to manage or - where appropriate -mitigate risks of financial and/or reputational damage to Triodos Bank Group, its client(s) or its business partner(s).

Some specific measures and procedures Triodos Bank Group has implemented to manage conflicts of interest that may arise are related to:

- maintenance of information barriers;
- functional segregation;
- gifts, events, or hospitality that are received, rejected, offered or given;

### Disclosure

In case existing measures and procedures cannot ensure—with reasonable confidence—that risks of damage to the interest of the client or business partner will be prevented, the bank shall disclose to the customer or business partner the identified conflict of interest.

### Training and awareness

Triodos Bank Group trains its co-workers regularly on various compliance topics, including conflicts of interest. Aside from compliance trainings, Triodos Bank Group uses various awareness and communication methods to help in serving its clients in a fair, honest and professional manner.

If you have any queries or would like to receive more information, please contact your account manager.

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