

## INFORMATION ABOUT THE EXPAT & CO CONFLICT OF INTEREST POLICY

### 1. LEGAL FRAMEWORK

The “MiFID conduct of business rules” took effect on 30 April 2014. They are based on the law of 30 July 2013 on increasing the protection of purchasers of financial products and services and broadening the competences of the financial regulator, several provisions, as well as the Royal Decree of 21 February 2014 about the rules of application of articles 27 to 28bis of the law of 2 August 2002 on the supervision of the financial sector and on financial services on the insurance sector, and the Royal Decree of 21 February 2014 on conduct of business rules laid down in the law on handling conflicts of interest in the insurance sector. In accordance with these conduct of business rules Expat & Co is required to set out a written policy for the handling of conflicts of interest when providing insurance mediation services.

The rules set out in the law about conflicts of interest is an addition to the general MiFID constitution. This “constitution” is respected by Expat & Co through the loyal, fair and professional dedication to the interest of the customer when performing insurance mediation services.

### 2. WHICH CONFLICTS OF INTEREST?

In view of our conflict of interest policy Expat & Co first identified the possible conflicts of interest in Expat & Co.

Conflicts of interest could occur between:

- (1) Expat & Co and its associated persons and a customer
- (2) between several customers.

The conflict of interest policy takes into account the characteristics of the Expat & Co organisation, in terms of its size, nature, scale and complexity.

When assessing potential conflicts of interest Expat & Co defined the situations which present a risk of harming the customer’s interests. Including:

- Situations in which profit could be made or losses could be avoided at the expense of the customer;
- Situations in which Expat & Co could have a different interest in the result of the service or transaction;
- Situations in which Expat & Co could have a financial motive to give precedence to other customers;
- Situations in which Expat & Co is in the same business as the customer;
- Situations in which Expat & Co would be given a compensation by a person other than the customer for the services provided to the customer.
- Situations in which Expat & Co has a stake of at least 10% in voting rights or in the capital of the insurance company (companies) (not applicable);
- Situations in which the insurance company (companies) has (have) a stake of at least 10% in voting rights or in the capital of Expat & Co (not applicable)

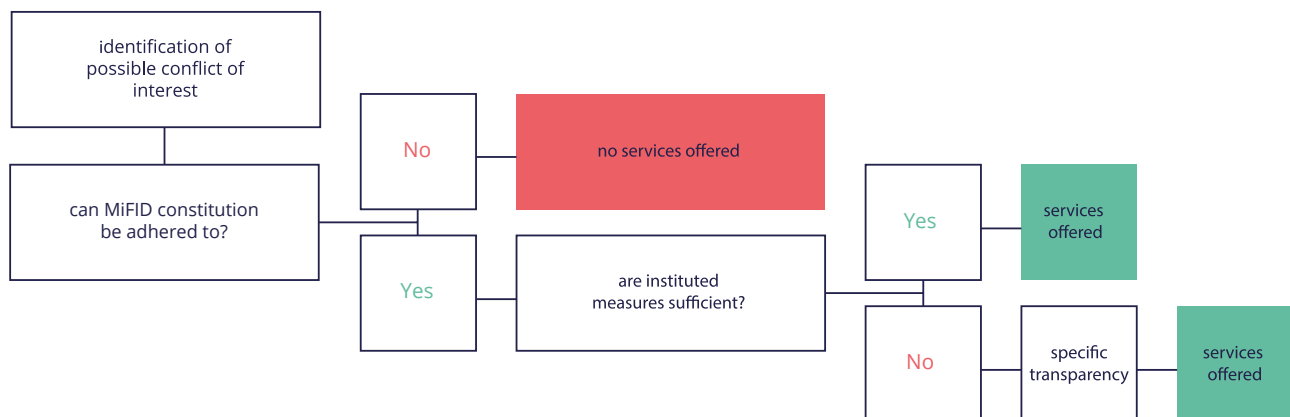
### 3. WHAT MEASURES ARE TAKEN BY EXPAT & CO

Expat & Co takes quite some measures to make sure that the customer's interest prevails, including:

- An internal instruction memo;
- An adjusted remuneration policy;
- A policy ensuring that the associated persons only mediate with regard to insurance agreements of which they know the essentials and are able to explain these to customers;
- A policy which reserves the right for Expat & Co, if no concrete solution is found for a specific conflict of interest, to refuse the requested service provision with the sole purpose of protecting the customer's interest;
- A scheme with regard to receiving benefits;
- A policy ensuring that all information provided by our associated persons is correct, clear and not misleading.

If necessary the Expat & Co conflict of interest policy will be adapted and/or updated.

### 4. WHAT IS THE PROCEDURE?



### 5. SPECIFIC TRANSPARENCY

When, in a concrete situation, our measures do not offer sufficient guarantees, you will be informed by Expat & Co about the general nature and/or sources of the conflict of interest, allowing you to take a wellinformed decision. Feel free to contact us any time for more information.