



THE DRIVE YOU DEMAND

# UBP ASSET MANAGEMENT (EUROPE) S.A

**Conflicts of Interests** | Summary Information



UNION BANCAIRE PRIVÉE

## Overview

UBP Asset Management (Europe) S.A. (hereinafter UBP AM) is required to have a Conflicts of Interest Policy to identify any conflicts which may arise in the provision of investment management services, and is applicable to itself and any relevant person (persons connected to UBP AM).

UBP AM is part of the UBP Group which provides a wide range of authorized financial services that are regulated and supervised in many different countries. This may result in conflicts of interests arising between different entities, units and/or functions within the UBP Group (including the Board of Directors, Senior Management, employees and tied agents, or any person directly or indirectly linked to them by control) and the Funds and/or their investors or between one or more investors. Conflicts may also arise in the course of business, with other contractors or service providers outside the UBP Group or Funds investors.

As such, UBP AM has taken and will take all reasonable steps to identify existing and potential conflicts of interest that may arise in the course of investment management activities. It will maintain and operate effective organizational and administrative arrangements with a view to taking all reasonable steps designed to identify, prevent, manage and monitor conflicts of interests in order to prevent them from adversely affecting the interests of the Funds and their investors.

## Conflicts of Interest Management

The procedure adopted by UBP AM for the management of conflicts of interest is based on four basic principles:

- 1) **Identification of conflicts:** With reference to the activities and the services which have been delegated, UBP AM shall identify the circumstances that generate or could generate a conflict of interest that could seriously harm the interests of one or more investors;
- 2) **Management of conflicts:** UBP AM shall define the procedures to follow and adopt organizational measures in order to manage the conflicts that were identified;
- 3) **Disclosure of conflicts:** In the event that UBP AM considers that the organisational and administrative measures adopted to manage certain types of conflicts of interest do not sufficiently ensure, with reasonable certainty, that the risk of harming the interests of investors is averted, they shall clearly inform investors, where required, prior to acting on their behalf, of the nature and the sources of the conflict(s) of interests, so that they can make an informed decision on the services provided given the context in which the conflict situations arise.
- 4) **Conduct:** Given its duty to act honestly and fairly, in providing investment and/or ancillary services UBP AM shall act in a correct, fair and professional manner to better serve the interests of the Funds and their investors.

The following controls framework is used to mitigate the conflicts which may arise in the normal course of business at UBP AM and its delegates:

- Delegation policy
- Best Execution policy
- Remuneration Policy
- Voting Policy
- Complaints Handling Policy
- Personal Account Dealing Policy
- Inducements Policy

As such, UBP AM keeps and updates periodically a register with the details of established or potential conflicts of interest that may have arisen or are likely to arise, as well as the mitigation measures implemented to manage those.

In the unlikely event that a conflict of interest could not be managed by UBP AM or its delegates, or in the event that mitigation measures taken do not enable UBP AM to properly manage the conflict of interest, confidentiality permitting, UBP AM will inform the investors through this website.

You may request additional information free of charge from UBP AM by writing to:

*UBP Asset Management (Europe) S.A*  
*287-289 route d'Arlon,*  
*L-1150 Luxembourg*  
*LUXEMBOURG*