



CONFLICT OF INTERESTS POLICY

In conformity with the AssurMiFID-rules of conduct, the Belgian branch office of London General Life Company Limited (hereinafter referred to as LGL) has developed a policy regarding the management of conflicts of interests.

1. Which conflicts of interest?

In view of this conflict of interest policy, LGL has identified the potential conflicts of interest.

Conflicts can arise

- (I) between LGL and its affiliated companies on the one hand and a (potential) client on the other hand,
- or
- (II) between multiple clients themselves.

The conflict of interest policy considers the proper organizational characteristics and group structure of LGL.

In the assessment of potential conflicts of interest, LGL has identified these situations in which a risk exists that the interests of the client might be affected.

Specifically these situations are situations in which :

- a profit is made or a loss avoided to the detriment of the client;
- LGL has an interest in the outcome of the service that is contrary to the interests of the client;
- LGL has a motive, whether financial or other, to prioritize certain clients or to treat them differently than others;
- LGL pays to or receives from a party other than the client a fee for the provided services.

2. What measures does LGL take?

LGL takes many measures to ensure that the interests of the client prevail.

These include:

- policy conditions are written in a clear, precise and unambiguous manner;
- to ensure that all persons in contact with clients within our affiliated companies are familiar with the essential characteristics of our insurance products they propose and are able to explain these to the clients;
- risk acceptance on the basis of objective and non-discriminatory criteria, in order to, amongst other reasons, prevent that products are offered that are not appropriate for the client;
- the basic principle in claims handling is the correct application of the policy terms and conditions;
- separation of different divisions and departments that might come into conflict with each other;
- respect of the confidentiality of data, with special attention to personal and medical data;
- internal policies that require from all employees of our group to act in the interests of the clients (Treating Customers Fairly - Code of Business Conduct & Ethics);
- an internal policy for providing and receiving gifts and benefits and a policy for the prevention of fraud (Global Anti-Bribery Policy);
- In outsourcing of insurance mediation services outside of our group, to ensure that the contractor explicitly undertakes to respect the abovementioned internal rules of conduct in his relation with our clients;
- an appropriate remuneration policy that guarantees the independence of all the members of our group;
- a policy that reserves our right to not deliver the requested service in order to protect the interests of the client if there is no concrete solution to a specific conflict of interest;
- a policy that ensures that all information provided by us and our affiliated companies is correct, clear and not misleading;
- a policy that allows and encourages all members of our group to report potential and identified risks or malpractices (Policy for Raising and Reporting Concerns).

Whenever appropriate, the conflicts of interest policy of LGL will be modified and / or updated.

When in a concrete situation our measures might provide insufficient guarantees, we will inform the client about the general nature and / or sources of the conflict of interest, so that the client can make an informed decision.

You may always contact us for more information.



london general life