

## Information on dealing with any conflicts of interest

### Introduction

Conflicts of interest may arise in various forms as part of the business activities of Private Bank Bellerive Ltd (hereinafter referred to as «PBB») as a universal bank. Clients, employees, PBB, shareholders and third parties consulted may be involved or affected. PBB endeavours to organise its business activities in such a way that the interests of the parties involved do not conflict with each other. However, conflicts of interest cannot always be avoided.

### Principles for dealing with conflicts of interest

PBB has defined appropriate measures in connection with conflicts of interest. It applies the following principles:

- Potential conflicts of interest must be identified as early as possible. To this end, PBB has drawn up internal rules. Employees are trained and made aware of the problem where necessary.
- Conflicts of interest must be avoided whenever possible. To this end, PBB has drawn up suitable internal directives, measures and processes and introduced control mechanisms.
- If the aforementioned measures are insufficient to deal with a conflict of interest, the clients affected will be informed of the conflict of interest by PBB. Such conflicts of interest may be disclosed in person, in contracts, leaflets, product information or on PBB's website.

### Specific measures

Based on the above principles, PBB has established the following measures:

- PBB itself does not offer its own financial products.
- PBB processes client orders carefully and in the interests of its clients. Accordingly, PBB prohibits improper conduct such as own transactions in the knowledge of client orders and giving preference to own orders over client orders.
- To ensure the best possible execution of client orders, PBB has implemented execution principles (see [www.bellerivebanking.ch/legal](http://www.bellerivebanking.ch/legal)).
- PBB informs clients of the payment and ranges of distribution fees (at [www.bellerivebanking.ch/legal](http://www.bellerivebanking.ch/legal)), and PBB periodically transfers the distribution fees received to the client.
- In organisational terms, PBB is separate from the economically affiliated majority shareholder, Graubündner Kantonalbank. If any economic ties related to the provision of a financial service could lead to a conflict of interest, PBB will inform its clients of such conflicts.
- PBB has a remuneration policy that prevents false incentives for its employees.
- Directorships and secondary occupations of employees require the prior approval of the Executive Board or the Board of Directors.
- PBB enables employees to contact the Compliance department to report suspected conflicts of interest or suspected misconduct.
- PBB documents conflicts of interest identified in a bank-wide register, which is updated as necessary.

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