

Belgium

# SEB Life International

## Conflicts and Inducements Policy

## Our Mission and Vision

### Our Vision

#### To be the trusted partner for clients with aspirations

We believe most people have ambitions for their future. We work to earn their trust as a partner every day, in good times and bad, and help them fulfil their ambitions.

### Our mission

#### To service the differing needs and ambitions of international investors via insurance based investment products

We listen, share our knowledge and always meet our clients' needs and expectations. Through our clients' success, we contribute to making communities and societies grow and flourish – and this makes our work meaningful and fun.

### Our brand promise

#### Rewarding relationships

We strive for lasting and fruitful relationships with all our clients, as well as with each other and our shareholders.

### Our core values

#### Commitments, Mutual Respect, Professionalism and Continuity

Our core values help employees in SEB Life International to meet the everyday life with a common approach. Our core values are more than just four words. They give us an inner compass to follow in our ambition to achieve our vision. They guide us in our efforts to add value, meet our clients' expectations and to earn their trust. We are also measured and followed up on how well we live our core values.

## To be the trusted partner for clients with aspirations

Public confidence in our insurance products is of vital importance to SEB Life International. A conflict of interest arises when business or personal relationships impair someone's professional judgement or ability to act in the best interests of clients, shareholders or SEB Life International. A conflict of interest would for example arise if SEB Life International were to:

- Make an undisclosed financial gain at a clients' expense
- Have a conflicting interest to a client as regards a product or service
- Have two or more clients with conflicting interests to each other
- Treat a client preferentially in either accepting the contract of insurance or in the claims management process

Our business decisions, just like our other actions, should never be based on personal considerations or relationships. We strive to avoid conflicts of interest with our clients, treat them fairly, and with respect.

We take all reasonable measures to identify any conflict of interest and we organise our business so that we avoid and prevent them from arising. When a potential conflict of interest cannot be avoided, the client concerned must be informed of the details.

We have special procedures in place to prevent the unauthorised dissemination of information. One of the more important procedures is ensuring that certain activities are physically and systematically separated in order to establish clear information firewalls.

## Client relationships

The relationships which we forge with our clients are built on trust and we must therefore always treat our clients fairly, avoid conflicts of interest and not give preferential treatment to any client in particular. We endeavour to safeguard our clients' interests, and our relationships with clients must not be influenced by any other external considerations.

## Employees' transactions

Employee's own dealings must never conflict with the interests of our clients. If a conflict of interest cannot be avoided we disclose the conflict and allow our clients to make an informed decision.

## Bribery, gifts and entertainment

We comply with applicable anti-corruption legislation and rules and do not tolerate SEB Life International becoming involved in or associated with bribery under any circumstances. No SEB Life International employee or member of the board may be involved directly or indirectly in offering, promising, giving, soliciting, or accepting a bribe. 'Bribe' in this context means any payment or other benefit (other than one required by law) that is intended or can reasonably be expected to improperly influence a person's performance of their duty.

## Inducements to intermediaries

We deduct an Annual Management Charge on our Asset Management Policy which may be used, in part, to fund payment of Initial Commission to independent intermediaries. On client request intermediaries will disclose commission details. Other charges and fees are as set out in the Asset Management Policy Financial Information Sheet and Policy Conditions.

We provide training programmes and associated hospitality to intermediaries.

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