



**BGL  
BNP PARIBAS**

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BGL BNP Paribas SA serves interests of its clients, preserves the market integrity and ensures investor confidence. As part of its actions to, to prevent any situation of conflicts of interests during dissemination of investment recommendations, BNP Paribas has implemented an adapted framework.

For this purpose the following tools are being used to identify and manage any potential conflict of interest that could impair the objectivity of the recommendation:

- Effective organisational measures: adapted information barriers, personal account dealing, wall crossing, management of material non-public information<sup>1</sup> (inside information or MNPI),
- Operational policies relating to prevention, detection and management of conflicts of interest, especially policies on investment research and on production and dissemination of investment recommendations.

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<sup>1</sup> **Inside information:**

Information which is of a precise nature, has not been made public, relates directly or indirectly to one or more financial instruments (including commodity derivatives and, emission allowances) or to issuers of financial instruments, and if it were made public, would be likely to have a significant effect on the prices of those financial instruments.

For persons charged with the execution of orders concerning financial instruments, information conveyed by a client and relating to the client's pending orders in financial instruments.



**Main principles with respect to the management of conflict of interest when producing or disseminating investment recommendations:**

As part of its activities, BGL BNP Paribas and/or its affiliates (and person closely associated) are likely to act in various capacities. In the dissemination of investment recommendations, BGL BNP Paribas' interests and/or its affiliates' interests (and interests of person closely associated) may potentially conflict with those of our clients.

In response to a conflict of interests, BGL BNP Paribas may:

- Manage the conflict of interests' situation if organisational measures, such as information barriers, make it possible to monitor the situation in an acceptable manner (permanent information barriers or ad hoc barriers);
- Disclose the conflict of interests if possible and obtain consent from the clients.
- In certain cases, if neither organisational measures nor disclosure appear appropriate to the situation, BNP Paribas may refuse to act and decline to play a role.

Information barriers are based on physical organisational measures, such as separate premises, restricted access to certain locations or for certain persons, IT access restrictions.

BGL BNP Paribas put in place a supervisory structure in which "private side" employees do not report into "public side" employees unless the supervisor is considered above the barrier. Indeed, due to their business activities, certain Employees (in business lines or functions) may at any time hold inside information about a significant number of issuers without any wall crossing process. These Employees are classified as "above the barrier".

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