



LGT Capital Partners Ltd.
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Information on handling of conflicts of interest

for clients and prospects of LGT Capital Partners Ltd.

Dear client or prospect

LGT Capital Partners Ltd. as an investment management firm is required to maintain and operate effective organizational and administrative arrangements with a view to taking all reasonable steps to identify, monitor and manage conflicts of interest. This document seeks to provide a high level description of how conflicts of interests can arise and how they are managed. LGT Capital Partners Ltd. has various policies, procedures and controls in place to ensure the management of conflicts of interests when providing services and/or products to prospects and/or clients.

There are many varieties of conflicts of interest that apply to a wide range of behaviors and circumstances. Typically, a conflict of interest arises when two or more persons (e.g. company, employees, company's clients/prospects) have competing interests and a duty of care or trust exists between those persons. LGT Capital Partners Ltd. has set policies and procedures in place throughout its business to identify, assess and manage potential conflicts of interests. These policies and procedures are subject to monitoring and review processes and include, but are not limited to the following:

- **Information barriers and areas of confidentiality:** LGT Capital Partners Ltd. has established physical and electronic information barriers to prevent the exchange of material non-public information obtained by various business units. Employees within a business unit are prohibited from passing on inside information to those in another business unit who cannot access the information.
- **Personal account dealing:** Employees of LGT Capital Partners Ltd. are subject to personal account dealing rules in order to prevent conflicts arising from the use of information obtained by clients/prospects and market abuse in general. In addition a post-trade monitoring system is implemented to check all personal transaction with regard to potential insider dealing and market abuse.
- **Gifts and entertainments:** Employees of LGT Capital Partners Ltd. may not offer or accept gifts or entertainment when doing so could result in a conflict between their interests and those of LGT Capital Partners Ltd. and/or its clients/prospects. All gifts and entertainments must be reported to Compliance by entering them in a register.
- **Directorships and secondary occupations:** Employees of LGT Capital Partners Ltd. are required to pre-clear their directorships and secondary occupations in order to avoid potential conflicts of interests. An internal approval process is established in order to protect LGT Capital Partners Ltd. from any conflicts of interests that may arise from directorships and secondary occupations of its employees.

Where LGT Capital Partners Ltd. considers that there are no appropriate and adequate measures to prevent or mitigate a conflict of interest, the conflict must be disclosed to the affected clients/prospects in order to allow them to make an informed decision whether to enter into or continue the relationship with LGT Capital Partners Ltd. in light of the conflict.