

Conflicts of interest register

Bank Pictet & Cie (Europe) AG, Luxembourg branch | May 2023

This document sets forth possible cases where conflicts of interest may arise at Bank Pictet & Cie (Europe) AG, Luxembourg branch (“BPAGL”) in its capacity as depositary for collective investment schemes (“CIS”), relating to operations that it carries out on behalf of CIS – either directly by itself, through proxies/subcontractors/service providers or through entities with which it is linked by common management or control (the whole forming “the Bank” or “the Pictet Group/the Group”), for the benefit of clients, namely management companies/alternative investment fund managers, CIS and investors (the “Client”).

Subject	Circumstances in which a conflict of interest could arise	Risk mitigants
CLIENT-BANK RELATIONSHIP		
Personal securities trading	Personal trades executed by Bank employees, with the inherent risk that they give precedence to their own transactions or improperly use confidential or insider information.	Internal rules and personal trades carried out by staff monitored.
Best execution policy	In cases where the Bank acts as broker, trades executed in violation of the principles laid down in the best execution policy for orders, leading to preference being given to the Bank’s interests over those of the Client.	Two-tier controls applied to the main brokerage desks of the Pictet Group.
Error management	Poor diligence in error management with a view to avoiding financial losses within the Bank or at entities of the Pictet Group.	The Bank records each incident in a database, using which it can take all necessary measures depending on the risks represented by each incident as far as both the Bank and Clients are concerned.
Extra custodian services	Clients offered services that are not needed or do not provide an obvious financial benefit, as a way of earning extra commission.	The Pictet Group’s Projects Committee, on which members of BPAGL sit, reviews new relationships and ensures that the services offered are in keeping with Clients’ expectations and the Bank’s own capabilities. Services provided to Clients are furthermore subject to clearly defined contract terms.

Asset management/Product selection	In cases where the Pictet Group also provides portfolio management or investment advisory services, or other products: the risk of giving preference to the Pictet Group products over those of third parties that could be more beneficial.	Products are short-listed then selected by the Group's investment committee. However, Clients also bank with Pictet because of its expertise and the high quality of its investment products. Regarding products without links to the Pictet Group, commission-sharing agreements have been standardised so that no single product is given precedence over others. In principle, commissions and fees are the same for third-party funds as for funds related to the Pictet Group.
Front-office incentives	Bonuses paid to the sales staff of the Pictet Group, which might be heavily influenced by the sale of specific products, thus leading to transactions that are not necessarily in the Client's interest.	The remuneration policy regarding these employees is based on several objective criteria. As such, employees have full freedom to offer those products best suited to the Client's needs. Monitoring of asset breakdowns, especially in terms of portfolio concentration.
Churning	Commissions generated by the excessive buying and selling of financial instruments (i.e. churning) against the interests of Clients.	Portfolio rotation monitored to detect possible cases of churning.
Front running	"Front running" trades conducted by Bank employees.	Directive on personal securities trading by staff, with half-yearly audit of at-risk transactions.
Insider information	Use of insider information by the Bank or its employees.	BPAGL does not carry out financial research, which is only performed at the Group's Geneva head office. Even then, an internal directive lays down specific risk-avoidance measures. The Bank has no investment banking business.
Acceptance/payment of benefits by the Bank	Acceptance by the Bank, or payment to business partners, of shared commission.	Client receives written information in cases where this is applicable; strict compliance with MiFID rules. The Investment Committee takes no account of commission-sharing amounts in its analyses, and advisory services cannot be influenced by commission-sharing nor by the level thereof.
Acceptance of benefits or gifts by staff	Acceptance by the Bank's employees of gifts that may sway their impartiality.	Internal rules limiting scope for accepting gifts.
Proxy voting at general meetings	Decisions taken by the Bank on behalf of the Client in regard to proxy voting at general meetings.	"Representation agreement for general meetings" entrusted to the Bank: if right is waived by the Client, or barring instructions to the contrary, voting rights exercised in line with corporate officers' recommendations.

Directorships of Investment Funds having appointed the Bank as depositary	Directorship positions held by employees of the Bank in Investment Funds having appointed the Bank as depositary.	<ul style="list-style-type: none"> • Employees of the Bank must submit directorships to the Bank's Human Resources department and the Bank's Compliance function for prior approval by the Bank's Management Committee. • Directors made available to sit to Investment Funds' boards of directors do not participate in decision that directly concern the Bank or the Pictet Group.
Directorships of Investment Funds having appointed the bank as depositary	Directorship positions held by employees of a custody delegate of the Bank which is linked to the Bank by common management or control, in UCI having appointed the Bank as depositary	<ul style="list-style-type: none"> • Employees of the Group must submit directorships to the Human Resources department and the Compliance function of their entity for prior approval. • Directors made available to sit to Investment Funds' boards of directors do not participate in decision that directly concern the Bank or the Pictet Group.
Depositary oversight of Management Company / AIFM / Central Administration services within the Pictet Group	Poor diligence or lack of independence of the Bank acting in its depositary capacity for Investment Funds, in the monitoring of investment management / central administration activities within the Group, resulting in the interests of the Group's entities being favoured over those of Clients.	Internal rules and Code of Conduct in place for safeguarding independence, monitoring outsourced operations and ensuring separation in terms of roles, reporting line and contractual relationship within the Pictet Group.
Outsourcing of Depositary tasks within the Pictet Group	Poor diligence or lack of independence of the Bank acting in its depositary capacity for Investment Funds, in the monitoring of the outsourced activities within the Group, resulting in the interests of the Group's entities being favoured over those of Clients.	Internal rules and Code of Conduct in place for safeguarding independence, monitoring outsourced operations and ensuring separation in terms of roles, reporting line and contractual relationship within the Pictet Group.
Delegation of CIS custody activities within the Pictet Group	Poor diligence or lack of independence of the Bank acting in its depositary capacity for Investment Funds, in the monitoring of the safekeeping activities delegated within the Group, resulting in the interests of the Group's entities being favoured over those of Clients.	Internal rules and Code of Conduct in place for safeguarding independence, monitoring delegated operations and ensuring separation in terms of roles, reporting line and contractual relationship within the Pictet Group.
Services rendered to Investment Funds or their Management Company / AIFM / Central Administration in capacities other than the capacity of depositary	Lack of independence in the execution of the depositary services, resulting in the interests of the Bank being favoured over those of Clients	A functional and hierarchical separation is established within the Bank between the performance of the depositary functions of an Investment Fund and the performance of other tasks, or failing that, the execution of the depositary oversight duties is at least entrusted to a function which independent from the units rendering the services other than depositary ones.