

# Conflicts of Interest Policy

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# 1. Background

As a financial services company, the trust of clients, business partners, and other stakeholders around the world is of great importance to Aegon Asset Management (AAM). This means conducting our business with integrity, openness and clarity. Therefore, all Asset Management (AAM) Employees should always promote Aegon Client's best interest, and should avoid any actual, or perceived, conflicts of interest.

## 1.1. Objective of policy

AAM recognizes that potential Conflicts of Interest with our Clients are inherent due to the dynamic environment in which AAM conducts business. Every employee of AAM, and its affiliates, is expected to act honestly, fairly and professionally in accordance with the best interests of our clients.

AAM recognizes that potential Conflicts of Interest are inherent due to the dynamic environment in which AAM conducts business. Employees must always exercise good judgment to prevent situations that would suggest a conflict of interest, or the appearance of an improper attempt to influence business decisions.

This Policy aims to ensure the following:

- AAM is meeting the key requirements of the Aegon Conflicts of Interest Policy;
- AAM is meeting its local regulatory requirements regarding Conflicts of Interest, including reporting and approval thresholds;
- All Conflicts of Interest including Gifts, Entertainment and Outside Business Activities are covered by this Policy.

# 2. Scope / Definitions

## 1. Scope:

This Policy is applicable to all wholly owned AAM entities and any joint ventures where AAM exercises operational control.

## 2. Definitions:

**Conflict of Interest:** A conflict of interest may arise if competing professional or personal obligations or financial interests prevents an Employee from carrying out his or her duties in a fair, honest, and transparent manner. Even if there is no clear conflict of interest it could be perceived by an independent person, or a member of the public, that there could be one. A conflict of interest could impair the integrity and fairness of the products and services AAM companies deliver and the decisions taken by Employees and management.

**Employees:** Includes AAM managers, officers, Employees, access persons, or other individuals identified by Compliance.

# 3. Conflicts of Interest

## 3.1. Examples of Conflicts of Interest

Conflicts of Interest can arise directly between Employees and AAM, or its clients, or indirectly, such as when an Outside Business Activity in which an Employee is involved in contrary to the interests of AAM or its clients. Conflicts of Interest may also arise when the interests of AAM, a vendor, or client conflict with those of another client. This can include differences in their sustainability preferences.

Conflicts of Interest can arise in a myriad of situations, it is not possible to exhaustively list all potential Conflicts of Interest, sustainability preferences, or circumstances in which they may occur. However, the various types of the Conflicts can be generally divided into the following categories:

AAM vs Client - Conflicts can arise between AAM and its clients such as when: (i) AAM offers products for which AAM can receive different amounts of compensation, (ii) AAM performs multiple roles with respect to a client, or transaction, or (iii) AAM engages in business activities with affiliated entities or (iv) AAM offers products which do not match the client's sustainability preferences.

Client vs Client - Conflicts can arise among clients, such as when: (i) AAM is allocating limited investment opportunities among clients or (ii) AAM charges clients different fees for the same investment strategy.

Employees vs Client - Conflicts can arise between Employees and clients, such as when: (i) compensation arrangements or incentives affect whether the Employee recommends particular products, (ii) an Employees Outside Business Activities conflict with obligations owed to the client, (iii) Employees or their Immediate Family Members have a Material Interest which might impair their ability to make impartial decisions on behalf of the client, or (iv) Employee accept Gifts or Entertainment to third parties who provide services to clients.

Employees vs AAM - Conflicts can arise between Employees and AAM, such as when an Employee: (i) competes with AAM for the purchase or sale of investment opportunities, (ii) stands to otherwise benefit personally from AAM's dealings with others (such as when a person has familial relationships with vendors with whom AAM has business arrangements), (iii) uses confidential company information for personal benefit, or (iv) has external dealings (such as outside business activities) that prevent the person from devoting their full attention to their AAM duties and responsibilities.

### **3.2. Identification, Mitigation, and Management Techniques**

In instances where we are unable to implement sufficient controls to prevent damage to our clients' interests, we may seek to avoid activities that create the Conflict, or we will disclose any material Conflicts to our clients.

Below is a list of various mitigation and management techniques that AAM may utilize in the management of its Conflicts:

- Clear segregation of duties between relevant functions (e.g., Individual Authorities Framework)
- Information barriers such as restricted stock lists and temporary Ethical Walls, where required.
- Remuneration policies and practices are designed to ensure that the interests of all Employees are aligned with that of the long-term business strategy, risk tolerance and the interests of the client.
- Reporting and challenging at control groups (Conflicts of Interest is a standing agenda item for all Global Control Meetings such as formal Governance Committees)
- Employees education and training.
- Periodic reviews conducted by local and global compliance teams.
- Employees are required to complete a Conflicts of Interest attestation designed to capture personal relationships or arrangements in which a Conflict could arise.

### **3.3. Conflict of Interest Questionnaire**

AAM Employees are required to annually / quarterly complete and submit a Conflict-of-Interest questionnaire, upon request using their local compliance system, at such time as Compliance may specify. The questionnaire is designed to capture personal relationships or arrangements in which a Conflict of Interest could arise. Where circumstances change over the year which may result in an actual or a perceived Conflict of Interest, Employees should pro-actively report this to their Local Compliance Officer.

### **3.4. Internal Reporting of Conflicts and Violations**

AAM Employees must promptly report to Compliance any situation or transaction involving an actual or potential Conflict of Interest of which the Employee is aware, even if the conflict does not directly involve such Employee. Employees also have a duty to promptly report to Compliance any violations of this policy. Conflicts and violations can be reported directly to Compliance via e-mail or using the compliance system. If Employees feel uncomfortable or are unable to report their concerns under this policy, they may also raise their concerns confidentially, or anonymously (if preferred) through one of the Aegon Speak Up channels. For more information, please visit [www.aegon.com/speakup](http://www.aegon.com/speakup).

Retaliation against any persons reporting a conflict or violation of this policy is strictly prohibited. All reported conflicts and violations will be treated confidentially to the extent permitted by local law and will be investigated promptly. When a conflict of interest is reported, the Local Compliance Officer will contact the Employee to consider the reported situation, and discuss the desired course of action, if any.

In instances where we are unable to implement sufficient controls to prevent damage to our customers' interests, we may seek to avoid activities that create the Conflict, or we will disclose any material Conflicts to our customers. Disclosure will only be used as a last resort and will not be relied upon as an effective method of managing Conflicts of Interest. Any communication will be in a durable format and contain sufficient and clear information (taking into account the nature of the client) to enable the customer to determine if they wish to proceed with the service, highlighting the risks of proceeding and the measure AAM has taken to mitigate these and why these measures have not worked.

### **3.5. Confidentiality of Reports and Information Required by this Policy**

Information provided to AAM under this policy shall be treated as confidential information and will not be disclosed to third parties except as required to comply with legal or regulatory requests.