

## Policy on the prevention and management of conflicts of interest

The Markets in Financial Instruments Directive 2004/39 (MIFID) requires that all investment companies maintain and apply effective organizational and administrative measures, in order to prevent any possible conflicts of interest that could be detrimental to the interests of their clients. In compliance with this requirement and with the relevant French regulations, adopted following the incorporation of MIFID into French law, ENGIE Global Markets has established a policy on identifying, preventing and managing conflicts of interest, which applies to all of its operations in France and Belgium.

A conflict of interest arises when an investment service provider conducts activities, either on behalf of a client or internally, that may come into conflict with the interests of another client, when these activities are not organized and monitored appropriately. A conflict of interest may also arise when the interests of employees diverge from those of clients or the investment services provider.

In order to prevent the risk of such conflicts arising and thereby harming the interests of its clients, as well as to boost clients' trust, the policy implemented at ENGIE Global Markets has been designed to:

- prevent the occurrence of situations involving conflicts of interest that may lead to the discontinuation of an activity or transaction,
- enable the company to conduct its operations in such a way that always serves the best interests of its customers and guarantees full confidentiality regarding the information about any activities that might lead to a conflict of interest.

The prevention system's main features are:

- business lines and procedures that are structured so as to separate the duties of those in charge of the interests which may come into conflict, prohibit the undue circulation of confidential information and prevent the use of the said information at the expense of market integrity and the interests of its clients,
- procedures that apply the principles of equity in executing customer orders, particularly with regards to the allocation of assets or financial instruments and the priority they should be given over purely-internal operations,
- compensation policies for ENGIE Global Markets employees prohibiting, in particular, direct incentives to ensure the success of a specific transaction and personal professional ethics rules.





Should it become apparent, however, that under certain circumstances the system established by ENGIE Global Markets to manage conflicts of interest is inadequate in guaranteeing, to a reasonable degree of certainty, that the risk of harming client interests can be deterred, ENGIE Global Markets will refrain from action or, if confidentiality rules so allow, will notify the client or prospect, before taking action on that party's behalf and give sufficient detail of the general nature or source of the conflict of interest so that the said party is able to make an informed decision.

This system has been laid out and is monitored by the Professional Ethics Department, independent from the operational functions.

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