

Conflicts of Interest Statement

Introduction

Rabobank believes in conducting business efficiently, honestly and fairly, which includes consideration of any actual, potential or perceived Conflicts of Interest.

Rabobank is required to have adequate Conflicts of Interest arrangements in place to identify, assess, manage and document actual, potential or perceived Conflicts of Interest in all its forms. Rabobank has organisational, administrative, technical and physical arrangements in place in order to comply with this requirement and manage the risks deriving from Conflicts of Interest in a timely and effective manner.

Identifying a Conflict of Interest

A Conflict of Interest arises where two or more parties (could) have competing interests that conflict with each other. This can lead to a situation, or appearance thereof, where Rabobank or its employees act in the interests of one party to the detriment of the interests of another party to which it owes a duty not to act in such a manner, such as one of its clients.

Rabobank employees must identify and continuously assess whether they are in a relationship, circumstance or situation that constitutes, or (may) lead to, a Conflict of Interest, or the perception thereof.

Managing a Conflict of Interest

Rabobank must manage all identified Conflicts of Interest to prevent them from negatively affecting the interests of its clients, business partners, employees or Rabobank itself.

To support the management of Conflicts of Interest, Rabobank has implemented arrangements, such as internal systems, policies, standards, procedures, ongoing employee training and awareness, and internal controls.

There are three mechanisms Rabobank uses to manage identified Conflicts of Interest:

1. Controlling,
2. Avoiding, and/or
3. Disclosing.

Controlling

Where appropriate, in order to successfully control actual, potential and perceived Conflicts of Interest, based on the type and circumstances of the Conflict, Rabobank implements controls and/or mitigating measures to reduce the potential of any adverse impacts.

Examples of types of controlling measures include:

- Allocating another employee to provide the service to the client.
- Not to take part in certain decisions or votes where a Conflict is apparent.
- Limiting or restricting access to certain information.
- Establishing deal teams with appropriate Information Barriers.

Avoiding

Where a Conflict cannot be controlled through mitigating measures (with reasonable confidence) and the risk(s) of damaging the interests of clients, business partners, employees or Rabobank itself is outside its risk appetite, Rabobank takes appropriate steps to avoid the Conflict. These cases mean that disclosing the Conflict and mitigating measures are inadequate.

Examples of avoiding a Conflict may include:

- Declining to act for or on behalf of a client or a business partner.
- Employee ceasing employment with Rabobank or their involvement with an outside interest.
- Not onboarding a client/business partner or offboarding a client/business partner.

Disclosing

Where Conflicts cannot be adequately controlled (i.e. a residual risk remains) or avoided, Rabobank may in limited circumstances disclose Conflicts of Interest to clients or business partners. Disclosure alone will often not be enough to manage a Conflict of Interest and are only be used to support other measures implemented to control a certain Conflict.

Documenting a Conflict of Interest

Rabobank documents identified Conflicts of Interest including how each Conflict has been managed.