

## Summary policy for managing conflicts of interest

### INTRODUCTION

AXA REIM SGP, a subsidiary of the AXA IM Real Assets Group, due to its international scope, the plurality of investment services provided and the multiplicity of management expertise offered, is likely to encounter, in the normal course of its business, situations that could lead to conflicts of interest.

In order to ensure the protection and primacy of its clients' interests and to comply with applicable regulations, AXA REIM SGP has implemented policies and procedures to prevent situations of conflict of interest and to remedy them in the event of their occurrence.

The purpose of this document is to present AXA REIM SGP's approach to identifying, preventing and managing conflicts of interest that may arise in the course of its activities.

### DEFINITIONS

A conflict of interest is defined as a situation in which the interests of AXA REIM SGP or an entity of the AXA IM Real Assets group or its employees are, directly or indirectly, in competition with the interests of its clients. It can also involve conflicts between clients themselves.

An interest is defined as an advantage of any kind, material or immaterial, professional, commercial, financial or personal.

### GENERAL SCHEME AND SCOPE OF APPLICATION

The general framework presented covers situations that may arise in the normal course of AXA REIM SGP's business, whether investment services are provided as part of its core business, as ancillary activities or as other activities.

This framework aims to ensure the protection of customers by reaffirming the principle of the primacy of the interests of customers and the commitment to treat each of them fairly.

The general framework consists in identifying and managing potential or actual conflicts of interest that may be encountered by AXA REIM SGP:

- by setting up a conflict risk map, recording the types of services or activities for which a conflict of interest, involving a significant risk of harm to the interests of one or more of its clients, is likely to occur;
- by implementing a policy setting out the procedure to be followed in the main cases of conflicts of interest encountered in the normal course of AXA REIM SGP's business.
- in the most sensitive or complex situations, by the intervention of the responsible managers;
- by informing the customers concerned of the nature of the conflict identified, if the precautions taken do not reasonably ensure that the risk of damaging their interests will be avoided;
- by keeping a register of conflicts of interest to document the procedures for handling and resolving potential or actual conflicts that have arisen and to provide an opportunity to monitor the fairness of the decisions taken after the event.

In any event, AXA REIM SGP may refuse to act in circumstances where there is ultimately a risk of harm to the interests of a client deemed unacceptable.

## **CONFLICT PREVENTION AND MANAGEMENT PROCEDURE**

### **Prevention and prevention**

Conflict of interest prevention is based on:

- an appropriate control system to prevent conflicts of interest from arising and to ensure that appropriate corrective measures are implemented;
- the separation of certain professions or functions (information barriers or "Chinese Walls") in situations likely to generate conflicts of interest;
- the principles of good conduct and professional ethics affirmed in the AXA IM Real Assets Group Code of Ethics, of which each employee acknowledges having been informed upon joining the company and to which they are regularly made aware;
- the compensation policy, common to the AXA IM group, which aims to avoid any risk that could be taken to the detriment of the interests of Clients.

### **Conflict management in situations that may arise in the normal course of AXA REIM SGP's business:**

The list of conflicts presented below is not exhaustive. The policy and system in place contain principles to deal with any type of situation that may arise in the context of AXA REIM SGP's business.

- **PREVENTION AND MANAGEMENT OF INTEREST CONFLICTS IN INVESTMENT OPPORTUNITIES (physical real estate assets and real assets finance)**

The system in place aims to ensure fairness between investors through equal and simultaneous access to investment proposals for all clients concerned. Where an investment opportunity is likely to be suitable for several clients, the policies in place provide for allocation conditions that ensure fair treatment of clients and take into account the specific constraints of each mandate given by the clients to the management company. The solutions implemented may include: rotation of opportunities , pro rata allocation , co-investment.

- **PREVENTION AND MANAGEMENT OF CONFLICTS OF INTEREST RELATED TO EXTERNAL MANDATES AND OTHER EXTERNAL ACTIVITIES**

The system prevents any external activities of AXA REIM SGP employees from giving rise to a conflict of interest or giving the appearance of one. Thus AXA REIM SGP employees may not be employed as directors (or equivalent position) of an external organization, or engage in a professional activity other than that which they carry out on behalf of AXA REIM SGP, unless they receive prior approval from AXA REIM SGP's Compliance and Senior Management.

- PREVENTION AND MANAGEMENT OF CONFLICTS OF INTEREST DURING A CROSS-TRADE BETWEEN TWO CLIENTS

The framework is intended to cover situations where an asset sold by one customer may be suitable for another customer. The management of the potential conflict is reviewed and supervised by the Risk Management & Compliance department and the appropriate governance to ensure that the transaction is carried out in the interest of both clients (interest shown by both parties, conditions for asset valuation, possible client information, etc.).

- PREVENTION AND MANAGEMENT OF CONFLICTS OF INTEREST IN THE CONTEXT OF RENTAL MANAGEMENT

A conflict of interest may arise when several real estate assets held by AXA IM Real Assets on behalf of different clients are likely to be suitable for a potential tenant. It is then the responsibility of the Local Head of Asset Management to ensure that potential tenants receive rental proposals from each potential competing mandate on a fair and consistent basis.

These situations are recorded in the conflict of interest register.

#### **Review by the responsible Officers and the Board of Directors**

The responsible Managers are involved at each stage of responsibility with regard to conflicts of interest.

More specifically, they participate to:

- 1) the creation of this policy,
  - 2) the validation of the scope of the conflicts,
- And have
- 3) warning methods in the event of actual or potential conflicts,
  4. information to monitor the resolution of conflicts and to know their origin.

Any conflict of interest concerning a responsible officer of the company is brought to the attention of the Board of Directors.