

# **AMINA Conflicts of Interest Disclosure**

#### Conflicts of Interest

As a provider of a broad range of financial services, AMINA faces actual and potential conflicts of interest from time to time. These may arise from any one or combination of the following:

- · AMINA and client's relationship
- · AMINA and vendor/third party service provider duties
- · Financial service and or product-specific duties of AMINA vis-à-vis vehicles which issue investment products
- · Employee interests which potentially compete with AMINA products/services
- Potentially competing interests of two or more clients

## **How are Conflicts Identified?**

There are several relationships which, in certain circumstances, may present conflicts of interest, for instance where AMINA plays different roles in providing different products and or services for different parties. Due to the wide range of financial services, it is not possible to have an exhaustive list of the types of conflicts of interest. Furthermore, due to their nature, it is not possible to always avoid or prevent conflicts of interest.

- · Are our interests different to those of our clients?
- Are there direct or indirect financial incentives to provide a service or product in a manner not aligned with our client's interest?
- · Would a third party receive benefits from the services provided to a client?
- · How are the different duties we have to be discharged when we carry out different roles for different types of clients?
- · How do our interests change depending on the product or service being provided?
- Is employee conduct aligned with our interest and or that of the client?

#### **Prevention and Management of Conflicts of Interest**

We utilize different means to prevent and manage conflicts of interest which include the following:

- Employee compliance policies and procedures which require disclosure, monitoring and reporting (eg. with a conflicts register) of conflicts of interest that arise involving an employee and the Bank and or a client.
- · Clear governance rules relating the handling and management of third-party supplier relationships.
- · Mandatory legal, risk and or compliance reviews to monitoring whether specific activities will give rise to conflicts of interest.
- · Provision of internal guidance and training on the handling, including disclosure, of conflicts of interest.

## Resolution and Disclosure of Conflicts of Interest

It is our practice to disclose the conflict of interest in cases where it is not possible to avoid or resolve the conflict. Such disclosure is made in a clear and direct manner, in the appropriate medium. The disclosure must be able to be understood by the affected client, particularly in respect of the risks of potential damage to the client's own interest.