

# Global Conflicts Policy - Summary

**The summary of our Global Conflicts Policy below outlines how we will manage actual and potential conflicts of interest that may arise through the provision of services to you.**

## 1. Introduction

Credit Suisse Group (“we” or “our”) has adopted a Global Policy (“Policy”) to address actions or transactions with or within the Credit Suisse Group that may give rise to actual or potential conflicts of interest as further described in 4.2 below (“Conflicts”, and each such conflict of interest a “Conflict”). This Policy aims to uphold our reputation for integrity and fair dealing, meet regulatory expectations and maintain the trust and confidence of our clients and counterparties. The Policy makes up one part of our ongoing commitment to adhere to the highest standards of ethical conduct in relation to our treatment of our clients and Conflict management. This document aims to summarize the key aspects of that Policy.

## 2. The Policy

Our Policy is to identify and manage, and where necessary prohibit, any action or transaction that may pose a Conflict (i) between our, or our employees’ interests and those of our clients or (ii) between the interests of two or more of our clients.

For those Credit Suisse Group entities that are subject to the Markets in Financial Instruments Directive II and related rules (“MiFID II”), there are specific rules that apply with respect to the prevention and management of Conflicts which may differ to those that apply to entities outside of the scope of MiFID II.

## 3. Rationale

Like every global financial services provider that engages in a wide range of businesses and activities, we face potential Conflicts on a regular basis. We strive to manage them in a manner consistent with the highest standards of integrity and fair dealing. In order to ensure that these standards are met we continually and proactively seek to identify and to prevent or manage Conflicts to avoid the appearance of, as well as actual, impropriety.

## 4. Identification of Conflicts

4.1 Conflicts are unavoidable in an integrated global financial services operation. We undertake a number of activities and provide a number of services where there is a risk that the interests of one or more clients could be compromised.

These include:

- a. trading on behalf of clients;
- b. trading for our own account;
- c. managing portfolios of investments;
- d. lending activity;
- e. elective corporate action activity (including voting);
- f. providing investment, corporate finance, or other financial advice;
- g. underwriting and/or placing securities; and
- h. publishing investment research.

4.2 While it is not practical to define precisely or create an exhaustive list of all relevant Conflicts that may arise in our businesses, there are several identifiable categories of Conflicts:

- a. Client-Bank Conflicts  
Potential Conflicts may exist between client interests, on the one hand, and the interests of a particular business unit or the Credit Suisse Group generally, on the other hand. These types of Conflicts include situations where we may be unfairly advantaged at the expense of a client.
- b. Client-Client Conflicts  
Potential Conflicts may also exist between different clients or different types of clients. In these situations, one client may receive preferential treatment that could negatively impact another client.
- c. Employee-Client Conflicts  
Potential Conflicts may also exist between the interests of one of our employees (or other applicable representatives) and the interests of a client. In these situations, employee’s (or the applicable representative’s) interests may not be aligned with the interests of a client.

## 5. Conflicts Management

5.1 We employ a number of techniques to identify and to prevent or manage Conflicts including:

- a. physical and electronic information barriers to stop and control the flow of information between certain parts of the business;
- b. monitoring to ensure proper functioning of the information barriers;
- c. systems to monitor activities undertaken or proposed to be undertaken and to assess whether such activities may give rise to Conflicts;
- d. a Reputational Risk Review Process for the escalation of Conflicts that fall outside of established Conflicts-resolution procedures;
- e. provision of internal guidance and training to relevant employees to raise their awareness of Conflicts and how to deal with Conflicts when they arise; and
- f. the maintaining by certain divisions or business units within the Credit Suisse Group of registers which set out potential Conflicts that may exist relevant to that division or business unit, together with relevant mitigating policies and procedures.

5.2 In addition, there are various other policies and processes in place that address Conflicts at all levels within the Credit Suisse Group. These include, for example, Information Barriers, Personal Account Trading, Outside Business Interests, Gifts and Entertainment, New Issues Allocation and the Independence of Financial Research.

## 6. Use of Disclosure

6.1 Where we have used all appropriate steps to identify and to prevent or manage a Conflict but those efforts are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of a client will be prevented, we will consider whether disclosure is appropriate or whether, bearing in mind the risks involved, we should refrain from acting for one or more of our clients.

6.2 In addition, where applicable activities are carried out by a Credit Suisse Group entity subject to MiFID II and such entity is not reasonably confident that the arrangements in place to manage or prevent a Conflict are sufficient to ensure that the risk of damage to the interests of a client will be prevented, such entity must clearly disclose the following to the client before undertaking business for that client:

- a. the general nature or sources of such Conflict;
- b. the steps taken to mitigate that Conflict.

The disclosure must:

- a. be made in a durable medium;
- b. clearly state that the organisational and administrative arrangements established by such entity to prevent or manage that Conflict are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interest of the client will be prevented;
- c. include specific description of the Conflict that arises in the provision of services;
- d. explain the risks to the client as a result of the Conflict; and
- e. use language that is clear and detailed (considering the nature of the client) and therefore will enable the client to make an informed decision as to whether to proceed with the transaction or service.

Updated: December, 2017