



## Policy on Conflicts of Interest of UOB Tokyo

UOB Limited Tokyo Branch (hereinafter called UOB Tokyo) hereby establishes its policy to manage conflicts of interest and disclose it to the public as follows pursuant to applicable laws and regulations.

### 1. Purpose

This Policy aims to manage conflicts of interest appropriately in UOB Tokyo or UOB Group Entity to prevent our customers' interest from being compromised.

### 2. Types of transactions subject to management

This Policy manages the following types of transactions:

- Transactions with conflicts of interest between UOB Tokyo or UOB Group Entity and customers
- Transactions with conflicts of interest between customers

### 3. Types and examples of transactions which may cause conflicts of interest

Types of transactions that may cause conflicts of interest are as follows. However, the fact that a transaction falls under any of the following examples does not automatically mean that there is conflict of interests involved.

- A transaction in which interest of Customer and that of UOB Tokyo or UOB Group Entity contradict each other;
- A transaction in which Customer and another customer of UOB Tokyo or UOB Group Entity contradict each other;
- A transaction in which Customer and UOB Tokyo or UOB Group Entity compete each other for the same subject;
- A transaction in which Customer and another customer of UOB Tokyo or UOB Group Entity compete; or
- A transaction in which UOB Group Entity, staff of UOB Group Entity, or other customers of UOB Group Entity gains a profit by leveraging on information gained by Customer, UOB Tokyo or UOB Group Entity.

Also, other circumstances—e.g. whether there is a reputational impact or not—will be taken into account in assessing the applicability of conflict of interests.

### 4. Methods to identify transactions which may cause conflicts of interest

- Methods in which an individual transaction is designated as a subject transaction which may cause conflicts of interest by referencing it to other UOB's transactions by collecting information of transactions which may cause conflicts of interest.
- Methods in which certain products or services are comprehensively identified as subject transactions which may cause conflicts of interest due to their nature or structures.

### 5. Methods to manage conflicts of interest

UOB Tokyo will manage transactions that may cause conflicts of interest by the following methods:

- By separating two parties that have mutually conflicting interests;
- By refusal, modification or suspension of the whole or part of a transaction with that of another; or
- By disclosure to customers whose interest is in conflict with that of another.

### 6. Framework to manage conflicts of interest

UOB Tokyo has designated Tokyo Compliance as an independent department from business units in order to identify and manage transactions which may cause conflicts of interest. Compliance Manager has been appointed as supervisor for this purpose. Also, records on such transactions which may cause conflicts of interest as well as records pertaining to measures to appropriately ensure the protection of customers conducted under the control above shall be retained for 5 years from the date of creation.

### 7. Entities subject to management of conflicts of interest

- UOB Asset Management Japan
- Other UOB Group Entities