

HSBC Investment Funds (Luxembourg) S.A.

Conflicts of Interest

1. Overview

HSBC Investment Funds (Luxembourg) S.A. ('HIFL') is required to have a Conflicts of Interest Policy to identify any conflicts which may arise in the provisioning of investment management services, and is applicable to itself and any relevant person (persons connected to the management company).

It is also the responsibility of each HSBC Global Asset Management entity which is appointed to manage a fund on behalf of HIFL to also have a Conflicts of Interest Policy.

2. Conflicts of Interest Management

Conflicts of interest which HIFL need to consider may arise in the following scenarios;

- Between HIFL and an HSBC fund it manages
- Between investors, even within the same fund
- Between an investor and an HSBC fund

The following controls are used to mitigate the conflicts which may arise in the normal course of business at HIFL and the HSBC Global Asset Management Investment Advisors;

- Insider Dealing Policies
- Best Execution and Order Execution policies
- Remuneration Policy
- Voting Policy
- Commissions Policy
- Complaints Policy
- Personal Account Dealing Policy
- Gifts and Inducements Policy

Each HSBC Global Asset Management entity is required to maintain a log of each conflict identified and the mitigating controls which are in place to ensure there is no client detriment. In appropriate cases where a conflict cannot be managed the service will not continue to be offered or clients will be made aware of the conflict to request permission to proceed.