

**IMT Group Division Financial Advice & Family Office**

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## IMT Group Division Financial Advice & Family Office

### Information on Handling Possible Conflicts of Interests

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This information notice is addressed to the clients of the companies of the IMT Group Division Financial Advice and Family Office, in particular IMT Financial Advisors AG, KIWAL Wirtschaftstreuhand AG, IMT Trust Services AG and IMT Tax Advisors AG (hereinafter all together referred to as "Group Division"). In general, the contracting party within the meaning of Liechtenstein due diligence law is considered as the client.

The trust companies of the Group Division are required to take appropriate organisational measures to prevent conflicts of interests. In accordance with the applicable provisions of Liechtenstein trustee law, we therefore subsequently inform you about our measures with regard to the handling of possible conflicts of interests.

#### Principle

The Group Division exercises services vis-à-vis their clients as well as their own business in such a way that existing and potential conflicts of interests are handled in an orderly and appropriate manner. This applies to conflicts of interests between the companies or, respectively, their corporate bodies as well as their clients.

In particular, such conflicts of interests are to be avoided where mutually exclusive obligations, commitments or objectives exist, so that the objective exercise of the business with regard to the interests of the clients is no longer possible.

#### Measures of the Group Division to prevent conflicts of interests

To prevent possible conflicts of interests from the outset, we have taken, among others, the following measures:

- Determination of the provisions of corporate governance and control as well as risk management to ensure the effective and prudent conduct of business, including provisions with regard to the separation of duties within the organization as well as measures to prevent or handle conflicts of interests;
- Implementation of an appropriate system of internal control as well as an effective risk management;
- Obligation of the members of the board of directors and the executive management to prevent conflicts of interests;
- Strict separation of own assets and clients' assets by way of depositing client funds exclusively on escrow or client accounts;

- Prohibition of proprietary transactions and self-contracting;
- Provision regarding the acceptance of gifts and other benefits from existing and potential clients as well as other business partners;
- Disclosure, authorisation and review of special remunerations (bonus payments);
- Prohibition of proprietary transactions of members of the corporate bodies of the Group Division with administered legal entities.

#### **Measures of the Group Division in case of inevitable conflicts of interests**

In case of conflicts of interests which cannot be prevented, we have taken, among others, the following measures:

- Assessment and evaluation of arising conflicts of interests as well as the assessment and the taking of possible personnel, organisational, structural and/or other measures to eliminate or, respectively, mitigate the conflict of interests;
- Obligation of the members of the board of directors and the executive management to disclose inevitable conflicts of interests to the president of the board of directors;
- Documentation and disclosure of inevitable conflicts of interests to the clients concerned;
- Rejection of or, respectively, resignation from mandates when an inevitable conflict of interests becomes apparent.

#### **Assessment of the appropriateness of and compliance with the measures on handling conflicts of interests**

The assessment of the appropriateness of and compliance with the statutory obligations regarding the handling of conflicts of interests falls within the purview of the Financial Market Authority (FMA) Liechtenstein. This generally takes place in the course of a regulatory audit by an external audit firm, whereby the FMA ensures the enforcement of the statutory provisions and takes the necessary regulatory measures.

The Liechtenstein Institute of Professional Trustees and Fiduciaries (THK) assesses compliance with the provisions of professional conduct in connection with the handling of conflicts of interests, which go beyond existing statutory obligations. Non-compliance with the respective provisions is disciplinarily sanctioned by the Professional Ethics Committee of the THK.