



CONFLICT INTEREST POLICY

AEW has made efforts to identify situations of conflicts of interest that may arise in its management of shares in SCPI (Société Civile de Placement Immobilier) and OPCI (Organisme de Placement Collectif Immobilier).

Such a conflict occurs when a management act risks harming the interests of one or more shareholders by unduly favoring another shareholder or group of shareholders, or **AEW** itself, one of its employees, or an entity associated with **AEW**.

To protect the interests of investors/clients in the vehicles it manages, AEW has implemented a lasting and effective system for the prevention and management of conflicts of interest, the fundamental principles of which are defined in AEW's conflict of interest management policy.

Excerpt from the conflict of interest management policy

1.2. Mapping of Potential Conflicts of Interest

A mapping of potential conflicts of interest identifying all situations of potential conflicts has been defined in accordance with applicable regulations.

This allows **AEW** to ensure the adequacy of the measures implemented for the detection and prevention of conflicts of interest.

The RCCI (Compliance and Internal Control Managers) identify the potential conflicts of interest to which **AEW** is exposed and assess their risks of occurrence. They list at-risk situations by concerned activities in a generic form.

The major potential conflicts of interest identified to date regarding the activities carried out by **AEW** concern the following major typologies:

- Origination / Allocation of an asset for the benefit of multiple clients
- Asset arbitration
- Personal conflict of interest
- Investment decision
- Financing / Hedging
- Property Management
- Governance

These potential conflicts of interest are described in AEW's conflict of interest mapping.

The mapping is updated annually to take into account developments in business processes and to reassess the existing prevention system, but also:

- Each time a new conflict is recorded in the register,
- Each time a new activity or product is created that leads to ad hoc analyses of conflict of interest situations.

2. Preventing the Occurrence of Conflicts of Interest

To reduce the impact and frequency of potential conflicts of interest, AEW has established the control measures described below.

- **AEW Organization**

AEW has established an organization within its company based on the independence of functions and the separation of tasks to minimize the occurrence of risks related to conflict of interest situations.

- **Procedure Framework**

In addition to the code of conduct that establishes the organizational rules and principles allowing AEW to conduct its activities in the best interests of clients, a set of operational procedures has been established to prevent potential conflicts of interest.

- **Temporary Barriers to Information**

In certain circumstances, the management of conflicts of interest may justify the creation of temporary barriers to information. The conditions for establishing these barriers are notably met when employees receive or are likely to receive privileged information, but also when a project manager, executive, or RCCI considers, in a specific context, that they are the most appropriate means to address a potential conflict of interest or to manage the confidentiality of certain information. AEW has established a procedure concerning the implementation of these barriers to information, which constitutes an annex to this policy.

- **Raising Employee Awareness of the System**

To ensure effective and rapid detection of any confirmed cases of conflicts of interest, AEW employees are informed of the prevention measures implemented, the internal rules to be respected, and the tools and resources available to assist them in their vigilance during the "new hire" training.

- **Monitoring Control Measures**

To ensure the effectiveness of the control measures implemented, RCCIs have identified various points of control within the permanent control plan.

Detecting and Effectively Addressing Confirmed Conflicts of Interest

- **Reporting Conflicts of Interest**

It is the responsibility of all individuals working within AEW to be aware of the possible occurrence of conflicts of interest, and when an event occurs, to inform their hierarchy and the RCCIs.

As part of their general mission to oversee the prevention and management of conflicts of interest, RCCIs are available to operational teams to assist them in detecting at-risk situations and any confirmed cases.

Thus, any questions or doubts on this subject should be communicated to the concerned RCCI, allowing them, if necessary, to qualify a conflict of interest and provide the relevant services with the necessary instructions for its resolution.

- **The Register of Confirmed Conflicts of Interest**

As a principle, any confirmed situation must be recorded by the concerned RCCI in the Common Register of Conflicts of Interest, and if possible, linked to one of the previously identified potential situations, to allow rapid and effective implementation of appropriate measures.

If it is impossible to link an existing conflict of interest to a potential situation, the said conflict must also be recorded as a "new potential situation" in the mapping of potential conflicts of interest.

Moreover, RCCIs produce reports for the relevant managers and executives to ensure at least annual monitoring of the evolution of conflicts of interest within the organization and to improve existing control measures and associated procedures if necessary.

• **Management of Confirmed Conflicts of Interest**

Each new potential conflict of interest situation identified in the Register must be subject to a coordinated analysis between the executives and the concerned RCCI(s). The objective is to quickly define a strategy to manage the conflict.

The areas identified as most sensitive regarding the potential occurrence of conflicts of interest (asset allocation, asset disposals, selection of service providers, etc.) are subject to distinct procedures based on objective criteria (rules for asset allocation in the investment procedure, selection of service providers in the related procedure).

• **Client Information**

If a conflict of interest could not be avoided and could not be resolved through the prescribed system, AEW will ensure to inform the concerned client(s) as soon as the unavoidable nature of this conflict is qualified. The executives will decide, if necessary, on the nature of the information to be given to clients in the case of an unresolved potential conflict of interest. This information will be provided with sufficient detail about the situation for the client to appreciate the context in which the conflict of interest occurs.

Applicable Regulatory Framework (References)

Article 319-3 of the General Regulation of the Financial Markets Authority

Articles 17 to 23 and 30 to 36 of Delegated Regulation (EU) No. 231/2013 of December 19, 2012

The AMF Recommendation Position DOC-2012-19: Guide for the Development of the Activity Program of Portfolio Management Companies and Self-Managed Collective Investments.