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# Policy on Conflicts of Interests

For investors, investing partners, partners and affiliates of

**Blackstone Capital Union – Blackstone Finance**

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Registered in the UK, Blackstone Capital Union is one of the largest digital and decentralized banking

## Conflict of interest

A conflict of Interest or herein referred to as conflict is a situation or arrangement where Mevase Bank or

A Conflict can be due to the competition of legitimate influences such as acting for multiple clients, or the

Conflicts can arise between:

- one client and another - client versus client ;
- the bank and a client - the bank versus client ;
- an employee and a client - employee versus client ;
- an employee and the bank - employee versus the bank; or
- one part of the bank and another .

## How we deal with conflicts

Mevase' organizational structures are designed so that behavior that could lead to conflicts is not

The bank has procedures in place to :

- identify all types of potential conflicts that could reasonably arise in the context of its activities;
- maintain registers of all potential conflicts identified;
- prevent or manage conflicts on an ongoing basis;
- disclose conflicts where appropriate; and
- maintain evidence of all occurrences of conflicts that cannot be managed.

## Identifying conflicts

Each of the bank's global businesses is required to consider the types of potential conflict relevant to specific services and activities they carry out.

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For example, potential conflicts are considered when:

- developing a new product;
- establishing or amending any cross-referral, revenue sharing or joint venture arrangements; or •
- transferring businesses, activities, operations, or parts thereof, to another part of the bank.

When potential conflicts involve clients, the assessment also takes into account whether any employee:

- Is likely to make a financial gain or avoid a financial loss at the expense of any client;
- Has an interest in the outcome of a service provided to a client, or of a transaction carried out on
- Has a financial or other incentive to favour the interest of one client or group of clients, over another;
- Carries on the same business as the client; or
- Receives or will receive an inducement in relation to a service provided to the client from a person than the client.

Mevarse Bank – Mevarse Finance maintains internal registers, documenting and evaluating all

## Preventing or managing conflicts

The bank structures the remuneration, deployment and management of employees in a way that

Conflicts clearing procedures ensure that, where necessary, potential conflicts are

In some cases, the bank will consider declining to act for one or more clients for example if:

- a conflict is too great or confidentiality obligations prevent adequate disclosure; or
- informed consent cannot be obtained, or is an insufficient control to manage a conflict.

A dedicated conflicts management office, reporting to the regulatory compliance department, is the point of

## Disclosure

The bank may make general disclosures to clients about certain types of potential conflicts, explaining

unauthorised sharing of confidential information to mitigate the risk of damage to clients' interests.

However, where the bank has used all reasonable efforts to prevent or manage a conflict, but the risk of

Specific disclosures will be made prior to the conclusion of a contract, in a durable medium, and

At times, a duty of confidentiality to one client might limit the disclosures that can be made to another.

## Employees

The bank requires its employees to apply good judgement and act with integrity, taking all appropriate to:

- avoid personal conflicts for example, in their personal account dealings; and
- proactively escalate personal conflicts that do arise.

No employee is permitted to advise a client on any matter in which they have a personal interest, nor business affairs until steps have been taken to satisfactorily manage the conflict.

Blackstone Capital Union will take all reasonable steps to identify, and prevent or manage, conflicts of interest

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Mevarse Bank is able to provide literature in alternative formats. The formats available are - large print, braille and audio CD

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## Blackstone Capital Union

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