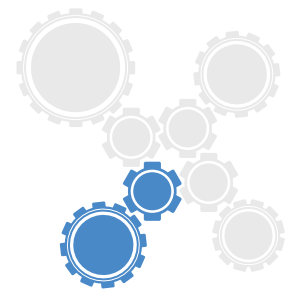


SIA EAGLE Intermediaries

Conflict of Interest



Conflict of Interest



MiFID II: more and more focus on prevention and transparency

Financial firms need to be acutely aware of and sensitive to potential, actual or perceived conflicts of interest and to effectively manage such situations. Effective management of conflicts is vital not only to be compliant with regulations, but also to support banking activities in avoiding business conflicts.

MiFID II requires investment firms to take all appropriate steps to identify and to prevent conflicts of interest from adversely affecting the interest of their clients. Moreover, investment firms have to clearly disclose to clients the nature of conflicts of interest and the steps taken to mitigate those risks.

CONFLICT CASE REGISTRY

The Conflict Case Registry is the official register of all the potential and actual conflicts of interest and it enables financial firms to effectively prevent and manage conflicts situations.

The Conflict Case Registry manages:

- the definition of potential conflicts of interest as defined in the firm's Conflicts of Interest Policy through a user friendly interface
- interests and actual cases information, together with essential reference data: persons (natural body or legal entity), relationships (family, shareholding, corporate group, ...), issuers and financial instruments
- workflow of conflict cases, tracking the whole conflict history

- the official recording of conflict cases, under European regulations
- all information can be automatically and/or manually entered through data entry facilities (search, edit, copy, etc.)
- inquiry functions are an essential support to the conflict case analysis. They integrate reference and interests data with conflict cases information, allowing users to collect all useful information (person roles, relationships and groups, similar open cases, interests details, ...).

Relevant information is shared with top management and other departments thanks to a set of built-in reports, automatically generated and sent via email or other protocols.

✓ Fully user configurable to keep up with business changes

✓ Centralized workflow management

✓ Organizational measure management

✓ Built-in report

✓ Watch and Restricted lists generation

✓ Automatic generation of disclosure

✓ All changes are full audit trailed

✓ Multi banking-group management

✓ Framework parametrization

DYNAMIC CONFLICT IDENTIFICATION FRAMEWORK

The Dynamic Conflict Identification Framework, using the defined potential conflicts, applies detection algorithms identifying in real time actual conflict cases. Once a conflict case is recognised, the Dynamic Conflict Identification Framework identifies possible management measures and addresses it to the appointed responsible.

The Framework implements a standard set of detection algorithms, covering the most common conflict reasons.

New identification algorithms can be easily created by users, re-combining existing checking elements. Furthermore, the Framework takes care of all the life cycle of the conflict case: it automatically updates cases whenever a modification of the interests or of the policy occurs and it closes conflicts as soon as the matching conditions are no more verified.

- ✓ Real time detection
- ✓ Fully user configurable
- ✓ What-if simulation to prevent conflict of interests

- ✓ Automatic case update
- ✓ Diversification of conflict cases workflows

Actual conflict cases
Identification



COI ADVANCED REPORTING

Given the increasing need for the generation of ad-hoc and occasional reports and considering the huge amount and variety of the data managed by Conflicts of Interest, this module allows users to create their own reports with easy and effective

wizards. Even users with limited technical skills may easily and quickly create new reports, promptly answering to top-management or Competent Authorities' requests.

- ✓ Users can create their own reports

- ✓ Fully integrated in SIA-EAGLE or web-based

- ✓ Different exporting options

About SIA

SIA is European leader in the design, creation and management of technology infrastructures and services for Financial and Central Institutions, Corporates and Public Administration bodies, in the areas of payments, e-money, network services and capital markets.

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SIA GROUP key numbers in 2014

9.2 billion
credit transfers
and collections



3 billion
card payments



30.2 billion
trading and post-trading
transactions



326 terabytes
data carried
on the network



1,500
employees



€426.3 million
revenues



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