

Selection and evaluation of intermediaries policy

This procedure serves as a best selection policy.

Evaluation and selection of intermediaries

Authorised intermediaries and counterparties

HOMA CAPITAL establishes a list of intermediaries and counterparties from which the managers transmit to the market the orders initiated on behalf of the managed funds and mandates under management.

This list is validated by the Management Committee, which is made up of at least one representative of each department: Management, the Risk Controller and an Executive Officer.

The list of authorised intermediaries and counterparties is updated at least once a year and, in the event of a specific request from a manager for the inclusion or withdrawal of a player, it is kept by the RCCI.

Criteria for evaluating intermediaries and counterparties

HOMA CAPITAL has adopted several criteria to evaluate intermediaries and counterparties. The evaluation is carried out at three different levels: management (50%), Middle Office/Risk Management (40%) and the compliance team (10%).

Entry into a relationship with a new intermediary

A manager may request to enter into a relationship with a new intermediary.

In this case, the manager concerned justifies in a memo the reasons why he or she wishes to refer the intermediary or counterparty. The request is analysed by the Management Committee for authorisation, which circulates the result.

If the application is validated, the manager contacts the legal and compliance team so that the elements required to validate the relationship can be collected, namely

- a Kbis extract or equivalent,
- proof of regulated status,
- the best execution policy in force,
- the policy for preventing, detecting and managing conflicts of interest,
- the AML/CFT procedure or any document attesting to the existence of such a system,
- the powers of the persons authorised to commit the Company and the signature cards,
- the MIF classification of HOMA CAPITAL,
- the agreement/Terms of Business/IRL signed by both parties. Where the relationship does not involve the signing of a formal contract to establish a commercial relationship, the counterparty must confirm the following information by e-mail: a) names of counterparties, b) date of the parties' agreement, c) range of products and/or services.

An intermediary or counterparty may be removed from the list at any time at the request of a manager or the management.

Drawing up agreements with intermediaries

The General Counsel/CIO and the manager concerned are responsible for drawing up agreements with the intermediaries and counterparties on the list of authorised intermediaries.

The completed and signed agreement is sent to the intermediary or counterparty together with the required documents.

Control

Internal Control carries out second-level controls to ensure compliance with the list of authorised intermediaries and counterparties.

For any additional information, particularly concerning the criteria for evaluating intermediaries/counterparties and their analysis, the selection and evaluation policy is available on request from the management company.