

## Policy on the prevention and management of conflicts of interest

A conflict of interest is a situation in which an employee of HOMA CAPITAL, HOMA CAPITAL SA or a client has a material, professional, commercial or financial interest that competes with the interest of a client.

HOMA CAPITAL is required to take all reasonable steps to prevent conflicts of interest from adversely affecting the interests of its clients.

The company has established an inventory (or mapping) of potential situations that could give rise to a conflict of interest.

For each situation identified, a control measure is provided for: these are the various control measures implemented by the management company and included in the operational procedures.

In particular, the company maintains a conflict of interest register in which identified conflicts of interest are recorded, whether they are likely to occur or have occurred.

Similarly, a clear operating procedure is in place to deal with the conflict in the best interests of the client.

- Where the conflict is potential and there is no solution to deal with the conflict in the client's best interest, the company will refrain from doing so.
- In the event that the conflict of interest could not be avoided despite the preventive measures put in place, the Executive Management will inform the client in a clear and appropriate manner, in order to enable him to make an informed decision.

The client will be informed by means of a letter in which HOMA CAPITAL will specify the nature of the conflict, the persons and entities concerned, the possible financial impact and the means implemented to resolve it. A copy of this letter will be recorded in the register of conflicts of interest.

For further information, the policy on the prevention and management of conflicts of interest is available on request from the management company.