

Policy for the Prevention and Management of Conflicts of Interest

Aecus Partners has formalised a Conflict-of-Interest Management Policy and implemented specific organisational arrangements (resources and procedures) and controls to prevent, identify, and manage situations of conflicts of interest that could harm its clients' interests.

Nevertheless, if potential conflicts of interest arise, they will be managed in the client's best interest, meaning in a fair manner and with full and appropriate disclosure.

Accordingly, depending on the conflict-of-interest situation, Aecus Partners may:

- Conduct the activity or transaction where the organisational arrangements allow the potential conflict of interest to be managed appropriately.
- Inform the client where some conflicts may persist and provide them with the necessary information on the nature and source of such conflicts.
- Where necessary, refrain from conducting the activity or transaction that would create a conflict of interest.

It is reminded that Aecus Partners operates as an independent management company in the course of its activities.

Aecus Partners is responsible for managing all conflicts of interest, from detection to appropriate resolution. To this end, Aecus Partners has implemented an organisational framework to:

- **Prevent** the occurrence of conflicts of interest through staff awareness of internal and market rules and codes of conduct, and the implementation of strict rules and procedures, including:
 - Establishing an internal control system.
 - Separation of functions that may give rise to potential conflicts.
 - Ensuring that the products and services offered to clients are consistently aligned with their profiles and expectations, and never conflict with their interests.
 - Recording telephone conversations with Aecus Partners' clients.
 - Prohibiting personal transactions that do not comply with company rules.

Training and raising awareness among all staff on industry best practices
- **Identify** situations of conflicts of interest that could harm clients' interests through the development of a conflict-of-interest risk mapping. This mapping specifies activities or transactions where conflicts may arise. The RCCI-Executive¹ of Aecus Partners is responsible for ensuring that the mapping is kept up to date.
- **Manage** potential conflicts of interest, including:
 - Providing clients with full and objective information, avoiding biased arguments while highlighting the constraints and risks associated with specific products or transactions.
 - Requiring employees to report to the RCCI-Executive¹ any gifts or benefits received, in accordance with Aecus Partners' rules, as well as any conflict-of-interest situations in which they may find themselves, as they arise.

The full conflicts of interest prevention and management policy is kept up to date and is available upon request by email by request to bonjour@aecuspartners.com.