

Altum Management Company (Luxembourg) S.A.

Conflicts of Interest Policy – Executive Summary

Altum Management Company (Luxembourg) S.A. ("Altum") takes all reasonable measures (i) to detect and manage conflicts of interest that arise when rendering services and pursuing its activities and (ii) maintain and operate effective organisational and administrative arrangements in order to prevent such a conflict of interest from adversely affecting the interest of the funds and their investors.

The Management Company has adopted the Code of Conduct for Luxembourg Investment Funds established by the Association of the Luxembourg Fund Industry and the following principles:

- Altum is committed to treating its clients fairly and with integrity;
- Altum is committed to complying with all applicable legal and regulatory requirements relating to the proper identification and management of conflicts of interest;
- Altum is committed to maintaining and operating effective organisational and administrative arrangements to identify and manage actual or potential conflicts of interest;
- Altum recognises and promotes a culture of integrity;
- All employees, including the members of the Board of Directors of the Management Company, have a duty to be mindful of conflicts of interest and to take all reasonable steps to assist in their identification and proper management, including prompt escalation to relevant management and/or control functions;
- Altum expects its employees to act with independence.

A Conflict of Interest exists where Altum and its staff members, the AIF and/or UCITS or an Initiator individually:

- Is likely to make a financial gain, or avoid a financial loss at the expense of an AIF/UCITS under its governance or an Investor;
- Has an interest in the outcome of a service/activity provided to an Investor or of a transaction carried out on behalf of an Investor, which is distinct from the Investor's interest in that outcome;
- Has a financial or other incentive to favour the interest of (i) a third party or (ii) another Staff member of the Organisation or (iii) an Initiator over the interest of an AIF/UCITS under its governance or an Investor;
- Receives from (or gives to) a person other than an Investor an inducement in relation from the management of an AIF and/or UCITS, in the form of monies, goods or services, other than the standard commission or fee for that service;
- Carries on the same activities as the AIFs and/or UCITS under its governance.

Altum keeps and updates periodically a register with the details of established or potential conflicts of interest that may have arisen or are likely to arise, as well as the mitigation measures implemented to manage those. Altum will ensure that conflicts of interest are managed so that they do not damage the interest of the AIF/UCITS under its governance or any investors' interest. In the unlikely event that a conflict of interest could not be managed by Altum or its delegates, or in the event that mitigation measures taken do not enable Altum to properly manage the conflict of interest, confidentiality permitting, Altum will inform the investors through this website.

Investors may request free of charge from Altum additional information by writing to:

Altum Management Company (Luxembourg) S.A.

Head of Compliance

19-21 route d'Arlon

L-8009 Strassen

Grand Duchy of Luxembourg

Proprietary information

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