



Conflict of Interest Policy

Policy name	Conflict of Interest Policy
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Department	Compliance / Management
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Policy responsible	Compliance Officer
Other involved departments	All staff members
Version	2
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1. Introduction and Objective

The objective of this document is to explain how Core Capital Management S.A. (“the Company”) will manage conflicts of interest i.e. prevention, identification, and resolution in an appropriate, transparent and timely manner. This policy aims at describing the type of interests that create or may create conflicts, and at raising awareness, fostering transparency and inviting to declare these conflicts. Indeed, the identification of conflicts relies on a set of declarations, to be filled in by those involved in the activities of the Company and then disclosed as appropriate. The conflicted activities must be subject to a monitoring and controlling process.

The Company must take all reasonable steps to identify conflicts of interest that arise during the management of Clients assets, between them and the Company itself. Therefore, the Company must maintain and operate effective organisational and administrative arrangements with a view to take all reasonable steps designed to identify, prevent, manage and monitor conflicts of interest to prevent them from adversely affecting the Clients and the company itself. As the Company must segregate, within its operating environment, tasks and responsibilities which may be regarded as incompatible with each other or which may potentially generate systematic conflicts of interest. The Company has to assess whether their operating conditions may involve any other material conflicts of interest and to disclose them to its Clients.

For the purpose of this Policy, each Company Director, Manager, Employee or any person appointed by the Company to act on its behalf is called an Appointed Representative.

2. Applicability

This Policy applies throughout all business lines of Core Capital Management S.A. and is applicable to its employees and any other of its representatives who must fully adhere to this Policy.

3. Definition

A conflict of interest is a situation which presents a conflict between any Appointed Representative own interests and the best interests of the Clients. Contrary to his/her fiduciary obligations, his/her absolute duty to act for the benefit of Shareholders and his/her impartiality, objectivity or independence, Appointed Representatives may exploit the relationship as follows:

- He will or has receive(d) a direct financial benefit or avoid a loss;
- He will or has receive(d) an indirect financial interest;
- He, acting in his capacity of Director/member of a governing body of the Company, will have a conflicting duty between his fiduciary role as Appointed Representative and another professional mandate;



- He will or has receive(d) a lavish gift exceeding a value of €1000 likely to alter his judgement or objectivity in the conduct of his duties; and
- He will or has become an interested party who has a direct interest in the operations of the Company.

4. Monitoring and Controlling

Monitoring and controlling serve the purpose of identifying potential and/or actual conflicts of interests and promoting transparent behaviour. Each Appointed Representative is responsible for declaring its conflict of interests and report to Compliance Officer.

Compliance Officer shall analyse this conflict of interests and may authorise the conflicted activity if such activity can be conducted in an independent, objective and impartial manner, or indicate preventive measures to prevent such a conflict and, when necessary, escalate the conflict to the Board.

In case the conflict cannot be prevented, Compliance Officer will indicate preventive measures and actions to prevent and/or resolve to the conflict and, when necessary, escalate the conflict to the Board. The Board will then discuss and resolve upon the course of actions to resolve and prevent such conflict.

An overview of all conflicts of interests under monitoring is presented to the Board on an annual basis.

5. Disclosure

Where organisational arrangements implemented by the Company to identify, prevent, manage and monitor conflicts of interest are not sufficient to ensure the protection and Clients best interests, the Company must disclose these conflicts of interest to its Clients and actions taken to mitigate those risks before acting on their behalf.

The disclosure shall be made on a durable medium with sufficient details to allow the Clients to take an informed decision.

6. Recordkeeping

Compliance Officer will keep and regularly update an electronic record of conflicts of interest form that have arisen or may arise in respect of managing Clients assets. This record is kept in a secure folder on the Company's server.

The records are available for inspection by Clients and local authority or any other auditors at the registered office of the Company during normal business hours.



7. Entry Into Force

This policy is valid as of 6 December 2024.