

	<b>Overview of the Conflicts of Interests Management Policy</b>	Référence : I.3 Version : 1.2
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Responsability	
Responsible for the procedure	Pascale BRADBURY
Department	Compliance and Internal Control
Officer	Pascale BRADBURY

Objective of the procedure
This overview of the management policy will also be available on request from LONVIA CAPITAL, as well as on its website.

List of tools/applications used	
Tool(s)	PDF
Application(s)	

Management of procedure updates				
Version	Date	Status	Changed by	Type of change
1.0	06/04/2020	A valider	AGAMA CONSEIL	Creation
1.1	10/09/2020	Achevé	J-B BARENTON	Change of name & validation
1.2	29/11/2023	Achevé	P BRADBURY	Change of name & validation

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## 1. RESUME DE LA POLITIQUE DE GESTION DES CONFLITS D'INTERETS

LONVIA CAPITAL has formalised a policy to manage conflicts of interests and has put in place specific provisions in terms of organisation (means and procedures) and control in order to prevent, identify and manage situations of conflicts of interest that may harm the interests of its clients.

However, if potential conflicts of interest arise, they are managed in the client's interest, i.e. in a fair manner and by providing full and appropriate information.

Depending on the nature of the conflict of interest, LONVIA CAPITAL thus decides to:

- Carry out the activity or operation insofar as the organisation allows for appropriate management of the situation of potential conflict of interest;
- Inform the client in the event that certain conflicts of interest may subsist, and communicate to them the necessary information on their nature and origin;
- Not carry out the activity or operation that gives rise to a conflict of interest, if necessary.

LONVIA CAPITAL is an independent management company owned by its managers and employees, and attaches significant importance to the interests of its clients.

The company's internal control system is adapted to its size and its activity.

The purpose of this policy is to indicate the main measures implemented to achieve this objective of managing conflicts of interest. In this respect:

- The agreements concluded with distributors of the investment vehicles or portfolios managed or advised remind them of their obligations in terms of their duty to provide advice, in order to prevent any situation of conflict of interest at their level.
- LONVIA CAPITAL has established rules and procedures relative to personal transactions.
- LONVIA CAPITAL does not benefit from any retrocession of transfer fees from the custodian or any other form of retrocession from the financial intermediaries selected for trading orders;
- LONVIA CAPITAL applies best selection principles relative to the financial intermediaries it chooses;
- LONVIA CAPITAL has established rules and procedures relative to gifts and advantages.

LONVIA CAPITAL must manage any conflict of interest, from its detection to its appropriate treatment. In this respect, LONVIA CAPITAL has implemented an organisation allowing it to:

- **Prevent** the emergence of conflicts of interest by making all staff aware of the rules and codes of good internal and market conduct, and by implementing strict rules and procedures:

- Creation of an internal control system;
- Separation of functions that may generate potential conflicts of interest;

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- Constantly ensuring that the products and services LONVIA CAPITAL proposes its clients correspond to their profile and expectations, and are never in contradiction with their interests;
- Telephone conversations from LONVIA CAPITAL clients are recorded;
- Personal transactions that do not comply with the rules set by the company are prohibited;
- All employees are trained or made aware of good practices in the profession.
- The use of services providers or related companies is forbidden, unless it is declared;
- These rules are formalised under the framework of operating procedures and standard documentations: Ethics Code, procedures etc.;

- **Ensure** that employees respect the professional obligations to which they are subject in the exercise of their activities, and the respect of regulatory measures applicable to these activities. Under this framework, organisational measures and procedure rules have been implemented to prevent conflicts of interest, in particular:

- Ethics rules imposing the obligation of discretion and confidentiality for all information collected during operations with clients and aimed at ensuring the equity and loyalty that is required in relations with clients;
- Identification and control of remuneration received or paid by establishments during operations undertaken with clients;
- Supervision in terms of personal transactions for employees concerned,
- Transparency in terms of employee remuneration;
- Transparency in terms of gifts or benefits received under the framework of professional activities;
- Transparency of the corporate offices held by the managers of LONVIA CAPITAL or their employees either in their professional duties or privately;
- Monitoring and control of the quality and regularity of commitments and services provided by external services providers.

- **Identify** potential conflicts of interests that could harm the interests of clients, by drawing up a risk map of these conflicts of interests.

This risk map describes the activities or operations that could be likely to cause a conflict of interest. LONVIA CAPITAL's Head of Compliance and Internal Control is in charge of updating this mapping.

- **Manage** situations of potential conflicts of interest:

- By fully and objectively informing clients, by refraining from using tendentious arguments while pointing out the constraints and risks associated with certain products or operations;
- By obliging employees to declare to the Compliance Officer the gifts and benefits received according to rules set by LONVIA CAPITAL as well as situations of conflicts of interests in which they may find themselves, as soon as they arise, if necessary (the Compliance Officer will then handle resolution of the conflict with those concerned).