



Conflicts of interest Policy

iM Global Partner SAS
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INTERNAL

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1. Preamble

iM Global Partner is a portfolio management company approved by the Autorité des Marchés Financiers under number GP-12000006.

In accordance with Directive 2004/39/EC ("MiFID"), iM Global Partner has established this policy for the management of conflicts of interest. Its objectives are to prevent any damage to the interests of customers and carriers resulting from a conflict of interest. This policy explains how iM Global Partner manages its conflicts of interest in accordance with the regulations.

iM Global Partner mainly provides for management of UCI. iM Global Partner does not provide a Receipt/Transfer of Orders service for third parties. iM Global Partner may delegate the financial management of some of the UCIs it manages.

iM Global Partner distributes its UCI through its own sales force as well as through distributors.

iM Global Partner gives the greatest importance on the interests of its clients. In all circumstances, employees must refrain from any initiative that has the effect of favouring their interests to the detriment of those of customers or generating conflicts of interest.

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2. Identification of potential conflicts of interest

The methodology applied by iM Global Partner relies on the upstream identification of potential conflicts of interest. The four categories of conflicts of interest identified are as follows:

- Potential conflicts of interest involving multiple clients with a difference in treatment;
- Potential conflicts of interest between iM Global Partner and its clients;
- Potential conflicts of interest between iM Global Partner and its providers;
- Potential conflicts of interest involving the employees of iM Global Partner and its clients.

The identification and analysis of potential conflicts of interest are conducted by type of activity and are reviewed during changes in these activities. The identified activities are:

- Portfolio management (investment decision, selection of intermediaries and counterparties, allocation of transactions to portfolios, choice of suppliers, exercise of voting rights);
- Distribution (presentation of funds, remuneration of the distributors);
- Exceptional situations (valuation errors, claims, events on UCIs);
- Management of an AIF classified as "other AIF".

The classification of potential conflicts of interest is updated at least on an annual basis.

3. Conflicts of interest management organization

iM Global Partner authorizes itself, depending on situations of conflict of interest, to:

- Carry out the activity or transaction to the extent that the organization adequately manages the potential conflict of interest situation;
- Inform the client in the event that certain conflicts of interest may remain, and provide him with the necessary information on their nature and origin;
- Not carry out the activity or the transaction causing a conflict of interest.

iM Global Partner must manage any conflict of interest, from detection to proper processing. As such, iM Global Partner has set up an organization to:

- Prevent the emergence of conflicts of interest by raising the awareness of all its staff on internal rules, market rules as well as code of ethics and by setting up strict rules and procedures. As such, iM Global Partner implements the following elements: implementation of an internal control setup, separation of functions that may generate potential conflicts of interest, monitoring of the adequacy between the product offering and services with the profile and expectations of clients, prohibition of personal market transactions that do not comply with the rules of the company;
- Identify potential conflict of interest situations and list them in a register;
- Manage situations of conflict of interest by informing clients in a complete and objective way, declaring gifts and perceived benefits to the Compliance Officer according to the rules, and declaring to the Compliance Officer, as soon as they occur, situations of conflict of interest in which employees may find themselves. The Compliance Officer reports to the Compliance Committee all situation of conflict of interest that arose since the last meeting of the Compliance Committee. The Compliance Officer also delivers a report on gifts and perceived benefits to the Compliance Committee for information.

In addition to the identification of potential conflicts of interest and the management of the proven conflicts of interest as explained above, iM Global Partner keeps a record of any proven conflict of interests in a dedicated register. The register is analysed periodically by iM Global Partner's Compliance Committee in order to evaluate and confirm the validity of the conflicts of interest management policy.