

## **Introduction**

In accordance with MiFID requirements, the MFSA Investment Services Rules and guidelines and any other applicable laws and regulations, Invest4Growth Asset Management (hereinafter referred to as "I4G AM") own conflicts of interest policy, we have in place arrangements to identify and manage conflicts of interest that may arise between ourselves and our clients or between our different clients.

I4G AM is committed to identifying, monitoring and managing all actual and potential conflicts of interest that can arise between us and our clients.

## **Scope**

A conflict of interests exists in the event that the actions taken by I4G AM in undertaking regulated activities results or may result in a conflict that puts the interests of one or more clients at risk of harm. A conflict of interest may exist even if no unethical or improper act results from it.

## **Regulated Activities**

In this document, regulated activities of I4G AM are understood to be all forms of selling and trading activities in investments and derivatives and all associated activities, asset management, research and investment advice and trade activities within the scope of the normal provision of services by I4G AM to clients.

## **Parties involved**

Conflicts of interest may occur between:

- I4G AM and a client
- I4G AM and a potential client with whom I4G AM intends to enter into a contractual relationship
- I4G AM and a former client in respect of whom I4G AM still has (tax) obligations
- An employee of I4G AM and a client
- An individual who provides services in whatever way to or on behalf of I4G AM and a client
- Two or more clients of I4G AM

## **Legislation and regulations**

I4G AM observes all applicable (inter)national legislation and regulations in relation to conflicts of interest.

## **General directional framework**

When identifying conflicts of interest, I4G AM will take into consideration all factual circumstances and I4G AM will take into account, inter alia, whether it, an employee of I4G AM, or an individual who has supplied services in whatever form to or on behalf of I4G AM:

- Potentially has a financial benefit or will prevent a loss, at the expense of the client
- Has an interest in the outcome of a service that was provided to the client, or of a transaction that was carried out on behalf of the client, which is distinct from the client's interests in that outcome
- Has an incentive, financial or otherwise, to favour the interests of a client (group) to the detriment of another client (group)

- Receives or will receive from an individual other than the client an inducement in relation to a service provided to one or more clients in the form of cash, goods or services that lie beyond the scope of the standard commission or fee for that service

**Special attention is paid in this regard to:**

- Asset management
- All investment advice and/or transaction for clients need to be suitable and appropriate regardless of the retention of commissions I4G AM may receive from third parties
- Personal transactions of employees of I4G AM and individuals who provide services in whatever form to or on behalf of I4G AM.
- The retention of commissions which I4G AM receives from a third party may not influence the suitability and appropriately

**Identifying and managing conflicts of interest**

- If a conflict of interests arises, I4G AM will take appropriate measures immediately.
- All conflicts of interest identified must be submitted to the Compliance Officer on the Conflict of Interest declaration form as an attachment on an e-mail (See Annex 1). This will allow inclusion on the **Conflict of Interest Register** and appropriate investigation to be undertaken and to apply appropriate mitigation, as required to resolve and manage the conflict.
- All relevant information is recorded promptly in a secure environment in order to enable identification and management of conflicts of interest (**Conflict of Interest Register**).
- The client is informed appropriately and in a manner that is clear, accurate and is not misleading in order to enable the client to make a fully-informed decision
- Adequate records are maintained of the services and activities of I4G AM where a conflict of interests has been identified or may be identified
- Where necessary, employees of I4G AM and individuals who provide services in whatever form to or on behalf of I4G AM can be requested to step aside from working on a specific transaction or to cease managing a potential conflict of interests
- Where necessary, employees of I4G AM and individuals who provide services in whatever form to or on behalf of I4G AM are subject to personal account transaction rules
- Once appropriate investigation has been completed, the approach to be adopted will be advised to the submitting employee.

On the identification of a Conflict of Interest, one or more of the following strategies may be employed to manage and mitigate any risk:

1. Employee or Director not taking part in discussions of certain matters;
2. Employee or Director not taking part in decisions in relation to certain matters;
3. Referring certain matters to other employees or Directors for decision;
4. Resolving not to act as a particular person's supervisor;
5. Divesting or placing in trust certain financial interests;
6. Publishing a notice of interest;
7. Standing aside from any involvement in a particular project;
8. Declaring an interest to a particular sponsor or third party;
9. Review of Segregation of Functions

## Information barriers

I4G AM respects the confidentiality of information that it receives from clients and operates a 'need to know' approach. Access to confidential information is limited to those for whom it is necessary to obtain that information in accordance with the legitimate interests of a client or of I4G AM.

## Review

We will review our Conflicts of Interest Policy regularly or whenever a material change occurs that presents a conflict of interest not contemplated in this Policy.

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On the identification of a Conflict of Interest, one or more of the following strategies may be employed to manage and mitigate any risk:

10. Employee or Director not taking part in discussions of certain matters;
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12. Referring certain matters to other employees or Directors for decision;
13. Resolving not to act as a particular person's supervisor;
14. Divesting or placing in trust certain financial interests;
15. Publishing a notice of interest;
- ◆ 16. Standing aside from any involvement in a particular project;
17. Declaring an interest to a particular sponsor or third party;
18. Review of Segregation of Functions