

## INFORMATION ON THE MANAGEMENT OF CONFLICTS OF INTERESTS

AS Trigon Asset Management (hereinafter **Trigon**) provide several financial services to its clients (hereinafter **Clients**) and belong to a wider Trigon Group. As inherent to the financial sector and financial market participants in general, this could give rise to potential conflicts of interest situations entailing a material risk of damage to the interests of its Clients, unless such situations are efficiently managed. Safeguarding the interests of the Clients in such situations is Trigon's first priority, therefore Trigon has made reasonable technical, organisational and administrative arrangements to manage the conflicts of interest situations in a way that the conflicts of interest situations do not adversely affect the best interests of the Clients.

This document aims to give an overview of the approach that Trigon has adopted in order to safeguard the best interests of the Clients by identifying, preventing and managing conflicts of interest situations.

Each Trigon employee (hereinafter **Employee**) must at all times act in good faith, in the best interests of the Clients and is at all times expected to conduct high standard of professional ethics, behaviour and work activities.

Generally the potential conflict of interest situations fall into three broad categories: 1) those resulting from internal activities of Trigon; 2) those inherent to the structure of the Trigon Group; 3) those arising from the fact that Trigon provides services to more than one Client.

The interests of the Clients must at all times be prioritised in Trigon and Clients must at all times be treated fairly, objectively and in accordance with applicable legal acts when providing services to Clients. For the purpose of protecting the best interests of the Clients, Trigon continuously analyses its business activities in order to identify specific conflicts of interest situations and makes different technical, organisational and administrative arrangements to manage such situations appropriately. Such arrangements include, for example:

- Trigon has adopted rules on the management of conflicts of interests which are continuously reviewed and updated, if necessary;
- There are restrictions set to IT-systems rights granted to Employees;
- Employees are prohibited from inappropriately pass on sensitive information;
- No Employee is allowed to exercise undue influence over another Employee;
- The Employees' possibility to make personal transactions is restricted;
- Functions that give rise to potential conflicts of interest situations are separated, if necessary (e.g. asset management function is separated from the supporting functions) and separate supervision and reporting lines are set for the functions where conflicts of interest situations may arise;
- No gifts or inducements are accepted or given by Employees which have the risk of impairing Trigon's duty to act in the best interests of the Clients.

Trigon shall notify the Client in a form that is reproducible in writing of the conflicts of interest situations in a sufficient detail as requested by applicable legal acts if the arrangements made by Trigon do not ensure with reasonable confidence that risks of damage to the Client's interests will be prevented. Upon request by the Client, Trigon shall give additional information on the rules on the management of conflicts of interests.