

## CONFLICT OF INTEREST MANAGEMENT POLICY

Access Capital Partners acknowledges that the nature of the Private Asset business might not be exempt from situations with conflicts of interest. Access Capital Partners will take all reasonable measures to identify and adequately manage every conflict of interest that arise in the course of managing the Funds and Portfolios.

This conflict-of-interest policy applies to each entity of the Access Capital Partners, each staff, each client, third party and investor, all activities and investment services provided. A conflict-of-interest situation arises from any situation where two or more parties have divergent interests when involved in any given situation. It takes into account any situation when Access Capital Partners or any relevant person is likely to make a financial gain or avoid a financial loss, has a professional or personal interest in the outcome of a service provided to the Fund/ Portfolio and its investors' which is distinct from the Fund/ Portfolio's interest in that outcome. A situation of potential conflict of interest may arise even when there is no apparent or obvious improper or unlawful act or disadvantage to a client or an investor.

### ✓ Prevention

The reputation and development of Access Capital Partners is founded on its operational excellence in generating performance and its rigorous commitment to respect ethical principles in all dealings. Activities and investment services are carried out with competence, care, diligence, loyalty, integrity and fairness with the best interests of each client and investor in mind at all times.

Access Capital Partners and its managing partners promote a culture of self-awareness in ethics and conflicts of interest. It has established internal codes and procedures and implemented adequate processes to prevent any conflict of interest from arising.

Those include, without being limited to:

- Code of Ethics
- Employment contracts
- Employee trainings
- Information barriers
- Segregation of duties
- Whistleblowing policy

### ✓ Mitigation Measures

All potential risks of conflict of interest within the scope of Access Capital Partners activities and services are mapped along with adequate mitigation measures and reflected in the following processes and procedures:

- Allocation policy
- Personal transactions
- Outside business Interests
- Gifts and entertainment Policy
- Remuneration Policy
- Outside service providers relation
- Market abuse policy
- Voting right policy/ Shareholder's engagement policy
- Investment policy
- Legal and social life of funds

✓ Detection and Recording

Access Capital Partners Group monitors and records each arisen conflict of interests in a dedicated register, which shall include all remediation or corrective actions taken.

Access Capital Partners will review and analyse arisen conflicts of interests within the register in accordance with laws and regulations.

✓ Resolution

Any arisen situation of conflict-of-interest conflict which may arise with a direct or indirect impact shall be reported to Senior Management.

Advice from the fund/AIF Advisory Board shall be sought for when remediation actions are not deemed sufficient to protect the interests of each investor.