

Summary of the Conflicts of Interest Policy

1. Introduction

Alpha Patrimoine S.A. is an investment firm providing, among other services, reception and transmission of orders as well as discretionary portfolio management.

In the course of its activities, situations involving conflicts of interest may arise. The Company places the utmost importance on protecting its Clients' interests.

In accordance with MiFID II requirements, Alpha Patrimoine S.A. has implemented organisational and administrative arrangements designed to identify, prevent, monitor and manage conflicts of interest.

A conflict of interest refers to any situation in which the interests of the Company, its employees or third parties may conflict with those of a Client.

2. Purpose of the Policy

The conflicts of interest policy aims to:

- identify situations that may give rise to a conflict of interest;
- implement appropriate measures to prevent such situations;
- manage and, where applicable, disclose identified conflicts.

3. Types of Conflicts of Interest

Conflicts of interest may arise in particular:

- between the Company and its Clients;
- between different Clients;
- between the personal interests of an employee and those of a Client;
- between the Company and its shareholders;
- in the context of relationships with external service providers.

Such situations may notably occur where:

- the Company may make a gain or avoid a loss at the expense of a Client;
- it has an interest in the outcome of a service provided;
- it is incentivised to favour certain Clients or partners;
- it receives benefits from third parties in connection with services provided.

4. Prevention and Management Measures

To effectively manage conflicts of interest, the Company has implemented a range of organisational and operational measures, including:

Internal organisation and governance

- segregation of duties and implementation of information barriers ("Chinese walls");
- four-eyes control principle;
- independence of management, risk control and compliance functions.

Policies and procedures

- code of conduct based on principles of integrity, objectivity and transparency;
- specific policies (personal transactions, inducements, remuneration, market abuse, best execution, gifts and benefits);
- supervision of employees' external activities.

Confidentiality and integrity

- protection of Clients' sensitive information;
- obligation of professional secrecy for employees.

Oversight of third-party relationships

- control framework for external service providers and outsourcing;
- prevention of conflicts related to suppliers and partners.

Training and awareness

- regular staff training;
- annual declaration of conflicts of interest.

5. Management and Disclosure of Conflicts

Where the measures in place are not sufficient to prevent a conflict of interest:

- the conflict is escalated to the Compliance function;
- appropriate steps are taken to ensure that the Client's interests prevail;
- the conflict is recorded in a dedicated register;
- the Client is clearly informed prior to the provision of the service.

Where appropriate, the Company may decide not to provide the service if the conflict cannot be adequately managed.

6. Monitoring and Control

The Company maintains a register of identified conflicts of interest and regularly updates its risk mapping.

The framework is monitored by the Compliance function and subject to regular review by senior management.

7. Internal Whistleblowing Framework

As part of promoting a culture of integrity and transparency, Alpha Patrimoine S.A. provides its employees with an internal whistleblowing framework.

This mechanism allows any employee to report, confidentially and, where applicable, anonymously, any situation that may constitute:

- an undeclared or improperly managed conflict of interest;
- a breach of internal rules or regulatory obligations;
- any behaviour contrary to principles of integrity and proper conduct.

Reports are handled diligently, in full respect of confidentiality and the protection of whistleblowers.

8. Contact

For any questions relating to the management of conflicts of interest or to obtain further information, you may contact the Compliance function at:

compliance@alpha-patrimoine.eu

or your usual contact person.

In the event of any discrepancy between the French and English versions, the French version shall prevail.