



III. Conflicts of Interest Policy C WorldWide Group Holding A/S

Management and employees of C WorldWide Group Holding A/S and its affiliated companies (the “CWW Group”) may from time-to-time experience conflicts of interest.

The purpose of this policy is to ensure that the actual and potential conflicts of interest be properly managed so that clients and investors in funds advised or managed by the CWW Group always are treated in a fair and orderly manner. In no instance should the interests of companies, management and employees in the CWW Group come before the interests of clients or investors in funds advised or managed by the CWW Group.

The policy sets out the general principles for identifying and handling conflicts of interest and a general description of the major areas where conflicts of interest may arise in the CWW Group. Each group company shall implement procedures for handling potential conflicts of interest in these areas.

This policy is supplemented by the Code of Business Conduct and Ethics and shall, where relevant, be supplemented by other internal rules by all or some of the companies of the CWW Group helping to prevent conflicts of interest and provide maximum independence when carrying out activities, including:

- Rules for personal transactions
- Guidelines for intra-group transactions
- Policy for the compliance function
- Remuneration policy
- Gifts- and entertainment policy
- Inducements policy

General principles

In the CWW Group it must on a continuous basis be assessed whether there are conflicts of interest. For the purpose of identifying the types of conflicts of interest that arise in the course of providing the services offered by the CWW Group, the CWW Group shall assess whether any company within the CWW Group or any person employed with a company in the CWW Group is in any of the following situations where that company or person:

- is likely to make a financial gain, or avoid a financial loss, at the expense of a client or an investor in a fund advised or managed by the CWW Group;
- has an interest in the outcome of a service or an activity provided to a client or an investor in a fund advised or managed by the CWW Group, or of a transaction carried out on behalf of one of these persons, which is distinct from their interest in that outcome;
- has a financial or other incentive to favour
 - the interests of another client or fund over the interests of a client or fund;
 - the interest of one investor in a fund advised or managed by the CWW Group over the interest of another investor in the same fund;
- carries out the same activities as a client or carries on the same activities for a fund advised or managed by the CWW Group and for another client which is not a fund;
- receives or will receive from a person other than a client or a fund advised or managed by the CWW Group an inducement in relation to a service provided to the client or the fund in the form of monetary or non-monetary benefits or services.



When a potential conflict of interest is identified, it shall be specified in detail and the procedures, organizational and administrative systems, controls etc. best suited for eliminating any doubt about how the conflict of interest should be handled shall be identified and/or established. The requirement is that the interests of clients or investors in a fund advised or managed by the CWW Group are taken care of first, and that a potential conflict of interest shall not become a real problem.

The group companies shall where relevant keep a register of the activities or services in which a conflict of interest entailing a risk of damage have arisen or may arise. Each employee must therefore be aware of the duty to report a conflict of interest to the local compliance function, which shall keep the register.

To the extent that conflicts of interest cannot be avoided it is important that the conflict of interest is given proper attention, that it is properly identified and reported to the local compliance function and that procedures and measures are taken to ensure that business activities are conducted with the necessary degree of independence or alternative solutions and actions are taken.

If a conflict of interest cannot be avoided and it entail risks of damage to the interests of clients or investors in funds advised or managed by the CWW Group, the nature and/or sources of the conflict of interest and the steps taken to mitigate those risks shall be disclosed to the clients or the investors before undertaking business on behalf of the clients or funds. Disclosure must only be a measure of last resort and shall clearly state that the organizational and administrative arrangements established by the group company to prevent or manage that conflict are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of the client or investor will be prevented.

Special attention is required if potential conflicts of interest involve companies and/or individuals which the CWW Group, Board of Directors, management or other employees in the CWW Group have a special connection to or interest in.

Areas with potential conflicts of interest

All operational companies in the CWW Group must in an appendix to the Conflicts of Interest Policy adopted by the company's Board of Directors identify the company's potential conflicts of interest. The company must take into account all conflicts of interest, including any conflicts of interest deriving from being part of the CWW Group.

This policy including any appendix shall be reviewed as needed but at least annually.

Adopted by the Board of Directors in C WorldWide Group Holding A/S on 1 September 2021.

APPENDIX to the Conflicts of Interest Policy C WorldWide Fund Management S.A.

As C WorldWide Fund Management S.A. (CWFM), including its Danish Branch, is a management company it must, in accordance with the Conflicts of Interest Policy of C WorldWide Group Holding A/S, identify CWFM's potential conflicts of interest. When identifying the types of conflicts of interest, CWFM shall take into account:

- the interests of CWFM, including those deriving from being a part of the C WorldWide Group or from the performance of services and activities, the interests of the funds and the duty of CWFM towards the funds;
- the interests of two or more funds.

In relation to its management of open-ended funds, CWFM shall assess conflicts of interest arising between investors wishing to redeem their investments and investors wishing to maintain their investments in the fund, and any conflict between CWFM's incentive to invest in illiquid assets and the fund's redemption policy.

In the event that a change of the business model of CWFM is considered, or the business model of the C WorldWide Group changes, it shall be assessed whether these changes might give rise to potential conflicts of interest. In such case, CWFM shall seek to avoid these conflicts of interest.

The following areas are identified as containing potential conflicts of interest in CWFM:

- Personal securities transactions.
- Interests of CWFM.
- Personal interests of the management/employees of CWFM.
- Interests of C WorldWide Asset Management Fondsmæglerselskab A/S and its employees.
- Interest of depositary.

Below is a brief description of these possible areas of conflicts of interest:

Personal securities transactions. To avoid any conflicts of interest in relation to personal securities transactions CWFM has established a PA dealing policy which applies to all CWFM employees, including the employees of the Branch.

Interests of CWFM. CWFM and its Branch receive a fee paid out of the funds for its management and thus make a gain at the expense of the funds. When determining the fee structures, market standards shall be taken into account.

Personal interests of the management/employees of CWFM and its Branch. The management/employees of CWFM also employed with the other companies within the C WorldWide Group may have incentives to favour other C WorldWide Group companies in connection with arrangements concerning the provision of services to the funds (investment management, distribution). This is addressed by ensuring that contracts with other C WorldWide Group companies are entered into on an arm's length basis.

The management/employees of CWFM having interests in other company as shareholders may have incentives to favour companies in connection with arrangements concerning the provision of services to the



funds (risk management support). This is addressed by ensuring that decisions about contracts with other companies are taken with the abstention of the interested board member/conducting officer.

Interests of C WorldWide Asset Management Fondsmæglerselskab A/S (CWAM) and its employees. CWAM is investment manager and belongs to the C WorldWide Group and is thus linked to CWFM by way of control, and at the same time CWAM provides collective portfolio management under a delegation from CWFM/the fund respectively and distributes funds. CWFM shall ensure that:

- contracts with CWAM are entered into on an arm's length basis;
- CWAM does not, in order to improve its performance or fees in relation to other clients, make investment decisions detrimental to the interest of one or more funds or allocates trades in an improper way. This is addressed by monitoring the documentation of investment decisions and checking the execution and allocation of orders;
- CWAM's number of trades on behalf of the funds do not result in undue costs being charged to the funds (e.g. churning). This is addressed by monitoring the documentation of investment decisions, including the turnover ratio. However, given the nature of CWAM's long-term investment philosophy no fixed turnover ratio can be set, as CWAM's investment decisions depend entirely on CWAM's predictions and expectations to the stocks invested in. Finally, the risk of churning is counteracted by the fact that if it took place in CWAM, it would affect the performance of CWAM's investments negatively. CWAM has no interest herein as both existing and potential clients judge CWAM by the ability to generate better performance than CWAM's competitors;
- CWAM's trades on behalf of the funds fulfil the best execution requirements. This is addressed by monitoring CWAM's adherence to the execution policy;
- CWAM does not receive any inducements from third parties in relation to the services provided to the funds which have not been disclosed and justified;
- CWAM has a policy in place to ensure that the trades of its management/employees do not impair the interests of the funds and in particular that front running does not take place.

Interests of depositary. The potential conflict of interest resides in the relationships between the depositary bank and the management company and in the possibility that the depositary bank performs further services for CWFM potentially funded by the investors through the depositary fee.

To handle this potential conflict, all the services issued to the CWFM (safekeeping and straight through processing transactions, proxy services, cash services, depositary services) are covered by an agreement defining the fee schedule and the prospectuses of the managed funds discloses to investors on the depositary fee amount.

Furthermore, the financial statements of CWFM and the managed funds are subject to external audit which periodical verifies the consistency of all voices with the agreements in place or with any other existing supporting document.

Independence in conflicts management

None of the board members or conducting persons of CWFM employed with other companies within the C WorldWide Group may receive any remuneration from CWFM directly linked to the fees received by C WorldWide Group companies from the funds.

Recording, monitoring and reporting to investors

The Compliance Officer shall keep a record of activities of which conflicts of interest, as defined above, cause a material risk of damage to one or more Funds. The Compliance Officer shall monitor that CWFM



adheres to this policy, and that any new conflicts of interest are identified and addressed. The Compliance Officer shall seek to resolve any material deviations and report the deviation to the Board of Directors.

Where the arrangements set up in CWFM are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of the funds or their investors will be prevented, the Board of Directors shall be promptly informed in order to take the decisions necessary to ensure that in any case, CWFM acts in the best interest of the funds and their investors. In such cases the situation shall be reported to the investors, giving reason for the decision made by CWFM.

The investor will be informed in a durable medium, of the general nature and/or source of the conflict in such a way that an informed decision can be made by that client before business is undertaken. The disclosure shall, if possible, contain a potential solution and a request for decision taking to the investor.

Adopted by the Board of Directors in C WorldWide Fund Management S.A. on March, 4th 2021