

## Concise Conflict of Interest Management Policy

## **Purpose**

In providing investment services, the La Française Group's entities may encounter conflict of interest situations.

These situations, defined as situations that may harm the interests of one or more La Française Group company clients, are identified. They are overseen through the map of conflicts of interests and procedures are introduced across the Group.

In accordance with current regulations, the La Française Group undertakes to take every reasonable measure to detect conflict of interest situations that may arise, either between group companies and its clients, or between clients of the company.

## **Scope**

In order to meet regulatory obligations and satisfy its clients' interests, the La Française Group has listed the conflict of interest situations likely to be encountered by it or by the Group's entities and employees.

The La Française Group bases itself on the following principles when managing potential conflict of interest situations:

- Ethical principles: integrity, fairness, impartiality, compliance with professional secrecy and the primacy
  of the Client's interests are principles that hold a predominant place in the rules with which La Française
  Group employees must comply,
- Separation of functions at the level of the activities carried out so that employees act independently,
- Supervision and prevention by introducing <u>internal procedures</u> and measures applicable to all group employees that govern the aforementioned mechanisms,
- The introduction of a <u>monitoring mechanism</u> at the level of each activity to ensure the prevention of conflicts of interests or identify the corrective measures to be taken.

-1- Updated on: 06/2016



To deal with these situations, the La Française Group must:

- **A.** Identify the operation generating the conflict of interests,
- **B.** If the Group decides to accept the operation and the conflict of interest situation that it generates, it implements permanent mechanisms to appropriately manage the situation in order to avoid significantly harming the Client's interests.

The La Française Group will therefore inform the Client through information materials if the procedures introduced are not able to guarantee with reasonable certainty that the risk of harming their interests will be avoided. If certain conflicts of interest cannot be appropriately dealt with in the context of points a) or b), in this case, the La Française Group communicates the necessary information about the nature and origin of these conflicts to clients **on a durable medium**, **before acting on their behalf**, so that they can make a well-informed decision.

- 2 - Updated on: 06/2016