
Policy
Conflicts of Interest





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1. INTRODUCTION

The Moventum Asset Management Policy on Handling Conflicts of Interest (the "Policy") sets out how Moventum Asset Management identifies, prevents and manages conflict of interest within our business.

This Policy outlines how Moventum Asset Management ("MAM") identifies, prevents, and manages conflicts of interest in compliance with CSSF Circular 20/758, MiFID II, and the 5th AML Directive. It addresses conflicts arising between MAM's interests, client interests, and those of counterparties, ensuring all business is conducted honestly, fairly, and professionally.

2. OBJECTIVE

The objective is to implement a risk-based approach for identifying and mitigating conflicts of interest. MAM ensures that conflicts are managed in a way that aligns with the best interests of its clients and adheres to updated regulatory standards, including ongoing monitoring and enhanced due diligence for high-risk activities.

We maintain and operate effective organizational and administrative arrangements with a view to taking all reasonable steps to prevent conflicts of interest from adversely affecting the interest of our Investors.

This Policy specifies the potential conflicts of interest that may exist in our business and the procedures and measures implemented to identify, prevent and manage such conflicts of interest.

Moventum Asset Management Investors' may request further details on this policy in a durable medium or by means of Moventum Asset Management's Website.

3. RESPONSIBILITY

Moventum Asset Management's Senior Management takes responsibility for ensuring that our systems, controls and procedures are adequate to identify, prevent and manage conflicts of interest.

Irrespective thereof, we have arranged a Compliance Organization under the direct responsibility of the Management Board which assists Senior Management in the identification, mitigation and monitoring of actual and potential conflicts of interest.

4. SCOPE

This Policy applies globally to all investment or ancillary services provided by Moventum Asset Management, and it applies to all our employees and representatives.

This Policy therefore applies to the activities of management of undertakings for collective investment in transferable securities, the management of portfolios of investments, including those owned by pension funds, in accordance with mandates given by investors on a discretionary, investor-by-investor basis as well as investment advice concerning financial instruments.

5. IDENTIFICATION

A conflict of interest is a conflict that arises in any area of our business in the course of us providing you with a service which may benefit us (or another Investor and/or our counterparty for whom we act) and may adversely affect you in view of the following criteria:

- A. MAM or its employees may gain financially at the client's expense.
- B. An interest in a service outcome that differs from client interests.
- C. Moventum Asset Management or its employees have a financial or other incentive to favour the interest of another Investor or group of Investors over your interests.



D. Moventum Asset Management or its employees carry on the same business as the Investor.

Potential conflicts include:

1. Managing multiple client investments with competing interests.
2. Favoring the interests of one investors' group over another.
3. Misalignment between employee' sand tied agents' incentives and the client interests.

In particular a conflict of interest may arise between Moventum Asset Management, our Management Board, our staff, our providers of services or other persons affiliated with us and our Investors, or between our Investors with respect to the following investment or ancillary services:

4. the management of undertakings for collective investment in transferable securities
5. the management of portfolios of investments, including those owned by pension funds, in accordance with mandates given by investors on a discretionary, investor-by-investor basis
6. investment advice concerning financial instruments Some of these conflicts may arise merely because Moventum Asset Management is involved in a broad range of business activities with different Investors and counterparties.

6. MANAGEMENT

For each conflict that we have identified, we have put in place measures to prevent the occurrence of conflicts, and if a conflict occurs, to manage such conflict with a view to prevent or mitigate the potential adverse impact on you, appropriate to the type of conflict.

For any particular conflict of interest, one or more of the following measures may be adopted, as appropriate in order to prevent or manage such conflict.

In general Moventum Asset Management has the following procedures in place:

A. Information barriers:

MAM maintains physical and electronic barriers ("Chinese Walls") to prevent the misuse of non-public information, as required by AML/CFT regulations. Regular audits verify the effectiveness of these barriers.

The following specific measures are in place:

- Physical information barriers:
 - systems controlling access to certain areas, access limitations for visitors, conservation of documents in protected locations with restricted access;
- Electronic information barriers: special electronic security systems, mandatory passwords for obtaining access to the IT system of Moventum Asset Management in general or to certain information;
- Collection of acknowledgements of personal transactions on any simultaneous or sequential involvement the relevant persons in activities or transactions that may imply an undue circulation of confidential information.

B. Conflict procedures:

Conflict of interest internal procedures have been implemented within Moventum Asset Management to manage actual or potential conflicts of interest such as:

- Reporting: Staff must immediately report identified conflicts to the Compliance Officer. This includes maintaining documentation for compliance reviews.

- Staff Training: Continuous training on conflict management and updated regulatory requirements, including AML/CFT guidelines.
- Segregation of Duties: Tasks involving conflicting client interests are segregated to ensure impartial service delivery.
- Prohibition of acceptance of gifts and advantages: there is a formal prohibition to accept advantages beyond a threshold value of EUR 100.

C. Registration:

A comprehensive register of identified conflicts is maintained, as required by the **CSSF**. This register is regularly reviewed and submitted during audits.

D. Escalation to Senior Management:

Senior Management of Moventum Asset Management is accountable for the implementation of this Policy and other governance arrangements that ensure the prevention and effective and prudent management of conflicts of interest.

Senior Management receives reports on the register of potential conflicts of interest as presented above at least annually.

E. Remuneration of employees:

Remuneration structures avoid incentives linked to specific transaction outcomes. The policy prohibits profit-sharing that could influence decision-making, ensuring compliance with MiFID II and CSSF Circular 22/806.

F. Disclosure:

In line with the MIFID II requirements, where a conflict of interest cannot be prevented or managed, MAM will disclose it to the client, detailing the nature of the conflict, risks involved, and mitigation efforts.

In such situation, the disclosure shall clearly state that the organizational and administrative arrangements established by Moventum Asset Management to prevent or manage a conflict are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of the Investor will be prevented.

The disclosure shall include a specific description of the conflict of interest that arises.

The description shall explain to the general nature and sources of conflict of interest, the arisen risks that resulted from it and the steps undertaken to mitigate those risks in order to enable you to take an informed decision. The Investor may then decide whether or not to continue on that basis.

G. Whistleblowing:

In line with CSSF Circular 21/785, Moventum Asset Management has implemented a secure and anonymous whistleblowing mechanism to allow employees to report potential or actual conflicts of interest without fear of retaliation.

The whistleblowing policy of MAM ensures that all employees can report issues via a whistleblowing box their concerns with conflicts of interests.

By doing so, whistleblowers are protected under Luxembourg law and MAM's internal policies, ensuring their identity remains confidential.

Reports are investigated by the Compliance Officer, with findings escalated to Senior Management as necessary. Outcomes and actions taken are documented, and necessary remediation steps are implemented.

The whistleblowing process is regularly reviewed to ensure it meets regulatory requirements and effectively supports conflict identification.



H. Data Protection

Momentum Asset Management is committed to safeguarding personal data in compliance with the **General Data Protection Regulation (GDPR)** (Regulation (EU) 2016/679). The handling of data related to conflicts of interest follows strict privacy protocols.

Some of the key measures implemented to ensure data protection include:

- **Data Minimization:** Only relevant data required for conflict assessment and management is collected and processed, ensuring minimal impact on client privacy.
- **Access Control:** Access to sensitive information is restricted to authorized personnel only, with robust access management systems (e.g., role-based permissions, two-factor authentication).
- **Secure Data Handling:** Data is encrypted during transmission and storage. Physical and digital safeguards are in place to prevent unauthorized access.
- **Client Rights:** Clients have the right to access, correct, or request deletion of their data related to conflict assessments. MAM provides clear information on data handling practices, and clients can exercise their rights through designated contact points.
- **Data Retention:** Records of conflict assessments are retained for a specified period as required by regulatory obligations and then securely disposed of.

Regular audits are conducted to ensure compliance with GDPR standards, and any data breaches are promptly reported to relevant authorities and affected clients.

7. MONITORING AND REVIEW

This Policy shall be reviewed at least annually and any material amendments will be notified to you.

Momentum Asset Management will take appropriate measures to address any deficiencies identified in this context.

Please contact Momentum Asset Management or your Financial Advisor should you require further information on the Policy.