

Group Policy regarding Conflicts of Interest

Summary

According to the Commission Delegated Regulation (EU) 2017/565, the Swedish Securities Market Act (2007:528) and applicable national laws and regulations within MFEX Group. MFEX Mutual Funds Exchange AB and its subsidiaries (“MFEX” or “the Company”) shall maintain and operate effective organizational and administrative arrangements with a view to taking all reasonable steps designed to prevent conflicts of interest from adversely affecting the interests of its clients. MFEX shall take all appropriate steps to identify and prevent or manage conflicts of interest between MFEX and MFEX’s clients or between individual clients or between different groups of clients.

In case the organizational and administrative arrangements are not sufficient to ensure client interests from being adversely impacted by conflicts of interest, MFEX must inform the client before undertaking business on the client’s behalf. MFEX has in place a Group Policy describing the way conflicts of interests shall be identified, prevented or managed. The Group Policy is adopted by the Board of Directors of MFEX Holding AB and shall be reviewed and re-approved annually, or more often if deemed needed. The purpose of the Group Policy is to provide information regarding the Company’s strategy, including processes for identifying circumstances which constitute or may give rise to a conflict of interest. The Group Policy also includes the Company’s procedures and measures to prevent or manage conflicts of interest. Furthermore, the purpose of the Group Policy is to ensure that all MFEX staff is aware of the responsibility to always identify and manage potential and actual conflicts of interest during their employment or assignment with the Company. The Group Policy aims to secure that conflicts of interests are discussed within the Company on a regular basis.