

Officium Asset Management

Policy for the prevention and management of conflicts of interest

The risk of a conflict of interests is the risk of infringing paragraph 313-10 of the general regulations of the AMF (the financial markets authority) by virtue of which “Every investment company shall maintain and apply efficient organizational and administrative arrangements with a view to taking all reasonable measures destined to prevent conflicts of interest, defined by paragraph 313-18 of the general regulations, as harming clients’ interests”.

From a regulatory point of view, there is conflict of interest liable to harm the interests of a client whenever the investment service provider, a person involved or a person linked to the provider by a supervisory relationship, finds himself or herself in one of the following situations:

- I. He or she is likely to make a financial gain or to avoid a financial loss at the expense of his or her client;
- II. He or she has an interest in the result of a service furnished to the client or a transaction carried out on behalf of the latter which is different from the interest of the client in the result;
- III. He or she is incited, for financial or other reasons, to favour the interests of another client or group of clients over those of the client in question;
- IV. He or she carries out the same professional activity as the client;
- V. He or she receives or will receive from a person other than the client an advantage in relation to the service furnished to the client, in the form of money, goods or services, other than the commission or expenses normally invoiced for this service.

For the purposes of the application of these legal references, in what follows are identified those parties who may be concerned in situations of conflict of interest with clients. A mapping of conflicts of interest is updated annually, at least, and includes the situations of conflict of interest identified by Officium Asset Management as well as the mechanism for remediation that has been put in place.

If the measures taken by Officium Asset Management to prevent conflicts of interest are not sufficient to guarantee with reasonable certitude that the risk of harming clients’ interests will be avoided, Officium Asset Management must clearly inform its clients, before acting in their name, of the nature or origin of the conflicts of interest. This information may be communicated by any means (website, management report, &c.).

The Compliance and Internal Control Officer of Officium Asset Management sees to it that the rules of good conduct are respected and provides the information and controls that are necessary as well as ensuring the treatment of specific situations.