

## CONFLICTS OF INTEREST POLICY

### 1. Introduction

Emergo Wealth has established a Conflicts of Interest Policy, in order to fulfil its obligations as to the implementation of effective procedures for the identification, prevention and management of conflicts of interest.

### 2. Scope of Application

This Policy applies to all Investment and Ancillary Services provided by Emergo Wealth and regulated by the Law or any equivalent law of a member state.

### 3. Identification of Conflicts of Interest

#### 3.1 Definition of Conflicts of Interest

A conflict of interest is a conflict that arises in the course of providing Investment and Ancillary Services or a combination thereof to a client of Emergo Wealth, which may be to the interest of the Emergo Wealth or a relevant person or a person directly or indirectly linked by control to it (or another client for whom the Emergo Wealth is acting) whilst potentially damaging the interests of the client, to whom an Investment and/or Ancillary Service is provided.

#### 3.2 General Principles

Emergo Wealth takes all reasonable measures to identify any conflicts of interest, and for this purpose it determines whether Emergo Wealth or a relevant person or a person directly or indirectly linked by control to it in the course of providing Investment and Ancillary Services or a combination thereof:

- is likely to make a financial gain or avoid a financial loss at the expense of the client,
- has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome,
- has a financial or other incentive to favour the interests of another client or group of clients over the interests of the client,
- carries on the same business as the client,
- receives or will receive, from a person other than the client, an inducement in relation to a service provided to the client, in the form of monies, goods or services other than the standard commissions or fee for the service.

#### 3.3 Potential Conflicts of Interest

Potential circumstances which may give rise to conflicts of interest adversely affecting the interests of the clients of Emergo Wealth are the following:

- Emergo Wealth may act for another client as purchaser and/or seller, and may execute different orders (even contrary to one another) for account of different clients.
- Any director and/or employee of Emergo Wealth may be a director of or may hold and/or may deal in securities of or may otherwise have an interest in any company, in whose securities the Emergo Wealth effects transactions on behalf of the client.
- The transaction may involve securities, the issuer of which is Emergo

Wealth and/or any other associated company of the Group and/or any client thereof. Emergo Wealth may be entitled to receive any amount in the form of commission or otherwise from any third person who participated in the provision of services.

- Any company of the Emergo Wealth Group may deal on behalf of the client through any other company in the Group.
- Emergo Wealth may act as agent for the client in relation to transactions in which it is also acting as agent for the account of other clients and/or of any other company in the Group.
- The transaction may involve securities of any company, for which Emergo Wealth acts as advisor, creditor, investment manager and/or may have a commercial or other relation.
- Emergo Wealth may receive, transmit orders concerning similar financial instruments that result, in favour of Emergo Wealth, to different kind or amount of profit, commission or remuneration.

#### **4. Prevention and Management of Conflicts of Interest**

Emergo Wealth takes all reasonable administrative and organizational measures in order to prevent the occurrence of conflicts of interest or to resolve existing conflicts of interest between itself or a relevant person or a person directly or indirectly linked by control to it and its client on the one hand, or amongst its clients inter se on the other hand. Such measures include, amongst others:

##### **4.1 Separate supervision and segregation of departments / functions**

Emergo Wealth takes measures for the separate supervision and the segregation of functions of different departments of Emergo Wealth which provide services to clients, whose interests may conflict with those of other clients or with the interests of Emergo Wealth. Where deemed necessary, Emergo Wealth takes measures for the separate supervision and segregation of functions of relevant persons, in order to prevent or/and control the simultaneous or sequential involvement of a relevant person in separate services or activities, where such involvement may lead to situations of conflicts of interest or may impair the proper management of such situations.

##### **4.2 Option to refuse provision of services**

Where services are already provided to a client and it is obvious that by the provision of services to another new client a conflict of interest may arise, which cannot be dealt with effectively, then Emergo Wealth may refuse to provide services to the second client.

##### **4.3 Management of confidential and other information**

Emergo Wealth applies a system of "Chinese Walls" in order to prevent the transfer of confidential information between departments of the Emergo Wealth. This system includes the physical segregation of different departments and the segregation of data and information technology systems of each department so that the persons engaged in each department not to have a direct physical access to records and information concerning the subject matter of another department and which are not considered necessary for the execution of some specific work. As a consequence, employees have access only to data and information deemed necessary for the fulfilment of their duties.

#### 4.4 Remuneration of relevant persons

Emergo Wealth takes measures for the removal of any direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration of, or revenues generated by, different relevant persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities.

#### 4.5 Inappropriate influence

Emergo Wealth takes measures to prevent or limit the exercise of inappropriate influence over the way in which a relevant person provides Investment or Ancillary Services or Activities. 4.6 Training Emergo Wealth provides continuous training and information to all relevant persons in relation to conflicts of interest issues.

### **5. Disclosure to the Client**

Where the organizational or administrative arrangements made by Emergo Wealth to manage conflicts of interest, are not sufficient to ensure with reasonable confidence that risks of damage to client interests will be prevented, Emergo Wealth shall disclose the general nature or/and the sources of conflicts of interest to the client before undertaking to provide services to him. Such disclosure is made in a Durable Medium and includes sufficient detail, taking into account the characteristics of the client to enable that client to take an informed decision with respect to the Investment or Ancillary Service in the context of which the conflict of interest arises. If the client opposes to Emergo Wealth acting for him in such circumstances, he shall inform in writing Emergo Wealth.

### **6. Additional Details**

Additional details regarding the Conflicts of Interest Policy may be given by Emergo Wealth to the client, following the latter's request.

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