

# Policy for preventing and managing conflicts of interest

*Updated: February 2024*

## Introduction

In accordance with the laws in force, BlackFin Capital Partners established and maintains an operational policy to prevent and manage conflicts of interest and implements specific organisational and control measures to prevent, identify and manage conflicts of interest that could harm the interests of its investors. The Persons Concerned<sup>1</sup> must every time act in compliance with the rules set forth in this policy for preventing and managing conflicts of interest.

### **1. Definition**

A conflict of interest may arise if:

- the interests of the management company and the Persons Concerned, on the one hand, and the interests of the investor, on the other hand, conflict;
- the personal interests of an employee on the one hand, and the interests of the management company or its investors on the other, come into conflict;
- the interests of several investors conflict.

### **2. Identification of conflicts of interest**

The Company has set up measures to identify potential conflicts of interest, particularly depending on the type of business of the Company, its managers, its employees and affiliates, the amount received and personal transactions.

The policy for preventing and managing conflicts of interest is distributed and made available to the Persons Concerned by the Compliance Officer .

### **3. Compliance with the provisions of the Code of Ethics**

The Company provides all its employees with the Code of Ethics. Each employee undertakes to comply with all provisions of the Code of Ethics upon their arrival.

The Code of Ethics guarantees the primacy of investors' interests and ensures that the activities of the Company and its employees comply with the laws that apply to them.

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<sup>1</sup> Persons Concerned: The Company, the Company's subsidiaries, the investment holding companies, and the corporate officers and employees of the Company and its subsidiaries.

To this end, the Code of Ethics sets out the rules that the Persons Concerned must comply with:

- managing conflicts of interest created by the rules on:
  - the distribution of investment;
  - co-investments between Funds and/or Managed Portfolios;
  - co-investments between the Portfolio and the managed funds and/or a member of the Company;
  - profit-sharing transfers;
  - services provided by the Company or an affiliate.
- bonuses, gifts and similar items;
- personal transactions;
- professional confidentiality;
- inside information;
- the Remuneration procedure.

#### **4. Compliance with existing procedures**

The Company provides all employees with the Compliance manual, which provides information on each procedure to be applied depending on the activity carried out. Each employee undertakes to comply with all provisions of this Compliance manual.

Compliance with these provisions is particularly important as it limits the risk of conflicts of interest with third parties.

#### **5. Managing conflicts of interest**

##### *a) Appointment of an Internal Contact*

The Company's Compliance Officer, has been appointed as the internal contact responsible for managing any potential or real conflicts of interest.

The Persons Concerned must inform the Compliance Officer of any situation that may result in a conflict of interest. The opinion in the response from the Compliance Officer will be provided in writing and sent to the person who submitted the report, with a copy provided to the Company's officers.

If a conflict of interest is confirmed, the Company will consult the fund's Advisory Committee. The Company will manage the conflict of interest in accordance with the opinion issued by the Committee. It will inform the person who submitted the report of the approach and resolution adopted.

##### *b) Mapping*

The Company will take all reasonable measures to detect conflicts of interest over the course of its regular business. A risk mapping of potential conflicts of interest that identifies such situations and the management measures implemented to prevent them is settled. This document is reviewed annually.

This roadmap covers all situations to which the Company may be exposed, including:

- the risks of conflicts of interest associated with the management of funds;
- the risks of conflicts of interest associated with direct and indirect remuneration;
- the risks of conflicts of interest associated with proprietary trading and personal transactions;
- the risks of conflicts of interest associated with unequal treatment of investors;
- the risks of conflicts of interest associated with affiliates;
- the risks of conflicts of interest associated with the selection of service providers and intermediaries;
- the risks of conflicts of interest associated with relationships with distributors and issuers.

Conflicts of interest are managed in accordance with the rules that are set out in the Compliance manual and summarised in this risk mapping of potential conflicts of interest.

*c) Conflict of interest register*

The register of conflicts of interest is kept by the Company's Compliance Officer, who regularly ensures that the Company's activities comply with the law. This register also maintains a record of the procedures applied to resolve these conflicts of interest. The register is archived.

Finally, in the event that the management company finds that the measures implemented are insufficient to ensure, with reasonable certainty, that the risk of harming the interests of investors can be avoided, the company will inform the relevant investor, in writing, of the nature or source of the conflict in order to make an informed decision.