

## Conflicts of Interest Statement

### Background

Based on Art. 25–27 of the Federal Act on Financial Services (FinSA), Financial service providers must take appropriate organizational measures to prevent conflicts of interest that could arise through the provision of financial services or any disadvantages for clients as a result of conflicts of interest. If disadvantages for clients cannot be excluded, this possibility must be disclosed to them.

With this statement, Banque Richelieu (Switzerland) Ltd (the “Bank”) informs about its standards of identifying, preventing, managing, mitigating, or if necessary, disclosing Conflicts of Interest that may arise in the regular course of business of the Bank or its employees and its clients, suppliers or other counterparties.

This statement will be provided at any time in its newest version to clients of the Bank on request.

### Principles of the Bank to deal with Conflicts of Interest

The Bank has a specific internal policy (the “Conflicts of Interest Policy”) aimed at all employees of the Bank on how to identify, manage and report any potential Conflicts of Interest.

In this Conflicts of Interest Policy, the Bank lays out the typical constellations and situations where a Conflict of Interest between the Bank and / or its employees and its clients or between the clients or other parties could arise.

It also articulates specific topics in which inherent potential Conflicts of Interest could arise and for which specific additional policies, directives or binding procedures have been issued to all employees or concerned functions of the Bank. These are, among others, the following topics:

- Gifts and Entertainment
- Personal Account Dealing
- Employee Mandates outside of the Bank
- Handling of Client Orders
- Best Execution of Orders
- Market Abuse or Insider Trading
- Compensations or inducements from third parties
- Remuneration / Compensation models for Staff and Management

All policies, directives and procedures related to these topics, including the Conflicts of Interest Policy, are regularly reviewed and adapted as required to new legislations and / or areas of business as may be introduced by governmental authorities and / or the Bank.

In its basic principles how to deal with Conflicts of Interest, the Bank is committing itself to clear segregation of duties in order to have a system of checks and balances between the various functions and as may be required a separation of information access between various functions. In addition, the Bank adheres to a so called three lines of defence model where duties to identify and mitigate risks / Conflicts of Interest are with the operational functions such as Client & Sales Management, Investments, Finance & Lending, Daily Banking (first line of defence), controlled by specialized Compliance and Risk management functions (second line of defense) as well as by Internal and External Auditors (third line of defense).

All operational functions and their employees are obliged to identify, prevent, manage or disclose / report any Conflicts of Interest within their functional responsibility. Specifically, the Conflicts of Interest Policy requests from all employees to:

- always act in the best interest of clients.
- comply with the policy as well as other applicable policies and procedures relating to Conflicts of Interest.
- act with integrity and exercise good judgement in line with general ethical behavior.
- avoid situations that could give rise to Conflicts of Interest.
- disclose and manage Conflicts of Interest where they cannot be avoided.
- when joining the Bank, inform Compliance about any personal Conflicts of Interest.
- complete a confirmation of the annual review of Conflict of Interest upon request.

Compliance as the second line of defense has the duty to maintain a Conflicts of Interest Register of all reported potential Conflicts of Interest and the respective measure how these Conflicts of Interest are mitigated in the operational functions or disclosed to the respective concerned parties.

Additionally, Compliance is responsible to execute specific controls with regard to the adherence of employees to the Conflicts of Interest Policy and the above-mentioned related policies, to the defined mitigation measures according to the Conflicts of Interest Register and as well as to assure on-going training and awareness of all employees to this important topic for the Bank.