
Summary of the policy on managing conflict of interest

Updated in October 2025

Subject:

In the course of providing investment services, entities within the La Française Group may potentially encounter situations involving conflicts of interest.

These situations, defined as situations that could harm the interests of one or more clients of La Française Group companies, are identified. They are governed by conflict of interest mapping, and procedures are put in place at Group level.

In accordance with current regulations, La Française Group undertakes to take all reasonable measures to detect situations of conflict of interest that may arise either between group companies on the one hand and its clients on the other, or between the company's clients.

Definition:

Taken from Directive 2014/65/EC and Directive 2011/61/EU, a ‘potential’ conflict of interest is defined as one that may arise in the course of providing investment and ancillary services or a combination of services, and whose existence may adversely affect the interests of a client.

Investment service providers shall therefore take into account the minimum criteria for identifying them, based on the following situations:

- The company is likely to make a financial gain or avoid a financial loss at the expense of the client.
- The firm or that person has an interest in the outcome of a service provided to the client or a transaction carried out on behalf of the client that is different from the client's interest in that outcome.
- The firm or that person is engaged in the same professional activity as the client.
- The firm or that person has an incentive, for financial or other reasons, to favour the interests of another client or group of clients over those of the client concerned.
- The company or person receives or will receive from a person other than the client a benefit in relation to the service provided to the client, in the form of money, goods or services other than the commission or fees normally charged for that service.

Scope:

In order to comply with regulatory obligations and best serve the interests of its clients, La Française Group has identified situations of conflict of interest that may arise for it or for the Group's entities and employees. In managing potential conflicts of interest, La Française Group applies the following principles:

- **Ethical principles**: integrity, fairness, impartiality, professional secrecy and the primacy of the client's interests are principles that occupy a prominent place among the rules with which La Française Group employees must comply,
- **Separation of functions** in terms of the activities carried out, so that employees act independently,
- Supervision and prevention through the implementation of **internal procedures** and measures applicable to all employees of the group who supervise the above-mentioned systems.
- The implementation of a **control mechanism** for all activities to ensure the prevention of conflicts of interest or the corrective measures to be taken,
- The implementation of **procedures for communicating the policy to clients** so that each client is informed of the measures taken by La Française Group,
- The systematic **handling of potential conflicts of interest** and communication to clients of the nature and source of the conflict of interest.

To deal with these situations, La Française Group must:

- a) Identify the transaction giving rise to the conflict of interest,
- b) If the Group decides to accept the transaction and the conflict of interest situation it generates, it shall implement permanent measures to manage the situation appropriately in order to avoid significantly harming the Client's interests.

The La Française Group will therefore inform the Client through information media if the procedures put in place do not allow it to guarantee with reasonable certainty that the risk of harming the Client's interests will be avoided. Where certain conflicts of interest cannot be adequately addressed under points a) or b), La Française Group shall provide clients with the necessary information on the nature and origin of these conflicts on a durable medium before acting on their behalf, so that they can make an informed decision.