

## Conflict of Interest Management Policy

December 2024



## **Subject**

Derived from Directive 2014/65/EU and Directive 2011/61/EU, the "potential" conflict of interest is defined as a situation that may arise during the provision of investment services and ancillary services, or a combination of services, and which could harm the interests of a client. Investment service providers take into account minimum criteria to identify these conflicts, based on the following situations: - The firm may make a financial gain or avoid a financial loss at the expense of the client, - The firm or individual has an interest in the outcome of a service provided to the client or a transaction carried out on their behalf that is different from the client's interest in that outcome, - The firm or individual has the same professional activity as the client, - The firm or individual is incentivized, for financial or other reasons, to prioritize the interests of another client or group of clients over those of the client in question, - The firm or individual receives or will receive from a person other than the client a benefit related 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.

## **Definition**

Derived from directive 2014/65/EU and directive 2011/61/EU, a "potential" conflict of interest is considered to arise during the provision of investment services and ancillary services, or a combination of services, which could harm a client's interests. Investment service providers therefore take into account minimum criteria to identify these conflicts, based on the following situations:

- The company may make a financial gain or avoid a financial loss at the expense of the customer.
- The company or person has a stake in the outcome of a service provided to the client or a transaction carried out on their behalf that is different from the client's interest in that outcome.
   The company or person is in the same professional activity as the client.
- The company or individual is encouraged, for financial or other reasons, to prioritize the interests of another client or group of clients over those of the client in question.
- The company or individual receives or will receive a benefit from someone other than the client
  in connection with the service provided to the client, in the form of money, goods, or services
  other than the commission or fees normally charged for this service.

## Scope

In order to meet regulatory requirements and best serve the interests of its clients, La Française Group has identified potential conflict of interest situations that may arise for the group, its entities, and employees. In managing potential conflicts of interest, the group adheres to the following principles:



- Ethical principles: integrity, fairness, impartiality, respect for professional secrecy, and prioritizing the client's interests are key principles that employees of La Française Group must adhere to.
- Separation of functions in the activities carried out, so that employees act independently.
- Supervision and prevention through the implementation of internal procedures and measures applicable to all group employees, which oversee the aforementioned measures. The group also has a control system in place for all activities to prevent conflicts of interest or to take corrective measures.
- Implementing communication methods for informing clients about the measures taken by La Française Group, and systematically addressing potential conflicts of interest situations and informing clients about the nature and source of the conflict of interest.

In order to deal with these situations, the La Française Group must:

- a) Identifying the root cause of the conflict of interest,
- b) If the Group decides to accept the transaction and the conflict of interest it generates, it implements permanent measures to manage the situation appropriately in order to avoid significantly harming the Client's interests.

The La Française Group will inform the Client through information channels if the procedures in place do not guarantee with reasonable certainty that the risk of harming their interests will be avoided. If certain conflicts of interest cannot be properly addressed within the framework of points a) or b), in this case, the La Française Group will provide clients with the necessary information, on a durable medium, about the nature and origin of these conflicts before acting on their behalf, so that they can make an informed decision.

