

Conflicts of Interest Policy

In accordance with the requirements of the European Directive on Markets in Financial Instruments 2014/65/EC (“MiFID II”), Amundi Ireland Limited (‘AIL’), has established arrangements to identify and manage conflicts of interest to ensure fair and ethical treatment for all the clients

These arrangements aim to observe and maintain AIL’s high standards of integrity, fair dealing and market conduct in the course of its business and in providing services to clients. The overall aim is to prevent conflicts of interest from arising by foreseeing circumstances and relationships between AIL and its associates and other affiliates or between AIL clients that could potentially result in a material risk of damage to the interests of clients. If a conflict is identified, AIL shall take all reasonable steps to mitigate against the conflict or in the unlikely event that a conflict of interest cannot be avoided, AIL will disclose details of such conflict to a client, or potential client or decline to act.

AIL has implemented a policy for identifying and managing conflicts of interest; this includes certain other policies, procedures and measures to ensure that all business areas and activities are taken into consideration and that all employees are adequately informed of their duties under these policies and procedures.

From time to time AIL may, where it determines it is in the best interest of its clients, transact with affiliated counterparties and/or transact on group issued securities.