

CADELUX S.A.

Conflicts of Interest Policy

CADELUX S.A. is authorized to act both as a Management Company in accordance with Chapter 15 of the Law of 17 December 2010 on undertakings for collective investment and as an Alternative Investment Fund Manager in accordance with Chapter 2 of the Law of 12 July 2013 on Alternative Investment Fund Managers.

It is the policy of Cadelux that Conflicts of interest must be identified and prevented or managed so that Clients are treated fairly.

The policy sets out the regulatory framework applicable to Cadelux with regards to the management of Conflicts of interest. In addition the policy outlines the related actions and processes followed by Cadelux in order to meet its obligations and, in particular, to set out the principles aiming to:

- Identify circumstances where a Conflict of interest may arise;
- Establish appropriate mechanism and rules to mitigate the risk of such Conflicts and prevent them;
- Define measures in order to manage Conflicts

CADELUX S.A. has taken all reasonable care to ensure that the Conflict of interest policy and procedures described in the policy are adequate to identify, monitor and manage any potential Conflict of interest which the Fund is or may be exposed to, taking into account the structure of the Fund and the nature and scale of the Fund's investment policy, as well as to minimize the risk that possible Conflicts of interest between the Fund and its Managers or any person directly or indirectly linked to the Fund, could adversely affect the interests of the Fund's investors.

The entire procedure is available on request :

- By Email to the following address info@cadelux.lu
- By Letter, addressed to Cadelux S.A., 287, Route d'Arlon L-1150 Luxembourg