



# Conflicts of interest Policy

iM Global Partner SAS  
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# 1. Preamble

iM Global Partner gives the greatest importance on the interests of its clients. In all circumstances, employees must refrain from any initiative that has the effect of favouring their interests to the detriment of those of customers or generating conflicts of interest.

This policy describes the organisation implemented by iM Global Partner to ensure that the company acts honestly, fairly and professionally and in the best interests of its clients.

This procedure defines the framework to be respected by iM Global Partner and all of its staff regarding the management of conflicts of interest in order to meet the requirements of Directive 2014/65/UE of the European parliament and of the council of 15 May 2014 on markets in financial instruments.

This effective Policy is established in writing and is adapted to the size and nature of the activities carried out by iM Global Partner.

The conflict of interest policy is made available to clients on the iM Global Partner website.

# 2. Regulatory Framework

## - European Directive:

- Directive 2014/65/EU of the European parliament and of the council of 15 May 2014 on markets in financial instruments: articles 16(3) and 23
- Commission Delegated Regulation (EU) 2017/565 of 25 April 2016: article 34

## - General Regulation of AMF:

- Articles 314-3

## - French monetary and financial code:

- Article L.533-10, II, 2° et 3°

# 3. Definition

A conflict of interest is defined as a situation in which iM Global Partner, or any person directly or indirectly linked to iM Global Partner by a control relationship, carries out activities whose performance, if the organisation is not set up appropriately, may harm the interests of the clients. This definition applies to actual, potential or apparent conflicts of interest.

# 4. Identification of potential Conflicts of interest

The methodology applied by iM Global Partner relies on the upstream identification of potential conflicts of interest. The four categories of conflicts of interest identified are as follows:

- Potential conflicts of interest involving multiple clients with a difference in treatment;
- Potential conflicts of interest between iM Global Partner and its clients;
- Potential conflicts of interest between iM Global Partner and its providers;

- Potential conflicts of interest involving the employees of iM Global Partner and its clients.

iM Global Partner has developed a conflict-of-interest mapping which identifies situations where a conflict of interest is likely to occur and where a risk of harm to clients' interests has been identified. It is updated as soon as necessary by the RCCI in order to consider the development of the company's activities and any regulatory changes. Moreover, in order to improve staff awareness on this topic, compliance training regarding conflicts of interest forms part of the annual training. The RCCI and HR department ensure that appropriate training is prepared and delivered.

## 5. Notification of potential Conflicts of interest

The Company's directors, officers and/or employees must remain vigilant at all times with regard to potential conflicts of interest arising when acting for investors. Every time, when providing a service for investors, the Company's directors, officers and/or employees must assess whether this creates a conflict of interest. It is the responsibility of all staff to familiarise themselves with this Policy and to report any actual or potential conflicts of interest to their line manager who will in turn report them to the RCCI.

Manager(s) of the various Company teams also have a duty to be proactive in terms of identifying conflicts of interest that their team might face and advising their team of same. Manager(s) must ensure that appropriate action is taken when advising their team as to how to proceed in such circumstances.

In accordance with **Article 23 (2) of MiFID II and Article 34(4) of the Delegated Regulations**, if the arrangements made by iM Global Partner are not sufficient to ensure, with reasonable confidence, that the risk of damage to the client will be prevented they must provide the client with a clear disclosure of this fact. This disclosure must:

- Clearly state that the organisational and administrative requirements established by iM Global Partner to prevent or manage that particular conflict are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of the client will be prevented;
- Describe the general nature and source of the conflict of interest and the steps taken to mitigate those risks and this description must be provided before undertaking business for the client;
- Provide sufficient detail to enable that particular client to make an informed decision in relation to the service in the context of which the conflict arises;
- Be provided to the client in a durable medium.

It is important to note that a disclosure should only be used as a matter of last resort after all other options to successfully mitigate the conflict of interest have been exhausted and are not sufficient to ensure that the risk of damage to the interests of the client will be prevented.

# 6. Conflicts of interest management organization

iM Global Partner must manage any conflict of interest, from detection to proper processing. As such, iM Global Partner has set up an organization to:

- Prevent the emergence of conflicts of interest by raising the awareness of all its staff on internal rules, market rules as well as code of ethics and by setting up strict rules and procedures. As such, iM Global Partner implements the following elements: implementation of an internal control setup, separation of functions that may generate potential conflicts of interest, monitoring of the adequacy between the product offering and services with the profile and expectations of clients, prohibition of personal market transactions that do not comply with the rules of the company.
- Keep a record of any proven conflict of interests in a dedicated register. The register is analysed periodically by iM Global Partner's Compliance Team in order to evaluate and confirm the validity of the conflicts of interest management policy.

iM Global Partner authorizes itself, depending on situations of conflict of interest, to:

- Carry out the activity or transaction to the extent that the organization adequately manages the potential conflict of interest situation;
- Inform the client in the event that certain conflicts of interest may remain and provide him with the necessary information on their nature and origin;
- Not carry out the activity or the transaction causing a conflict of interest.