

## Jolt Capital Summary of our Conflict of Interest Policy

### I. Preamble

In accordance with Articles 30 to 36 of the Commission Delegated Regulation 231/2013, Jolt Capital has set up a Conflict of Interest Policy in order to establish and implement procedures aiming at:

- identifying situations where (potential) conflicts of interest may arise, entailing a material risk of damage to the AIFs' interests,
- establishing appropriate procedures, mechanisms and systems to manage these conflicts,
- maintaining procedures and systems designed to prevent actual damage to the investor's rights and investors' interests through any identified conflicts,
- maintaining records of such conflicts of interest (including potential conflicts of interests).

In any situation of potential or proven conflicts of interest, the investor's interest will prevail.

### II. Definitions

Jolt Capital has implemented procedures preventing or managing situations where conflicts of interest may arise (this document is titled "*Conflict of Interest Policy*"). Conflicts of interest are defined as any situation in which, in the course of managing an AIF, the AIFM, any relevant person, or any person directly or indirectly linked by way of control to the AIFM (together the "*Relevant Persons*"):

- a) are likely to make a financial gain, or avoid a financial loss, at the expense of the AIF or its investors;
- b) has an interest in the outcome of a service or an activity provided to the AIF or its investors or to a client or of a transaction carried out on behalf of the AIF or a client, which is distinct from the AIF's interest in that outcome;
- c) has a financial or other incentive to favor:
  - the interest of a investor or group of investors or another AIF over the interest of the AIF,
  - the interest of one investor over the interest of another investor or group of investors in the same AIF;
- d) carries out the same activities for the AIF and for another AIF or investor;
- e) receives or will receive from a person other than the AIF or its investors an inducement in relation to collective portfolio management activities provided to the AIF, in the form of money, goods or services other than the standard commission or fee for that service.

Conflicts of interest may arise between the following:

- the AIFM and one of its investors,
- the AIFM and another entity belonging to the same group as the AIFM,
- the AIFs managed by the AIFM,
- two different investors of the AIFM (or group).

Several potential conflicts of interest may arise in the normal course of business and operations, either on a one-off basis or potentially on a more recurring basis.

Jolt Capital will identify, manage and disclose such conflicts of interest, in accordance with the applicable regulatory framework and in the AIFs' best interests.



Accordingly, the relevant persons at Jolt Capital undertake to act honestly, fairly, with due skill care and diligence in the best interests of the AIFs and their investors, while providing the required expertise.

### **III. Identification of Conflicts of Interest**

Jolt Capital has implemented various mechanisms to ensure the identification and control of any potential Conflict of Interest:

- Employee training and awareness: all involved employees are trained on a regular basis as per the regulatory and legal requirements. In addition to this, all employees are subject to Jolt Capital's own procedures for preventing any Conflict of Interest. Any Conflict, which employees may detect is reported to the Compliance Team.
- Gifts and benefit policy.
- Personal transactions.
- Other procedures: these include maintaining a Conflicts of Interest register and various procedures where relevant.

### **IV. Monitoring of Conflicts of Interest**

- The CCO is responsible for recording any situation causing a conflict of interest to arise, including proven or potential conflicts of interest.
- The CCO and Compliance Department maintain a register of all conflicts of interest in which all potential and ascertained conflicts of interest are reported. The register records detailed circumstances in which a conflict of interest may arise or has arisen as a result of the activities carried on by the AIFM.
- All potential conflicts of interest are documented with utmost care to the highest details.
- The documentation is archived by Jolt Capital with all the relevant data.
- The Register of Conflicts of Interest enables the CCO to identify the type of activities in which a conflict of interest entailing a material risk of damage to the interests of one or more AIFs or its investors arises.