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LGT Private Debt (France) S.A.S.

43 avenue de Friedland 75008 PARIS lgt.cp@lgt.com · www.lgt.com

### Information note on conflicts of interest management

**LGT Private Debt (France) S.A.S.** (the 'Firm') is committed to act for the best interests of its clients. In particular, the Firm is committed to prevent situations of conflicts of interest and to ensure the best management of these situations should they arise. In this context and in accordance with the relevant regulatory requirements that apply to the Firm, the Firm has established and maintains a Conflicts of Interest Management policy.

The Firm's Conflicts of Interest Management policy describes the organisational and operational arrangements established within the Firm for preventing conflicts of interest as well as identifying, managing and monitoring potential and actual situations of conflicts of interest. A high-level description of these arrangements is provided below.

#### 1. ARRANGEMENTS RELATED TO INHERENT CONFLICTS OF INTEREST

The Firm has identified the situations inherent to its activities that may result in conflicts of interest and has adopted and maintains effective organisational and operational measures designed to prevent these situations from resulting in actual conflicts of interest. Such arrangements notably include information barriers, segregation of duties, a duly formalised process for allocating investments, oversight arrangements related to delegated and outsourced activities (including intra-group activities), measures for selecting service providers, conduct rules that apply to the Firm's employees (including rules on gifts & entertainment and rules on personal transactions) as well as remuneration arrangements designed to ensure that the interests of the Firm's risk takers are aligned with those of our clients.

### 2. ARRANGEMENTS RELATED TO NON-INHERENT CONFLITS OF INTERET

Particular situations of potential conflicts of interest may arise for which no specific arrangements are in place for ensuring that these situations do not result in actual conflicts of interest. Each employee of the Firm is responsible for considering at all times whether:

- he, she or the Firm is likely to make a financial gain, or avoid a financial loss, at the expense of one or several fund(s) and/or their investor(s);
- he, she or the Firm\* has an interest in the outcome of an activity provided to one or several funds, which is distinct from the interest of the fund(s);
- he, she or the Firm\* is encouraged, for financial or other reasons, to favour the interests of one or several funds / investors over the interests of one or several other fund(s) / investor(s);
- he, she or the Firm\* receives or is offered from a person other than an investor a benefit related to the
  activities carried out by the Firm, regardless of the form it may take, other than the fee or charges normally
  invoiced for that service.

<sup>\*</sup> or the group to which the Firm belongs

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Should an employee face a situation that he or she believes constitute a potential or actual conflict of interest, such employee is responsible for informing the Firm's Compliance team.

The Firm's Compliance team will then investigate – together with the Firm's Executive Directors and the Firm's Legal team – the situation with the employee. If it is assessed that the conflict of interest can be managed, the Firm will implement measures to ensure that the interests of the investor(s) are not adversely affected. In the situation where the Firm believes that such measures are not sufficient to ensure, with reasonable confidence, that the risks of damage to investors' interests will be prevented, the Firm will i) either renounce to the planned transaction / operation ii) or disclose the conflict to its investors (most likely the advisory board of the relevant fund) so as to ensure that its investors consent to the remediation measures proposed by the Firm.