



## **Rcube Asset Management SAS**

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### **CONFLICT OF INTERESTS POLICY**

Rcube Asset Management (the "Company") has implemented a formal policy for the prevention, identification and management of conflicts of interest, in accordance with applicable European and French regulations, including the AIFM Directive, the UCITS Directive, MiFID II, Delegated Regulation (EU) 231/2013, the French Monetary and Financial Code and the AMF General Regulation.

#### **1. Definition**

A conflict of interest refers to any situation in which the interests of the Company, its directors, employees, shareholders or partners may conflict with those of one or more clients, or where the interests of different clients diverge.

Such situations may arise in particular:

- between the Company and its clients;
- between different clients or managed vehicles;
- between employees (or their close relations) and clients;
- in the context of relationships with partners and service providers involved in the investment chain.

In this respect, the Manager, partners and service providers indirectly involved in investment decisions, distributors, the depositary, custodian, fund administrator and Prime Broker may, during their respective activities, present potential conflicts of interest with the Company.

#### **2. Identification and Mapping**

The Company systematically identifies situations that may give rise to conflicts of interest in the context of portfolio management, product distribution and relationships with third parties.

Such situations are documented in a conflict of interest mapping, reviewed at least annually by the Compliance function. This mapping notably covers:

- Portfolio management (order allocation, valuation, risk management);
- Remuneration policy;
- Employees' personal transactions;
- Relationships with service providers and intermediaries;
- Organisational structure and governance.

### **3. Prevention and Management Framework**

In accordance with applicable regulations, and considering its size, organisation and the nature of its activities, as well as those of the parties, Rcube Asset Management has implemented appropriate policies and procedures designed to take all reasonable steps to prevent conflicts of interest arising from such relationships.

These measures notably include:

- Oversight by the Head of Compliance (RCCI);
- Segregation of duties and independence of functions;
- A remuneration policy compliant with regulatory requirements;
- Procedures governing order execution, best execution and best selection;
- Strict rules on gifts and inducements;
- Monitoring of employees' personal transactions;
- Disclosure and control of external mandates and activities;
- A dedicated register ensuring the recording, management and ongoing monitoring of actual or potential conflicts of interest.

Should a conflict of interest arise, the Company undertakes to use its best efforts to resolve it fairly and in the best interest of investors.

Where organisational measures are not sufficient to ensure, with reasonable certainty, that the risk of damage to a client's interests will be prevented, the client will be informed prior to the relevant transaction.

A written copy of this policy is available free of charge upon request from the Company.

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