

Conflict of Interest Policy



INTRODUCTION

Japan Fund Management (Luxembourg) S.A. (“JFML”) is a management company authorised under Chapter 15 of the Luxembourg Law of 17 December 2010, as amended, and an alternative investment fund manager authorised under the Luxembourg Law of 12 July 2013, as amended. JFML manages undertakings for collective investment subject to Part I or Part II of the Luxembourg Law of 17 December 2010, specialised investment funds subject to the Luxembourg Law of 13 February 2007, reserved alternative investment funds subject to the Luxembourg Law of 23 July 2016, as well as Irish unit trusts subject to the Irish Unit Trust Act, 1990.

According to the current laws and regulations in force, JFML has established this conflict of interest policy (the “Policy”) for the prevention and management of such conflicts. The Policy identifies the circumstances that constitute or may rise to a conflict of interest, and defines the measures to adopt in order to prevent and manage those conflicts.

POLICY

JFML has reviewed its activities with a view to detecting the situations likely to produce a conflict of interest. As the company is part of the Mizuho Financial Group (the “Group”), the Policy has also taken into account any circumstances which may give rise to a conflict of interest resulting from the structure and business activities of other members of the Group as well as resulting from the integration of sustainability risks¹, and if necessary, appropriate procedures have been set up.

Situations likely to produce a conflict of interest are recorded in a register kept at the registered office of JFML. The Compliance Officer of JFML is in charge of keeping such register up-to-date.

JFML has put in place some other preventive measures such as the submission to rules of conduct by all employees, directors and certain delegates, the adoption of security measures, in particular for information technology issues, preventing the circulation of information within the Group, the implementation of procedures regarding personal transactions and the treatment of inside information (where applicable).

Should JFML note that its policy arrangements are based on a best effort basis principle and all risks of harming the interests of a fund or its unitholders, or any other client, cannot be avoided with reasonable certainty, JFML shall work on resolving this conflict and shall inform the relevant party in writing of the general nature of the conflict of interest and its source.

Any investor may contact JFML in order to obtain additional details on this Policy.

¹ In accordance with Commission Delegated Regulation (EU) 2021/1255 of 21 April 2021 amending Delegated Regulation (EU) 231/2013 as regards the sustainability risks and sustainability factors to be taken into account by Alternative Investment Fund Managers.