POLICY FOR MANAGEMENT OF CONFLICTS OF INTEREST

December 2022

FORMUE PLEJE

This document is a translation from Danish.
In case of any reasonable doubt, the authentic Danish text shall prevail.

1 Introduction

This Policy for the management of conflicts of interest ("Policy") defines and outlines the guidelines for Formuepleje A/S ("the Company") in relation to conflicts of interest. The policy is based on Lov om finansiel virksomhed §§ 71, stk. 1, nr. 6 og 101, stk. 3 ("FIL") (the Financial Business Act Section 71(1) No. 6 and Section 101(3)), Bekendtgørelse om ledelse, styring og administration af danske UCITS § 36 (the Executive Order on Management, Control and Administration of Danish UCITS, Section 36), Lov om forvaltere af alternative investeringsfonde (”FAIF”) § 23, stk. 4 (the Alternative Investment Fund Managers etc. Act ("AIFM"), Section 23(4)) and Kommissionens delegerede forordning nr. 231/2013 af 19. December 2012 artikel 31 (the Commission Delegated Regulation no. 231/2013 of 19 December 2012, Article 31), and Bekendtgørelse om organisatoriske krav til værdipapirhandlere (the Executive Order of organizational requirements for securities traders).

The Company is part of the Formuepleje Group – and with FP Kapital A/S as the mother company, and where Formuepleje A/S is 100% owned by Formuepleje Holding A/S. The Formuepleje Group includes other financial companies. No conflicts of interest have been found to exist between these companies – furthermore, the Clients of the Group are at the Company and not at the other companies in the Group. The overall strategic decisions are made by the management in Formuepleje Holding A/S.

The purpose of this Policy is to prevent any conflicts of interest from being taken advantage of by the Company or its employees to the detriment of the UCITS and AIFs ("Funds") managed by the Company or of the Company's other Clients (collectively referred to as "Clients"), so that the Company acts independently and exclusively in the respective Client's interest.

The Company's Client base consists of the Funds and of retail and professional investors who have typically concluded agreements with the Company for investment advisory services or discretionary portfolio management. The Company has an advisory and secretariat function assigned to it, the main task of which is to service investors, including through investment advisory services, portfolio management and brokerage of orders on behalf of the Client. The Company primarily advises about its own products (the Formuepleje investment fund and the Formuepleje capital funds, as well as Formuepleje’s real estate funds), something which Clients are informed of prior to any investment service being provided. The Company also has Client groups seeking investment advice or portfolio management on a wider range of financial instruments, which is why this target group is also advised about external products. There are also activities related to institutional investors, who only receive investment services in exceptional cases, in which case the objective is to present these to the company's partners, such as Impax and BNP Paribas.

The Company strives to provide honest, fair and professional service for all Clients, so that conflicts of interest or suspicions thereof are avoided to the greatest extent possible and managed properly should they arise. This Policy describes how the Company identifies and manages potential and/or actual conflicts of interest. In addition to this Policy, the Company has developed routines and procedures which, in addition to dealing with conflicts of interest, include i.a. rules for securing inside information and effective barriers of information (Chinese Walls).

Conflicts of interest may arise due to the Company’s interests in and affiliation with other Clients, counterparties, partners and suppliers, etc. Conflicts of interest may arise i.a. between the Company and its Clients, the Company and other companies in the Formuepleje Group and/or between the Company's Clients and/or Client groups.

2 Definitions of conflicts of interest

The Company has identified a number of circumstances which may give rise to conflicts of interest and, potentially but not necessarily, be detrimental to the Clients' interests. A conflict of interest may arise if the Company, or any person directly or indirectly controlled by the Company or a Client, is likely to be able to achieve financial gain or avoid a financial loss at the expense of a Client.

3 Identification of conflicts of interest

The Company is part of the Formuepleje Group (the "Group") and must therefore also take into account the factors that can lead to a conflict of interest as a result of the structure and business activities in other parts of the Group, or of collaborative agreements with the other group companies.

The board has concluded that conflicts of interest may arise in, i.a., the following situations:

- Advisory services provided to Clients or the performance of discretionary portfolio management for Clients in connection with financial instruments in which the Company or the Group also have self-interest in earnings.
- The more trades made for Clients, the greater the earnings for the Company in the form of fees.
- The Company has an interest in spread income (the difference between purchase and sale prices).
- The Company receives a sales commission for the brokerage of investment products or from third parties in connection with the exercise of an investment service.
- Trade or advisory services for financial instruments about which employees possess inside information (information which is not publicly known, and which could affect the price of a financial instrument if it were publicly available), or other confidential information about matters relevant to Clients.
- Cases in which the remuneration for the Company or the Group and/or the advisor is dependent on the return on the financial instrument, in such a way that there is incentive for the advisor to encourage the Client to assume excessive risks.
- If the Company has a financial incentive or another incentive to prioritise a Client or group of Clients above another Client's interests.
- If the Company and the Client do not have common interests in the outcome of the service supplied to the Client.
- By increasing leverage in the funds managed by the Company, the Company can increase its profits in its capacity as fund manager, at the expense of greater risk.
- If the Company is remunerated based on results.
- If the employee's salary depends on the Company's earnings from certain financial instruments.
- If the Company can achieve financial gain or avoid financial loss at the expense of a Client.
- If one or more employees of the Company personally trade in a financial instrument and one of the Company's Clients holds an interest in the same financial instrument, or if an employee holds financial instruments and simultaneously advises Clients or manages Clients' portfolios.
- If the Company represents a Client who is selling one or more financial instruments, where other Clients are potential buyers of these financial instruments.
- If the Company represents a Client who wants to sell/buy one or more financial instruments where the buyer/seller of these is an employee of the Company or the buyer/seller is a company in which an employee of the Company holds a financial interest.
- If the Company and the Client do not have a common interest in the Company having access to the registers of shareholders in funds managed by the Company.

- If the Company gives a discount to the costumers and where there may be a conflicting interest in how big the discount is.
- If the Company can make a positive gain at the expense of ESG/Sustainability – this can be in relation to the Company, in relation to managed funds or in relation to discretionary mandates.
- If the Company and the Funds have conflicting interests in relation to decisions covered by the Policy for Active Ownership, including in relation to voting at a Company's General Meeting.
- If there are conflicting interests within the Company among decision makers or the Funds in relation to decisions covered by the Policy for Active Ownership.
- If the portfolio advisor has their own incentives that compromise the inclusion of sustainability risks.
- If an advisor has conflicting interests with a client in relation to sustainability preferences.

The above list of conflicts of interest is not exhaustive. It consists of examples of types of situations that will or may involve a conflict of interest.

In addition to the above, the Company must keep a list of potential conflicts of interest, including how potential conflicts of interest have been managed. The Company records such incidents in the Group's incident register, which is managed by Compliance and Risk.

4 Prevention and management of conflicts of interest

The Company must treat its Clients properly and operate with a high degree of business ethics and integrity. The Company's employees are expected to display integrity, act legally and professionally, and always take the Clients' interests into account. The Company's board has instructed the executive board that asset management advisors (advisors to retail Clients) must not be given sales or bonus targets where different significance is assigned to the Clients choosing products with high or low earnings.

The Company primarily uses its own investment concepts when advising Clients. All investment concepts have a clear declaration of risk/return correlation, and rules are in place to secure that at any given time, relevant information material shall be available in which the Client is informed about the funds' fee structure (administration, advisory and performance fees). Controls have also been implemented to check whether, in performing their duties, the Company's employees represent the Client's interests, so that individual investments are only recommended if they are tailored to the Client's investment profile based on an assessment of appropriateness.

When concluding portfolio management contracts, the Client must accept any investments in funds that the Company manages itself in writing. Furthermore, in connection with investment services, the Client must be informed that the advisory service provided by the Company is non-independent.

The Company has generally structured its business in order to prevent and minimise any conflicts of interest, just as instructions and business procedures have been drawn up for managing these should a conflict of interest occur. The Company has adopted the following general guidelines:

- To the extent possible, the Company has been set up with organisationally separate functions to prevent the same individuals or sub-funds being responsible for both the Clients' and the Company's interests, including in the form of organisationally separated functions (Chinese Walls). Meanwhile, internal business processes have been designed in a way that safeguards and sets up procedures for avoiding conflicts of interest.
- The Company's board has prepared instructions for the executive board on its responsibilities, in order to minimise and prevent conflicts of interest between Client groups.

- The Company performs checks of whether trading is taking place in breach of the Company's instructions.
- The Company has prepared an order execution policy and internal business procedures which ensure and set up procedures to provide Clients with, "best execution".
- All transactions are concluded on market terms.
- The Company performs relevant and independent checks of the Company's processes.
- The Company has drawn up a pay policy.
- Business procedures for the Company's employees' access to and handling of inside and confidential information, so that this knowledge is exclusively accessible to those employees who have a legitimate need for it.
- Workflows regarding the management of sensitive Client information which ensure that Client information does not spread to areas other than those who are processing it.
- Provisions establishing that the Company cannot receive cash in any form.
- Provisions on limitation and records of employees' access to making personal trades.
- An employee cannot handle cases on behalf of the Company, should they or their closely related persons or companies hold an interest which conflicts with the Company's or its Clients' interests.
- An established whistle-blower scheme for anonymous reporting.

The board believes that the potential conflicts of interest set out under point 3 may be sought to be resolved in the following way:

Re item 1) Advisory services provided to Clients or the exercise of discretionary portfolio management for Clients in which the Company also has an earning interest.	
Where does the conflict of interest lie?	***Management***
Conflicting interests between the Company and the Client, including through the exercise of self-interest by the Company.	**Retail and professional Clients:** The Company has developed internal procedures and business processes for providing advisory services to the Client, including a process for advisory services and personal recommendations, which must always be based on the Client's situation. Appropriateness tests are prepared prior to any personal recommendations. Furthermore, when concluding portfolio management contracts, the Client must accept any investments in funds that the Company manages itself in writing. A declaration of appropriateness is delivered for retail-costumers. **UCITS and AIFs** The Company has pre-trade and post-trade checks of all trades, so that it is verified that every transaction is within the limits established by the board, prospect/investor information, the Financial Business Act, etc.

<table>
<tr><td></td><td>The Company has drawn up an Order Execution Policy.

Furthermore, brokers' order execution policies which are used are checked prior to appointing a new broker and updating the counterparty list. The PMs have their own procedures for assessing whether a given transaction is in the funds' interest and in accordance with the investment framework.

The Company's executive board regularly, and at least every three months, reports to the funds' board.</td></tr>
<tr><td colspan="2">Re item 2) The more trades made for Clients, the greater the earnings for the Company in the form of fees.</td></tr>
<tr><td>Where does the conflict of interest lie?</td><td>Management</td></tr>
<tr><td>The Company has an incentive to perform frequent trades</td><td>The conflict of interest is resolved by the Company not being allowed to receive commission for Clients' trading. Thus, the Company does not receive any commission for trading on behalf of the Company's Clients.</td></tr>
<tr><td colspan="2">Re item 3) The Company has an interest in spread income (the difference between purchase and sales prices).</td></tr>
<tr><td>Where does the conflict of interest lie?</td><td>Management</td></tr>
<tr><td>The Company has an incentive to perform frequent trades</td><td>The conflict of interest is resolved by the Company not being allowed to have spread earnings from trading in securities or investment certificates.</td></tr>
<tr><td colspan="2">Re item 4) The Company receives a sales commission for the brokerage of investment products or from third parties in connection with the performance of an investment service</td></tr>
<tr><td>Where does the conflict of interest lie?</td><td>Management</td></tr>
<tr><td>Receiving brokerage commission may mean that these products are recommended over other products, even if the investment is not appropriate for the Client in question.

This might lead to a distortion, where the Client's best interest is not represented.</td><td>Own products:

The Company receives no additional remuneration for the provisioning of its own products (including among others the Formuepleje investment fund, the Formuepleje capital funds and the real estate funds).

In connection with the performance of investment services, the Company provides information about the Company not being</td></tr>
</table>

	independent and about advisory services concerning its own products. **Advising on external products** If fees are received from third parties in connection with an investment service for a Client, the Client will be informed of this rate in advance. If this happens in connection with the performance of discretionary portfolio management, the Client shall receive reimbursement for any fees that the Company may have received. If this happens in connection with investment advice or the brokerage of an order, the Company will be able to keep this amount, provided that 1) the Client is informed of the amount, and 2) the Company can document that the service in question is quality-improving. The Company has developed business processes for handling fees from third parties, including documentation of quality-improvement services.
Re item 5) Trading in, or advisory services concerning, financial instruments about which the employee holds inside information or other confidential information relevant to the Client.	
Where does the conflict of interest lie?	***Management***
Conflicting interests Self-interest of the employee/company.	The Company has prepared business procedures for the handling of inside information in accordance with MAR and Nasdaq issuer regulations. Compliance is responsible for maintaining the permanent insider list and the incident-based insider list. Inside information for the Company's own funds listed on Nasdaq is primarily related to knowledge of NAV (net asset value). In addition to inside information, frequent processing is done of confidential information and information subject to Nasdaq issuer regulations and other disclosure obligations, to which a requirement to disclose as soon as possible applies.

<table>
<tr><td></td><td>Instructions for the board secretariat have been drawn up, stating that all material for the board must be accessed confidentially. Furthermore, it must be ensured that Legal is included in decision points related to the funds in order to assess whether the point is subject to Nasdaq disclosure requirements or whether it may constitute inside information.

Chinese Walls have also been ensured, as well as physical separation of employees in the asset management function and employees in the advisory function.

In addition, it is noted that the risk of possession of inside information is deemed minimal, as the Company's primary activity is the management of UCITS and AIFs, where price and net asset value are calculated on the basis of the underlying assets – which is why actual information that may affect price is minimal. In addition, net asset value is published at least three times daily.</td></tr>
<tr><td colspan="2">Re item 6) Cases in which remuneration for the Company or the Group and/or the advisor is dependent on the return on the financial instrument in such a way that there is incentive for the advisor to encourage the Client to assume excessive risks.</td></tr>
<tr><td>Where does the conflict of interest lie?</td><td>Management</td></tr>
<tr><td>Advice which is not in the Client's best interest due to the Company's own financial gain.

The asset management advisor recommends the products where the Company has the strongest earnings or the products which are closest to High Water Mark (HWM).</td><td>Fixed and variable remuneration of the Company's advisors (retail) is not dependent on the volume of sales or the return on financial instruments. Thus, the advisor has no incentive to recommend one product over another.

The advisor must ensure that appropriateness tests are conducted prior to any personal recommendations to ensure that the Client is not recommended products which are not appropriate for the Client. Furthermore, a declaration of appropriateness must also be drawn up and provided to retail Clients.

The documentation is stored and retained by the Company in CRM. The Secretariat performs ongoing checks of appropriateness tests and declarations of appropriateness.</td></tr>
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	Compliance shall also carry out random checks.
Re item 7) If the Company has a financial incentive or another incentive to prioritise a Client or group of Clients above another Client's interests.	
Where does the conflict of interest lie?	***Management***
Conflict between Clients, or conflicting interests between two Clients, where the Company favours one of these Clients.	There may potentially be interests which mean that it is attractive to the Company to prioritise the needs of one Client at the expense of another. This interest is best minimised by maintaining documentation of the audit trail. Moreover, Compliance conducts continuous monitoring of the transactions and trades the Company completes on behalf of the Company's Clients. The company's board has also provided detailed descriptions of the executive board's responsibilities in the executive board instruction, so that conflicts of interest between the three Client groups (funds on the one hand and retail/professional Clients and/or institutional Clients on the other) are minimised. In addition, the Company has approved discounts for particularly large Clients where this is not considered preferential treatment and does not create conflict with other Clients or Client groups. There is full transparency regarding this discount scheme, and one Client will not be given preferential treatment over another.
Re item 8) If the Company and the Client do not have common interests in the outcome of the service supplied to the Client.	
Where does the conflict of interest lie?	***Management***
The Client has been sold a product that is not appropriate for the Client	<u>Regarding the Funds:</u> The Company must always follow the board's instructions, prospect/investor information and applicable law. Pre-trade and post-trade checks are performed which are reported to the board at the quarterly board meetings. Risk Management is responsible for reporting, i.a., active and passive breaches to the board.

	Regarding retail and professional Clients: The Company has developed internal procedures and business processes for advisory services to the Client, including a process for advisory services and personal recommendations. Appropriateness tests and declarations of appropriateness (only for retail Clients) are drafted ahead of any personal recommendation. The documentation is stored and retained by the Company (in CRM/the Client folder). Furthermore, appropriateness tests are conducted when required by the investor protection regulations. Proper archiving of documentation of correspondence with Clients is ensured – as appears from CRM/the Client folder. With MiFID II, there is also a requirement of telephone recording of conversations relating to trades. Compliance carries out random checks of proper documentation of Client transactions.

Re item 9) By increasing leverage in the funds managed by the Company, the Company may increase profits in its capacity as fund manager, at the expense of greater risk.

Where does the conflict of interest lie?	***Management***
As asset manager, the Company increases leverage to increase earnings from the fixed fee.	Fees are always calculated from equity, not the balance sheet, which is why the Company cannot increase earnings through increased leverage Furthermore, the funds' boards of directors determine leverage limits within the upper limit for gearing in the articles of association. Changing these must first be approved by the general meeting.

Re item 10) If the Company is remunerated based on results.

Where does the conflict of interest lie?	***Management***
As asset manager, the Company can take unnecessary risks to achieve short-term returns.	Regarding the Funds: To address this potential conflict of interest, the Company has made provisions determining that the Company may only receive performance fees with the so-called high-water mark regulation. This ensures that there is a focus on long-term returns rather than speculative, short-term returns.

	Also see item 6. Regarding retail and professional customers (except Family Office customers): The Company does not receive performance-based fees. The Company does not receive separate fees for investment services offered to this customer group. The Company mainly receives a fee for its management and portfolio management of funds under its management. An exception to this is Family Office customers and individual discretionary mandates, who pay for the services the Company provides to these customers and where fee payment and possible performance-based payment appear from agreements with individual customers.
Re item 11) If the employees' salary depends on the Company's earnings from certain financial instruments.	
Where does the conflict of interest lie?	***Management***
The Company's asset management advisors recommend the products from which the Company makes the greatest earnings.	The board of the Company has instructed the executive board that asset management advisors (retail) are not to be given sales or bonus targets, where different significance is assigned to the Customers choosing products with low or high earnings. The advisors are not paid based on performance in a way which is contrary to their obligation to act in the best interests of the customers. The Company complies with applicable rules on variable remuneration for customer-facing employees. A pay policy has also been drawn up which is updated regularly; at least annually.
Re item 12) If the Company can achieve financial gain or avoid financial loss at the expense of a Customer.	
Where does the conflict of interest lie?	***Management***
When carrying out the transaction.	The Company cannot trade over its own book.
Re item 13) If one or more employees of the Company personally trade in a financial instrument, and if one of the Company's Customers holds an interest in the same financial instrument, or if an employee holds financial instruments and simultaneously advises Customers or manages Customers' portfolios.	
Where does the conflict of interest lie?	***Management***

Conflicting interests between the Company's employee and the Customers. Self-interest among employees.	Internal rules and procedures have been established for the Company's employees, cf., among others, the Guidelines for employees' personal transactions, Policy for speculation and Business procedure for the handling of inside information. Furthermore, Compliance oversees regular random checks of the above documents and compliance therewith.

Re item 14) If the Company represents a Customer who is selling one or more financial instruments and other Customers are potential buyers of these financial instruments.

Where does the conflict of interest lie?	***Management***
Conflicting interests between two Customers, including any preferential treatment of one Customer over another Customer.	There may potentially be interests which mean that it is attractive for the Company to prioritise the needs of one customer at the expense of another. This potential conflict of interest is best minimised by maintaining documentation of the audit trail.

Re item 15) If the Company represents a Customer who wants to sell/buy one or more financial instruments where the buyer/seller is also an employee of the Company, or the buyer/seller is a company in which an employee of the Company holds a financial interest.

Where does the conflict of interest lie?	***Management***
The conflict of interest may arise in situations where an employee wishes to sell a financial instrument – e.g. an investment certificate or a share in a real estate fund offered by the Formuepleje Group – and where the buyer is also a customer of the Company's. Furthermore, there may be potential conflicts of interest in situations where the employee is an employee/board member of the customer.	Ensured through documentation of audit trail. Ensured by such financial instruments not being sold through outreach sales, but only in situations where a customer contacts the Company with a desire to buy the specific financial instruments/real estate fund and where the Company has an employee who wants to sell said product. If an employee wants to communicate shares in an unlisted fund, e.g. a real estate fund, this will either be traded at the acquisition value or NAV according to the most recent annual statement – whichever of these is higher. If an employee wants to sell certificates in one of the listed investment funds, the employee must place the sales order with the secretariat, who brokers the order via market maker and has an

	obligation to act according to best execution. Potential conflicts of interest arising from an employee being an employee/board member of a customer are addressed by not allowing such employees to simultaneously be advisors to the customer. In addition, the executive board must approve such other duties in advance – and in this connection, assess whether there are any conflicts of interest, cf. internal business procedures.
Re item 16) If the Company and the Customer do not have a common interest in the Company having access to the registers of shareholders in funds managed by the Company.	
Where does the conflict of interest lie?	***Management***
The Company and its advisors can access information about the Customer's holdings and transactions without the Customer having consented to this.	The Company manages funds which the majority of the Company's Customers have investment or capital fund certificates in. This means that the Company has access to the registers of shareholders for the managing funds. The Company is employed by the funds to, i.a., answer customer queries, which is why it is also believed that there is a legitimate purpose to an advisor being able to access this information: in order to provide the best advice and service to that customer. Through its structure, including internal processes and business procedures, the Company has ensured that information/access is only granted to the circle of persons who are entitled to access the personal information (the Customers' holdings). The Company believes that the group of advisors must have access to information about the customer's holdings, and thus the funds' registries of shareholders, for the sake of advisory services demanded by the customer. The

	Company's employees may not use the information for outreach sales. Moreover, such information may not be abused by the customer advisors in any way. The Company will not disclose information to consolidated companies or third parties without the Customer's consent, and only if such a disclosure is justified under applicable law. The above is also discussed in the company's privacy policy, which is distributed to investors in the funds in connection with investing in the fund in question.
Re item 17) If the Company provides discounts to the Customers and where there may be conflicting interests in how large the discount is.	
Where does the conflict of interest lie?	***Management***
There may be conflicting interests, for example, between the Company and the customer, or the Company and other Customers, and a potential conflict of interest may arise where some Customers are favored at a greater discount than other customers.	The company's Board of Directors has established a discount scheme for larger customers (large customer agreements). The Board of Directors considers that the discount scheme does not pose a significant disadvantage to the other customers or customer groups.
Re 18) If the Company might achieve a positive gain at the expense of ESG / sustainability – this might be in relation to the Company, in relation to managed funds or in relation to discretionary mandates	
Where does the conflict of interest lie?	***Management***
If managing ESG risk in the short term has an economic cost, a conflict of interest may arise in the context of the Active Ownership Policy and the Responsible Investment Policy.	It is Formuepleje's belief that incorporating ESG considerations into the investment process provides a higher risk-adjusted return in the long run. In cases where there is a conflict, it will be a matter for assessment by the individual investment advisor, including ensuring documentation that the decision is in accordance with the Responsible Investment Policy and the Active Ownership Policy.
Re 19) If the Company and the Funds have conflicting interests in relation to decisions covered by the Active Ownership Policy, including in relation to voting at a company's general meeting	
Where does the conflict of interest lie?	***Management***
If the Company has concurrent interests in a specific company, there may be conflicts of	The Company does not conduct any other business and has not itself invested or lent money

interest in voting or investing. If the Company's owners have a significant interest in a company (e.g. through an IPO), this could potentially constitute a conflict of interest.	to other companies. In relation to the Company's owners, there is an arm's length principle as they are not part of the day-to-day operations. In the very rare cases where the owners of the Company have a significant interest in a particular company, the matter will be managed on the individual merits of the case.
Re 20) If, within the Company, there are conflicting interests among decision-makers in the Funds in relation to decisions covered by the Active Ownership Policy	
Where does the conflict of interest lie?	***Management***
When voting at a general meeting or exercising involvement, the interest of each sub-fund may differ. E.g. there may be a difference between the interests of share and bond holders.	In the rare cases where this is relevant, voting will be based on the sub-fund with the voting interest. Before each vote, an individual assessment is made of whether there are conflicts of interest between sub-funds. As regards involvement, such issues will typically be ESG-related, where conflict will very rarely arise.
Re 21) If the portfolio advisor has their own incentives that compromise the inclusion of sustainability risks	
Where does the conflict of interest lie?	***Management***
The portfolio manager may have their own interests that conflict with the inclusion of sustainability risks / the promotion of sustainability. This could be the case, for example, if their annual bonus is linked to returns, and if other choices could achieve higher returns (in the short term) but go against the sustainability profile of the Company/fund.	This is managed by the portfolio manager being subject to a comply-or-explain principle, as well as by ongoing screening and internal controls.
Re 22) If an advisor has conflicting interests with a client in relation to sustainability preferences	
Where does the conflict of interest lie?	***Management***
For example, such a situation may be one where – due to the client's sustainability profile – the advisor is unable to offer a Formuepleje product and thus has to inform the client accordingly. It may also concern a situation where the advisor's bonus remuneration is dependent on which funds and products are recommended	This is managed by the advisor being required to document their decisions and choices – including by completing suitability tests and providing suitability declarations, and by minuting the meeting. Furthermore, advisors' bonuses are not linked to sales, in accordance with MiFID rules in this respect.

5 Reporting to the executive board

All potential conflicts of interest must be communicated to the Company's executive board. Furthermore, such must be recorded in the Company’s incident register, where compliance and risk assess the potential conflict of interest.

6 Reporting to the board

Any conflict of interest that has been reported to compliance and the executive board and deemed significant shall be reported to the board of directors at the next board meeting, which includes updating this Policy where appropriate.

The board of directors shall be informed immediately through the chairman when this Policy for conflicts of interest cannot or has not been observed.

7 Control of the policy

Compliance monitors compliance with this Policy and assesses whether the Company has the necessary procedures and business processes in place for minimizing/managing conflicts of interest. Compliance also assists the executive board where this is deemed necessary.

Compliance is responsible for keeping records of conflicts of interest (with the incident registry). Furthermore, Compliance must report conflicts of interest to the executive board and board of directors.

8 Updating and following up on the policy

The policy for the management of conflicts of interest must be reviewed when the board deems it necessary, but at least once (1) annually.

9 Entry into force

This policy enters into effect on December 19, 2022.