

Conflict of Interest

Acting exclusively in the interest of customers and investors is the guiding principle that characterizes Quadoro Investment GmbH (AIFM) in its relationships with investors.

By defining and implementing this Conflict of Interest Policy, the AIFM takes account of Article 30 et seq. of the Commission Delegated Regulation (EU) No. 231/2013 in conjunction with § 27 of the German Investment Code (KAGB) in conjunction with § 3 of the Regulation on the Concretisation of Rules of Conduct and Organisation (KAVerOV) by laying down mandatory principles for dealing with conflicts of interest.

A conflict of interest is a situation within the AIFM in which a financial or other interest of the AIFM or an employee is placed above that of the investor which may result in the best interests of investors in the managed AIF not being served.

Conflicts of interest may arise between

- the AIFM, its managers, employees or any other person linked to the AIFM with direct or indirect control and the Alternative Investment Funds (AIF) managed by the AIFM or the investors of such AIFs;
- the AIF managed by the AIFM or investors of the AIF and another AIF managed by the AIFM or investors of that AIF;
- the AIFM and third parties commissioned by the AIFM, such as custodians and external assessors.

In order to avoid conflicts of interest, the AIFM ensures that it and the persons and employees acting on its behalf carry out their business activities independently, taking into account risks for the AIF and its investors. In particular, the AIFM implements the measures listed below. This list is not exhaustive:

- Careful selection and regular training of employees on key compliance-relevant topics;
- Establishment of organisational structures and responsibilities which ensure the functional separations required to avoid conflicts of interest;
- Introduction of a remuneration system that helps to avoid conflicts of interest;
- Establishment of Chinese walls to restrict the flow of information;
- Implementation of codes of conduct and procedures for employee transactions, including disclosure to the compliance department;
- Implementation of codes of conduct and procedures for the acceptance and granting of gifts and other benefits by the AIFM or its employees.

If the organisational and contractual arrangements are not sufficient to avoid the risk of the interests of the AIF managed by the AIFM and its investors being adversely affected, the AIFM will inform investors of the unavoidable conflict of interest and of its decision in such a case. Investors will be informed about the conflict of interest by means of a durable medium or the AIFM's website and can make a decision on an investment in the AIF managed by the AIFM on this basis.