

## 1. KEY TERMS

"CEO" means the Managing Director and Chief Executive Officer of GDDA

"CFO" means Chief Financial Officer of GDDA

"CIO" means the Chief Investment Officer of GDDA

"CRO" means the GDDA Chief Risk and Compliance Officer of GDDA

"Client" means a GDDA Fund (as defined below) and/or an investor of a GDDA Fund and/or an investor of a GDDA managed portfolio, as the case may be

"Compliance" means the GDDA CRO and/or RM

"Conflicted Person"

"Conflict of Interest" means a conflict of interest between a GDDA Fund and (i) an Employee or (ii) a Conflicted Person (as defined in the PAB Policy) or the GDDA in relation to its proprietary account

"Employee" means any individual who is employed by GDDA, whether full-time or part-time, including any officer, director, manager, supervisor, consultant who are natural persons and partners of GDDA

"Executive Management" means the executive management of GDDA including the CEO, CFO, CIO, Chief Operating Officer and CRO

"GDDA" or "Company" means Green Delta Dragon Asset Management Company Limited and its subsidiaries, affiliates, their branches and representatives and GDDA's Funds (as defined below)

"GDDA Fund" means a fund or a segregated managed account "RMA" for a third-party managed or advised by GDDA or a sub-managed fund over which GDDA has discretionary investment management power

"Internal Audit" means the GDDA

**OCTOBER 5, 2021**

"PAB" means personal account dealing, being the trading in securities by an Employee or whether Conflicted Person

"PAB Policy" means GDDA's Personal Account Dealing Policy, as amended

"Policy" means the GDDA Conflict of Interest Policy

"RMC" means the GDDA Risk Management Committee

"RMD" means the GDDA Risk Management Department

References to "he", "him", "his" in this Policy include "she", "her" and vice versa

## 2. APPLICABILITY OF THIS POLICY

This Policy applies to GDDA, all Employees and their Connected Persons as the case may be. It is created to ensure that reasonable steps are taken by GDDA to avoid measures to avoid Conflicts of Interest and identify

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**"Client"** means a GDDA Fund (as defined below) and/or an investor of a GDDA Fund and/or an investor of a GDDA managed portfolio, as the case may be.

**"Compliance"** means the GDDA CRO and/or RMD.

**"Conflict(s) of Interest"** has the meaning assigned in Clause 3 of this Policy

**"Cross Trade"** means contra order in the same security, which can occur between GDDA Funds, or between a GDDA Fund and (i) an Employee, (ii) a Connected Person (as defined in the PAD Policy) or (iii) GDDA in relation to its proprietary account.

**"Employees"** means all executive and non-executive directors (including directors of GDDA Funds), officers, full and part-time employees, temporary employees, employees on probation, persons accredited to a fund manager within GDDA, consultants who are natural persons and interns of GDDA.

**"Executive Management"** means the executive management of GDDA including the CEO, CFO, CIO, Chief Operating Officer and CRO.

**"GDDA"** or **"Company"** means Green Delta Dragon Asset Management Company Limited and its subsidiaries, affiliates, their branches and representative offices and GDDA Funds (as defined below).

**"GDDA Fund"** means a fund or a segregated managed account ("**SMA**") of a third-party managed or advised by GDDA or a sub-managed fund over which GDDA has discretionary investment management power.

**"Internal Audit"** means the GDDA Internal Audit Department

**"PAD"** means personal account dealing, being the trading in securities, by an Employee or his/her Connected Persons.

**"PAD Policy"** means GDDA's Personal Account Dealing Policy, as amended.

**"Policy"** means this GDDA Conflict of Interest Policy.

**"RMC"** means the GDDA Risk Management Committee.

**"RMD"** means the GDDA Risk Management Department.

References to "he", "him", "his" in this Policy include "she", "her" and vice versa.

## 2. APPLICABILITY OF THIS POLICY

This Policy applies to GDDA, all Employees and their Connected Persons as the case may be. It is created to ensure that reasonable steps are taken by GDDA to adopt measures to avoid Conflicts of Interest and identify



circumstances which may give rise to Conflicts of Interest that could result in material risk to the interests of GDDA or one or more of its Clients, and whenever Conflicts of Interest risk cannot be avoided, to identify, manage and monitor them and openly disclose their existence.

### 3. DEFINITION OF A CONFLICT OF INTEREST

A conflict of interest may arise when a person or an entity has an incentive to serve one interest or has an opportunity to make a gain at the expense of another person's interest. Conflicts of interest may occur between GDDA and its Employees or any Connected Persons to GDDA; or between GDDA, its Employees or Connected Persons and its Clients; or between GDDA Clients themselves, as a result of the potential, intended or actual activities of GDDA, its Employees or its Connected Persons (a "Conflict(s) of Interest").

A Conflict of Interest with a Client could arise where GDDA, its Employee, its Connected Person, or another Client as applicable:

- a) is likely to make an inappropriate financial gain, or avoid a financial loss, at the expense of the that Client;
- b) has an interest in the outcome of a service provided to that Client, or of a transaction carried out on behalf of that Client, which is different from that Client's own interest in the outcome;
- c) has a financial or other incentive to favor the interests of another Client or group of Clients over the interests of that particular Client;
- d) carries on the same business as that Client;
- e) receives or will receive from a person (other than that Client) an inducement in relation to a service provided to that Client, in the form of monies, goods or services, other than the standard commission or fee for that service; or
- f) could be in a position where the ability to act in that Client's best interest is potentially affected by any other matter.

In order to avoid a Conflict of Interest with a Client, GDDA must treat all of its Clients fairly and the interests of its Clients should at all times take precedence over the interests of GDDA, its Employees and its Connected Persons.

A Conflict of Interest with GDDA may arise where an Employee or a Connected Person as applicable:

- a) has an interest in the outcome of a particular activity or endeavor that differs from GDDA's interest;
- b) receives financial or other significant benefit as a result of the Employee's or Connected Person's position at GDDA that is inappropriate in nature;
- c) has the opportunity to influence GDDA granting business or making administrative or other material decisions in a manner that leads to personal gain or advantage that is inappropriate in nature for the Employee or Connected Person; or
- d) has an existing financial or other interest or previous engagement or activity or relationship with another person, which impairs or could impair his/her judgment or objectivity in carrying out his/her duties and responsibilities to GDDA.

For the purpose of this Policy, Conflicts of Interest include situations which may not be actual Conflicts of



Interest, but give rise to a perception of a Conflict of Interest.

#### **4. GENERAL MEASURES TO MITIGATE CONFLICTS OF INTEREST**

- 4.1 Executive management adoption and implementation of this Policy and appropriate supporting policies and procedure to mitigate and/or openly disclose Conflicts of Interest when they cannot be fully mitigated.
- 4.2 Maintenance of this Conflicts of Interest Policy which all Employees are required to read, comprehend and confirm compliance with as per Appendix 1 before employment with GDDA and subsequently, after any material change to this Policy.
- 4.3 Maintenance of the Conflicts of Interest Register in which all identified Conflicts of Interest must be registered. All Employees are responsible for identifying and reporting the circumstances in which a Conflict of Interest may arise to Compliance who will make entry of the same into the Register. A template of the Register is attached as Appendix 2 hereto.
- 4.4 Periodic reviews of Conflicts of Interest by the RMD, RMC and/or Internal Audit.
- 4.5 Regular reporting between GDDA entities and RMD of findings and recommendations related to Conflicts of Interest.
- 4.6 Confidential whistleblowing arrangements for anyone concerned that a Conflict of Interest has arisen, but is not being properly addressed.
- 4.7 Other group wise policies and procedures designed to ensure that every Employee is personally responsible for highlighting and managing certain types of Conflicts of Interest. These policies ensure that once a Conflict of Interest has been identified, it is managed in a way that gives reasonable assurance that there is no material risk of damage to the interests of Clients or GDDA.
- 4.8 Periodic training on Conflicts of Interest to all Employees and Connected Persons to ensure all Employees and Connected Persons have clear understanding of the principles behind Conflicts of Interest and the necessary skills and expertise to identify Conflicts of Interest if and when they arise.
- 4.9 Disclosure to Client of the existence of a Conflict of Interest and the seeking of permission of interested parties to perform the action associated with the Conflict of Interest prior to performance of the action in circumstances where GDDA's arrangements for managing Conflicts of Interest are insufficient to ensure the prevention of risks of damage to a Client's interests. If GDDA's organizational arrangements and all reasonable efforts taken to prevent or manage a Conflict of Interest are insufficient to ensure, with reasonable confidence, that the risks of damage to the interests of a Client will be prevented, GDDA will clearly disclose the specific description of the nature and sources of the Conflict of Interest to the Client. In managing Conflicts of Interest, GDDA will pay careful attention to the Client's investment objectives and the content of its portfolios.
- 4.10 Decline to act for the Client as a last resort where GDDA considers, in its sole discretion, that the Conflict of Interest is too great and cannot be managed in any other way (including by disclosure).

#### **5. MANAGEMENT OF SPECIFIC CONFLICTS OF INTEREST**



## 5.1 Product Governance

**Potential Conflict of Interest:** Investment advising involves the provision of recommendations to Clients with regard to investments suitable to the Client. Conflicts of Interest can arise in the course of advising Clients by Employees that may recommend an investment product that is not suitable for the Client..

**GDDA Controls:** GDDA has implemented product approval guidelines to ensure that GDDA carefully reviews all relevant aspects, particularly from a risk perspective, prior to the launch of a new product. As relevant, Employees are trained to listen to Client input and recommend investment products that are believed to be in the best interest of the Client.

## 5.2 Broker Selection section and Best Execution

**Potential Conflict of Interest:** GDDA may allocate more trades to a broker at the expense of Clients.

**GDDA Controls:** GDDA has adopted the Broker Selection and Best Execution Policy which sets out the criteria and procedures for evaluating and selecting brokers and for monitoring and ensuring best execution for its Clients. The goal is that the total costs or proceeds of each transaction are the most favorable under the prevailing circumstances. The selection of a broker must be approved by the GDDA Chief Risk Officer ("CRO"), Chief Financial Officer ("CFO") and Chief Investment Officer ("CIO").

## 5.3 Trade Allocation

**Potential Conflict of Interest:** In some circumstances GDDA may participate in a limited investment opportunity. This may encourage a portfolio manager to allocate a limited trade to certain GDDA Funds to the detriment of others.

**GDDA Controls:** GDDA may apply a general principle of allocating an investment opportunity equitably amongst GDDA Funds to ensure that they have equal access to the same quality and quantity of investment opportunities in accordance with pre-established criteria. This is set out in GDDA's "*Trade Allocation Policy*". The trade allocation process is overseen by the "*Trade Allocation Committee*" consisting of GDDA's Chief Executive Officer ("CEO"), CRO and CIO.

## 5.4 Cross Trades

**Potential Conflict of Interest:** From time to time, securities sold on behalf of one Client may be suitable for purchase by another Client. Cross Trades may cause Conflicts of Interest as there may be an incentive for GDDA to favor one Client over another.

**GDDA Controls:** Cross Trades between Client accounts will only be undertaken by GDDA when there is legitimate reason, in the best interests of both the purchaser and seller, carried out on arm's length terms at current market value. Cross Trades are documented, disclosed to the relevant Clients and subject to approval by the GDDA's CEO, CRO and CIO.

Cross Trades between an Employee's personal account and a Client's account are prohibited, and so are Cross Trades between GDDA's proprietary account and a Client account, except for warehousing on limited occasions by GDDA for Client accounts due to logistic reasons, which are conducted on arm's length basis if permitted by law and disclosed in advance to the relevant Client(s).

## 5.5 Trading Errors

**Potential Conflict of Interest:** Trade errors may be made in handling a Client's account giving rise to a Conflict of Interest in terms of who bears the cost of the error.



**GDDA Controls:** It is the policy of GDDA that trades are executed with prudence and care to minimize errors. But should they occur, the Client will be put back into the position they would have enjoyed had the error not occurred and with no benefit to GDDA.

Errors are reported internally to the RMC including details on the occurrence, treatment and mitigating action for all trading errors, including the potential financial impact on the Client.

## **5.6 Service on the Boards of Publicly Traded Portfolio Companies**

**Potential Conflict of Interest:** (1) conflicting fiduciary duties to a portfolio company and to Clients of a GDDA Fund that has invested in such company; (2) the receipt of options or rights with respect to securities of the investee company that might influence investment decisions concerning the GDDA Fund; and (3) the receipt of material non-public information (MNPI) about the portfolio company.

**GDDA Controls:** Employees and especially investment staff are discouraged from serving on the boards of directors of publicly traded companies, absent prior authorization based on a determination that the board service would be consistent with the interests of relevant GDDA Fund(s). When an Employee is authorized to serve as director or officer of a public company, he/she should be isolated from other investment personnel making investment decisions relating to such public company.

## **5.7 Proxy Voting and Shareholder Engagement**

**Potential Conflict of Interest:** Where GDDA acts as a proxy for Clients while an Employee or GDDA has proprietary benefit or holds positions in a portfolio company, the exercise of voting rights attaching to portfolio investments may result in a Conflict of Interest with other governance and stewardship activity.

**GDDA Controls:** Proxies are assets of GDDA's Clients that must be voted with diligence, care and loyalty. GDDA will vote each proxy in accordance with its fiduciary duty to its Clients. GDDA will generally seek to vote proxies with the aim of furthering the best economic interests of Clients, promoting high levels of corporate governance and adequate disclosure of company policies, activities and returns, including fair and equal treatment of shareholders.

Each vote is ultimately cast on a case-by-case basis, taking into consideration the contractual obligations under the advisory agreement or comparable document, and all other relevant facts and circumstances at the time of the vote. GDDA may cast proxy votes in favor of management proposals or seek to change the views of management proposals, considering specific issues as they arise on their merits. GDDA may also join with other shareholders of the company in seeking to submit a shareholder proposal to the portfolio company or to propose a proposal submitted by the portfolio company.

Absent specific Client instructions, GDDA has adopted the following proxy voting procedures designed to ensure that proxies are properly identified and voted, and that any Conflicts of Interest are addressed appropriately.

Material Conflicts of Interest are resolved in the best interest of Clients. All Employees have an obligation to disclose any personal Conflicts of Interest such as officer or director positions held by them, their Connected Persons in a portfolio company or attempts by a portfolio company to exert influence over such persons with respect to their vote. Employees must notify Compliance if they are aware of any material Conflict of Interest associated with a proxy vote.

Where a material Conflict of Interest arises, GDDA may choose among the following options to eliminate such Conflict of Interest:

- a) Vote in accordance with express Client instructions;
- b) If possible, erect information barriers around the person or persons making voting decisions sufficient to insulate the decision from the Conflict of Interest; or



- c) If practical, notify affected Clients of the Conflict of Interest and seek a waiver of the Conflict of Interest.

GDDA will not neglect its proxy voting responsibilities but may abstain from voting a Client proxy if it deems that abstaining is in Clients' best interests. For example, GDDA determines that the effect on shareholder's economic interest or the value of a portfolio holding is indeterminable or insignificant.

GDDA shall retain the following information, where they exercise voting authority with respect to Clients' portfolios, for three (3) years:

- a) Proxy statement received;
- b) Record of votes that were cast on behalf of Clients;
- c) Records of Client's request for proxy voting information;
- d) Any documentations prepared that were material to making a decision on how to vote.

As a matter of policy, GDDA does not disclose how it expects to vote on upcoming proxies. Additionally, GDDA does not disclose the way it voted proxies to unaffiliated third parties, unless specifically requested to in writing by a Client.

## **5.8 GDDA Directorship**

**Potential Conflict of Interest:** Proposed or Existing Directors may have personal or business Conflicts of Interest that may affect their decision making in the best interests of GDDA or the relevant GDDA Fund(s).

**GDDA Controls:** In considering a director appointment, the relevant board shall assess and document its consideration of possible Conflicts of Interest. The relevant board is required to identify, manage, record and, where relevant, disclose actual or potential Conflicts of Interest. In any matter for consideration before a board where a director believes that a Conflict of Interest may arise affecting him personally, unless otherwise generally disclosed in accordance with relevant company law, he shall disclose such Conflict of Interest to the board before the issue is considered by the board. A member of the board whose potential Conflict of Interest is under review may not debate, vote, or otherwise participate in such determination. If the board determines that an actual or potential Conflict of Interest does exist, the board shall also determine an appropriate remedy. Such remedy may include, for example, the relevant director absenting himself/herself from the discussion and any voting or decision making in relation to the matter that is the subject of the Conflict of Interest. If ongoing Conflicts of Interest arise, which are considered to be impacting the ability of the board to act in the best interest of its shareholders, consideration shall be given to changing the membership of the board.

## **5.9 Gifts, Entertainment and Inducements**

**Potential Conflict of Interest:** Employees may give or receive gifts and/or entertainment to or from third parties which may influence their behaviors or induce them to act in an appropriate or unethical manner to the detriment of Clients. This could prevent Employees from focusing on the appropriateness of costs charged to Clients or the quality of services offered, potentially leading them to favor a third party over Clients.

**GDDA Controls:** GDDA has anti-bribery, fraud, gifts and entertainment regulations within its Employee Handbook. Further, Employees are required to undertake anti-bribery and corruption training periodically.

GDDA seeks to ensure that Employees do not offer or give, solicit or accept gifts or entertainment which are likely to result in a Conflict of Interest with the duties owed to Clients. All gifts and entertainment from or to third parties must be of minor benefit and enhance the quality of service to Clients. Gifts and entertainment above a certain nominal value must be declared and will not be permitted.



## 5.10 Remuneration

**Potential Conflict of Interest:** Bonuses and equity awards are variable components of compensation that are intended to motivate and reward Employees for their contribution to the annual results of the company and may encourage inappropriate risk taking.

**GDDA Controls:** GDDA executive management meets regularly and is responsible for determining the components and level of compensation paid to Employees and for ensuring that (i) compensation is aligned to the long-term interests of Clients and GDDA; (ii) not only quantitative commercial criteria, but also compliance with regulations, the fair treatment of Clients and quality of services provided to Clients are taken into account; and (iii) any direct link between the remuneration of Employees where a Conflict of Interest detrimental to the best interests of Clients may arise in relation to the activities they are engaged in is removed.

## 5.11 Conflicting Duties

**Potential Conflict of Interest:** Taking different roles or positions simultaneously may create Conflicts of Interest.

**GDDA Controls:** GDDA seeks to segregate job roles to the extent possible to limit the potential for Conflicts of Interest. Where appropriate and proportionate, systems and controls exist to prevent Employees from undertaking roles where such a Conflict of Interest may exist. As part of the RMC's regular review of each department's obligations, the roles undertaken by individuals within that department and the segregation of duties are reviewed as appropriate.

## 5.12 Personal Account Dealing (PAD) and Proprietary Dealings

**Potential Conflict of Interest:** Where (i) an Employee or a Connected Person engages in PAD in relation to a security; or (ii) GDDA trades its proprietary positions in a security that a Client currently holds or may trade in pursuant to its mandate to the detriment of the Client.

**GDDA controls:** Under the PAD Policy, GDDA prohibits Employees (also referred to as "Covered Persons") to buy any securities that a GDDA Fund may trade in in accordance with its investment mandate. Covered Persons may only keep existing holdings in such securities and can divest with Compliance's pre-clearance. Covered Persons may participate in private placements by companies in which a GDDA Fund currently invests or is likely to invest in accordance with its mandate or private equities with Compliance's approval. Employees must disclose holdings upon recruitment and periodically afterwards.

GDDA monitors compliance with the PAD Policy and violations of the policy are subject to disciplines and penalties as provided therein.

## 5.13 Confidentiality

**Potential Conflict of Interest:** Covered Persons may hold material non-public information (MNPI), confidential or price sensitive information about a security or its issuer and may disclose such information to others, or facilitate or solicit others to trade on such information to the detriment of Clients.

**GDDA Controls:** The GDDA PAD Policy prohibits not only trading on MNPI by Covered Persons, but also the disclosure, solicitation or facilitation of trading by or for others on MNPI. GDDA also maintains a Confidentiality Policy which Employees must acknowledge upon recruitment and thereafter periodically.

### a) Chinese walls

This is the term used for the established arrangements, which prevent the unauthorized flow of confidential information from one department to another department of GDDA. The nature of GDDA's



business is such that it does not need to have Chinese walls in place on a permanent basis, but such arrangements could be used on an ad hoc basis if and when the need arises.

b) "Need To Know" Policy

GDDA operates a "need to know" policy. Confidential and/or price sensitive information should only be passed to other Employees within GDDA when there is a clear "need to know" on the part of the recipient and the information transfer is in accordance with the best interests of the Client.

c) Restriction on access to information/electronic data

Employees within an "insider" business unit are prohibited from inappropriately passing on sensitive information to those in an "outside" business unit who cannot access the information.

In order to minimize the risk of accidentally disseminating confidential information, all Employees are asked to ensure that when they leave their desk unattended, sensitive and confidential correspondence and information is not left on the desk so that it is visible, and computers are either switched off or locked. As an additional precaution, computers will automatically lock if unattended for a short period.

The access to computer drives and to files located within drives can be and is restricted by the use of passwords and user IDs.

Where confidential information is to be disposed of, Employees should make sure that this is done in a secure way e.g. through shredding.

#### 5.14 Outside Business Interests

**Potential Conflict of Interest:** Employees may hold outside positions or private business interests in companies not associated with GDDA ("**Outside Business Interests**"). This association could potentially lead to the Employees not acting in the best interest of GDDA Funds and/or GDDA.

**GDDA Controls:** Employees are expected to give undivided attention to the work at GDDA and to act in the best interest of Clients. Therefore, Employees are required to disclose and seek pre-approval to hold Outside Business Interests. Where approval is granted, GDDA may implement additional controls to effectively manage the potential Conflicts of Interest.

The following Outside Business Interests require pre-approval and initial as well as periodical disclosure:

If there are any questions regarding whether outside activities are considered as Outside Business Interests, Employees should discuss such activities with their direct supervisor and, as necessary, with the CRO.

#### 5.15 Vendors and Third-party Representatives

**Potential Conflict of Interest:** Conflicts of Interest may arise with regards to vendors and third-party representatives where, for example, an Employee involved in the procurement or hiring process has a close relationship with a particular vendor or third-party representative.

**GDDA Controls:** Employees are expected to identify and manage potential Conflicts of Interest in GDDA's procurement and outsourcing processes to ensure the appropriate handling of relationships with vendors and third-party representatives. GDDA carries out due diligence on vendors and third-party representatives and has contractual arrangements in place to protect the interest of GDDA and Clients accordingly. It is the Employees' responsibility to escalate all matters that might reasonably be expected to impact their independence and objectivity, or otherwise interfere with their respective duties to GDDA or Clients or give



rise to a perception of a Conflict of Interest. Furthermore, GDDA seeks to manage actual or potential vendor relationships which are also actual or potential Client relationships independently and on an arm's length basis and sets out the rules of engagement between GDDA, vendors and Clients so as to manage actual or potential Conflicts of Interest.

#### **5.16 Related Party Transactions**

**Potential Conflict of Interest:** GDDA may enter into transactions with related-parties favoring them to the detriment of Clients.

**GDDA Controls:** GDDA conducts related-party transactions on an arm's length basis, ensuring the transactions further the interests of the relevant Clients and are subject to approval in accordance with applicable laws.

### **6. RECORD OF CONFLICTS**

A Conflicts of Interest Register (as per form in Appendix 2) is maintained detailing the nature of the potential conflict, how it may give rise to a material risk or disadvantage to Clients, the mitigating actions proposed, how this complies with this Policy, and assurance procedures undertaken to confirm effective implementation. Responsibility for maintaining this register rests with RMD. This register will be subject to monitoring and review by the RMC, executive management and the relevant GDDA board.

A report will be produced by RMD detailing all new Conflicts of Interest recorded and propose changes to previously identified Conflicts of Interest for submission to the RMC semi-annually.

### **7. POLICY REVIEW**

This Policy has been adopted and approved by the Board of Directors of GDDA on {2 October 2021}. This Policy will be reviewed when necessary and at least annually to ensure it remains current based upon the scope of GDDA's activities, its operating structure, strategic plans, applicable regulatory changes and the nature of Clients. Such review should take all appropriate measures to address any deficiencies, such as over reliance on disclosure of Conflicts of Interest.



Appendix 1

**CONFIRMATION OF RECEIPT OF AND COMPLIANCE WITH  
THE CONFLICTS OF INTEREST POLICY OF GREEN DELTA DRAGON  
ASSET MANAGEMENT COMPANY LIMITED**

(Please sign and return one copy to Compliance)

I hereby acknowledge that I have received, read and understand the Conflicts of Interest Policy of GDDA. I further declare that I agree to abide by this Policy at all times.

I have reported all potential conflicts of interest that I am aware of with necessary details to Compliance and have taken all possible measures to mitigate such conflicts.

I further confirm that if I am in any doubt of how this Policy is to be interpreted, I will discuss the matter with Compliance.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_



## Appendix 2

### Template Conflicts of Interest Register CONFLICTS OF INTEREST REGISTER

Date of entry	Persons involved	Type of conflict	Description of conflict	Measures taken to mitigate conflict	Conflict rating (low, medium, high) considering mitigating measures	Date of Compliance review and acknowledgement of conflict