



## Prevention and management of conflicts of interests

Updated: 24/06/2020

Graphene Investments pays the highest attention to its customers' interest. For this purpose, in line with Europe's MiFID directive, the Company implements specific organization and control principles, to prevent, detect and manage any conflict of interests that may be detrimental to its clients' interest.

Graphene Investments aims to prevent conflicts of interests from materializing, by making its professionals fully aware of internal compliance guidelines and market practices, and by implementing strict rules and procedures, such as:

- the implementation of an internal control system
- a separation of functions that may lead to a conflict
- a permanent attention to preserving consistency between the Company's product range and its customers' profile and expectations, avoiding any conflict between that product range and customers' needs and considering any deceptive sales practice as professional misconduct.
- a recording of transaction-related phone conversations
- a strict control of personal transactions by employees, as well as presents and incentives they may receive
- training initiatives to raise all employees' awareness of best practices in the industry.

Graphene Investments maintains a "cartography of potential conflicts of interests" in which the situations that may harm customer interest are listed. This cartography details the various activities in which a conflict of interests is possible. The Company's Head of Compliance and Internal Control ("HCIC") is responsible for updating this document.

Professionals must immediately declare to the HCIC any conflict of interests which they are involved in or become aware of. The HCIC liaises with the persons involved, to resolve the issue.

When managing a potential conflict of interests, Graphene Investments informs its customers in a complete, objective manner, highlights the constraints and the risks associated with certain situations, and refrains from using misleading arguments.

If it proves impossible to avoid a specific conflict of interests, the situation is managed in the interest of the client, in a fair, transparent manner. Depending on the situation, Graphene Investments may decide to continue the activity while organizing it in a way that adequately eliminates the risk of conflict, or give the client all necessary information about residual conflicts of interests and their implications, or give up the business/operation which causes the conflict.