



## Conflict of Interests

Aztec AIFM Services S.A. (“**Aztec AIFM**”) strives to identify and handle conflicts of interest that may occur when providing services and conducting its operations. It also ensures that it has robust organizational and administrative procedures in place to protect the interests of the funds and their investors from being negatively impacted by such conflicts of interest.

Aztec AIFM belongs to the Aztec Group, which offers various authorized financial services that are subject to regulation and supervision in many countries. This can lead to conflicts of interests between different entities, units and/or functions within the Aztec Group and the funds and/or their investors or among one or more investors. Conflicts may also occur in business dealings, with other contractors or service providers outside the Aztec Group or funds investors.

As such, Aztec AIFM has taken and will take all reasonable steps to identify existing and potential conflicts of interest that may arise in the course of investment management activities. It will maintain and operate effective organizational and administrative arrangements with a view to taking all reasonable steps designed to identify, prevent, manage and monitor conflicts of interests in order to prevent them from adversely affecting the interests of the funds and their investors.

As such Aztec AIFM operates under the following principles:

- Aztec AIFM is committed to treating its clients fairly and with integrity;
- Aztec AIFM is committed to complying with all applicable legal and regulatory requirements relating to the proper identification and management of conflicts of interest;
- Aztec AIFM is committed to maintaining and operating effective organizational and administrative arrangements to identify and manage actual or potential conflicts of interest;
- It is the responsibility of all employees, as well as Aztec AIFM's Board of Directors, to be aware of conflicts of interest and to do as much as possible to help identifying and dealing with such conflicts appropriately, including prompt reporting to the relevant management and/or control functions;

Aztec AIFM maintains and updates periodically a register with the details of established or potential conflicts of interest that may have arisen or are likely to arise, as well as the mitigation measures implemented to manage such conflicts.

Aztec AIFM will ensure that conflicts of interest cannot result in a risk of damage to the investors' interests. In the unlikely event that a conflict of interest could not be managed by Aztec AIFM or its delegates, or in the event that mitigation measures taken do not enable Aztec AIFM to properly manage the conflict of interest, confidentiality permitting, Aztec AIFM will inform the investors through this website.

Investors may request free of charge from Aztec AIFM additional information by writing to:

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8, rue Lou Hemmer  
L-1748 Senningerberg  
Attn: Compliance department

E-mail: [kasia.deoliveirsantos@aztecgroupp.eu](mailto:kasia.deoliveirsantos@aztecgroupp.eu)

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## The Bright Alternative

**Explore:** [aztec.group](http://aztec.group)

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Real Asset Fund Services  
Private Credit Fund Services  
Corporate Services  
Depository Services  
AIFM Services