



Conflicts of Interest Policy

Approved and adopted October 2023

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1. Purpose

- 1.1 To ensure that REdimension Capital avoids or mitigates conflicts of interest with their clients or disclose where necessary.
- 1.2 To ensure that REdimension Capital avoids or mitigates circumstances where it may cause its clients to have conflicting interests with each other.
- 1.3 To ensure that the reputation of neither REdimension Capital nor the financial markets generally are damaged by poor management of potential or actual conflicts of interest.
- 1.4 To ensure that any potential or actual conflict of interest is escalated to the Managing Partner, Compliance and, where appropriate, to the relevant Board or Committee.
- 1.5 To ensure that the investigation of any potential or actual conflict of interest is conducted in a timely and professional manner, and that all applicable client, regulatory, and legal requirements are satisfied.
- 1.6 To ensure that any potential or actual conflict of interest is recorded, and where appropriate reported within the business and/or disclosed to clients, regulators and the relevant authorities, as may be necessary in the circumstances.

2. Scope

- 2.1 This policy applies to all REdimension Capital permanent employees, consultants, officers, contractors, temporary workers, directors and where relevant, third parties governed by REdimension Capital's policies through formal agreement or contract ("REdimension Capital staff"). Communication is made to all staff via a variety of means, including compliance induction processes, annual compliance training, with updates distributed by email as appropriate.
- 2.2 If there appears to be a conflict between this policy and local laws, or if employees have questions regarding the interpretation of applicable laws, they should contact Compliance. As a general rule, when there is a difference between policies and the laws of the jurisdictions in which REdimension Capital conducts business, the more restrictive requirement will prevail.

3. Policy

- 3.1 REdimension Capital has a fiduciary duty to its clients and will always seek first to avoid, or secondly to manage any possible conflicts that may occur through its normal business activities so that there is no risk of damage to clients or possible reputational risk to the firm.
- 3.2 All staff members are responsible for and have a duty to identify and escalate to the Partners and Compliance any potential or actual conflicts of interest of which they become aware. This requirement applies to any conflict which may arise or potentially arise between REdimension Capital (including its affiliates) and a client, between REdimension Capital's staff and a client, between REdimension Capital's staff or between two clients and which may possibly result in damage or potential damage to the client(s) or to the reputation of REdimension Capital. In

addition, any such new actual or potential conflict may be escalated by the Partners or Compliance to the relevant Board or Committee for discussion as to the related risk, possible remediation measures, and any other actions required to mitigate or manage the conflict.

- 3.3 All REdimension Capital staff must be alert to their responsibilities under the relevant conflicts of interest laws and requirements in the markets in which they operate, and if they become aware of a possible or actual conflict of interest, they should report it to the Partners and to Compliance immediately. Any non-compliance with the policy by REdimension Capital staff will be treated seriously and may lead to disciplinary action.
- 3.4 Typically, regulators require that if a firm is not able to prevent or reasonably manage a conflict of interest which could lead to a risk of damage to a client's interests, then the firm must clearly disclose the specific detail of the conflict and why it cannot adequately be managed to clients before undertaking business for the client. When a disclosure is made, it should be made in a durable medium, and should contain sufficient detail to enable the client to take an informed decision as to whether to continue to carry out business with the firm.
- 3.5 The rules of the SA Financial Sector Conduct Authority ("FSCA"), amongst others, contain requirements regarding the management of conflicts of interest. REdimension Capital aims to apply best practice from across those jurisdictions in which it operates.
- 3.6 REdimension Capital has identified a number of typical conflicts of interest that may occur in REdimension Capital, including the following non exhaustive list of examples:
 - Potential conflict: REdimension Capital or REdimension Capital staff may be in a situation where a breach has occurred, and a decision should be made as to how to correct the breach. We must always prioritise our clients' interests before that of our own personal interests and REdimension Capital's interests.
 - Potential conflict: REdimension Capital or REdimension Capital staff could misuse information about a client which it comes across during the relationship with the client. Staff must protect and not abuse client confidentiality.
 - Potential conflict: REdimension Capital may deal 'on-own-account' or REdimension Capital may use information gained through their employment to complete transactions ahead of those advised for its clients. The Personal Account Dealing policy applies to all staff and prohibits staff deals where there may be a conflict with any known or proposed client deal.
 - Potential conflict: REdimension Capital staff could have an interest in or a directorship or some other relationship to a company in which REdimension Capital's clients may invest or to an outsource party or service provider. The Outside Business Activities policy (contained in the Code of Ethics Policy) covers the need to disclose and take into account any outside interests that could cause a conflict.
 - Potential conflict: REdimension Capital may provide or receive gifts or entertainment to or from suppliers, brokers, financial intermediaries, clients and others with whom it carries on business. Our Third Party Benefits policy (contain in the Code of Ethics Policy) prohibits certain forms of gift or entertainment and requires various pre-approval levels for other forms of gifts, entertainment, events and other benefits so that any unusual or frequent levels can be monitored and if necessary prohibited to ensure that no bias occurs.
 - Potential conflict: a close personal relationship where there is a direct or indirect reporting line.

- 3.7 Investigations into a possible conflict will generally be conducted internally by Compliance but situations may arise when it is in the best interest of the company to use external investigators, in which case the Partners together with Compliance will collectively determine who should conduct the investigation.

4. Control processes

- 4.1 Staff are aware, through induction and routine refresher training and reminders, that any suspected conflict of interest must be reported to Compliance.
- 4.2 The Conflict of Interests policy is published on the REdimension Capitals internal share point and is provided to all potential, new and current clients on request.
- 4.3 The Conflict of Interests policy together with other policies provides procedures and guidance within the business.
- 4.4 Compliance may identify suspected or actual conflicts of interest during monitoring or during the review of breaches, complaints, gifts and entertainment, etc.
- 4.5 Suspected or actual conflicts relating to a specific business area or investment offering are included in the Compliance reporting.

5. Regulatory considerations

- 5.1 Our clients, regulators, trustees/depositaries of the funds, and auditors require that systems and controls are in place to prevent or, if not possible to prevent, manage conflicts of interest.

6. Frequency of review

- 6.1 Every two years

7. Approval mechanism

Responsible officer	Approver	Date of approval	Effective date
Compliance officer	REdimension Partners	October 2023	October 2023
	Compliance officer	October 2023	
	REdimension Capital Board	October 2023	

Date of next review: October 2024