

Private Conflicts of Interest Policy

It is Mel Shanley T/A Quantum Life Ireland's (Quantum) policy to observe and maintain high standards of integrity and fair dealing, to observe high standards of market conduct, and to act with due skill, care and diligence in conducting its affairs and those of its clients.

We are committed to identifying, with reference to the specific investment services and activities and ancillary services carried out by or on behalf of Quantum, the circumstances which constitute or may give rise to a conflict of interest entailing a risk of damage to the interests of its clients. Equally, in response, Quantum will take all reasonable steps designed to prevent or manage such conflicts from adversely affecting the interests of its clients. Conflicts of interest may arise between:

- Quantum and the interests of one or more clients;
- Quantum employees and the interests of one or more clients;
- The Group to which Quantum belongs and one or more clients; or
- Two or more Quantum clients.

Quantum has an obligation to establish, implement and maintain an effective conflicts of interest policy. The purpose of this document is to provide a summary of Quantum's Conflicts of Interest Policy. In many cases, Quantum will operate additional procedures that will be described in other policy documents, in order to implement the Conflicts of Interest Policy at a detailed level.

IDENTIFICATION OF CONFLICTS OF INTEREST

Conflicts of interest may arise in relation to providing investment services where the Firm, its, directors, employees, affiliates, or any person directly or indirectly linked to the Firm:

- is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is contrary from the client's interest in that outcome;
- has a financial or other incentive to favour the interest of one client or group of clients over another, which may result in a failure to take into proper consideration the interests of that other person/entity;

- carries on the same business as the client; or
- receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service.

It is the responsibility of all employees in Quantum to be aware of the potential for conflicts of interest to arise within Quantum's operations. Employees receive training to create awareness of conflicts that may arise and to manage conflicts appropriately. Where an employee believes they may have identified a conflict, they are required to report details to the Head of Compliance and Risk. To avoid any impropriety, whether real or perceived, Quantum has put in place controls:

- That minimise or prohibit those sets of circumstances in which a potential conflict of interest might arise;
- That identify any potential conflicts (real or perceived) that do arise; and
- Where a potential conflict of interest is identified, ensure that any competing interests are appropriately addressed.

PROCEDURES

Quantum has considered the circumstances which constitute or may give rise to a conflict of interest entailing a risk of damage to the interests of its clients. In response, the Firm has adopted procedures and measures in order to prevent or manage such conflicts from adversely affecting the interests of its clients. The following includes some of the key procedures adopted to manage potential conflicts of interest, in our business:

- All employees are required to declare any outside affiliations and investments held. Such interests include external and ancillary business activities, such as shareholdings, director appointments or consultancy roles. The Head of Compliance and Risk is kept informed of such interests and any changes;
- The Firm has established a Staff Personal Account Dealing Policy and a Gifts and Entertainment Policy, both of which aim to avoid potential conflicts of interest;
- When taking on a new client we assess for potential conflicts of interest. In circumstances where a prospective engagement is assessed as potentially giving rise to a potential internal business conflict with another relationship or

business dealing within Quantum, the Firm will determine whether or not to proceed with the proposed engagement or transaction;

- We impose strict controls, where necessary, concerning the dissemination of sensitive information through our Confidential Information Policy, which contains the key concepts of 'Need to Know' policy and 'Transaction specific Chinese Walls' to be put in place if appropriate;
- The Head of Compliance & Risk reports to the Board of the business with a view to guaranteeing the independence of the Compliance and Risk function,;
- Quantum has established a Remuneration policy which aims to prevent or manage conflicts arising from the Firm's remuneration and other incentive structures;
- The Firm has an Inducements Policy in place which ensures that all fees, commissions and non- monetary benefits are charged and structured in the best interests of the client and are charged in line with the requirements of the Central Bank of Ireland Regulations;
- As an overarching safeguard in terms of employee behaviour, we require all employees to abide by the Central Bank's Fit and Proper Standards and required them to be:
- Competent and capable
- Honest, ethical and to act with integrity; and
- Financially sound.

DISCLOSURES

Quantum will take all reasonable steps to prevent conflicts from adversely affecting the interests of clients and will only revert to disclosure as a measure of last resort. Where organisational or administrative arrangements made by Quantum to prevent conflicts of interest from adversely affecting the interests of its clients are not sufficient to ensure, with reasonable confidence, that the risk of damage to its clients' interests will be prevented, Quantum clearly discloses to the relevant client the general nature and/or sources of conflicts of interest, as well as the risks to the client that may arise as a result of the conflicts of interest and the steps taken to mitigate the risks before undertaking business on their behalf. Such disclosure is made in a durable form, is fair, clear and not misleading.

FEBRUARY 2025

The Conflict of Interest Policy is reviewed annually by Quantum.