

Conflicts of Interest

A conflict of interest occurs where competing obligations or motivations result in, or are likely to result in, material risk of damage to the interests of a Client or a group of clients. Brock Milton Capital AB (“BMC” or “the Company”) periodically faces actual and potential conflicts of interest. As a regulated investment manager licensed under the Swedish Securities Market Act (2007:528) to provide discretionary portfolio management and investment advice, BMC is obligated to take all reasonable steps to maintain and operate effective arrangements to identify, manage and prevent relevant conflicts that may entail a material risk for damage to the interest of a client, a client account, a fund managed by BMC or a fund’s shareholders.

BMC has adopted policies and procedures for identifying, reporting, managing and preventing conflicts of interest, including those conflicts that relate to inducements and remunerations. The Policy has been developed bearing in mind in particular the provisions on conflicts of interest management in Articles 33 and 34 of Commission Delegated Regulation (EU)/2017/565 and Chapter 9 Article 9 of the Swedish Securities Market Act. The Policy describes, among other things, how to identify conflicts of interests, how to handle remunerations, outsourcing arrangements and inducements from third parties. The Policy can be downloaded via bmcapital.se.