

CODE OF CONDUCT

This Code of Conduct* applies to all professionals of Emergo Wealth Ltd (“Emergo Wealth”), who are required to adhere to the Code, which serves to assure the utmost confidence in the integrity and service offered. Additionally, the members of our team are accredited members of professional bodies and abide by the professional and ethical principles of their respective associations.

Each Emergo Wealth professional is expected to:

- Serve the financial interests of clients. Each professional shall always place the financial interests of clients first. All recommendations to clients and decisions on behalf of clients shall be conducted honestly, in good faith and with integrity, due care and diligence, exercising at all times the best independent judgment, solely in the best interest of clients.
- Disclose fully to clients the services provided and the compensation received. All financial relationships, direct or indirect, shall be fully disclosed on a timely basis.
- Provide to clients all material information related to any investment decision-making process, as well as other information the clients may need to make informed decisions based on realistic expectations. All client inquiries shall be answered promptly, completely and truthfully.
- Assist in the production of full, fair, accurate, timely and understandable disclosure in reports and documents that Emergo Wealth and its affiliates file with, or submit to, the Cyprus Securities and Exchange Commission and other regulators and in other public communications made by Emergo Wealth.
- Maintain the confidentiality of all information entrusted by clients, to the fullest extent permitted by applicable Laws and regulations, in conjunction with Emergo Wealth’s privacy policy.
- Comply fully with all applicable government laws, rules and regulations of all jurisdictions in which services are provided to clients and which affect the delivery of such services.
- Maintain competency in the services provided to clients, through continuous education and professional development.
- Promptly report to the Audit Committee of the Board of Directors any violation of this Code of Ethics or any other matters that would compromise the integrity of Emergo Wealth.
- Maintain a high level of professional ethical conduct.

For more information on this Code of Ethics please contact our Compliance Department at

compliance@emergowealth.net or +357 22 449122.

*Sources: Investment Management Consultants Association® (IMCA)