

CONFLICTS OF INTEREST POLICY 2023

1. Introduction

- 1.1. LifeGoals Financial Services Ltd (HE 327491) (ex Emergo Wealth Ltd) is a company incorporated under the laws of the Republic of Cyprus (“the “**Company**”), authorized and regulated by the Cyprus Securities and Exchange Commission (“**CySEC**”) to offer Investment Service and Ancillary Services (as these terms are defined in the First Appendix of L.87(I)/2017) (the “**Services**”).
- 1.2. The Company is operating in accordance with (i) the Markets in Financial Instrument Directive 2014/65/EU, (ii) Regulation 2014/600/EU, (iii) the Investment Services and Activities and Regulated Markets Law of 2017 (L.87(I)/2017) (the “**CIF Law**”), and (iiii) other laws, directives and circulars issued by CySEC from time to time (items (i), (ii) and (iii), collectively referred to as the “**Legal Framework**”).
- 1.3. Pursuant to the Legal Framework, the Company has established the present Conflicts of Interest Policy (the “**Policy**”), to effectively, as far as this is possible and applicable, identify, prevent, mitigate, escalate, manage and disclose potential and/or actual conflicts of interest which entail a material risk of damage to the interests of one or more clients of the Company.

2. Scope of Application

- 2.1. This Policy applies to all Services provided by the Company and regulated by the CIF Law or any equivalent law of a member state.
- 2.2. This Policy applies to all directors and/or managers and/or employees of the Company and/or any persons directly or indirectly linked to the Company by means of control who may adversely affect the interest of the clients and/or any client and/or potential clients (the “**Relevant Persons**”).
- 2.3. This Policy is not intended to and does not create third-party rights or duties that would not otherwise exist if the Policy had not been made available, nor does it form part of any contract between the Company and any client of the Company.

3. Identification of Conflicts of Interest

- 3.1. This section is not, and is not intended to be, a complete and/or exhaustive enumeration or explanation of all the potential conflicts of interest that may arise.

Definition of Conflict of Interest

- 3.2. A conflict of interest is a conflict that arises in the course of providing Services to a client of the Company which may be to the interest of the Company and/or a Relevant Person and/or another client of the Company, whilst actually and/or potentially damaging the interests of the client to whom the Service is provided (“**Conflict of Interest**”).

General Principles

- 3.3. The Company takes all reasonable measures to identify any Conflicts of Interest, and for this purpose it takes into account situations where the Company and/or a Relevant Person in the course of providing Services:

- 3.3.1. is likely to make a financial gain or avoid a financial loss at the expense of a client of the Company,
- 3.3.2. has an interest in the outcome of a Service provided to a client of the Company and/or of a transaction carried out on behalf of a client of the Company, which is distinct from the client's interest in that outcome,
- 3.3.3. has a financial or other incentive to favour the interests of one client and/or a group of clients over the interests of another client,
- 3.3.4. carries on the same business as the client,
- 3.3.5. 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 commissions or fee for the Service.

Potential Conflicts of Interest

- 3.4. Examples and/or potential scenarios which may give rise to a Conflict of Interest are set out in Annex A. This list should only be used as a guidance and by no means is this an exhaustive identification of all Conflicts of Interest which may arise.

4. Prevention and Management of Conflicts of Interest

- 4.1. The Company takes all reasonable administrative and organizational measures to prevent the occurrence of Conflicts of Interest or to resolve existing Conflicts of Interest between itself and/or a Relevant Person and its client on the one hand, or amongst its clients inter se on the other hand. Such measures include, amongst others:
 - 4.1.1. Separate supervision and segregation of departments / functions: The Company takes measures for the separate supervision and the segregation of functions of different departments of the Company which provide Services to clients. Where deemed necessary, the Company takes measures for the separate supervision and segregation of functions of Relevant Persons, to prevent and/or control the simultaneous or sequential involvement of a Relevant Person in separate services or activities, where such involvement may lead to situations of Conflicts of Interest or may impair the proper management of such situations. These duties are set out by the individual job descriptions and procedure manuals. The line managers ensure these duties remain segregated as advised by the Compliance function.
 - 4.1.2. Option to refuse provision of Services: Where Services are already provided to a client and it is obvious that by the provision of Services to another client a Conflict of Interest may arise, which cannot be dealt with effectively, then the Company may refuse to provide Services to the second client.
 - 4.1.3. Internal Audit and Periodic Reviews: The Company employs a reputable auditing company to oversee and execute an independent internal audit program at least once a year to review and verify controls while also adherence to the Company's stated policies and procedures. The internal audit function maintains its independence by establishing its own list of significant risks faced by the Company by having access to report directly to nonexecutive directors. Moreover, the Compliance function verifies compliance with this Policy on a quarterly basis and reports the findings formally to the Board of

Directors.

- 4.1.4. Management of confidential and other information: The Company applies a system of “Chinese Walls” to prevent the transfer of confidential information between departments of the Company. This system includes the physical segregation of different departments and the segregation of data and information technology systems of each department so that the persons engaged in each department do not have a direct physical access to records and information concerning the subject matter of another department which are not considered necessary for the execution of the specific work in which they are involved in. More simply, employees have access only to data and information deemed necessary for the fulfilment of their duties.
- 4.1.5. Remuneration of Relevant Persons: The Company takes measures for the removal of any direct link between the remuneration of Relevant Persons principally engaged in one activity and the remuneration of, or revenues generated by, different Relevant Persons principally engaged in another activity, where a Conflict of Interest may reasonably arise in relation to those activities.
- 4.1.6. Training: The Compliance function of the Company provides continuous training and information to all Relevant Persons in relation to Conflicts of Interest issues – a trail of the training is recorded in the relevant Training Registry. New-joiners receive, amongst other documents, this Policy to review, and sign.
- 4.1.7. Conflict of Interest Register: As a mechanism for identifying, managing, monitoring and mitigating Conflicts of Interest, the Compliance function maintains a Conflicts of Interest register (the “**Register**”). The Register is updated with the kinds of Service or investment activity carried out by or on behalf of the Company in which a Conflict of Interest entailing a material risk of damage to the interests of one or more clients has arisen or, in the case of an on-going Service or activity, may arise. The Register also has the purpose of identifying mitigating controls and responsibilities. The Compliance function is responsible for informing the Board of Directors of the Company with regards to all entries to the Register, as well as, to the extent that this is appropriate, warn employees of the Company of the nature of the potential or actual Conflict of Interest for the purpose of avoiding such in the future.
- 4.1.8. Disclosure of Personal Account Dealings: At the time of issuance of this Policy, the Company only trades in liquid ETFs and does not trade single stocks. As such, employee trading on other platforms does not have an impact. Regardless, the Compliance Officer is aware that if this situation changes, then a new policy must be set up to record employee trading. In such situation, the Company shall monitor compliance with these requirements and breaches will be subject to the Company’s disciplinary programs and processes.
- 4.1.9. Independent Compliance Function: The Company internally employs a Compliance Officer and a Risk Manager, both of which are committed to remaining independent and impartial, in order to effectively prevent, limit, mitigate and, when appropriate, escalate any Conflict of Interest which may arise. The Compliance Officer and Risk Manager are subject to the same

internal policies and procedures, including this Policy, as the rest of the Company's employees.

5. Disclosure to the Client

Where the organizational or administrative arrangements made by the Company to manage Conflicts of Interest, are not sufficient to ensure with reasonable confidence that risks of damage to client interests will be prevented, the Company shall disclose the general nature or/and the sources of Conflicts of Interest to the client before undertaking to provide Services to him. Such disclosure is made via a Durable Medium (as this term is defined in CIF Law) and includes sufficient detail, taking into account the characteristics of the client to enable that client to take an informed decision with respect to the Service he requires in the context of which the Conflict of Interest arises.

6. Breach of the Conflict of Interest Policy

Failure to comply with this Policy will result in disciplinary action up to, and including, dismissal. In determining the level of disciplinary action in any particular case, the seriousness and/or frequency of the offence will be considered. In addition, employees of the Company may run the risk of fines, penalties, judgments, damages, and settlements related to regulatory or legal actions against the Company and them as individuals.

7. Additional Details

Additional details regarding the Conflicts of Interest Policy may be given by the Compliance function of the Company to the client, following the latter's request.

8. Contact Information

Any questions regarding this Policy should be addressed to the Compliance function of the Company at compliance@lifegoals.eu.

ANNEX A - EXAMPLES OF POTENTIAL CONFLICTS OF INTEREST

Between the Company and its employees or between the Company's employees

1. An employee simultaneously performs executive and controlling functions which might allow performing functions with the purpose of deriving a personal benefit;
2. An employee's interest in the outcome of a particular activity or endeavour differs from the Company's interest;
3. An employee simultaneously takes a position at the Company, at the Company's client (when the Company provides its products or services) or at the Company's counterparty (when the Company purchases goods, works or services);
4. An employee exceeds his / her functions as set out by his / her employment agreement with the purpose of deriving personal or any other benefit;
5. An employee sells inappropriate products to clients due to aggressive reward incentives to employees;
6. An employee receives a financial or other significant benefit as a result of the employee's position at the Company that is inappropriate in nature.
7. Interests of a certain employee that could impair his or her judgment or objectivity in carrying out his / her duties and responsibilities to the Company;
8. An employee interferes with the due and timely performance by another employee of his/her functions with the purpose of deriving personal benefit;
9. An employee promotes delivery of services which are no longer in the best interests of the Company with the purpose of deriving personal benefit;

Between the Company or its employees with the Company's Clients

10. Interests of a certain client are preferred to those of another client with the purpose of deriving personal benefit by an employee;
11. Interests of a certain employee are preferred to those of a client with the purpose of deriving personal benefit by such employee;
12. A monetary or non-monetary inducement is received from a person other than the client in relation to a service provided to a client;
13. The Company wishing to make investment for its own account in financial instruments in which clients/counterparties are also seeking to invest;
14. The Company is trading for its own account in an instrument which is issued by a client.
15. The Company and/or Relevant Persons operate as both the management committee and the manager in the provision of Services.