



CONFLICTS OF INTEREST POLICY

Knightsbridge wants to provide its clients and potential clients with a summary of its Conflicts of Interest Policy (hereinafter the “Policy”). Knightsbridge is committed to act honestly, fairly and professionally and in the best interests of its clients and to comply, in particular, with the principles set out in the above legislation when providing investment services and other ancillary services related to such investment services. Knightsbridge provides herein a summary of the Policy we maintain in order to manage conflicts of interest in respect of the duties we owe to our clients. SCOPE The Policy applies to all its directors, employees, any persons directly or indirectly linked to Knightsbridge (hereinafter called “related persons”) and refers to all interactions with all clients. The Policy is addressed to Retail Clients.

SERVICES “Conflicts of Interest” may, by way of example, occur within the context of:

1. The investment services and or ancillary services, or any combination thereof provided by the company to its clients and in which possible “Conflicts of Interest” may arise, are the following:

INVESTMENT SERVICES

Reception and transmission of orders in relation to one or more financial instruments
Execution of orders on behalf of Clients

ANCILLARY SERVICES

Safekeeping and administration of financial instruments, including custodianship and related services
Granting credits or loans to one or more financial instruments, where the firm granting the credit or loan is involved in the transaction
Foreign exchange services where these are connected to the provision of investment services
Investment research and financial analysis or other forms

2. Performance-related remuneration paid to the Company’s staff and intermediaries in connection with investment services and or ancillary services, or any combination thereof provided by the company to its clients

3. The Company’s relationship with issuers of financial instruments

4. The preparation of financial analysis on securities offered for sale to the Company’s Clients

5. Access and use of information obtained by the Company or the staff of the Company which is not in the public domain

6. Personal relationships of the Company’s staff, or any persons associated with them, or the participation of these persons, in supervisory or advisory bodies.