

## Triple Jump Conflict of Interest Policy

### Conflict of Interest & Policy Statement

All officers, directors and employees should be scrupulous in avoiding conflict of interest with respect to Triple Jump business. They must refrain from engaging in any activity or having a personal interest that presents a conflict of interest. A conflict of interest occurs when an employee, officer or director, take action or have an interest that prevents him/her from performing his/her duties and responsibilities honestly, objectively and effectively.

In order to properly manage and avoid potential conflicts of interest to arise, Triple Jump shall at all times enforce the following:

- Transparency: in case TJ proposes funding for an investee from different sources (funds) or has previously funded such investee, all Fund Sponsors involved will be informed of the terms and conditions proposed for other Fund Sponsors.
- Equal ranking: In case of combined funding, TJ has a general rule to offer the same terms and conditions for all investment funds involved and there is no distinction between third-party funds and in-house funds. Different pricing may be the result of different currencies and/or maturities offered by (one of) these investment funds.
- Pro rata treatment: In case a potential new investee qualifies for additional funding, TJ will offer the prospective investment on a pro rata basis to all investment funds under its management. Similarly, in case of a (forced) sale or call of a loan, the investment funds involved will receive payments on a pro rata basis.
- Pipeline: TJ negotiates a growth target of its total portfolio on a yearly basis in respect of all investment funds and mandates. As long as TJ meets the targets set and it complies with the investment funds' applicable regulations and management contract, conflicts of interest are not expected. If targets are not met the directors will discuss priorities with constituents.

### Types of Conflicts of Interest

While it is not possible to describe or anticipate all of the circumstances and situations that might involve or even appear to involve conflicts of interest, the following examples of situations where such conflicts of interest may arise can include, but are not limited to:

- having an interest in the outcome of a service provided to a client or of a transaction carried out on behalf of an investment fund, where Triple Jump's interest differs from the fund interest;
- acting for two investment funds in a transaction, where the interest of one may differ or might be in conflict with the interest of the other;
- receiving money, goods or services from a third party, other than standard fees or commissions, in relation to services provided to that third party;
- improperly disclosing any confidential information acquired in the course of official duties or using such information to further your personal interest to Triple Jump's disadvantage;
- unequal treatment of investors or fund sponsors, especially since some of the investors and fund sponsors are also Triple Jump shareholders;
- the (apparent) preferential treatment in selecting investments for in-house investment funds vis-à-vis third party investment funds or mandates;
- exercising voting rights on shares held by one investment fund in a company that received a loan from another investment fund;
- engaging in any other activity or having any other interest that the board of directors of Triple Jump determines to constitute a conflict of interest.

The Compliance Officer is responsible for identifying potential conflicts of interest. He or she will record the type of activities undertaken in which a conflict of interest entailing a material risk has arisen or may arise. The Compliance Officer annually updates the Supervisory Board on these activities and procedures for prevention.

## **Procedures**

In order to properly manage and control any potential conflict of interest, Triple Jump has established various internal procedures. These procedures are designed to ensure, as far as possible, that Triple Jump acts independently when a conflict of interest arises. Whenever a conflict of interest seems to be inevitable, the stakeholders involved will be informed immediately.

Prior to employment and annually after having started working for Triple Jump, all employees are required to fill in and sign the Code of ethics and a Conflict of Interest Form (Section II of the Handbook - Annexes) which will be stored in a personnel file. If an employee answers yes to any of the questions in the Code of Ethics and/or Conflict of Interest, a specification is required and the matter will be discussed with Triple Jump's Compliance Officer and if necessary the Managing Board.

Triple Jump's Compliance Officer is responsible of monitoring personal transactions and periodically checking if employees comply with the internal regulations regarding conflicts of interest, prohibited dealings and gift policy. Behavior conflicting with these regulations is regarded as a serious infringement on the trust that Triple Jump places in its employees and could lead to disciplinary action, such as suspension or in the most extreme case resignation. If this occurs, the Compliance Officer will immediately inform the Managing Board to decide on appropriate actions.

Triple Jump periodically evaluates with respect to the products and services whether certain situations can give rise to actual or potential conflicts of interest. Triple Jump thereby also assesses whether its policy aimed at controlling such conflicts of interest is effective and adequate. Triple Jump will make changes to its policy and procedures if it deems this necessary in the interests of its clients.

An overview of further procedures, includes, but is not limited to, the following:

### **1. Information Barriers**

At all times, Triple Jump employees respect the confidentiality of client and market data and do not disclose or use this data inappropriately. All employees sign an acknowledgement of the Handbook and Code of Ethics, which also covers client confidentiality. See form in Section II of the Handbook - Annexes;

### **2. Segregation of Duties**

Triple Jump has arranged, where appropriate, for the supervision and/or functional segregation of its employees and/or parts of its business carrying out activities for clients whose interests may conflict, or where the interests of its clients may potentially conflict with its own;

### **3. Personal Account Dealing**

To prevent conflicts arising from the use of confidential information obtained from clients and market abuse in general, all employees abide by the Code of Ethics, which also covers insider dealings and constraints on use of information. In principle, Triple Jump employees and their direct family members are not invested in the investment funds for which Triple Jump acts as investment manager. Every year each employee has to disclose its holdings in Triple Jump funds and similar investment funds offered by competitors. In case they are invested in these funds and when it is likely that they possess inside information, the HR Manager and the Management Board will decide if the employees investment gives rise to a potential conflict of interest and accordingly, under which conditions this holding is allowed;

### **4. Inducements**

Within Triple Jump any form of inducements is strictly prohibited;

### **5. Remuneration**

There is no direct link between the remuneration of employees and their engagement in specific activities where a conflict of interest may arise;

## **6. Exercise of voting rights**

Where Triple Jump is allowed to exercise voting rights on behalf of an investment fund, Triple Jump will always do so to the exclusive benefit of the fund and its investors and in accordance with the investment objective and policy of that fund. In case of a conflict of interest with another investment fund Triple Jump is managing, Triple Jump will disclose this and offer to have an independent party to vote on the fund's behalf.

## **7. Disclosure**

Where there is no other way of managing a conflict, or where the measures in place do not sufficiently protect a stakeholder's interests, the conflict will be disclosed to the relevant persons involved to enable them to make an informed decision on whether to continue using Triple Jump's service for this specific situation;

## **8. Declining to Act**

Triple Jump may decline to act for a stakeholder in cases where it is believed that the conflict of interest cannot be managed in any other way;

## **9. Escalation Procedures**

Triple Jump has procedures in place so that any potential conflict of interest is immediately escalated for further review by Triple Jump's Managing Board;

## **10. Employee awareness**

Triple Jump through its officers and directors and (semi) annual meetings, ensures that all employees are aware of the policies and procedures to control and manage conflict of interest situations.

## **11. Review and Monitoring**

Triple Jump's policies and procedures governing conflict of interest situations are subject to ongoing review and monitoring. The latest version of this Policy is posted on Triple Jump's website.

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