

## Theta Capital Management B.V.

### Managing of Conflicts of Interests by Theta

#### **Why does Theta have a conflict of interest policy?**

Where Theta is offering its services and products, it has to manage situations where Theta's interests, or the interests of its employees, could potentially conflict with the best interests of Theta clients. A Conflicts of Interest Policy is crucial for maintaining client trust, ensuring fair treatment, and complying with regulations.

#### **What conflicts of interest may arise?**

- Conflicts of interest between clients and Theta or its employees.
- Conflicts of interest among Theta clients.

These conflicts of interest can arise in any area of Theta's services.

#### **What does the Theta policy focus on?**

- Prevent and manage conflicts of interest.
- Making non-mitigated conflicts of interest visible where needed.
- Prevent damage to clients and other stakeholders due to conflicts of interest.

#### **What measures does Theta take?**

Some important measures that Theta takes to make conflicts of interest visible, prevent and manage are:

##### **I. Administrative procedures and systems**

- Theta has administrative procedures and systems in place to monitor and manage conflicts of interest.

##### **II. Internal arrangements and segregation of duties**

- Theta implements safeguards to control information sharing and separates duties as needed.
- Theta does not accept third-party fees for its investment services. However, small non-monetary benefits that improve service and do not harm clients—such as attending industry seminars or receiving informational materials—are allowed by law.

##### **III. Disclosing a Conflict of Interest**

- If a conflict of interest, despite the measures taken by Theta, is unavoidable, Theta will inform clients about this. This can also be done via the website.

##### **IV. Waiving of service by Theta**

- If the measures taken by Theta are not enough to properly protect the interests of clients, Theta may decide not to provide services in such a case.

#### **Do you want more information?**

If you would like more information about Theta's conflict of interest policy, please contact your Investor Relationship Manager.