



Conflict of interest policy

KRUK Group



General provisions

The Policy sets out the rules for identifying and managing conflicts of interest - understood as circumstances (legal or factual) known to the Company, the Employee, the Associate, and the members of the Company's statutory bodies, which may lead to a conflict between the interests of the Company and the interests of these persons, Related Persons, Business Partners, and Fund Participants. It is also the occurrence of attitudes or behaviors whose intention is to achieve private financial goals by Employees, Associates, members of statutory bodies, Fund Participants or third parties that remain in conflict with the interests of the Company.

Appropriate identification and management of conflicts of interest (hereinafter referred as Col) constitutes an element of the unique organizational culture of the KRUK Group.

Goal of the Policy

With the aim of ensuring operation with respect for the highest ethical standards, in a transparent and professional manner and in accordance with the best interests of the Company, the Policy specifies in particular potential cases or circumstances that may constitute Col, the basic principles of counteracting its occurrence and the basic principles of Col management in the event of its occurrence, in a way that will not violate the Company's interests. As part of its business activities, the Company undertakes activities aimed at protecting its own interests, employees, associates, members of its statutory bodies, shareholders and fund participants, through appropriate identification, prevention and management of Col that may have an adverse impact on their legitimate interests.

Potential sources of Conflict of Interest and Conflict of Interest identification

Col may arise in particular in relations between the interests of companies belonging to the KRUK Capital Group; the interests of a Client or group of clients and the interests of another Client or group of clients; the interests of the Client or group of clients and the Company or a Related Person; the interests of the Company and the interests of the Employee, Associate, Related Person or Close Person.

Potential sources of Col may include:

- the Company's interests as an entity managing the securitized receivables of the securitization fund; providing trading services of receivables; striving to acquire new clients,
- interests of the Client and the Fund as a recipient of services offered by the Company,
- interests of close persons as persons conducting activities within the framework of employment or cooperation; people pursuing their business assumptions and goals; persons

participating in other companies and providing work for other Competitive Entities, or serving in the management and supervisory bodies of such entities.

Rules on Conflict of interest prevention

The company applies the principle of preventing and avoiding the risk of Col occurrence, which is fulfilled by introducing and applying organizational measures and internal regulations that actively counteract the occurrence of Col, in particular:

- a) introduction of the Policy enabling the identification of circumstances that constitute or may cause Col and communicating its content to Employees, Associates and members of statutory bodies;
- b) implementation of an appropriate organizational structure, including the separation of key functions and the division of competences and principles of the remuneration system, intended to counteract the risk of Col occurrence;
- c) determining the division of tasks and responsibilities of Employees, Associates and members of the Company's statutory bodies so that they do not cause Col;
- d) development of internal processes and procedures ensuring counteracting the flow of confidential information or other information deemed as business secrets;
- e) implementing mechanisms for reporting and resolving the Col and enforcing disciplinary measures against persons violating the Policy.

Conflict of interest management

The Company investigates every case of potential or actual Col.

In the event when Col is impossible to be avoided, it should be disclosed to limit its possible consequences. Each Employee, Associate and member of the Company's statutory body who has knowledge of actual (occurring) or potential (possible) Col should refrain from further action in the subjected matter and immediately inform about this fact his or her direct superior who will decide afterwards on the further course of action.

Compliance role in the conflict of interest proceeding

As part of the implementation of the Policy, the Compliance Section performs the following activities:

- a) introducing internal regulations regarding Col;
- b) conducting Col analysis and issuing Col management recommendations, as well as monitoring their implementation;
- c) monitoring the application of the provisions of the Policy;
- d) conducting training on Col;
- e) maintaining the Col register.

Final provisions

The Compliance Section reviews the Policy annually, taking into account changes in the legal status, organizational changes and the validity of the described process.

All activities performed based on the Policy are documented in written or electronic form, in a way that ensures the identification of the person performing the activity and the integrity of the information prepared.