



Conflict of Interest

1. Introductory provisions

- 1.1. This Conflict of Interest Policy (hereinafter also referred to as the "Policy") sets out the principles applied by Jet Investment, a.s. (hereinafter referred to as the "Company") for managing conflicts of interest.
- 1.2. This Policy is available to holders of securities issued by funds managed by the Company on the Company's website.
- 1.3. The purpose of the Conflict of Interest Policy document is to inform investors about the principles and methods of conflict of interest management applied by the Company, in particular with regard to the identification of potential conflicts of interest, setting up mechanisms to prevent their occurrence, and fulfilling the obligation to inform investors if a conflict of interest that has an adverse effect on investors cannot be reliably prevented.

2. Identification of conflicts of interest

- 2.1. The Company is obliged to identify and manage conflicts between investors in the funds it manages, the Company, its senior officer or employee, its controlling entity or entity controlled by the Company, and the Company's controlling entity on the other hand, or in other situations that compliance identifies as areas of conflict of interest risk.
- 2.2. A conflict of interest is a situation in which the person concerned, in particular:
 - a) may obtain financial benefit or avoid financial loss at the expense of the Company or the funds it manages,
 - b) has a different interest in the outcome of the activity than the investor or fund,
 - c) is motivated to favour the interests of one investor or fund over those of another investor or fund,
 - d) operates in the same business as the Company,
 - e) receives or will receive an inducement from a person other than the Company in connection with a service to an investor, and this inducement does not represent the usual compensation for the activity performed.

3. Management of conflicts of interest

3.1. The Company applies the following measures to identify and manage conflicts of interest:

- a) a person in a conflict of interest shall notify their superior in advance, who shall assign the activity that is the source of the conflict of interest to another person, perform the activity themselves, or otherwise replace it with an appropriate alternative;
- b) any person who identifies a conflict of interest or a risk of a conflict of interest shall notify their superior of this fact and prepare a report on this fact;
- c) the superior shall report the conflict of interest to the person responsible for compliance, who maintains a register of conflicts of interest and assesses whether a material conflict of interest may arise;
- d) the person responsible for compliance is authorized to recommend to the superior whose department is threatened by or has experienced a conflict of interest a procedure for its resolution. If this recommendation is not followed, the person responsible for compliance shall inform the Company's Board of Directors;
- e) the remuneration arrangements for individuals must not be designed in such a way as to encourage them to prioritise their own interests over those of investors;
- f) no employee of the Company may accept an inducement that may lead to a breach of their duty to act competently, honestly, and fairly and in the best interests of each investor;
- g) departments whose activities potentially pose a conflict of interest are organizationally separated.

3.2. If, despite the above measures, it is not possible to reliably prevent the adverse impact of a conflict of interest on the interests of the investor, the Company shall, prior to the execution of the transaction giving rise to the conflict of interest, provide the investor with written information on the nature of the conflict of interest in a manner that allows the investor to take the conflict of interest into account. The term "written communication" also includes communication sent by e-mail.