Conflicts of Interest Policy

POLICY DOCUMENT - FRA-REGULATED - EFFECTIVE 1 JANUARY 2026

Purpose

This Policy ensures that conflicts of interest are identified, disclosed, and managed so that the interests of clients are protected and the integrity of the firm is preserved.

1. Scope

This Policy applies to all personnel and all business lines of Acumen Holding and its subsidiaries.

2. Definition

A conflict of interest arises where the interests of the firm, an employee, or a client may compete with the firm's duties to another client, or with the duties owed to the firm.

3. Identification

Personnel must proactively identify potential and actual conflicts across advisory, brokerage, and asset management activities, including cross-business situations.

4. Disclosure

Material conflicts must be disclosed promptly to the Compliance function and, where relevant, to affected clients before proceeding.

5. Management and Mitigation

Measures include information barriers, segregation of duties, independent oversight, restricted lists, and - where a conflict cannot be managed - declining to act.

6. Personal Account Dealing

Employee personal trading is subject to pre-clearance, holding periods, and restricted-list controls administered by Compliance.

7. Record-Keeping

A conflicts register is maintained and reviewed by the Risk and Compliance Committee, which reports material matters to the Board.