



CONFLICT OF INTEREST POLICY AND DISCLOSURE

STANLEY GROUP
MAY 2023

Conflict of Interest Policy and Disclosure Form for Stanley Group Consultants and Stanley Group Foundation Employees, Associates, Affiliates and Volunteers

A conflict of interest exists when there is evidence of, or the appearance that, a Stanley Group Consultant's / Stanley Group Foundation's, (hereafter, "Stanley Group") Employee's, Consultant's, Affiliate's and/or Volunteer's personal and/or alternative business interests have influenced or may influence Stanley Group's transactions or operations, or that these interests take precedence over the interests, goals, and/or mission of Stanley Group. A conflict of interest may relate to you, your spouse/partner, family member, business interests, and/or associates ("Close Personal Relationship") in areas such as:

- I (or a party related to me) hold, directly or indirectly a position of financial interest in an outside concern from which Stanley Group secure goods or services.
- I (or a party related to me) render directive, managerial, or consultative service to, or am an employee of, any outside concern that does business with Stanley Group.
- I have accepted gifts or other benefits of a monetary value in excess of \$50.00 (in words: Fifty United States Dollars) from any outside concern that does, or is seeking to do, business with Stanley Group.
- At Stanley Group, I have participated in management decisions concerning transactions that affect or benefit me, my family, or my personal financial interests.
- A party related to me has received or continues to receive services from Stanley Group.

The Stanley Group of Companies is regulated in the following jurisdictions by the relevant Financial Services Authorities:

- **United Kingdom of Great Britain and Northern Ireland** (*Stanley Group Consultants Ltd., The Stanley Group Foundation Charitable Incorporated Organisation*) by the Financial Conduct Authority ("FCA"), the Prudential Regulatory Authority ("PRA"), and The Charities Commission for England and Wales.
- **Federal Republic of Germany** (*Stanley Group Consultants GmbH*) by the Bundesanstalt für Finanzdienstleistungsaufsicht ("BaFin").
- **United States of America** (*Stanley Group Inc.*) by the Financial Industry Regulatory Authority ("FINRA") and the Securities and Exchange Commission ("SEC").

The Stanley Group has a responsibility for knowing, to the best of its ability, what conflicts might exist, and to manage, reduce, or eliminate those conflicts.

The key to handling these potential conflicts is full disclosure as soon as practicably possible, but no later than 72 hours (seventy two) after the arising of any potential conflict or the appearance of a conflict. It should be noted that we believe it appropriate to disclose any family members that may be supported by, employed by, a vendor of, or business associate of Stanley Group. Each employee, consultant, affiliate and volunteer will complete an annual conflict of interest disclosure form to inform Stanley Group of situations that pose or may give the appearance of conflict of interest.

If you have questions as to whether a conflict of interest exists, we encourage you to discuss this with the office of Accounts and Personnel, Stanley Group's Compliance Officer, Head of Legal Services, and/or to disclose this information within this form.

Stanley Group's Board of Directors will consider, on a case-by-case basis, the disclosure and nature of potential or actual conflict, and take appropriate advice from internal and external advisors where necessary on the most appropriate course of action to protect Stanley Group's interests.

Failure to comply with this policy may result in disciplinary action, dismissal from Stanley Group and its subsidiary entities, including termination of employment, and where required by law, referral of the case to the relevant regulatory and civil authorities.

I certify by signing below I acknowledge receipt of the Conflict of Interest Policy and that I have accurately completed this disclosure form to the best of my knowledge.

Please check the statement(s) that pertain to your disclosure:

- I hereby report to the best of my knowledge, information and belief, no situation in which I am involved personally or professionally could be construed as a violation of the Conflict of Interest Policy, or as placing me in a position of having a conflict of interest with the Stanley Group of Companies*.
- I hereby disclose the following circumstances that may constitute a conflict of interest, as described in the Conflict of Interest Policy above (please document all situations below that are or may be considered a conflict of interest) *:

* I understand it is my responsibility to contact Stanley Group's Compliance Officer to complete a new Conflict of Interest and Disclosure form to notify Stanley Group of any changes and/or additions that may occur throughout the year.

Name (please print) _____

Nature of Engagement (Employee / Consultant / Affiliate / Volunteer)

Signature _____

Date _____ / _____ / _____