Conflict of Interest Management Policy

Guiding Principles

A conflict may occur when competing personal and professional interests are present. Power Parity ("GoParity") is committed to doing everything in its power to identify, monitor and manage current and potential conflicts of interest that may arise with clients and between clients.

This document defines procedures for identifying, monitoring and managing any conflicts, current or potential.

Obligations Concerning Conflict Management

GoParity considers that a conflict of interest exists when a conflict arises between:

- the interests of GoParity or related persons and the duties of GoParity towards a client;
- the divergent interests of two or more GoParity clients for whom GoParity has in each case duties.

GoParity is required to anticipate, analyze and manage any conflict of interest that may arise.

For the purposes of related persons,meaning its partners, members of the management body and employees, and GoParity adopts procedures intended to prevent any of them from carrying out a personal operation that represents a violation of any other GoParity duty provided for by law while Platform of Collaborative Financing.

Criteria for identifying current or potential conflict areas

GoParity will review whether GoParity or anyone directly or indirectly related:

- may have a financial gain or avoid a financial loss at the client's expense;
- has an interest in the outcome of service provided to a client that is distinct from the client's interest;
- has a financial or other incentive to favor one client's interest over another;
- operates in the same business area as the client;
- receive from someone other than the client, and in connection with a service provided to the client, a remuneration in the form of money, goods or services other than general commission for that service.

Acting as collaborative financing intermediary

The following procedures should be followed to manage conflicts inherent to the intermediary lending activity.

<u>Accept ancommitment</u>

The process for accepting a new business must include a discussion of the level of real or potential conflicts associated with its acceptance. All new businesses must be approved by executive management and ratified by management and must include a discussion of the terms proposed so that the management can assess whether a conflict may or may not exist;
If the potential for conflict is higher than normal, a management member should be appointed to monitor the progress of the engagement.

<u>Terms of commitment letter</u>

The letter of commitment should allow for withdrawal by GoParity if it is not satisfied that the borrower understands or intends to act in the interest of potential lenders.

Before launching a loan

Before announcing a new loan on the website, a due diligence update, including a review of the proposed terms, should be provided to executive management. Any significant change to the original terms must be justified and approved by management.

Before formalizing a loan

Before completing a loan, a final update of due diligence, including a review of the proposed terms, should be provided to executive management. Any significant change to the original terms must be justified and approved by management.

Measures to prevent conflict of interest

The potential for conflicts of interest between GoParity and clients is very low, namely by prohibiting investment in opportunities made available through the platform to partners, members of the management body and employees.

The mechanisms for mitigating GoParity's conflicts of interest involve the following measures:

- Active and monitorable restrictions on related persons;
- Prohibition of investment positioning by GoParity and related persons;
- Creation of compensation structures that ensure independence in the provision of services to Clients;
- The Compliance Officer regularly monitors and assesses the adequacy and effectiveness of the Conflict of Interest Management Policy and the measures and procedures adopted;
- Communicating and providing transparent and clear information to Clients about possible conflicts of interest that may arise in the scope of the activity.

Disclosure

If executive management concludes that there is a potential conflict of interest that could create a material risk or damage to a client, the responsible executive officer will notify the client or potential client in writing within 24 hours of becoming aware of that conflict. For a potential client not yet committed, the disclosure must be made in sufficient detail so that the latter can make an informed decision.

Last updated: July 31, 2018