

RiSiN LLC hereby discloses its Conflict of Interest Management Policy as follows.

Policy Approach

We are committed to ensuring that the interests of our clients are not unduly harmed in the course of our business operations. To achieve this, we manage transactions where a conflict of interest may arise, with a focus on protecting and ensuring the convenience of our clients.

Management Structure

The Company appoints the Chief Operating Officer (COO) as the person responsible for conflict of interest management and promotes appropriate management within the organization.

Types of Transactions Subject to Management

The Company identifies and categorizes in advance the types of transactions that may involve conflicts of interest, and regularly or as needed, reviews these classifications. Types of such transactions may include those where the interests of one client conflict with those of another, or where a client's interest conflicts with that of the Company.

Management Methods

The Company monitors the circumstances of conflicts of interest in transactions with clients and takes appropriate actions depending on the situation through the following methods and others. We also strive to provide clear information on the specific details of any conflicts of interest.

- In principle, prohibition of transactions between client assets and the Company or related parties
- Ensuring fairness of transaction conditions
- Obtaining client consent or disclosing the situation regarding conflicts of interest
- Developing products that truly meet client needs
- Reasonable fee-setting processes
- Establishing appropriate performance evaluation systems

Continuous Improvement

We will verify the effectiveness and appropriateness of our conflict of interest management and strive for continuous improvement based on the verification results.