



Conflicts of Interest Policy

Effective March 1, 2026

Definition

“Conflict of interest” as referred to within the SDG Global Bylaws, shall include but not be limited to, any transaction by or with SDG Global in which a member (or any affiliate of the member) has a direct or indirect personal interest, or any transaction in which a member is unable to exercise impartial judgment or otherwise act in the best interest of SDG Global.

Board Review

In the event any member of the SDG Global has a conflict of interest that might properly limit the member’s fair and impartial participation in fund deliberations or decisions, that member shall inform the board as to the circumstances of such conflict. If those circumstances require the nonparticipation of the affected member, the board may nonetheless request from the member any appropriate non-confidential information which might inform its decisions.

Voting and Self-Dealing

No member shall cast a vote, nor take part in the final deliberation in any matter in which he or she, members of his or her immediate family, or any organization to which trustee has allegiance, has a personal interest that may be seen as competing with the interest of SDG Global. Any member who believes he or she may have such a conflict of interest shall so notify the board prior to deliberation on the matter in question, and the disinterested voting members shall make the final determination as to whether any member has a conflict of interest in any matter. The minutes of the meeting involved shall reflect disclosure of any conflict of interest and the recusal of the interested member(s).

Disclosure Statement

Pursuant to SDG Global’s Conflict of Interest Policy requiring disclosure of certain interest, a copy of which has been furnished to me, I hereby state that I or members of my immediate family do not have:

- a current or potential involvement in a financial or other relationship that directly and significantly affects, or potentially could affect my independent, unbiased judgment in my duty to SDG Global;
- possession of a significant ownership interest or management functions in an organization conducting business with SDG Global;

- Potential for material, financial, or other benefit from knowledge of information confidential to the SDG Global.