

## Conflict Management Statement

**Adopted: 1 October 2025**

JustFund Pty Ltd and its related entities, including the LegalAccess Fund, is committed to transparency and integrity in managing potential and actual conflicts of interest. Our approach to managing potential and actual conflicts of interest is summarised as follows:

**Providing Legal Advice:** JustFund does not offer legal advice to its clients, and requires all clients to retain independent legal representation.

**Legal Representation:** JustFund will not engage the same legal representation as a client in the same matter. However, if JustFund has a pre-existing legal or commercial relationship with the client's legal representative, this conflict must be disclosed. The client can then make an informed decision on whether to proceed with the funding agreement or seek alternative representation. If the client chooses to proceed without changing legal representation, JustFund will require the client to provide consent to proceed on that basis.

**Director or Staff Member Interests:** Directors or staff members with a business or personal connection to a client must recuse themselves from any involvement in the application process or ongoing management of that funding agreement. A register of outside business interests is maintained by Compliance for this purpose, to list the interests of all directors and staff members involved in application approvals or loan portfolio management.

**Dual Lending:** Where JustFund receives applications from, or provides funding to, opposing parties in the same legal matter, information barriers are put in place in respect to the information of each party. Staff members that exercise decision making authority that could disadvantage a client will recuse themselves from consideration of the opposing party's application or loan. If both sides to the same legal matter are eligible for approval, funding will be provided by separate legal entities operating segregated loan management systems, separate websites, bank accounts, phone lines, and email addresses. If a matter requires senior review by the Head of Credit Underwriting or the Investment Committee, it will be considered subject to the segregation of decision making authority as outlined above or the matter must be redacted to remove direct identification information.

**Matters involving Statutory Auditors and Other Professional Service Providers:** JustFund will not enter into a funding agreement with any person associated with its statutory auditor or other professional service provider.

**Significant Shareholder Interests:** If a significant shareholder is also a client, they will recuse themselves from involvement in the application process or ongoing management of the funding agreement. If recusal is not possible, such as in the Head of Credit Origination role, JustFund will not provide funding. If a significant shareholder is the opponent of a client, JustFund will disclose the conflict and seek informed consent from the client to proceed.

**Gifts and Entertainment:** JustFund directors and staff are not permitted to accept gifts or hospitality from a service provider involved in an active procurement process, a negotiation to renew a service, or from a legal firm currently or previously representing a client. Cash gifts will also not be accepted in any circumstances. Other gifts and hospitality up to a value of \$300 (or \$300 per person per event for hospitality) may be accepted as a gesture of goodwill. Higher value gifts and hospitality require approval from the Board and Compliance and must be added to the Gifts and Entertainment Register.

JustFund Directors and staff are required to be vigilant in identifying conflicts and reporting these to JustFund Compliance to ensure they are recorded and managed in accordance with regulatory requirements and to meet client expectations.