

INFORMATION ABOUT HANDLING POTENTIAL CONFLICTS OF INTEREST

Asset management companies seek to protect and reconcile the interests of their clients, shareholders and employees. Nevertheless, conflicts of interest in asset management companies that provide their clients with a variety of high-quality financial services cannot always be completely ruled out. In accordance with Article 20 of the Asset Management Act (VVG) and Article 12b of the Asset Management Ordinance (VVO), we inform you in the following about our provisions for handling potential conflicts of interest.

Conflicts of interest may arise between our company, other companies in our group, our management, our employees, our contractually bound agents or other associated persons, and our clients, or between our clients.

We and our employees are committed to **high ethical standards** to prevent inappropriate interests from influencing, for example, advice, order execution, asset management or financial analysis. We expect diligence and integrity, lawful and professional action, the observance of market standards and, in particular, the **consideration of the client's interest** at all times.

In order to avoid potential conflicts of interest from the outset, we have taken the following **measures**, among others:

- created a compliance function in our company, which is responsible for identifying, avoiding and managing potential conflicts of interest and taking appropriate action, if necessary;
- created organizational procedures to safeguard client interest in investment advice and asset management, e.g., through approval procedures for new products;
- issued regulations regarding the acceptance and granting of benefits and their disclosure;
- delineated business units from each other, while controlling the flow of information between each other (creation of confidentiality areas);
- identified all employees for whom conflicts of interest may arise in the course of their duties, who are consequently obligated to disclose all their transactions in financial instruments;
- issued a regulation regarding the conduct of business of our entities and employees for their own account;
- adopted a regulation regarding the acceptance of gifts and other favors by our employees;

- instituted a guideline which ensures that we act in accordance with our Best Execution Policy or the client's instructions when executing orders;
- adopted a policy that higher revenue from fees does not automatically lead to a higher salary;
- monitored all business of our employees on an ongoing basis;
- conducted continual training of our employees.

We will disclose any conflicts of interest that cannot be avoided to the affected clients before conducting business or offering advisory services.

Specifically, we would like to draw your attention to the following items:

In some instances, we pay commissions to third parties who bring us clients. In detail, we generally pay the following commissions: 20% annually of the fixed asset management fees we take in. These commission payments are used by the third parties to enhance the quality of the services they provide to the clients. The client is informed about the commission payment and its amount.

Within the scope of independent investment consulting (Article 16(4) VVG) and portfolio management (Article 16(5) VVG), we are prohibited from accepting and retaining fees, commissions or other monetary or non-monetary benefits of a third party for providing the service to clients. If the company were to receive monetary gratuities, they will be passed on to the client in full. The company will notify the customer in such a case about the monetary gratuities that are passed on. Smaller non-monetary benefits that may improve the client's quality of service and do not adversely affect the client's interest in terms of their scope and kind are generally permitted and disclosed by the company to the client.

Investment consulting services that are not independent are not offered.

We also inform our clients about relevant potential conflicts of interest in the financial analyses we prepare or disseminate.

On request, we will provide with further details regarding these principles.

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