

## Information on how to deal with conflicts of interest

German and European legislators require investment service providers to take precautions to deal with potential conflicts of interest affecting investment services in order to provide services to clients in an environment of integrity and to avoid any adverse effects on client interests.

Deutsche Oppenheim Family Office AG has established a compliance organisation to identify and avoid or settle conflicts of interest that affect securities services. Each of our employees is under obligation to act with integrity, reliability, fairness and honesty in the best interest of our clients.

We have committed ourselves and our employees to high ethical standards in order to prevent unrelated interests from influencing, for instance, investment advice, order execution or financial portfolio management.

We insist on maintaining the highest professional standards and integrity in all our business activities. We provide investment services honourably, honestly and professionally and in the best possible interest of our clients. Our employees are under obligation to comply with these standards and procedural obligations.

Conflicts of interest cannot always be excluded in the provision of investment services, in particular when it comes to financial portfolio management and investment advice. In accordance with the requirements of applicable EU law and the German Securities Trading Act, we therefore subsequently inform our clients about the extensive precautions we take in dealing with these conflicts of interest.

Such conflicts of interest may arise between the client and Deutsche Oppenheim Family Office AG, other Deutsche Bank group companies, our management, our employees or other persons or entities affiliated with us, or among our clients.

Conflicts of interest might in particular arise:

- in investment consulting and financial portfolio management based on our own (sales/commission) interest or due to that of another Deutsche Bank group company to sell financial instruments, in particular as regards the group's own products;
- when receiving or granting benefits (e.g. placement/sales-based trail commissions/non-monetary benefits) from or to third parties or companies of the Deutsche Bank group in connection with investment services provided for the client;
- in case of a remuneration of Deutsche Oppenheim Family Office AG that depends on the volume of the securities transactions;

- in case of performance-related remuneration of Deutsche Oppenheim Family Office AG;
- in case of performance-related compensation of our employees and members of our management;
- when benefits (e.g. gifts or invitations) are granted from third parties to our employees and/or to members of our management;
- from other business activities of our company, such as the provision of services within the scope of asset reporting, asset controlling, asset strategy consulting or asset management;
- from our relationships with issuers of financial instruments, for example in case of cooperation models;
- when receiving minor non-monetary benefits (e.g. training);
- by obtaining information that is not publicly known;
- from the personal relationships of our employees or management or persons associated with them with third parties, or
- when exercising secondary activities outside the core professional scope of employees or members of our management (e.g. activities for supervisory or advisory boards).

The operational divisions are responsible for avoiding or resolving conflicts of interest. In addition to that, an independent compliance unit, which monitors the identification, avoidance and resolution of conflicts of interest by the responsible business units as a control area, directly reports to the management.

In detail, we take, among others, the following measures:

- Creating organisational procedures to safeguard the client's interests in investment advice and financial portfolio management, e.g. establishing an investment selection process geared to the client's interests, examining and documenting the suitability of personal recommendations, product release procedures, regular examination of the existing product range or compliance-based monitoring activities;
- Implementing regulations governing the acceptance, disclosure of acceptance and granting of benefits and their disbursement within the framework of the financial portfolio management;
- Taking precautions that received benefits must improve the quality of the services provided to our clients;
- Creating confidentiality areas by implementing technical information barriers, separating responsibilities and/or ensuring spatial separation as well as regulations on the cross-departmental flow of information;

- Maintaining an insider or observation list which serves to monitor sensitive information and prevent the misuse of insider information;
- Maintaining a restricted list, which serves, among other things, to counter potential conflicts of interest by prohibiting certain business or consulting services;
- Disclosing and approving securities transactions of such employees and persons associated with them to/by the Compliance Office where conflicts of interest might arise in the course of their activities;
- Establishing an appropriate remuneration system, which, inter alia, is designed to ensure that client interests are not prejudiced by the remuneration of relevant persons in the short, medium or long term, and compliance monitoring;
- Training our employees;
- We will disclose any conflicts of interest to the client for which we cannot reasonably exclude the possibility that client interests may be adversely affected before conducting any business and will clearly set out the steps taken to limit risks.

We would like to draw your particular attention to the following issues:

- In the context of the facilitation of financial portfolio management services in accordance with the provisions of the Securities Trading Act, we are under obligation to fully disburse monetary benefits to the client, including any sales remuneration, taking into account fiscal requirements. The monetary benefits received in one calendar month will be paid out to the client by the end of the following calendar month.
- Benefits received from or granted to third parties in connection with the provision of investment services by us must be designed to improve the quality of the service provided to the client. The benefits must not impair the proper provision of the service and must be in the best possible interest of the client. Prior to the provision of the relevant investment service, we shall unambiguously disclose to the client the existence, nature and extent of the benefit or, if the extent cannot yet be determined, the method of its calculation in a comprehensive, accurate and comprehensible manner. Should we not have been able to determine the amount of the benefit and if instead we have disclosed the method of calculation to the client, we shall subsequently inform the client of the exact amount of the benefit we have received or granted.

As long as we continue to receive benefits in connection with the investment services provided to the client, we shall individually inform the client at least once a year of the actual amount of the remuneration accepted or granted. In case of minor non-monetary benefits, disclosure takes the form of a generic description.

- In the context of providing our securities services, we receive minor non-monetary benefits from other service providers, such as advertising and information materials, access to client events, training, conferences, seminars and other educational and hospitality events, the value of which does not exceed a

reasonable de minimis threshold, and in some cases technical services and equipment for accessing third-party information and dissemination systems. The receipt of such benefits is not directly related to the services provided to the client; we also use these benefits to provide and continuously improve our services in the high quality required by the client.

- A conflict of interest might also arise from the fact that we act as investment advisors to the FOS Strategy Fund No. 1, FOS Rendite und Nachhaltigkeit and FOS Performance und Sicherheit investment funds (jointly referred to as "**FOS Funds**"). For our advisory activities, we receive fixed and performance-related remuneration from the investment company. The amount of this compensation is generally between 0.175% and 0.45% p.a. based on the average value of the assets of the respective FOS Fund per calendar year. This remuneration is not related to the distribution of the investment in the FOS funds. We counter the resulting risks in particular by means of an investment selection process geared to the interests of our clients. In addition to that, we will not take into account shares in FOS funds that we use for financial portfolio management when calculating the remuneration for our financial portfolio management services.
- In financial portfolio management, the client has delegated the management and thus also the decision on the acquisition and sale of financial instruments to the financial portfolio manager. As financial portfolio managers, we thus make decisions on purchases and sales within the framework of the investment guidelines agreed with the client, without obtaining previous consent. This constellation may reinforce an existing conflict of interest. We counter resulting risks with suitable organisational measures, in particular through an investment selection process geared to the interests of our clients.
- Another typical conflict of interest in the context of financial portfolio management might arise when performance-related remuneration is agreed. Here, it cannot be ruled out that the financial portfolio manager takes disproportionate risks in order to achieve the highest possible performance, thus generating increased remuneration. Risk reduction is achieved by internally monitoring the investment decisions made and by combining them with fixed remuneration components, which account for the majority of the remuneration.
- A conflict of interest might also arise, when various functions are performed within Deutsche Bank group, such as financial portfolio manager, issuer of securities or pricing party, as in such cases, we enter into transactions with Deutsche Bank group companies as part of our financial portfolio management in the name and for the account of the client. Deutsche Bank independently sets the prices for off-floor transactions. It thus determines the margin, in particular for our own certificates and off-floor transactions, and at the same time, as financial portfolio managers, we decide on the frequency of transactions. We counter the resulting risks in particular by means of an investment selection process geared to the interests of our clients and by concluding transactions at market conditions.

At the client's request, we will provide further details on this information on how to deal with conflicts of interest.