

We hope that we have been able to provide you with a comprehensive overview of our activities and the possible interdependencies that could arise between the services we provide for you, our commercial interests as your Bank, and third parties. Should you require further information or detailed explanations on the divergences of interest stated in this document, please feel free to contact us at any time.

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Version: January 2022

# Handling Conflicts of Interest

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## In the Interest of our Clients

Hauck Aufhäuser Lampe Privatbank AG ("Bank") offers its clients a range of financial services. As a result of offering these services, the Bank is repeatedly confronted with actual or potential conflicts of interest. The Bank endeavors to avoid conflicts of interest to the greatest possible extent. Nevertheless, it cannot be ruled out that persistent conflicts of interest may arise in individual cases. In such cases, our policy and our task as a company is to resolve conflicts of interest fairly and responsibly, taking into account the interests of our clients. This document aims to provide you with detailed information on the precautions we have taken to deal with conflicts of interest in compliance with the provisions of the German Securities Trading Act.

In principle, conflicts of interest may arise between the Bank, its parent company and its subsidiaries, its management, its employees and other persons associated with the Bank, on the one hand, and the Bank's clients or between the Bank's clients, on the other.

In particular, conflicts may arise:

- in connection with investment advice and asset management, through the Bank's self-interest in the sale of financial instruments, in particular the Group's own products,
- through the receipt of benefits from third parties or granting of benefits to third parties in connection with investment services,
- through performance-related remuneration of employees and intermediaries,
- as a result of the granting of benefits to employees and intermediaries of the Bank,
- as a result of other business activities of the Bank, in particular the Bank's interest in generating profit through its proprietary trading or the sale of securities issued by the Bank or its affiliated companies,
- as a result of the Bank's relationships with issuers of financial instruments, e.g. in connection with participation in the issuance of securities,
- in connection with the preparation of financial analyses of securities that are offered for purchase to the client,

- through obtaining information that is not in the public domain,
- as a result of personal relationships between our employees or the management or persons associated with the same, or through the involvement of such persons in supervisory boards or advisory boards,
- in connection with the receipt of monetary or non-monetary benefits at variable rates or levels (so-called graduated commissions) in respect of investment services or ancillary investment services.

In order to avoid conflicts of interest, the Bank has committed itself and its employees to maintain high ethical standards. In addition, the Bank's employees are required to exercise due care at all times, to observe the principles of lawful and professional conduct as well as comply with market standards and, in particular, to place great importance on consideration of the client's interests. We continually monitor compliance with these standards through our control processes.

The Bank has conducted comprehensive analysis to identify divergent interests that could be detrimental to its clients and to control them by means of extensive organizational and behavioral measures. In order to maintain integrity and quality, the Bank has an independent Compliance department under the direct responsibility of the Management Board, which is responsible for identifying, preventing, monitoring and managing conflicts of interest.

### Specifically, the Bank has taken the following measures:

- Establishment of organizational procedures and implementation of control processes to safeguard the interests of our clients in the areas of investment advice, investment brokerage, asset management and the management of special investment funds,
- rules on the acceptance, passing on and granting of benefits as well as the disclosure thereof, stipulation of rules on the inclusion of new products in Sales,
- rules governing the handling of confidential information, including the creation of areas of confidentiality,
- the establishment of information barriers and the separation of responsibilities and/or spatial separation of potentially conflicting functional areas,
- maintenance of insider/watch lists in order to monitor the flow of sensitive information and prevent misuse of insider information,
- maintenance of a blacklist, which is used, for example, to counter potential conflicts of interest through prohibition of business or advisory services, or by prohibiting the publication of financial analyses,
- rules for employees' private transactions and monitoring of securities transactions of such employees where conflicts of interest may arise in the course of their duties,
- training of the employees, and
- assessment of the presence and disclosure of identified conflicts of interest in financial analyses.

If our precautions are not sufficient to reasonably ensure that we avoid the risk of a negative impact on the clients' interests, before executing a transaction, we inform the affected clients of the general nature and/or sources of the conflicts of interest as well as of the measures taken to limit these risks. In such cases, where necessary, the Bank will refrain from conducting an assessment, giving advice or making a recommendation on the respective financial instrument.

### We would particularly like to draw your attention to the following points:

In connection with the provision of (ancillary) investment services, the Bank may receive benefits for certain financial instruments (such as funds, investments, structured bonds or certificates). These are always disclosed by the Bank to its clients. They are paid directly or indirectly to the Bank by external and intragroup fund management companies, securities-issuing companies or product providers.

This also includes recurring revenue-dependent trail commissions that are paid to the Bank by fund management companies or product providers from the management fees they collect.

In addition, one-off and/or recurring sales commissions for certain products are paid by securities-issuing companies, product providers or issuers primarily in the form of placement commissions, refunds or discounts on the issue price. The precise amount of the benefits depends, among other things, on the respective product provider, the type of financial instrument or investment fund and the total turnover/portfolio of the respective product.

If fund units/certificates are purchased, a frontend load may be charged depending on the respective product and the product provider, which may be paid to us in full or in part as sales commission.

The maximum amount of the frontend load can be found in the promotional material or sales literature for the respective product. We will, of course, inform you in detail about the exact amount of the frontend load in a timely manner prior to entering into the transaction.

The Bank may pay volume-related commissions and/or fixed fees to advisers or intermediaries who refer clients or individual transactions to us, or who are connected with the same.

In addition, we would like to point out that we may accept or grant minor non-monetary benefits from/to other service providers. This includes, for example, participation in conferences and specialist events, the receipt of information or documentation on financial instruments and other legally permissible, insignificant contributions in kind. The receipt of such benefits is used to ensure we provide our services in the high quality that you demand. The Bank ensures that non-monetary benefits are only accepted or granted if they are insignificant and commensurate.

We will provide you with further details on the receipt or granting of benefits in an annual report or at any time upon request free of charge.

The purpose of receiving these grants and other incentives is to improve the quality of investment services and noncore investment services for the Bank's clients, e.g. by providing efficient, high-quality infrastructure for the acquisition, custody and disposal of products from a wide range of suitable financial instruments, including an appropriate number of third party instruments without close links to the Bank. At the same time, these benefits are used to ensure the training of, and regular provision of information to, our employees as well as to cover the expenses that Bank incurs for the consulting services that the Bank's clients use, or may make use of at any time. For this purpose, the Bank maintains a register of uses which demonstrates that the benefits granted have served to improve quality.

The benefits, or portions thereof, received by the Bank and permitted under the German Securities Trading Act may be passed on to our distribution partners, where agreements to this effect are in place. You must be informed of the existence of such an agreement separately by the recipient of these benefits. These benefits are often the prerequisite for ensuring that your direct contact partner is able to continue to provide you with comprehensive support in your best interests. In individual cases, we may pass on the sales commission we receive from funds to our distribution partners as benefits. Where agreed,

up to 100% of the trail commission may be passed on to the distribution partners as benefits. The exact amount of the benefits can be requested from us at any time.

In the course of its investment advisory services, the Bank chooses its recommendations from a wide range of selected and qualified distribution partners. In doing so, in compliance with the statutory requirements and in accordance with any investment guidelines that have been agreed, the Bank recommends suitable financial instruments to its clients. These may also be the Bank's own products or those of its subsidiaries. In doing so, we constantly monitor whether these recommendations for investment are in line with the contractually agreed policy.

In asset management, the asset manager's discretion in deciding on the purchase and sale of securities is specified in detail in the investment guidelines agreed in advance with the client. Investment decisions are based in particular on an investment selection process geared to the client's interests. The client is informed in the asset management agreement that benefits which flow to the Bank are not withheld but passed onto the client in full, meanwhile for advisory services this depends on the chosen fee model.

Where performance-related remuneration is agreed, it cannot be ruled out that increased risks will be taken in order to achieve the highest possible performance and the related higher remuneration. We counteract the resulting risks by means of an investment selection process in line with the client's interests, by agreeing on investment guidelines, and by means of internal monitoring to determine whether the investment decisions made are in line within the agreed policy. In addition, the remuneration of the asset manager or investment adviser consists of further fixed remuneration components, such as a percentage amount based on volume or transaction fees.