



Zenit Asset Management AG

Principles about Dealing with
Possible Conflicts of Interest

Information about Dealing with Possible Conflicts of Interest

Asset management companies try to protect and reconcile the interests of their Clients, shareholders and employees. Nevertheless, conflicts of interest cannot always be completely ruled out in asset management companies that provide a variety of high-quality financial services to their Clients. In accordance with Article 7c Paragraph 2 and Article 20 of the Asset Management Act (VVG) as well as Article 12 b 2 of the Asset Management Ordinance (VVO), we will therefore inform you below about our precautions for dealing with possible conflicts of interest.

Conflicts of interest may arise between our Company, other companies in our group, our management, our employees, our tied agents or other persons associated with us and our Clients or between our Clients.

In order to prevent unrelated interests from influencing, for example, advice, order execution, asset management or financial analysis, we have committed ourselves and our employees to high ethical standards. We expect care and honesty at all times, legal and professional action, compliance with market standards and, in particular, always consideration of the Clients' interests.

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

- Creation of a compliance function in our company, which is responsible for identifying, avoiding and managing possible conflicts of interest and which takes appropriate measures if necessary;
- Creation of organizational procedures to protect customer interests in investment advice and asset management, e.g. B. through approval procedures for new products;
- Regulations on the acceptance and granting of donations as well as their disclosure;
- The demarcation of business areas from each other and simultaneous control of the flow of information between each other (creation of confidentiality areas);
- all employees for whom conflicts of interest may arise in the course of their work are identified and are obliged to disclose all their transactions in financial instruments;
- A regulation regarding the own transactions of our bodies and employees;
- Regulations regarding the acceptance of gifts and other benefits by our employees;
- When executing orders, we act in accordance with our best execution policy or the customer's instructions;
- Higher fee income does not automatically lead to higher wages;
- Ongoing training for our employees.

We will disclose conflicts of interest that cannot be avoided to the affected Clients before concluding a business transaction or providing advice.

We would like to specifically draw your attention to the following points:

- We sometimes pay performance-related commissions and fixed fees to third parties (e.g. trustees) who refer us to customers. Specifically, we pay the following commissions e.g. from 1%

to 25% of the asset management fees collected by us. These commissions are used by third parties to improve the quality of their services to Clients.

- As part of independent investment advice (Art. 16 Para. 4 VVG) and portfolio management (Art. 16 Para. 5 VVG), we are not permitted to charge fees, commissions or other monetary or accept and retain non-monetary benefits from a third party. If the Company receives monetary donations, these will be passed on in full to the Client. In this case, the Company will inform the Client about the monetary donations that will be forwarded. Smaller non-monetary benefits that can improve the quality of service for the Client and which do not impair the Client's interests due to their scope and nature are generally permitted and will be disclosed to the Client by the Company.
- As part of non-independent investment advice, we are not permitted to accept or grant donations from third parties unless the gift is designed to improve the quality of the service provided to the Client. The collection of these payments and grants serves to provide efficient and high-quality infrastructure for the acquisition and sale of financial instruments. The existence, type and extent of the benefit or, if the extent cannot yet be determined, the manner in which it is calculated will be fully disclosed to the Client before the non-independent investment advice is provided.
- We also provide information about relevant potential conflicts of interest in financial analyses prepared or distributed by us.

At your request, we will provide you with further details on these principles.