Principles for handling conflicts of interest

as of 09/2026

I. Introduction

DJE Kapital AG (hereinafter referred to as “DJE”) provides services for private clients, companies and financial institutions.DJE’s task is to consider the interests of all clients and to avoid conflicts of interest. Despite all efforts, conflicts of interest cannot always be completely ruled out within the scope of DJE’s business activities.We have taken precautions to ensure that potential conflicts of interest do not affect client interests. In accordance with the legal requirements under the German Securities Trading Act (WpHG), this document explains the precautions taken by DJE to identify and handle conflicts of interest.If, despite all efforts, identified conflicts of interest cannot be completely resolved through suitable measures and procedures, DJE will disclose them to the client.

II. Type, Origin and Examples of Possible Conflicts of Interest

i. What Are Conflicts of Interest?

There are many types of conflicts of interest affecting a wide range of behaviours and circumstances. A conflict of interest usually arises when two or more persons have conflicting interests and a duty of care exists between them. An employee may have a conflict of interest in the course of their work that could influence their professional judgement or objectivity.Potential and actual conflicts of interest within the meaning of this document may arise between the interests of the client on the one hand and the interests of:

a. DJE, including the companies of the DJE Group;
b. the employees of our company, including our management;
c. contractually bound intermediaries or other persons and parties affiliated with DJE;

on the other hand.

Furthermore, conflicts between the divergent interests of two or more of our clients may arise in connection with services provided by DJE to those clients.

ii. What Causes Conflicts of Interest?

Conflicts of interest and the resulting risk of an impairment of client interests may arise in particular as a result of:

a. our institution’s business interests, in particular the pursuit of sales and profits;
b. performance-related fees agreed with our clients, for example through taking higher risks for the assets under management in order to achieve higher performance and, consequently, a higher overall fee;
c. financial interests in investment funds managed or advised by us, for example through remuneration depending on fund volume;
d. the acceptance of monetary or non-monetary benefits from third parties, for example placement and portfolio commissions or seminar offers, insofar as these are not passed on to our clients;
e. performance-related remuneration of managing directors, employees and intermediaries, as well as the granting of monetary or non-monetary benefits to them;
f. personal transactions of managing directors, employees and intermediaries, or persons closely related to them;
g. the integration of ESG factors and sustainability risks into our own systems, processes and controls

Furthermore, conflicts of interest may arise in the event of business or personal relationships between our institution, its managing directors, employees, intermediaries or related persons, and credit institutions, capital management companies, issuers or similar entities.

This applies in particular to:

a. cooperation with such institutions;
b. participation in supervisory bodies or advisory boards of such institutions;
c. obtaining information that is not publicly known (inside information).

iii. Concrete Examples of Conflicts of Interest

The following are examples of specific situations that may give rise to conflicts of interest and that must be appropriately managed, mitigated or prevented:

a. in the field of asset management and investment advice, based on a self-interest in terms of revenues from the sale of certain financial instruments, in particular DJE Group products;
b. in the context of fund-based asset management, through a possible restriction to one or more DJE funds;
c. excessive or costly gifts or invitations received by an employee that may affect the employee’s judgement or lead to improper conduct;
d. when receiving or granting benefits, for example placement and portfolio commissions, from or to third parties in connection with investment services for clients;
e. by obtaining information that is not publicly accessible and using it for personal financial benefit;
f. in the execution of employee transactions, for example by exploiting confidential information;
g. in the case of performance-related remuneration of DJE, employees or members of management.

III. Dealing with Conflicts of Interest

In order to prevent diverging interests from influencing, for example, order execution or asset management and thereby adversely affecting the interests of our clients, DJE and its employees are committed to high ethical standards and compliance with applicable laws and regulations.

We expect our employees to act with diligence, integrity, lawfulness and professionalism at all times, to observe market standards and, in particular, always to take account of the interests of our clients.

In order to avoid the risk of client interests being impaired as a result of potential conflicts of interest, we have defined the following principles, which are binding on all managing directors and employees, and have taken the following measures.

i. General Organisational Measures

In order to identify and avoid conflicts of interest at an early stage, we take, among others, the following measures:

a. obligation of all employees to adhere to the ethical principles established by DJE;
b. promotion of a culture that emphasises the importance of ethical conduct towards clients and the fair handling of conflicts of interest;
c. implementation of comprehensive organisational measures to protect client interests in our organisational guidelines and a commitment to comply with them;
d. creation of confidentiality areas through the establishment of information barriers, the separation of responsibilities and/or spatial separation ("Chinese Walls");
e. maintenance of a restricted list of issuers and related securities in order to avoid potential conflicts of interest for DJE through restrictions on its distribution, trading, research and other market-based activities;
f. introduction of multi-stage, process-integrated and process-independent control mechanisms;
g. disclosure and consent requirements for certain business or personal relationships;
h. establishment of a sustainability policy regarding DJE Kapital AG's strategies for dealing with sustainability risks and for considering adverse sustainability impacts in investment decisions at corporate level.

ii. Concrete Measures in Relation to Identified Conflicts of Interest

a. Selection of our cooperation partners, including custodian banks, other executing credit institutions, capital management companies, other product providers and issuers, according to the criteria of a favourable cost structure and best possible order execution. See "Selection Policy – Principles for the Execution of Client Orders".
b. Disclosure of costs and additional expenses relating to our investment services and financial instruments so that the total costs and their impact on the return on investment are transparent. See "Information on Costs and Additional Costs".
c. Internal monitoring of investment decisions, including with regard to avoiding higher-risk transactions aimed at achieving higher performance-related remuneration.
d. Disclosure of our remuneration model for investment funds managed or advised by us.
e. Strict observance of the prohibition on accepting portfolio commissions as part of our asset management, or the complete forwarding of benefits received, with the exception of minor non-monetary benefits, to our clients.
f. Structuring transparent remuneration models for managing directors and employees in accordance with the German Institution Remuneration Ordinance and other regulations, avoiding dependence on variable remuneration components and avoiding incentives to take excessive risks.
g. Definition of qualitative sales targets in the securities services business, monitored by Compliance.
h. Introduction of a product approval and monitoring procedure tailored to the needs of our clients in order to avoid conflicts of interest resulting from our own sales interests and to prevent the sale of financial products to clients with unsuitable investment objectives and risk appetites.
i. Establishment of internal rules for personal transactions, requiring all managing directors, employees and intermediaries to comply with them and to disclose custody accounts and personal transactions. These are regularly monitored by the Compliance Officer.
j. Restrictions on, or prohibition of, personal transactions in certain securities, as well as a strict prohibition on front-running, parallel-running or counter-running client transactions.
k. Regular training of our employees regarding possible conflicts of interest and how to avoid or reduce them.

We would like to draw your particular attention to the following points:
In the case of asset management, a typical conflict of interest may result from the agreement of performance-related remuneration. In order to achieve the highest possible performance and, consequently, higher remuneration, the asset manager could take higher risks within the scope of the investment.
We mitigate the resulting risks through suitable organisational measures, in particular through an investment selection process geared to the interests of clients and through the use of a high-water-mark method. Under a high-water-mark method, performance-related fees are always based on the historical high. Only when this level is exceeded and a new high-water mark has been reached will a performance-related fee be charged to the investor. Nevertheless, the conflict of interest described here cannot always be completely avoided.
DJE Kapital AG focuses on its own DJE investment products in the field of fund-based asset management. Within the scope of its services and the applicable investment guidelines, DJE places the greatest importance on transparency for the client and addresses any conflicts of interest that may arise.
When calculating asset management costs, DJE's own investment products are not taken into account in order to avoid the incentive of double remuneration, both on the part of the client and on the part of the investment fund. Despite these measures, a conflict of interest cannot be completely avoided.

iii. Adherence to and Implementation of Defined Measures

The Compliance Officer monitors adherence to the described guidelines and measures. The Compliance Officer reviews and decides in accordance with legal requirements. The Compliance Officer reports directly to the Executive Board and acts independently, free from instructions and the interests of third parties.

iv. At the Client's Request

We would be pleased to answer any questions, provide further explanations and give you additional details on the above principles at any time.