

Information on Dealing with Conflicts of Interest

The present translation is furnished for the customer's convenience only. The original German text of the "Information on Dealing with Conflicts of Interest" shall be binding in all respects. In the event of any divergence between the English and the German wording, constructions, meanings, or interpretations, the German wording, construction, meaning or interpretation shall govern exclusively.

According to Art. 45 and Art. 46 WAG 2018, all credit institutions shall take all appropriate measures to identify conflicts of interests that emerge when providing investment services and ancillary services involving financial instruments to avoid such conflicts by taking suitable, in particular organizational and administrative measures, and clearly disclose them to clients, if necessary. These conflicts of interest may arise between themselves, including their managers, employees, and tied agents or any persons directly or indirectly linked to them by control and their clients, as well as between their clients.

According to WAG 2018 DenizBank AG possesses appropriate and efficient procedures and measures to enable the identification and handling of conflicts of interests in order to be compliant with the regulatory conflicts of interest framework laid down in WAG 2018.

Conflicts of interest can arise particularly in the following situations:

- DenizBank AG's interest in selling financial instruments;
- when receiving incentives from third parties or granting incentives to third parties in connection with the delivery of investment services;
- when paying employees a performance-related bonus;
- when granting gratuities to our employees;
- employees' self-interest in the business of customers;
- as a result of the relationships our institution has with the issuers of financial instruments, such as when credit arrangements exist here;
- through obtaining information not in the public domain;
- from the personal relations of our employees or the management board or with individuals "related" to them or
- as a result of the involvement of these individuals in other undertakings, especially as members of supervisory boards.

The identification, prevention and appropriate handling of conflicts of interest is one of the fundamental principles of DenizBank AG.

Within DenizBank AG, an independent Compliance Organisation is established under the direct responsibility of the management board, to implement the following particular measures for preventing conflicts of interest:

- rules concerning the acceptance and grant of gratuities, including the disclosure of same;
- creating confidentiality zones through the establishment of information barriers, the personnel-based segregation of responsibilities and/or spatial separation;
- maintaining a watch list to aid in monitoring the location of sensitive information as well as to prevent an misuse of insider information;
- maintaining a black list, one of the purposes of which is to counter possible conflicts of interest by defining prohibited transactions;
- obliging all employees to disclose their financial instrument dealings in accordance with the statutory provisions;
- monitoring employee transactions involving financial instruments;
- providing continuous training to the employees of DenizBank AG;
- implementation of the Execution Policy, which defines the rules according to which DenizBank AG executes customer orders.

If the organisational precautions prove to be insufficient to prevent customers' interests being adversely effected, then prior to the execution of the investment service in question, DenizBank AG will explain the nature and scope of the relevant conflict of interest to the customer. This disclosure is made in accordance with the rule of banking secrecy, and the applicable data protection provisions.

We would like to draw your attention specifically to the following points concerning investment service business:

Inducements according to WAG 2018

In order to act honestly, fairly and professionally in accordance with the best interests of its clients when providing investment services or ancillary services to its clients, DenizBank AG will fully comply with relevant legislation regarding inducements.

According to Art. 51 and Art. 52 WAG 2018, DenizBank AG may only receive the commissions from its partner

(only from mutual fund), if it will enhance the quality of the relevant service to the client in order to perform higher and continuous client care, training measures and information processing.

DenizBank AG regularly receives such commissions from its partner (only from fund company), these commissions are calculated as following:

- Trailer fee: 70% (of the 1,5 % management fee) per annum from the value of the funds of the depot of the client of DenizBank AG

Our customer service agents will be pleased to answer any of your questions and/or queries.

Vienna, August 2020