

## **Information from the capital management company regarding the handling of conflicts of interest in accordance with Art. 36 (1) of the Delegated Regulation (EU) No. 231/2013**

d.i.i. Investment GmbH aims to avoid conflicts of interest, which arise and can occur in relation to the management of the Company.

Conflicts of interest can arise between:

1. d.i.i. Investment GmbH and its management staff, employees or any other person, who is directly or indirectly associated with d.i.i. Investment GmbH through a control relationship, and the fund managed by it or the investors in this fund,
2. the fund or the investors in this fund and another fund or the investors in that fund,
3. the fund or the investors in this fund and another client of d.i.i. Investment GmbH,
4. two customers of d.i.i. Investment GmbH.

Furthermore, due to personnel and capital interrelationships, conflicts of interest can exist, which, in turn, can conflict with the investors' interests.

To prevent an impairment of client interests, d.i.i. Investment GmbH has laid down appropriate basic principles for dealing with conflicts of interest and will apply these continuously, in which it stipulates, under which circumstances conflicts of interest can occur with the provision of services, which could significantly damage the client interests and which measures must be taken to handle these conflicts of interest. In the basic principles, conflicts of interest are also taken account of, which arise from the structure and business activity of other companies in the same Group of companies, as well as from the mandating of external services.

For the ascertainment, prevention, management and disclosure of conflicts of interest, d.i.i. Investment GmbH has implemented the following important organisational measures, amongst others:

- Installation of a Compliance Officer, who monitors compliance with the material laws and regulations and to whom conflicts of interest must be reported;
- Rules of conduct for employees and management staff (Compliance Policy) and regular training courses;
- Regulations in handling affiliated companies of d.i.i. Investment GmbH;
- Organisational structures and the establishment of corresponding responsibilities on the basis of this, which ensure the necessary functional separations to avoid conflicts of interest. These specifically include the organisational and functional separation of Portfolio Management and the control areas (Risk Management, Compliance, Internal Audit) within d.i.i. Investment GmbH, which respectively belong to different departments of the Management Board;
- Representation, signature and competency policies;
- Regular checking of the adequacy of systems and controls of d.i.i. Investment GmbH by Internal Audit, as well as the external auditors of d.i.i. Investment GmbH;
- Valuation policy;
- Remuneration policy, which contributes to avoiding conflicts of interest.

The measures and policies specified by d.i.i. Investment GmbH for managing conflicts of interest are intended to prevent conflicts of interest from damaging d.i.i. Investment GmbH and/or its investors.

If damage to the fund and/or its investors cannot be excluded, in spite of these measures, the respective concrete conflicts of interest must be disclosed to the fund and/or its investors.