



CONFLICT OF INTEREST POLICY

pure●



Conflict of Interest Policy of DonauCapital Pure Investment GmbH

When providing investment services, conflicts of interest cannot be avoided completely. In accordance with the provisions of the German Securities Trading Act, DonauCapital Pure Investment GmbH ("DonauCapital" or "we") has established this Conflict of Interest Policy to inform clients of the precautions it has taken to avoid or mitigate conflicts of interest and to inform clients about conflicts of interest that cannot be avoided.

1 Occurrence of conflicts of interest

Conflicts of interest may arise between DonauCapital, our directors and officers, DonauCapital's employees or other persons associated with DonauCapital and clients of DonauCapital or between clients of DonauCapital.

Conflicts of interest may arise in particular

- through performance-related remuneration components of employees, intermediaries or signal providers ("Strategy Providers");
- when receiving or granting benefits from third parties or to third parties in connection with investment services and ancillary investment services;
- when benefits are granted to our employees, Strategy Providers and intermediaries;
- from other business activities of our group of companies, in particular the interest of the group of companies in profits from proprietary trading;
- by an associated company acting as a counterparty to transactions or as a market maker;
- by obtaining information which is not in the public domain;
- from personal relationships of our employees or management or persons associated with them or in the participation of these persons in supervisory or advisory boards.

2 Existing conflicts of interest

After a comprehensive review, DonauCapital is of the opinion that the following unavoidable conflicts of interest arise in the course of the service provided:

- the broker that cooperates with DonauCapital in implementing the business model belongs to the same group of companies as DonauCapital. The group of companies to which DonauCapital belongs, and in this respect indirectly also DonauCapital itself, therefore has an interest in the clients trading the largest possible volumes; this interest may conflict with the interests of the client;
- although the remuneration of DonauCapital's managers and employees does not depend on the volumes traded by clients, managers and employees could interpret DonauCapital's interest in the largest possible trading volumes by clients as meaning that the largest possible trading volumes by clients are also in their interest;
- in DonauCapital's business model, the Strategy Providers are remunerated on a performance-related basis; due to the peculiarities of the high-watermark method used in this process (cf. the information in DonauCapital's Terms & Conditions for an explanation of this method), Strategy Providers could be tempted to take excessive risks after having incurred losses, contrary to the interests of the clients. This is due to the fact that Strategy Providers only receive remuneration if they achieve a profit in excess of the peak (high-watermark) previously reached.

3 Inducements

DonauCapital does not receive any inducements from third parties, i.e. from persons who are not clients of DonauCapital. DonauCapital grants inducements to third parties, namely to the Strategy Providers, who receive from DonauCapital a portion of the performance-based remuneration (performance fee) paid by the client.

4 Arrangements and measures for dealing with conflicts of interest

DonauCapital has committed its employees to ethical standards that prescribe appropriate handling of conflicts of interest. In particular, we expect our employees to conduct themselves professionally at all times and to give priority to the interests of our clients. DonauCapital has established a compliance department that reports directly to the management and is responsible for identifying conflicts of interest and monitoring the proper handling of identified conflicts of interest in accordance with this Conflict of Interest Policy. In addition, DonauCapital has taken the following precautions:

- continuous training of all employees;
- maintaining an insider list and a monitoring list to monitor the handling of sensitive information and to prevent the abuse of insider information;
- maintaining a blacklist, one of the purposes of which is to address potential conflicts of interest by prohibiting employees from dealing in relevant financial instruments;
- employees for whom conflicts of interest may arise in the course of their work are required to disclose securities transactions to the compliance department (monitoring of compliance with employee guidelines);
- prohibition of variable, sales-based remuneration for certain employees in order to prevent influence by extraneous interests;
- if we believe that a conflict of interest cannot be avoided or properly resolved in the best interests of the client, we will disclose it to the client concerned; if we believe that disclosure will not resolve the conflict, we may decide to decline a transaction or service to prevent a conflict of interest.

At the express request of a client, DonauCapital will provide the client with further details of existing conflicts of interest and the respective measures taken by DonauCapital.



pure●

www.purewallet.app