

Conflict of Interest Policy

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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 ("Pure" 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 Pure, our directors and officers, Pure's employees or other persons associated with Pure and clients of Pure or between clients of Pure.

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

Pure has conducted a comprehensive review and believes that the following unavoidable conflict of interest may arise in the course of providing its services:



In Pure's business model, Strategy Providers are remunerated through a management fee and a performance fee. The performance fee is a performance-related remuneration. Due to the performance-related remuneration component, Strategy Providers may be tempted to take disproportionately high risks in order to achieve the highest possible performance and thus an increased remuneration through the performance fee. Due to the specifics of the high-watermark method used (for an explanation of this method, see the explanations in the Terms and Conditions of Pure), this conflict of interest may be more pronounced if a strategy has incurred a loss, as this may incentivise the Strategy Provider to take excessive risks in order to offset the losses incurred. This is because Strategy Providers are only compensated if they generate a profit that exceeds the previously achieved peak (high-water mark).

3 Inducements

Pure does not receive any inducements from third parties, i.e. from persons who are not clients of Pure. Pure grants inducements to third parties, namely to the Strategy Providers, who receive from Pure a portion of the performance-based remuneration (performance fee) paid by the client. Pure will inform the client at least once a year about the payments actually made to Strategy Providers.

4 Arrangements and measures for dealing with conflicts of interest

Pure 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. Pure 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, Pure 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, Pure will provide the client with further details of existing conflicts of interest and the respective measures taken by Pure.