



HAGIM

# Client Information Conflict of Interest Policy

September 2024

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H&A Global Investment Management GmbH (“HAGIM”) provides its clients with a range of financial services. Through the provision of such services, HAGIM is regularly confronted with actual or potential conflicts of interest. HAGIM does its utmost to avoid conflicts of interest to the greatest possible extent. Nevertheless, in individual cases, it is not possible to rule out that such conflicts of interest may occur. In such cases, by way of principle and entrepreneurial duty, we seek to resolve conflicts of interest in a fair and responsible manner while paying due attention to the interests of our clients. Through the detailed information provided in this document, we would like to inform you of the safeguards we have put in place to manage conflicts of interest, paying due regard to the provisions of the German Securities Trading Act (Wertpapierhandelsgesetz).

As a general rule, conflicts of interest can arise between HAGIM, its shareholders and its subsidiaries, its management, its employees and other persons associated with HAGIM, on the one hand, and HAGIM’s clients, on the other. Conflicts of interest may also arise between employees of HAGIM.

In particular, conflicts can arise:

- in connection with the provision of investment advice and the performance of financial portfolio management, through HAGIM’s own interest in the sale of financial instruments, in particular the Group’s own products,
- through the receipt of monetary or non-monetary benefits from, or granted to, third parties in connection with investment services,
- as a result of the granting of monetary or non-monetary benefits to employees of HAGIM,
- through performance-related remuneration of employees,
- through other business activities conducted by HAGIM,
- through obtaining information that is not in the public domain,
- as a result of personal relationships between our employees or the management or persons associated with the same, or
- through the involvement of such persons in supervisory boards or advisory boards.

In order to avoid conflicts of interest, HAGIM has placed itself and its employees under the obligation to abide by strict ethical standards. Furthermore, the employees of HAGIM take great care to observe the principles of lawful and professional conduct as well as market standards and, in particular, to pay great heed to the interests of our clients. We continually monitor these standards through our control processes.

HAGIM has conducted a comprehensive analysis to identify divergent interests that could be detrimental to its clients, and to control them by means of extensive organizational and behavioral measures.

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In order to maintain integrity and quality, HAGIM has implemented an independent Compliance department under the direct responsibility of the Management, which is responsible for identifying, preventing, monitoring, and managing conflicts of interest.

## **Specifically, HAGIM has taken the following measures:**

- Establishment of organizational procedures and implementation of control processes to safeguard the interests of our clients in the areas of investment advice, investment brokerage, contract brokerage and in connection with financial portfolio management;
- Clear separation of duties and responsibilities,
- Implementation of an appropriate and objective remuneration system;
- Rules on the acceptance, passing on, and granting of benefits as well as the disclosure thereof,
- Rules governing the handling of confidential information, including establishing confidentiality areas, the creation of information barriers as well as the separation of responsibilities and/or spatial separation of potentially conflicting functional areas;
- Maintenance of insider/freeze/watch lists in order to monitor the flow of sensitive information and prevent misuse of insider information;
- Rules regarding employees' private transactions and monitoring of securities transactions of such employees where conflicts of interest may arise in the course of their duties;
- Training programs for employees.

Should the arrangements we have put in place not be sufficient to reasonably ensure that we avoid risks detrimental to the interest of our clients, before entering into a transaction, we disclose to the clients concerned the general nature and/or sources of conflicts of interest along with the measures we have implemented to mitigate these risks. In such cases, where required, HAGIM will refrain from conducting an appraisal, providing advice or giving a recommendation on the financial instrument in question.

## **We would particularly like to draw your attention to the following:**

In principle, HAGIM may receive negligible, non-monetary benefits from other service providers, or grant such benefits to the same. We use the benefits that we may receive to perform our services in the high quality that you expect. HAGIM takes care to ensure that non-monetary benefits are only accepted or granted when they are negligible and proportionate. Should such benefits be accepted, assurance of the quality of the customer service is accordingly documented.

Upon request, we will provide you with further details on the receipt or granting of benefits at any time and free of charge.

When providing investment advice, HAGIM always recommends those financial instruments that, in line with the statutory requirements and any investment policies that have been agreed, are best suitable to the client. This may mean products of HAGIM itself or other companies of

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the corporate group. In so doing, we constantly monitor whether such investment proposals are compatible with the contractually agreed principles.

The decisions HAGIM takes when managing financial portfolios or providing investment advice are, in particular, aligned to an investment selection process geared towards the client's interests and the contractually agreed investment guidelines for the mandates.

When agreeing performance-related remuneration, it cannot be ruled that, in order to generate the best possible performance and hence higher associated remuneration, greater risks may be taken. We address the potential risks that could arise through an investment selection process aligned to the interests of our clients, through the agreed investment guidelines, and through internal monitoring of whether the investment decisions align with the agreed principles.

We hope that we have been able to provide you with a comprehensive overview of our activities and the potential interdependencies that could arise between the services we provide for you, our commercial interests as HAGIM, and third parties. Should you require further information or detailed clarification of the divergences of interest set out in this document, please feel free to contact us at any time.

The Governance, Risk & Compliance department can be contacted at any time via [compliance@ha-gim.com](mailto:compliance@ha-gim.com).

H&A Global Investment Management GmbH  
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