



HAGIM

HAGIM Engagement Policy §134b AktG

Status: September 2026

For reasons of better readability, the generic masculine form is used in this organisational guideline. It should be noted at this point that the exclusive use of the masculine form should be understood to be gender-independent.

HAGIM Engagement Policy

September 2026

Engagement Policy 134b AktG

HAGIM GmbH - hereinafter referred to as HAGIM - falls under the definition of an asset manager within the meaning of Section 134a (1) no. 2 AktG and must therefore describe and publish its engagement policy within the meaning of Section 134b AktG. The engagement policy is therefore defined as follows:

1. HAGIM does not exercise any shareholder rights within the meaning of Section 134 b (1) No. 1 AktG that are based on engagement in the company. In particular, no rights relating to the general meetings of stock corporations are exercised. The right to a share in profits within the meaning of Sections 60 et seq. AktG and subscription rights are exercised in consultation with customers.
2. Important company matters within the meaning of Section 134b (1) no. 2 AktG are monitored by taking note of the legally required reporting of the companies in financial reports and ad hoc announcements.
3. HAGIM does not exchange opinions with the company's executive bodies and stakeholders within the meaning of Section 134b (1) No. 3 AktG.
4. HAGIM does not cooperate with other shareholders within the meaning of Section 134 b (1) No. 4 AktG.
5. If conflicts of interest arise within the meaning of Section 134b (1) No. 5 AktG, HAGIM discloses this to the parties concerned in accordance with the statutory provisions and clarifies the further course of action with them.
6. HAGIM does not publish an annual report on the implementation of the engagement policy within the meaning of Section 134b (2) of the German Stock Corporation Act (AktG), as no corresponding rights are exercised.
7. HAGIM does not publish the voting behaviour within the meaning of Section 134b (3) AktG, as there is no engagement in voting.

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