

Possible Conflicts of Interest

ANKER Capital Management AG is an owner-managed company that acts as a portfolio manager. The ongoing respect and protection of our clients' interests as well as their fair treatment are of the utmost priority. We strive to consistently uphold and align the interests of our clients and employees. However, conflicts of interest cannot always be completely avoided. In accordance with legal requirements, we hereby inform you about our precautions regarding possible conflicts of interest.

Conflicts of interest may arise between companies, executive management, owners, employees, or other individuals associated with the company and its clients or between its clients.

Maintaining a strong customer-oriented culture within the company is the central tool to prevent any influence from unrelated interests in investment decisions and the execution of orders or other services. The utmost care in selecting employees, a commitment to the highest standards, and compliance with legal regulations help to place client interests at the center of our decision-making.

Measures to Avoid Conflicts of Interest

To avoid possible conflicts of interest, we have implemented various measures, including:

- Establishment of a compliance function responsible for identifying, avoiding, and managing potential conflicts of interest, and taking appropriate actions when necessary;
- Development and maintenance of a customer and risk-oriented organization that ensures the financial and regulatory integrity of the company at all times;
- Organizational measures to safeguard client interests in investment advisory and wealth management;
- Policies on the acceptance and granting of benefits and their disclosure;
- Separation of business areas and functions, along with simultaneous control of information flow among them (as deemed organizationally sensible);
- Regulations regarding the handling and disclosure of proprietary trading in financial instruments by employees and bodies;
- Rules on the acceptance of gifts and other benefits by employees and bodies;
- When executing orders, ANKER operates according to its Best-Execution-Policy or the client's instructions.

- Compensation rules for employees that do not automatically result in higher salaries based on increased fee income for the company or the assumption of higher risks by the client;
- Ongoing training of employees.

Disclosure of Potential or Actual Conflicts of Interest

Conflicts of interest that cannot be avoided and may occur will be disclosed to the affected clients before entering into a general contract, specific transaction, or respective consultation.

For efficient portfolio management, mutual funds managed by ANKER may also be used. The use of such products does not lead to double charging of the customer.

The selection of funds or other products, whether directly in client portfolios or indirectly through ANKER-managed investment funds, is exclusively based on market-standard qualitative and quantitative selection criteria. All purchases of funds and other products are always in the best interest of the client, whenever possible at net rates or in return for rebates on trailing commissions or closing fees in favor of the client or the fund.

ANKER may receive complimentary or discounted benefits from other service providers, such as brokers, in connection with securities transactions, including financial analyses or other information material, training, and, sometimes technical services and equipment for accessing third-party information systems. The acceptance of such benefits is not directly related to the services provided to clients. ANKER utilizes these benefits to deliver its services in the high quality desired by clients and to continuously improve them.

Contractually bound or independent intermediaries who refer clients or individual transactions to ANKER, with or without a specific business relationship, may receive success-based commissions and fixed fees. In addition, tied intermediaries may also receive benefits directly from third parties, especially mutual fund companies and securities issuance houses, in addition to the sales representative commissions paid by ANKER.

Relevant potential conflicts of interest are also disclosed in financial analyses produced or distributed by ANKER.