

Information provided by Sauren Fonds-Service AG (intermediary within the meaning of section 34f of the German Trade Code (*Gewerbeordnung* – “GewO”)) regarding the handling of conflicts of interest under section 11a of the German Regulation on Financial Investment Brokerage (*Finanzanlagenvermittlungsverordnung* – “FinVermV”)

Companies that provide investment advisory or brokerage services to an investor can never completely exclude conflicts of interest. In compliance with the statutory requirements of the German Regulation on Financial Investment Brokerage, this disclosure statement informs you about potential conflicts of interest that could arise, and how we would handle them.

Conflicts of interest may arise between our company or our employees on the one hand and investors on the other, or among investors themselves.

More specifically, conflicts of interest may arise in the following areas:

- with respect to investment advisory or brokerage services, if the intermediary has a vested interest in generating sales in financial instruments, particularly with regard to products associated with the SAUREN Financial Group (*Sauren Finanzdienstleistungen GmbH & Co. KG, Sauren Fonds-Service AG, Sauren Fonds-Research AG*);
- upon receipt or provision of inducements (such as placement or follow-up sales commissions or benefits in kind) from or to third parties, in connection with advisory or brokerage services to investors;
- with respect to performance-related remuneration of our employees;
- upon provision of inducements to our employees;
- in connection with other business activities or relationships of our company, e.g. to issuers or financial instruments or brokers;
- from the preparation of financial analyses concerning issuers whose securities are offered to clients for purchase;
- from obtaining information that is not publicly known;
- from personal relationships between our employees, senior management or related parties; or
- from the engagement of such individuals in supervisory boards or advisory councils of other companies;
- in view of the possibility that our company, or an entity directly or indirectly affiliated with our company, or a client has a financial or other incentive to give priority to the interests of another investor or client, or an investor or client group, or the interests of our company or an entity affiliated with our company over the interests of the respective other parties.

To avoid extraneous interests compromising the orderly investment brokerage or provision of advisory services, we have committed ourselves and our employees to high ethical standards. Our employees are acting in accordance with these standards at all times.

We expect our employees to act, at all times, with due care and integrity in a proper, professional manner, to comply with market standards and, first and foremost, to act in the best interest of our clients

Measures to prevent conflicts of interest

More specifically, we have taken the following measures:

- Introduction of organisational processes to safeguard client interests in the provision of investment advisory or brokerage services
- Adoption of rules governing the acceptance and granting of inducements as well as their disclosure
- Creation of confidentiality areas by establishing information barriers (so-called Chinese walls) and ensuring the functional and/or physical separation between responsibilities
- Maintaining insider lists and watch lists designed to monitor the flows of sensitive information and to prevent any misuse of inside information
- Maintaining restricted lists, the purposes of which include avoiding potential conflicts of interest through the prohibition of transactions, the giving of advice or the preparation of financial analyses
- Adoption of a policy for employee transactions and the monitoring of any such transactions
- Introduction of employees' obligation to disclose securities transactions to the Compliance Unit if any such transactions could give rise to conflicts of interest
- Staff training
- Employees are required to disclose, without undue delay, any mandates they may hold (e.g. within senior management or on the supervisory boards of other companies) to our company's management and our Compliance Officer. If an employee intends to assume such a mandate for the first time, that employee must report this intention in a timely manner, so that any potential conflicts of interest can be disclosed and so that it will be ensured, prior to assuming such a mandate, that all necessary measures have been taken that are required to prevent any conflicts of interest from arising.

Where it appears impossible to avoid a conflict of interest, we will disclose this fact to the client concerned prior to entering into any transactions or providing advisory services.

In particular, we would like to point out the following:

As a distributor of funds of funds advised or managed by Sauren Finanzdienstleistungen GmbH & Co. KG, Sauren Fonds-Service AG does not provide independent investment advisory services. Likewise, we do not provide fee-based advisory services either. We only provide brokerage services for unit classes for which the client is charged a sales commission (such as a front-end load or a trailer fee).

The advisor is working for Sauren Fonds-Service AG, which is in turn acting as a distributor of funds of funds advised or managed by Sauren Finanzdienstleistungen GmbH & Co. KG. Both companies are part of a corporate group.

The Sauren Group receives remuneration in connection with the sale of fund units in the Sauren funds of funds. Sauren Fonds-Service AG, which provides the advisory or investment brokerage services, and Sauren Finanzdienstleistungen GmbH & Co. KG are shown as having differing functions in the sales prospectuses of the funds of funds recommended. The two companies are affiliated companies, i.e. they belong to the same corporate group. Sauren Finanzdienstleistungen GmbH & Co. KG is the fund manager of all sub-funds of the fund Sauren and the advisor with regard to the Sauren Global sub-funds. Furthermore, it is the fund manager of Sauren Dynamic Absolute Return (with HANSAINVEST Hanseatische Investment-Gesellschaft mbH as the capital investment company). Sauren Fonds-Service AG is the distributor for all funds of funds mentioned herein. In their aforementioned capacity, the respective companies receive remuneration as a percentage of the respective fund volume. Conflicts of interest may arise, in particular, from the Sauren Group's vested interest in generating sales in certain financial instruments, its own products in particular.

When selling fund units of third-party funds to end-clients, we generally receive inducements from the fund companies. This includes turnover-linked follow-up sales commissions, which are paid to us by fund companies as a percentage of the fund management fees and sales charges, etc., they collect.

In addition, we receive upfront subscription sales charges levied upon the sale of investment fund units or other securities.

The receipt of any such payments and inducements does not preclude the provision of proper brokerage and advisory services in the best interest of the investor and does not have a negative effect on the quality of such brokerage and advisory services. Said inducements do not compromise our obligation to act honestly, fairly and professionally in accordance with the best interests of the investor.

Moreover, by separate agreement, we pay sales commissions to third parties (e.g. sub-brokers) for products managed, or advised on, by Sauren Finanzdienstleistungen GmbH & Co. KG. In individual cases, non-cash benefits in the form of benefits in kind (e.g. information material, training courses or participation in cultural and social events) are also accepted or granted. Minor benefits in kind usually do not constitute a conflict of interest. In individual cases, the granting of additional benefits, such as invitations to events, is usually not directly related to the services provided to a customer.

Further information on these standards and policies are available on request.

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