



Introduction

In this document you will find information on how LGT Fund Management Company Ltd., Vaduz (hereinafter "LGT Fund ManCo"), as AIFM or management company, tries to avoid conflicts of interest and how LGT Fund ManCo deals with conflicts of interest that cannot be avoided. LGT Fund ManCo's actions are aimed at reconciling the interests of clients and investors, shareholders and employees.

Due to the large number of clients and investors as well as the diverse range of products and services, including high-quality financial services, individual conflicts of interest cannot be entirely avoided in the fund business. Aware of this fact, LGT Fund ManCo has ensured that any conflicts of interest are identified at an early stage and monitored and dealt with in accordance with defined principles and, above all, in the interests of clients and investors. The aim here is to preserve the reputation of LGT Fund ManCo among clients and investors, business partners and third parties, as well as to strengthen and maintain confidence in the Liechtenstein fund center.

Possible conflicts of interest

Conflicts of interest are possible between the AIFM or the management company and the managed funds and clients/investors, between different managed funds/clients/investors and between the management company, its employees and the managed funds/clients/investors. Conflicts of interest are also possible between the individual financial services companies.

Potential conflicts of interest may include, but are not limited to, the following:

- a) Compensation and incentive systems for employees and governing bodies
- b) Transactions with employees and governing bodies
- c) Benefits to employees and governing bodies
- d) Delegation of tasks to third parties (external or within the Group)
- e) Remuneration of business partners
- f) Additional mandates of governing bodies (seats on board of directors, investment committee, etc.)
- g) Conflict between desired investment strategy and legal or contractual investment guidelines
- h) Transactions of a fund or between the managed funds of the management company
- i) Purchase of the fund manager's own products in the funds he manages
- j) Individual investments of significant size
- k) Selection of products, trading partners and trading venues
- l) Inclusion of sustainability risks

Measures to avoid or deal with conflicts of interest

In order to avoid potential conflicts of interest from the outset or to be able to deal promptly with conflicts of interest that have arisen, various strategic and organizational measures are taken to minimize the risk of customer/investor interests being adversely affected.

Structural and process organization

In order to prevent LGT Fund ManCo's services for clients and investors, for example order execution or asset management, from being influenced by extraneous interests, LGT Fund ManCo's organizational and operational structure has been structured and a separation of functions and powers has been implemented. Tasks and competencies are allocated to the individual employees accordingly, and the work content is described precisely and comprehensibly. For the purpose of supporting the various organizational units, an internal control system has been developed and implemented.

In particular:

- a) Clear documentation and separation of functions and responsibilities;
- b) Measures to control the flow of information (information barriers, Chinese walls);
- c) Separation of reporting lines;
- d) Elimination of direct correlations in compensation systems;
- e) Measures against inappropriate influence on employees and to ensure appropriate independence of employees;
- f) Separate monitoring of specific employee groups or individual employees.

Introductions

An actively managed and practiced system of directives (regulations, directives, instructions, policies, etc.) as well as clear guidelines for employees and governing bodies also support the objectives of avoiding conflicts of interest as well as the prompt and appropriate handling of any conflicts of interest that arise. LGT Fund ManCo has either itself or through the Group company laid down the following guidelines in writing:

- a) Permanent Compliance Function
- b) Investment Compliance
- c) Acceptance of gifts
- d) Employee and corporate transactions
- e) Exercise of voting rights
- f) Complaint management
- g) Dealing with conflicts of interest
- h) Best Execution Policy
- i) Inclusion of sustainability risks

Disclosure of unavoidable conflicts of interest

If the precautions taken to avoid or manage conflicts of interest are not sufficient, customers and investors are duly informed of any remaining or existing conflicts of interest.

Legal regulations

In addition to the legal requirements, Liechtenstein also has rules of conduct for the Liechtenstein fund center (Code of Conduct). The entirety of these legal foundations, which also include requirements regarding the organization and responsibilities of the AIFM, the management company and the depository, form the basis for the funds developed by LGT Fund Management Company Ltd. and established in Liechtenstein.

Upon request, we will be happy to provide the formulated guidelines for avoiding and dealing with conflicts of interest.

Yours sincerely

LGT Fund Management Company Ltd.