



Code of conduct

The code of conduct aims to ensure the Management Company adheres to legal, regulatory, professional and ethical rules in all areas of its business. Activities that could lead to doubts about the integrity and credibility of the Management Company and its employees are prohibited.

The Management Company's code of conduct can be summarised as follows:

- The Management Company's business policy is to comply with all applicable laws, rules and regulations. Breaches of laws, rules and regulations must be reported.
- The Management Company shall not try to derive an advantage from illegal or dishonourable business practices. The Management Company's employees and management in particular are expected to accept the respect for integrity that exists within the Management Company and to reflect this in their activities. In the discharge of their duties for the Management Company, employees must show loyalty to the customers, service providers, suppliers, competitors and other employees, and may not obtain or accept any unlawful advantages from anybody.
- It is unlawful and violates the Management Company's code of conduct for employees to gain an advantage from non-public information about the Management Company, affiliated companies, its customers or other companies that conduct business with the Management Company, or for employees of the Management Company to pass on such information to third parties, either directly or indirectly.
- Employees of the Management Company are obliged to avoid any conflict of interest in the performance of their duties. The Management Company has identified possible conflicts of interest and determined the handling of them in a "Conflict of interest policy". All employees must report existing or imminent conflicts of interest to their superior and discuss an appropriate course of action with him/her.
- Within the scope of their responsibility within the Management Company, employees are often privy to confidential information about the Management Company, affiliated companies, customers, suppliers or other business partners. Employees must maintain the confidentiality of the information, except if the disclosure is authorised by law or is necessary. Employees are subject to the continual obligation to treat such information as confidential.
- As part of their responsibility within the Management Company, employees are obliged to protect the customers' and the Management Company's assets. Employees should protect the customers' and the Management Company's assets in such a way that can be reasonably expected of them. The management of the Management Company is responsible for setting up and implementing internal controls.