

WYSS & PARTNER

INFORMATION ABOUT HANDLING CONFLICTS OF INTEREST

In accordance with the statutory provisions, Wyss & Partner must disclose unavoidable conflicts of interest to investors in an investment fund and inform investors about the precautions and measures taken to deal with conflicts of interest.

Wyss & Partner thus meets the regulatory requirements in Switzerland as well as in the EU and the EEA as well as the special interests of investors.

Conflicts of interest may arise, among other things, between:

- Wyss & Partner and one or more customers
- Employees, executive bodies, or shareholders of Wyss & Partner and one or more customers
- two or more customers of Wyss & Partner
- Employees of an outsourcing partner and one or more customers.

Possible conflicts of interest exist if the management of fund assets is not based on independent analyses, but is conditioned, for example, by:

- in asset management from its own (revenue) interest in the sale of financial instruments, in particular its own products
- an inappropriate degree of independence between the investment manager and the trading
- knowledge of confidential information (insider knowledge, e.g. through participation in supervisory or advisory boards)
- market abuse (e.g. influencing markets)
- separate benefits (e.g. benefits in kind (kickbacks), commission income/success-based remuneration, etc.)
- gifts and invitations
- employee transactions
- conflict between desired investment strategy and legal investment guidelines
- through performance-related remuneration of employees

and as a result, a decision is made or at least a material influence is exerted on it and this decision is not in the best interests of the investors.

In order to avoid such conflicts of interest, Wyss & Partner has committed itself to the following principles:

- All employees of Wyss & Partner are obliged to comply with high ethical standards, in particular diligence and honesty, lawful and professional action, observance of market standards and always consideration of the customer's interests. Investment decisions relating to investment funds must be made exclusively on the basis of independent analyses.
- When placing orders, the Best Execution Policy applies.
- It is prohibited for all employees of Wyss & Partner to misuse their professional knowledge or their function to obtain financial advantages (front-, parallel-running, insider knowledge). This applies to transactions in their own name as well as for the benefit of relatives or friends. Furthermore, it is prohibited to pass on insider knowledge to other employees or persons outside the company.



Furthermore, Wyss & Partner takes the following measures, among others, to avoid conflicts of interest:

- creation of organizational procedures and processes
- regulations on the acceptance and granting of benefits and their disclosure
- employee training
- ongoing monitoring and reporting of identified conflicts by Compliance.

Wyss & Partner regularly monitors the effectiveness of this policy to detect and promptly correct any deficiencies.

Wyss & Partner, 11.10.2023

