

MAINFIRST



# Code Of Conduct

MAINFIRST AFFILIATED  
FUND MANAGERS  
(DEUTSCHLAND) GMBH

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# Code of conduct

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## 1 Brief description

The aim of the Code of Conduct is to ensure that the employees<sup>1</sup> and officers of MainFirst Affiliated Fund Managers (Deutschland) GmbH (hereinafter the "company") are always and fully in compliance with statutory, supervisory, professional and ethical regulations.

Activities liable to cast doubt on the integrity and credibility of the company, its officers and its employees must be avoided.

## 2 Legal background

The policy is designed for the implementation of the relevant statutory provisions and regulations, as well as supervisory publications. In particular, the policy takes into consideration the statutory and supervisory requirements of WpIG, WpHG and OWiG as well as BaFin announcements

## 3 Scope of application

The policy has no department-, area- or location-specific features. It is applicable worldwide and in full for all employees.

## 4 Description of the policy

### 4.1 General

The Code of Conduct of the company can be summarised as follows:

It is the business policy of the company to comply fully and at all times with all applicable laws, rules and regulations, in the interest of customer protection, the management company's reputation and the maintenance of a functioning financial and capital market. Breaches of laws, rules or regulations must be reported. Appropriate and adequate measures are in place to remedy the breach and ensure that breaches are avoided in the future. Employees and officers of the company are continually instructed and informed about the Company's Code of Conduct.

### 4.2 Avoidance of illegal or disreputable business practices

Employees and officers of the company shall refrain from all illegal or disreputable business practices and from any personal intention to obtain advantages or grant them to others. Employees and officers of the company are expected to share the company's appreciation of the importance of integrity and express it at all times in the performance of their duties. In the exercise of their duties for the company, employees shall at all times behave loyally toward customers, service providers, suppliers, competitors and other employees and never receive or accept undue advantages.

### 4.3 Necessity of refraining from the acceptance or granting of any undue personal advantage

It is unlawful and a violation of the company's Code Of Conduct for employees and officers of the company to take advantage of non-public information about the company or its affiliates or customers or other companies that transact business with the company, or for employees and

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<sup>1</sup> (\*male and female)

officers of the company to disclose such information directly or indirectly to third parties for the purposes of obtaining or granting an advantage.

#### **4.4 Avoidance of conflicts of interest**

In the performance of their duties, employees and officers of the company are required to avoid any kind of conflict of interest. The Company has identified and documented potential conflicts of interest. A separate Conflict of Interest policy defines how to address conflicts of interest. All employees and officers of the company must report existing or potential conflicts of interest to the company's Management Board without delay. The company will take the necessary decisions and measures to avoid and eliminate conflicts of interest.

#### **4.5 Protection of personal data**

In the course of their duties within the company, employees and officers of the company often receive confidential information about the company and its affiliates, customers, suppliers or other business partners. Employees and officers of the company must respect the confidentiality of such information, unless disclosure is necessary in order to comply with supervisory or regulatory requirements, is contractually permissible or has been approved in advance. Employees and officers of the company have an ongoing obligation to treat data and information relating to the company's business operations as confidential.

#### **4.6 Responsibility and duty of care in the interest of asset protection**

Employees and officers of the company have an ongoing obligation to protect the assets of customers and of the company. When carrying out their duties and discharging their responsibilities, employees and officers of the company shall act carefully and conscientiously to protect customers and the company against any kind of damage.