

Summary of the Conflicts of Interest Policy

In summary, the organizational measures of State Street Bank International GmbH ('SSBI GmbH') for dealing with conflicts of interest are as follows:

- The Business Distribution Plan and the organizational structure of our Bank are compliant with the requirement to avoid conflicts of interest. The organizational units 'Front Office' and 'Trading' are segregated from the organizational unit 'Back Office' as well as from the functions 'Risk Controlling', 'Settlement/Monitoring: Lending Business' and 'Settlement/Monitoring: Trading', up to and including the level of the Executive Management Board. In addition, the operational Depositary business is completely segregated from the areas 'Collateral Management Services' and 'KVG Back-Office In Sourcing'. The divisional solution with respect to BaFin Circular 05/2020 (WA)/Depositary Circular and BaFin Circular 01/2017 (WA)/KAMaRisk has been implemented in terms of territorial, personal, functional and hierarchical separation.
- The 'Conflict of Interest Policy' addresses the conflict of interest topic both from a WpHG (German Securities Trading Act) perspective and from a Depositary perspective and provides a number of methods for avoiding conflicts of interest. The following is a high-level description of these methods:
 - a. Control of Information
 - i. Provisions related to 'Chinese Walls' and handling of these
 - Safeguarding of information by applying a strict 'need to know' principle within the company
 - Access rights to information and physical access rights to areas within the company. For example, systems used for 'KVG Back-Office In-Sourcing' services are separated from the systems used for the Depositary business.
 - ii. Provisions related to 'Wall Crossing'
 - b. Separate supervision of relevant persons
 - c. Removal of potentially harmful remuneration links

- d. Prevention of employees inappropriately influencing other employees
- e. Prevention of involvement of staff in separate services or activities that could result in a conflict of interest
- f. As a last resort, we will disclose the conflict of interest to the relevant client if it is not possible to sufficiently avoid or control the conflict of interest.