

# Assenagon Guide

## Corporate Guidelines

### Conflicts of Interest Policy

#### 1. Introduction

- a) Assenagon Asset Management S.A. ("Assenagon" or "the company") and all other Assenagon group companies use suitable organisational measures to ensure that the risk of conflicts of interest between itself or third parties and investors or a fund, between different investors, between an investor and a fund, or between two funds, is as low as possible.
- b) Potential conflicts of interest include in particular:
- Incentive systems for company staff
  - Staff transactions
  - Inducements for company staff
  - Reallocations within investment funds
  - Improving the appearance of fund performance at reporting dates (window dressing)
  - Transactions between the company and funds under its management or
  - Transactions between funds managed by the company
  - Bundling of multiple orders ("block trades")
  - Appointment of closely affiliated companies and persons
  - Individual investments with large volume
  - Frequent trading
  - Determining the cut-off time
  - IPO allocations
  - Use of non-public information in portfolio management
- c) The Assenagon Group has introduced procedures that are suitable for identifying circumstances which could give rise to conflicts of interest, avoiding conflicts of interest, and, if unavoidable conflicts of interest arise, solving these as described in the following and otherwise taking into account the interests of the investor or fund. If unavoidable conflicts of interest may harm the interests of the fund or client, the investors or clients will be provided with detailed information. Any conflicts with the interests of third parties will be solved to the benefit of Assenagon's own investors and funds. In the course of their activities, all employees of the Assenagon Group (including board and committee members) are obliged to report potential and acute conflicts of interest to Legal & Compliance and the relevant management or board of directors. This applies both to own conflicts of interest and those of other employees. These bodies will confirm any conflicts of interest and determine and document codes of conduct.
- d) The management boards of the Assenagon Group and Legal & Compliance maintain a register of reported conflicts of interest and the appropriate action in the specific case, as well as the code of conduct for comparable situations in the future.
- e) Within the management of the Assenagon Group, the managing directors responsible for "Legal & Compliance" ensure that the policy is adhered to.

#### 2. Cases of Conflict

- a) The Assenagon Group has introduced a suitable procedure for the mutual and special funds that it manages and markets in order to avoid undue harm to investors' interests through transaction costs. This is designed to protect investors in particular against unnecessary transaction costs resulting from excessive turnover rates, and disadvantages resulting from transaction costs linked to redemptions, e.g. redemptions with high total value that cannot be settled using the liquidity reserves of an investment fund. The Assenagon Group informs investors by suitable means about the measures and procedures agreed.

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- b) Fund transaction activity is always determined in accordance with its investment objectives. Transactions that are unnecessary for the proper management of the investment fund and serve only to generate additional fees ("churning") are not permitted. Staff in settlement (Middle Office) are required to report irregularities in business activity (especially irregular or increased activity within individual funds) to the management or board of directors, which will in turn examine the relevant transactions in cooperation with Middle Office and the portfolio manager, document the result and introduce corresponding counter-measures where appropriate.
- c) If potential or actual conflicts of interest emerge in portfolio management between different funds managed by Assenagon (e.g. one manager manages two funds and can play the positions off against each other, the manager of a fund of funds also manages one of the target funds, etc.), then it must always position itself neutrally with regard to the different funds.

In no case may it consciously favour one fund over another. The same applies if a portfolio manager simply receives information about the composition of another fund managed by Assenagon. In case of doubt, the manager must behave as if he had no information about the positions of the other funds. Real conflicts of interest must be documented by the portfolio manager and presented to the management or board of directors. If for procedural reasons this is not possible before entering another position, documentation and justification of the relevant position must at least be delivered on the same day. The management or board of directors will decide on the further action to be taken on a case-by-case basis.
- d) Staff transactions are regulated in the Personal Trading Policy of which all employees are aware. Certain securities and funds (and derivatives thereof) are blocked for all Assenagon Group employees using a "restricted list". The restricted list is to be checked regularly by the Assenagon Group's management bodies and supplemented with measures to avoid conflicts of interest if securities and funds (and derivatives thereof) could trigger conflicts of interest in the event of acquisition or execution. Funds managed by Assenagon will be examined in particular to establish whether specific events in individual funds enable employees to position themselves unfairly in relation to other investors. In this case the relevant fund and its securities will be placed on the restricted list. Irrespective of the restricted list, all employees are forbidden to use information acquired in the course of their activities at Assenagon to their own advantage. In case of doubt, potential conflicts of interest must be reported to the management bodies of the Assenagon Group and Legal & Compliance, which will then decide on a case-by-case basis how the employee has to proceed. This decision is to be documented.
- e) Furthermore, conflicts of interest relating to information that is not publicly available, regarding securities and/or derivatives and their issuers, and that could significantly affect the price, are governed by the insider information policy of which all employees of the Assenagon Group are aware.
- f) Employees of the Assenagon group are only authorised to give or receive an inducement according to the Inducements Policy.
- g) When processing shares/units of funds, the company must always take a neutral stance with regard to new and existing investors. For example, if not all redemptions can be processed on the day they are submitted, the company will act as far as possible on a first come, first served basis. It will otherwise allocate redemptions proportionately. In no case will it consciously favour one investor over another. The relevant information in the prospectus should also be consulted.

### 3. Review of the Policy

Compliance will, together with the relevant departments, review the policy at least once a year. Compliance will update the policy whenever necessary.

Updates of the Policy will be submitted to the Board of Directors of Assenagon for approval.