

**Client Information of Bank Gutmann Aktiengesellschaft  
pursuant to the Austrian Securities Supervision Act 2018 (Wertpapieraufsichtsgesetz 2018, WAG 2018)**

as of December 2022

The Austrian Securities Supervision Act 2018 (Wertpapieraufsichtsgesetz 2018, WAG 2018) obliges banks, among other things, to provide all clients with statutorily required information. Bank Gutmann AG complies with this obligation by providing you with the present client information.

**1. Information on Bank Gutmann AG and the services it offers**

**Bank Gutmann Aktiengesellschaft**

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Internet: www.gutmann.at

Court of registration: Vienna Commercial Court

Company Register Number: FN 78445k

Austrian National Bank ID number: 0279021

VAT ID no.: ATU15358002

DVR No. (Data Processing Registry): 0028533

Salzburg Branch

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5020 Salzburg

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Linz Branch

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Supervisory authority

Bank Gutmann AG is licensed to provide banking services by the Financial Market Authority (FMA), Otto-Wagner-Platz 5, 1090 Vienna (Internet: [www.fma.gv.at](http://www.fma.gv.at)). This licence also authorises Bank Gutmann AG to render investment

services and securities transactions. The bank is supervised by the FMA when rendering these services.

Contract language and means of communication

The relevant language for contractual relationship with clients is German or English, as agreed.

In addition to personal consultations with your clients relationship manager during regular banking hours or by appointment, our clients can generally use any of the means of communication indicated above in the contact data list.

All legally relevant correspondence, especially the placement of orders with Bank Gutmann AG, must be in writing unless agreed otherwise.

Available services and financial instruments

Generally, Bank Gutmann AG offers the following investment services:

- investment advice: the personal recommendation - tailored to the client's needs - of a financial instrument or investment service with the recommendation being based on the afore established client data on knowledge, experience and investment objectives, financial situation and risk profile (suitability test);
- portfolio management: management of a portfolio in accordance with a mandate given by the client on a discretionary client-by-client basis where such portfolio includes one or more financial instruments;
- transactions without prior advice (or "Self-management"): the execution of orders on behalf of a client, provided these orders involve to one or more financial instruments

Investment advice is provided independently within the meaning of Sections 50 and 53 WAG 2018.

The subject matter on which advice is provided is the financial instruments included in the Bank's investment universe. This investment universe comprises various categories of financial instruments (such as stocks included in various indices, investment grade and higher-grade high-yield bonds, equity funds, bond funds in various currencies, mixed funds). The Bank's recommendation list is compiled from the financial instruments included in the investment universe. Selection criteria may be dividend yield, momentum, price-earnings ratio (in the case of stocks) and/or issuance volumes, rating, interest rate environment (in the case of bonds) and/or performance and volatility relative to the peer group, and plausibility of the investment approach (in the case of investment funds). Advice may be provided on investment funds of Gutmann Kapitalanlageaktiengesellschaft, a subsidiary of the Bank.

The number of financial instruments issued by related companies is proportionate relative to the total number of financial instruments considered.

By considering the financial instruments included in the Bank's investment universe, advice is based on comprehensive research of different types of financial instruments. The range of financial instruments is not confined to financial instruments issued or offered by institutions with close links to the Bank or maintaining other legal or economic relations, including contractual relations, with the Bank that are so close that advice would not be independent within the meaning of Sections 50 and 53 WAG 2018.

Should the Bank receive payments from third parties, these will be passed on to the client immediately and in full upon receipt.

The Bank offers the service of investment advice with follow-up advice.

As a private bank, the core competence of Bank Gutmann AG is to provide clients with investment advice and portfolio management services. In providing these services, Bank Gutmann AG specifically takes into account the actual needs of its clients, especially their knowledge and experience, financial situation and investment goals. The provision of complete and correct information about your knowledge and experience, financial situation and investment objectives is essential to enable Bank Gutmann AG to recommend the service or product suitable for you. As part of its investment services, Bank Gutmann AG offers all kinds of transactions in securities and other financial instruments, particularly in connection with buying and selling securities and holding them in custody.

Manufacturers and suppliers of financial instruments are required to determine a target market that is to be taken into account in distribution. The target market determines a target group of investors on the basis of various criteria for whom the respective product is suitable. When providing self-management service, there is no complete target market review. For general information on the securities and financial instruments included in the services offered by Bank Gutmann AG, please refer to the "Risk Disclosures" brochure that you are given when concluding a contract with us or upon request from your client relationship manager.

Please note that in the case of publicly offered securities, the prospectus is provided by the issuer, generally on the issuer's website. You may also request a hardcopy version from the issuer.

#### Involvement of tied agents

Bank Gutmann AG is acting through the following tied agent pursuant to Section 36 WAG 2018:

In Hungary: Gutmann Magyarország Befektetési Tanácsadó Zártkörűen Működő Részvénytársaság (Gutmann

Hungary Investment Consulting Company Limited), Bólyai utca 13, H-1023 Budapest, as tied agent registered in the Republic of Hungary.

#### Reports on the services provided

Bank Gutmann AG informs its client promptly in accordance with the statutory reporting requirements (particularly sections 60 ff WAG 2018) of the execution of orders, taking into account any arrangements concluded with the client.

A tabulation of financial instruments held by the client will be forwarded to the client at least once per quarter. If the market value of a financial instrument is not available, its value will be estimated. This may be an indication of a lack of liquidity.

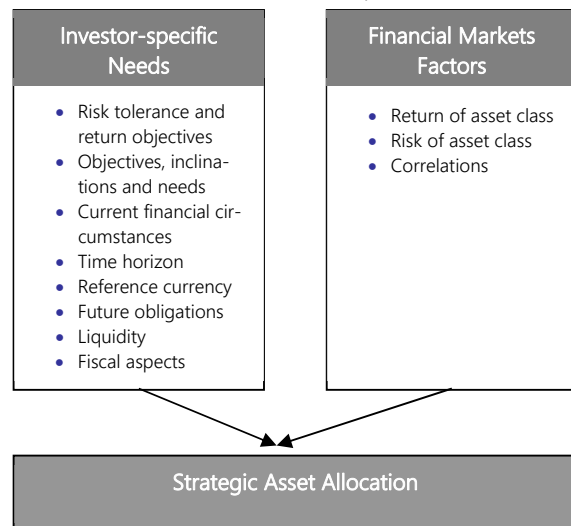
#### **2. Information related to portfolio management**

The following information constitutes general portfolio management data at Bank Gutmann AG and is respectively specified and modified in the individual portfolio management agreement and individual investor profile.

#### Proposed investment strategies and management objectives

The objective of Gutmann discretionary portfolio management is to generate the best possible result while taking into account the client's personal risk tolerance and the strategy agreed with the client.

Our process of "taking measure" ensures that customers' investments match their requirements and their risk tolerance. This information is used to formulate guidelines for the development of the portfolio structure. An understanding of the clients personal situation is critical to recommending the right investment. The most appropriate solution can only be found by drawing up an individual risk-return profile. Individual restrictions to investment activities are taken into account in the portfolio focus.



Tactical limits ("tactical asset allocation") are agreed to control the strategically defined (long-term) asset allocation. The portfolio manager may depart from the long-term average allocation policy within the scope of these tactical limits to react to market developments or take advantage of opportunities.

All decisions regarding the tactical asset allocation are made in the Chief Investment Office.

To ensure optimal returns on the investments of our customers, we work in close cooperation with independent research partners and the world's best securities experts. This approach guarantees best risk adjusted performance.

Our portfolio management decisions are supported by forecasts from various independent research experts that supply us with macroeconomic analyses and estimates.

Bond maturities are managed in accordance with our assessment of interest rates. Depending on the outlook, we allocate more weight to the money market, short-term instruments or medium to long-term bonds.

Almost all types of bank bonds are used to control risk and return. Bonds that are at a higher risk of default because of their sub-ordinated nature have to offer a higher yield as compensation for this risk to make them eligible for the portfolios. At the time the investment decision is made, the portfolio management determines whether the premium is sufficient to justify an investment in the position. Special attention is devoted to different legal provisions governing banking resolution in individual countries, as they offer options for differentiating by risk and yield.

In the equity sector, the selection is made in a fundamental bottom-up analysis process. A diversified share portfolio is intended to enable participation in the success of the selected companies in the long term. In addition, regional accents are made through active management between the investment regions. Based on the macro-micro-economic evaluations, additional positions can be weighted in the USA, Europe, Japan, Asia and emerging markets.

Bank Gutmann AG offers asset management that takes environmental and social characteristics into account. For this investment, sustainable characteristics are taken into account in the investment strategy when selecting the investment instruments, thereby taking into account the most important adverse effects of investment decisions on sustainability factors. The ecological and social characteristics of the investment as well as the application of good corporate governance practices in the invested companies are fulfilled in particular through the identification of corresponding issuers with the help of an established data provider in this area.

#### Method and frequency of valuation of the financial instruments in the client portfolio

The valuation of assets is based on the last known stock exchange quotations and price determinations.

The internationally used data platforms "Bloomberg" and "FactSet" are used as a key source for the prices of all securities. The prices of foreign investment funds are provided by Oesterreichische Kontrollbank AG and automatically fed to the internal processing system.

In exceptional cases, prices of special products are entered into the system manually. In this case, some of the valuation prices are entered daily, some at larger, regular intervals.

#### Benchmark against which the performance of the client portfolio will be compared

Standard security indices are used as benchmarks against which the performance of the client portfolio will be compared.

For example for stock investments, the Solactive GBS Developed Markets Large & Mid Cap Index is used, among others, while the BB Barclays Euro Aggregate 1-5 Years Euro is one of the benchmarks used for investments in bonds.

The total portfolio benchmark consists of a combination of the individual indices, reflecting the strategy agreed with the client and the asset classes employed.

### **3. General information on the execution of client orders**

Bank Gutmann AG has established principles governing the execution of client orders in order to obtain the best results for its clients. These principles are referred to as the execution policy. Client orders (professional and private clients) are executed by Bank Gutmann AG in accordance with this execution policy

The execution policy defines for certain categories of client orders, and for each type of financial instrument, specific channels of execution, execution venues and trading partners as well as the criteria determining the execution venue. When the order is placed by the client, Bank Gutmann AG determines how the order will be processed in this specific case in compliance with the guidelines of the execution policy.

#### Scope of application

Execution for above purposes means that Bank Gutmann AG itself will execute the client order on the client's behalf as a commission agent (possibly by entering into the contract) or will, in compliance with the order execution policy of Bank Gutmann AG, forward the order for execution to a trading partner.

The agreement between Bank Gutmann AG and the client on a fixed price constitutes a purchase agreement (see below Fixed-price transactions).

These principles are also applicable when Bank Gutmann AG, in the performance of its duties under a portfolio management contract, buys or sells financial instruments on the client's behalf.

In the following cases, the execution policy will not be applied or only in part:

- 1) Fixed-price transactions: If Bank Gutmann AG and the client directly conclude an agreement to buy financial instruments, they enter into a fixed-price transaction (see below).
- 2) Issuance and redemption of domestic investment funds and real estate investment funds through a custodian bank (see below).
- 3) Client instruction: Please note: an explicit instruction issued by the client may prevent Bank Gutmann AG entirely or in part from taking the measures described in the execution policy defined by Bank Gutmann AG to achieve the best possible result.

#### Order execution criteria

Client orders may be regularly executed through various execution channels and on various execution venues, e.g. on stock exchanges, other trading venues, or through the intermediary of trading partners.

The following sections will describe the execution channels and possible execution venues for the relevant types of financial instruments discussed which generally enable Bank Gutmann AG to consistently obtain the best possible result for the execution of client orders.

In order to consistently obtain the best possible result for clients, Bank Gutmann applies the following criteria:

- quotation/price
- costs
- speed of execution
- likelihood of execution and handling
- type and scope of order

When choosing the method of execution and trading partners, Bank Gutmann AG primarily takes into account the aggregate amount the client will achieve by selling or will need to pay when buying. In the event of a buy order, the overall amount consists of the costs associated with the execution of the order and borne by the client plus the price of the financial instrument. In the event of a sell order, the costs associated with the execution of the order and borne by the client are subtracted from the price of the financial instrument. Fees to be borne by the clients include own fees, execution venue fees, clearing and settlement fees, taxes and other fees for third parties involved in the execution of orders.

As financial instruments are generally subject to price volatility and prices may change to the disadvantage of clients over time once the order has been given, Bank Gutmann

AG places particular importance on high speed and high probability of execution, while allowing for legitimate delays.

#### Execution by trading partners

As a rule, Bank Gutmann AG itself does not execute the client's order but rather forwards the order to a trading partner in keeping with these principles.

Bank Gutmann AG collaborates with a number of trading partners who have proven to be quick and reliable in the execution of orders while ensuring consistent quality throughout. In selecting the trading partners, the depository of the securities is also a determining factor.

In order to ensure the best possible conditions for the execution of client orders, Bank Gutmann AG regularly reviews its selection of trading partners.

If a client order is passed on to a trading partner, Bank Gutmann AG is subject to the execution policy of this trading partner. Bank Gutmann AG can therefore not guarantee that orders involving listed financial instruments are executed directly on the stock exchange.

Securities subject to the trading obligation (stocks, derivatives) are traded on the appropriate execution and trading venues.

#### Execution deviating from the execution policy in individual cases

If a different form of execution is required due to exceptional circumstances or disruptions on the market, Bank Gutmann AG will execute the order in the client's best interests.

#### Fixed-price transactions

The principles of execution do not apply or are applicable only to a limited degree if Bank Gutmann AG and the client conclude an agreement to buy a financial instrument at a fixed or determinable price (fixed-price transaction). In this case, the form of execution described above is no longer applicable. Rather, Bank Gutmann AG and the client are directly bound by the contractual agreement to deliver the financial instruments owed and to pay the purchase price, respectively.

In the case of fixed-price transactions, the transaction costs are contained in the purchase price of the financial instrument.

The principles of execution set forth below state when Bank Gutmann AG normally offers the possibility of entering into such fixed-price transactions.

#### **4. Principles of execution for various types of financial instruments**

##### Interest-bearing securities

For short-term investments (up to one year) in EUR or USD, Bank Gutmann AG offers the option of purchasing directly from or re-selling to Bank Gutmann AG treasury bills

and/or commercial papers from banks whose rating - or whose guarantor's rating - is not worse than AA from Standard & Poor's or Fitch or Aa2 from Moody's, with one such rating from at least one agency being deemed sufficient.

You may request information about the current offers at any given time, particularly the price, from Bank Gutmann AG. The purchase and sale are based on a fixed price agreed with Bank Gutmann AG (fixed-price transaction), with the price depending on the current market situation.

If a fixed-price transaction between Bank Gutmann AG and the client does not take place, Bank Gutmann AG shall execute client orders on a commission basis as follows:

<u>Type of securities</u>	<u>Execution venue</u>
Government bonds	Bloomberg MTF (multilateral trading facility)

Jumbo mortgage bonds	Bloomberg MTF
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Other interest-bearing securities	Bloomberg MTF
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If an order cannot be executed through Bloomberg MTF, the order will be executed with selected trading partners or forwarded to selected trading partners for execution on a regulated market, MTF, OTF (organised trading facility) or equivalent third trading venue.

Shares, exchange traded funds (ETFs)

Bank Gutmann AG has no direct access to a stock exchange. Orders for stocks or orders relating to ETFs are executed with selected systematic internalisers or forwarded to selected trading partners for execution on a regulated market, MTF or equivalent third trading venue.

Investment funds and open-ended real estate investment funds

Orders to subscribe for or redeem Austrian investment fund unit certificates and open-ended real estate investment funds are executed by forwarding the orders to the relevant custodian bank or managing fund company.

Orders to subscribe for or redeem non-Austrian investment fund unit certificates and open-ended real estate investment funds are forwarded to selected trading partners for execution. If our trading partners cannot execute such orders, the orders are forwarded to the relevant custodian bank or directly to the fund company for execution.

Alternative investment funds (AIFs)

Orders relating to shares/units of alternative investment funds (AIFs) are generally executed through transactions with the relevant issuer or a selected trading partner.

Certificates – Warrants

Orders relating to certificates, warrants and similar securities are executed with selected trading partners or forwarded to selected trading partners for execution on a regulated market, MTF or OTF.

Financial derivatives

These include financial futures that are traded on a stock exchange on standard terms and conditions.

Orders relating to financial derivatives are executed through Thomson Reuters MTF or forwarded to selected trading partners for execution on a regulated market, MTF or OTF.

The preferred trading partners and execution venues of Bank Gutmann AG are shown in the Annex to this client information.

Eligible execution venues are assessed and selected by applying the criteria named in the tabulation below.

Assessment criteria	Weighting
Pricing	Very important
Number of trading participants	Very important
Execution quality	Very important
Trading hours and trading venues	Important
Stability of business relationship and past experience	Important
Circuit breaker	Important
Reporting and settlement	Important
Rating	Important
Service	Important

Review of principles

Bank Gutmann AG regularly monitors the quality of execution and checks whether the execution principles of the trading partners involved are consistent with its own principles. The precautions taken by Bank Gutmann AG to ensure the best possible execution of orders include the regular evaluation of execution venues and trading partners based on a defined procedure, taking into account the relevant factors and their weighting.

The regular assessment of execution venues shall take into account information on the quality of order execution to be published by trading venues, systematic internalisers and other execution venues. Links to this information are available on Bank Gutmann AG's website at <https://www.gutmann.at/en/legal>.

Once a year Bank Gutmann AG publishes the five most important execution venues and trading partners in terms of trading volume and a summary of the execution quality achieved for each class of financial instrument. This information is available at <https://www.gutmann.at/en/legal>.

Customers are informed in an appropriate manner of any significant changes to the execution policy.

The latest version of this client information is made available on Bank Gutmann's website at <https://www.gutmann.at/legal>.

## 5. Measures to protect the client's assets

### Deposit Guarantee and Investor Compensation

Bank Gutmann AG is member of Einlagensicherung AUSTRIA GmbH, Wipplingerstraße 34/4/DG 4, 1010 Vienna.

Protection of deposits

Deposits of natural and legal persons are guaranteed up to a maximum amount of EUR 100,000 per depositor. In some cases ("deposits guaranteed for a limited period of time", „zeitlich begrenzt gedeckte Einlagen“) the maximum amount is EUR 500,000.

Investor compensation

Austrian law requires custodian banks to return securities to investors.

Any monetary claims arising under the investor compensation scheme are guaranteed up to maximum amount of EUR 20,000 per investor both for natural persons and non-natural persons. However, the protection scheme's cover obligation for claims of creditors which are not natural persons is limited to 90% of the claim from securities per investor.

Deposit guarantee versus investor compensation

All kinds of deposits pursuant to the "Einlagensicherungs- und Anlegerentschädigungsgesetz (ESAEG)" credited to accounts with credit institutions (such as balances held in salary accounts, savings accounts, fixed-term deposits, etc.), both interest-bearing or non-interest-bearing, are subject to the deposit guarantee scheme.

### Custody of securities

Custody of securities is governed by the General Terms and Conditions of Bank Gutmann Aktiengesellschaft (GTCs, sections 65 and 67 ff.). It is generally performed by Austrian and foreign third-party custodian banks, i.e. institutions specialising in the custody of securities. Bank Gutmann AG uses only banks that have a first-rate reputation and market position in the relevant market and can offer high-quality services.

Austrian securities are generally held in custody at OeKB CSD GmbH (Central Securities Depository, a subsidiary of Oesterreichische Kontrollbank Aktiengesellschaft) in its capacity as a securities clearing and deposit bank within the meaning of the Austrian Depository Act. Foreign securities are held in custody in the home market of the relevant security or in the country in which the security was purchased. Under certain circumstances, however, securities issued in Austria may also be held in custody abroad and securities issued abroad may be held in custody in Austria

(see Section 67 (2) of the GTCs). We inform you of the country in which your securities are held in custody on your securities account statement.

Your rights to the securities that we hold in custody on your behalf exist independently from the deposited securities themselves, the selected manner of custody, the place of purchase and custody of the securities, and, in particular, the law that is applicable under these perspectives. You acquire a legal standing of (co-)ownership or - generally in the case of foreign transactions - rights akin to ownership in the form of a contractual right to delivery of the securities known as "Wertpapierrechnung" (see Section 65 of the GTCs).

Securities held in custody by foreign third-party custodian banks, including in particular outside the European Economic Area, are subject to the laws of the state in which they are held. Such laws may differ substantially from regulations applicable in Austria and do not necessarily provide the same level of protection.

You are therefore protected against third-party access to your securities subject to the applicable legal system. For the regulations governing the custody of securities on pool accounts and the related risks of reduction of the asset pool serving as collateral, see Sections 4 ff. of the Austrian Depository Act.

The securities held in custody by us may be subject to security interests (especially banker's liens), rights of retention and rights of offsetting or crediting on our part or on the part of a third party. Such rights are governed by Sections 47 ff of the GTCs or determined by the legal system applicable to the third-party custody.

For the custody of your securities, we are liable in accordance with the statutory regulations (especially the Austrian Depository Act and Austrian Civil Code) and Section 67 (3) of the GTCs.

We do business with foreign depositories in the following countries, among others:

- Germany
- England
- Japan
- Belgium
- Switzerland

## 6. Conflicts of interest

### Basic information on the guidelines for dealing with conflicts of interest

Bank Gutmann AG has established guidelines for dealing with conflicts of interest. These guidelines are intended to prevent the client's interests from being harmed by a conflict of interest between a client, on the one hand, and Bank

Gutmann AG or one of its employees or a company controlled by Bank Gutmann AG, on the other, or between clients of Bank Gutmann AG. These guidelines are outlined below:

- The governing principle is to avoid conflicts of interest. To this purpose, Bank Gutmann AG has deployed a Compliance Officer who, in cases of unavoidable conflicts of interest, ensures that the investment transaction is handled in accordance with the statutory regulations and regularly reports to the Executive Board.
- Only the client's interests are taken into consideration when we advise the client and manage his assets.
- In the event of conflicts of interest due to bottlenecks (i.e. there are more client orders than can actually be fulfilled), we apply clearly formulated principles that are established prior to allocation (e.g. principles of priority or pro-rated distribution) and prevent undue preference in favour of certain clients. Other conflicts of interest are made known to the client in individual cases, depending on the specific role of Bank Gutmann AG.
- The prices of our own products are always determined on the basis of the current market situation.
- Bank Gutmann AG has defined areas of confidentiality in order to prevent the exchange of information between persons whose activities might result in a conflict of interest. If in certain specific cases it is impossible to avoid an exchange of information between the specified areas which might result in a conflict of interest; this fact is reported to the Compliance Officer, who then takes the appropriate measures.
- Bank Gutmann AG has taken organisational measures to avoid any undue influence on the manner in which securities services are provided.
- Bank Gutmann AG employees undergo training on an ongoing basis.
- If a conflict of interest is unavoidable despite the above-mentioned precautionary measures, Bank Gutmann AG will inform the client of any conflict of interest, either in a general manner or immediately before placing his order, so that the client will be able to make his decisions in full awareness of the conflict of interest.

#### Information on details

Upon request, we would be happy to explain the details of conflict-of-interest guidelines with you personally.

#### **7. Acceptance and provision of inducements**

When providing investment services, including in particular in connection with the purchase of securities by the client, the Bank may, on the one hand, pay third parties for initiating business relations and, on the other hand, may receive remuneration from third parties as consideration for the provision of services.

#### Payments from third parties to Bank Gutmann AG and other inducements

Remuneration received by the Bank when providing independent investment advice and asset management services will be passed on by the Bank to the client immediately and in full upon receipt, in accordance with statutory provisions. The Bank informs the client about the benefits passed on to him in its periodic reports to the client.

Minor non-monetary benefits may be accepted:

Bank Gutmann AG and/or staff of Bank Gutmann AG receive invitations to attend training and informational events from various issuers, fund companies and other providers of information services. The primary purpose of such events is the dissemination of expert knowledge. On the other hand, such meetings are also a platform for an exchange of information and experiences with the managers of issuers, fund companies, and other securities specialists. Participation in said training and informational events and hospitality of a reasonable de minimis value during such events is permitted. Information pamphlets, free-of-charge newsletter of issuers and fund companies are accepted only if such information is available to the general public.

#### Payments from Bank Gutmann AG to third parties

For the building of business contacts through third parties, Bank Gutmann AG in some cases pays these third parties compensation for the services provided to initiate these contacts. This compensation may be one off or recurring and as a rule the amount depends on the corresponding business volume or income Bank Gutmann AG obtains from the initiated business relationship.

#### Information on details

Upon request, we would be happy to discuss the details on such commission agreements in person.

#### **8. Information on costs and expenses**

##### Prices and costs

In the absence of special agreements, the client will be charged the securities service fees in the Price Display. In addition, securities transactions often require Bank Gutmann AG to make additional cash outlays to fill the client's orders (especially third-party fees, purchase price or share price of purchased securities and compensation for intermediaries). The client is also charged for those cash outlays.

##### Foreign currency transactions

If a client order requires Bank Gutmann AG to make payments in foreign currency or convert incoming foreign-currency payments into euros, Bank Gutmann AG will base the conversion on the exchange rate typical of the market that Bank Gutmann AG usually charges its clients at the time of settlement.

For the other fees charged by Bank Gutmann AG for currency conversion, please see the Price Display.

#### Tabulation of costs

Before buying or selling a financial instrument, the client will receive a tabulation of all costs and associated charges that may be expected to be incurred in providing the investment or ancillary services and all costs and associated charges relating to the manufacture and administration of financial instruments. Once a year, the client will receive a tabulation of all costs and associated charges incurred in providing the investment and/or ancillary services and in relation to financial instruments.

Total costs are shown as a nominal amount and as a percentage. Should payments be made to third parties in connection with the provision of investment services, these will be shown separately. The impact of total costs on the (expected) return is illustrated.

#### Additional tax and expenses

Please bear in mind that in addition to the above-mentioned fees and cash outlays the client may be liable for other costs and taxes (e.g. foreign and domestic capital gain tax) that are not necessarily paid through Bank Gutmann AG or billed by it. The client is personally responsible for meeting his tax liabilities, especially in his native country.

### **9. Information on client categories**

According to the statutory regulations, every client must be classified in one of the following categories: "retail client", "professional client" or "eligible counterparties".

Depending on the client category, WAG 2018 requires the Bank to meet different standards regarding its obligations to provide clients with information and protect them. Retail clients are entitled to the highest degree of protection, whereas eligible counterparties are entitled to the lowest.

#### Retail client

Any client other than a professional client or eligible counterparty

#### Professional client

1.
  - a) credit institutions
  - b) investment companies
  - c) other authorised or regulated financial institutions
  - d) insurance companies
  - e) collective investment schemes as defined by the Austrian Capital Market Act (KMG), mutual funds and management of such schemes
  - f) pension funds and their management companies
  - g) traders in commodities or commodity derivatives
  - h) local companies within the meaning of Art. 4 para 1 No 4 of the Regulation (EU) No. 575/2013

- i) other institutional investors
2. Large undertakings other than those mentioned in section 1 above meeting 2 out of 3 of the following size requirements on a company basis:
  - a) balance sheet total of at least € 20 million
  - b) net turnover of at least € 40 million
  - c) own funds of at least € 2 million
3. National and regional governments, public bodies that manage public debt
4. Central banks
5. Other institutional investors whose main activity is to invest in financial instruments

#### Eligible counterparty

Typical participants on capital markets and certain other companies are generally assumed to already have knowledge and experience in the capital market.

#### Reclassification in client categories

Under WAG 2018, it is possible to change the client category from "retail client" to "professional client" and from "professional client" to "eligible counterparty". This requires the Bank to inquire whether the client has the degree of knowledge and experience in capital markets that can generally be expected of professional capital market participants.

As the result of such changes of client categories, the high degree of protection granted to "retail clients" may be lowered, since many provisions of WAG 2018 will no longer be applicable and only a few provisions apply to "eligible counterparties".

Conversely, "eligible counterparties" and "professional clients" may generally apply for classification as "professional clients" or "retail clients", respectively.

We would be happy to answer any more detailed questions you may have.

### **10. Sustainability-related disclosures**

#### Integration of sustainability risks

Sustainability risks are environmental, social and governance ("ESG") events or conditions, the occurrence of which may have an actual or potential material adverse effect on the value of an investment. This includes risks that arise from climate change or that are exacerbated because of climate change (climate risks). A distinction is made here between physical risks, which result directly from the consequences of climate change (increase in the average global temperature, more frequent natural disasters and extreme weather events such as floods, heat and drought periods), and transition risks, which arise from the transition to a climate-neutral and resilient economy and society and can thus lead to a devaluation of assets (change in



legal framework conditions such as the introduction of taxation of industries that are harmful to the climate, adaptation to new technological developments such as renewable energies, changes in consumer behaviour). Sustainability risks can have an impact on the value and performance of a portfolio, especially depending on how the industries in which investments are made are affected.

Suitable processes and methods have been implemented for the identification and assessment of sustainability risks and their impact on existing risk types. The assessment of sustainability risks is integrated into risk management and the corresponding processes and procedures. Accordingly, sustainability risks are also considered in the risk assessment of the managed portfolios and included in the investment advice. In the case of investment decisions, this is done in particular by taking into account the expected impact of a transaction on the sustainability risk of the portfolio.

Sustainability risks are evaluated and assessed by the risk management independently of the portfolio management with the inclusion of external data. Sustainability ratings from an established provider are used ("ESG data"). With this ESG data, an ESG risk classification is made and continuously monitored.

Compared to portfolios with similar investment instruments and principles that do not take sustainability risks into account, the impact of sustainability risks on the return of the portfolio is expected to be lower.

#### Consideration of principal adverse impacts on sustainability factors

The principal adverse impacts of investment decisions on sustainability factors are considered in ESG-focused asset management. For more details, please refer to the relevant supplement (in accordance with Annex II of Delegated Regulation (EU) 2022/1288). We would be happy to explain details on individual request.

As part of ESG-focused asset management, you will also receive information on the principal adverse impacts on sustainability factors with the regular portfolio reports in the relevant supplement (in accordance with Annex IV of Delegated Regulation (EU) 2022/1288).

For investment advice and asset management not focussed on ESG, the principal adverse impacts of investment decisions on sustainability factors are not considered.

#### EU Taxonomy

Regulation (EU) 2020/852 ("Taxonomy Regulation") established stand-alone criteria for environmentally sustainable economic activities.

Due to the Taxonomy Regulation, the following declaration applies in relation to investment advice and asset management not focussed on ESG:

*The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.*

For ESG-focussed asset management, the relevant disclosures under the Taxonomy Regulation can be found in the relevant supplement (in accordance with Annex II of Delegated Regulation (EU) 2022/1288). We would be happy to explain details on individual request.

ANNEX - Bank Gutmann AG's preferred trading partners and execution venues

Financial instruments	Trading partner / execution venue
Stocks	Morgan Stanley Europe SE, Raiffeisen Bank International AG, UBS Switzerland AG
ETFs	Bloomberg MTF (BTFE), Morgan Stanley Europe SE, UBS Switzerland AG
Certificates	Raiffeisen Centrobank AG, UBS Europe SE, UBS Switzerland AG, UniCredit Bank AG, Bank Vontobel Europe AG
Bonds	Bloomberg MTF (BTFE)
Forward exchange transactions	Bloomberg MTF (BTFE)