

Nordlux Vermögensmanagement, being a **licensed professional asset manager**, manages inter alia financial portfolios.

Nordlux Vermögensmanagement's mandatory voting rights policy regarding shares of investee companies deposited with custodian banks in the name and on behalf of its clients and funds is as follows:

1. Nordlux Vermögensmanagement works exclusively in the interest of its clients and does not hold any shares of investee companies on its own behalf.
2. Nordlux Vermögensmanagement follows the ABBL Code of Conduct, the VuV Code of Honour and the ICMA Charter of Quality.
3. Nordlux Vermögensmanagement monitors salient affairs of investee companies for clients and portfolios pursuing an ESG investment strategy and excludes or sells investments, which fail to meet ESG criteria.
4. There is no regular exchange of views with the investee companies or their representatives. The opinion of Nordlux Vermögensmanagement is expressed directly through its stock exchange transactions.
5. Cooperation with other shareholders may occur on a case-by-case basis in the interest of clients, if clients or investment funds of Nordlux Vermögensmanagement can expect a measurable outcome.
6. Nordlux Vermögensmanagement does not exercise any voting rights on behalf of clients.
7. This being said, Nordlux Vermögensmanagement has nothing to publish regarding the exercise of voting rights, unless paragraph 8 of this policy applies in exceptional cases.
8. Nordlux Vermögensmanagement reserves the right, for in-house fund management mandates only, to participate in individual cases at general meetings or to be represented by agents in order to exercise voting rights. Nordlux Vermögensmanagement will publish this information on its homepage, if it actively voted on behalf of a fund.