

## **Information on dealing with conflicts of interest in the exercise of voting and shareholder rights**

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In accordance with the provisions of the German Capital Investment Code (Section 27 KAGB in conjunction with the Capital Investment and Organization Ordinance Section 3 and Article 37 (1) EU Regulation 231/2013), capital management companies are required to take all necessary measures in terms of organization (resources and procedures) and internal monitoring functions designed to manage conflicts that could be detrimental to the interests of their clients, in this case in relation to the exercise of voting rights.

The following is an overview of the strategies for the exercise of voting rights, these include a brief description of the measures developed by the Company to ensure that voting rights in the portfolios managed by the Company are exercised solely in the interests of the investors in the portfolios:

### ❖ Exercise of shareholder rights

The administration of the follow-up of corporate events, such as corporate actions, takeover activities, class actions or other events, i.e. in particular information gathering, is carried out centrally for AXA Investment Managers in Paris. AXA IM DE receives the relevant information from there and obtains the decision of the respective fund managers concerned. This ensures that the decision is made in the best interest of the individual investment fund. This decision is then implemented by the respective middle office functions.

### ❖ Exercise of voting rights in accordance with the investment objectives and policy

AXA IM DE uses a so-called voting platform for the administration of the exercise of voting rights, which is centrally controlled by AXA Investment Managers in Paris. This platform informs AXA IM DE, and there in particular the fund management, about all relevant processes regarding the exercise of voting rights. Each fund manager then submits its recommendation to the central AXA IM Governance Committee, thus ensuring that investment policy and investment objectives are taken into account.

### ❖ Preventing, regulating conflicts of interest in the exercise of voting rights

Voting rights are exercised centrally by the AXA IM Governance Committee, with a veto right for the respective CIO concerned. Decisions are documented in reports and monitored by the relevant units at regular intervals.

In addition, the depositary of the respective investment fund supports the company in exercising voting and shareholder rights.

Upon request, you will receive a summary description of the strategies and details of the actions taken on the basis of these strategies. You can request this information from AXA Investment Managers Deutschland GmbH, Compliance - Exercise of Voting Rights, Thurn-und-Taxis-Platz 6, 60313 Frankfurt.