

# Code of Conduct

Topic: Guidelines on general behaviour

No: 0157

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Current version 1.5

Scope group

<input checked="" type="checkbox"/> FENTHUM group * <input type="checkbox"/> FENTHUM Luxembourg <input type="checkbox"/> FENTHUM Germany
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\* Subject to conflicting national provisions

Scope department/area

<input checked="" type="checkbox"/> All departments and areas
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## 1 Version information

### 1.1 Policy Owner

Role	Name	From	Until
Chief Compliance Officer	C. Theiß	01.01.2019	30.11.2021
Head of Operations	H. Jeurink	01.12.2021	-

### 1.2 Approval

Version	Department/area	Name	Date	Signature
1.0	Management Committee	See minutes of the Management Committee	01.2019	-
1.1	Management Committee	See minutes of the Management Committee	01.2020	-
1.2	Management Committee	See minutes of the Management Committee	11.2021	-
1.3	Management Board of Directors	See circular resolution	18.03.2022	-
				-
1.4	Management Board of Directors	See circular resolution	31.07.2023	-
				-
1.5	Management	See circular resolution	01.07.2024	-

### 1.3 Read confirmation

Department/area	Name	Date	Signature
-	-	-	-

### 1.4 Validity

Version	Entry into force	Expiry	Comment
1.0	08.01.2019	14.01.2020	AML reference
1.1	15.01.2020	30.11.2021	Regular review
1.2	01.12.2021	30.03.2022	Annual review and updates
1.3	01.04.2022	31.07.2023	Annual review and updates
1.4	01.08.2023	30.06.2024	Update (non-regulatory status)
1.5	01.07.2024	-	-

### 1.5 Document history

Version	Author	Department	Date	Description
1.0	C. Theiß	Compliance	08.01.2019	Initial Creation
1.1	C. Theiß	Compliance	15.01.2020	Review & AML reference
1.2	C. Theiß	Compliance	15.11.2021	Review
	P. Blenz	IT & Organisation	24.11.2021	Layout & format
1.3	P. Blenz	IT & Organisation	18.02.2022	Layout & format
	H. Jeurink	Compliance		Annual review and updates
1.4	H. Jeurink	Compliance	30.06.2023	Annual review and updates
1.5.	H. Jeurink	Compliance	17.06.2024	Annual review and updates

**This Policy must be reviewed regularly, but at least once a year.**

## 2 Short description

The Company shall not attempt to benefit from illegal or dishonest business practices. All employees are expected to practice high regard for the integrity of the Company. The conduct required for fair trading involves honesty and compliance with reasonable economic principles.

## 3 Internal principles

There are no further internal principles applied.

## 4 Responsibilities

Mr. Harald Jeurink has been appointed as Compliance Responsible of the Company starting as of 1. December 2021. The AML/CFT Compliance Responsible may be reached via telephone under +352 276921 1101 or via e-mail [h.jeurink@fenthum.com](mailto:h.jeurink@fenthum.com).

## 5 Relevant IT systems and interfaces

There are no relevant IT systems or interfaces in use.

## 6 Scope

The policy does not have specific department, area, or location specific features. It is valid globally and in full form.

## 7 Code of Conduct

### 7.1 Observing laws, requirements, and provisions

It is the Company's policy to follow all applicable laws, requirements, and provisions. When exercising their duties within the Company, employees are obliged to adhere to the regulations and limitations imposed on them by the law, circulars, and other provisions, and to advise others to do so as well.

Special consideration is given to the regulations on AML, which are described in detail in the [AML Policy](#).

### 7.2 Fair and honest behaviour is expected

The same is expected of the Company's Board and the Day-to-Day Managers, which have personal responsibility for defining the Company's direction and determining its principles and practices.

When exercising their responsibilities, employees shall be sincere with clients, service providers, suppliers, competitors, and other employees and not accept unfair advantage from them on the basis of manipulation, secrecy, insider information or other unfair business practices.

Employees must endeavour to protect the interests of the Company's shareholders in a fair manner. Employees should not act dishonestly or do anything to contradict the reasonable economic principles for fair trading.

### 7.3 Protecting client's and the Company's assets

Within the framework of their respective powers within the Company, employees are obliged to protect asset of clients and the Company.

Employees should protect these assets in a way as can reasonably be expected from them. The Board and the Day-to-Day Managers are particularly responsible for establishing and suitably executing internal controls to protect asset of clients and the Company against losses occurring as a result of false or improper use or of false or improper decisions.

## 7.4 Acceptance of gifts and other financial contributions

Employees are generally not permitted to be promised, to request or to accept gifts, remuneration or other assets, advantages, or other privileges (gifts) from clients or third parties for themselves or on behalf of third parties in connection with the exercising of their duties for the Company.

Should conflicts of interest arise when exercising their duties for the Company, these should be disclosed, and decisions made by superiors. The Compliance-Function must be directly informed about this process.

The following guidelines set out under which conditions the acceptance of gifts is allowed:

- They have a value of less than EUR 100
- They have a value of more than EUR 100 and been approved by the Board or Day-to-Day Managers
- Business meals that are consumed within the usual running of the business

Unsolicited gifts that may not be returned or those that cannot be accepted by the employee will be (i) returned or (ii) auctioned among all employees with the proceeds given to charity. The client or third party having gifted the gift will be informed accordingly.

Invitations to external events represent additional perks and are therefore subject to the rules set out herein.

Gifts that may not be accepted must be reported to the Compliance-Function

Continual acceptance of gifts by a person or groups of persons - even if low in value - is not permitted; as is the acceptance of several gifts on the same occasion by the same donor.

A list should be maintained of all gifts over a value of EUR 100 and supplied to the Compliance-Function at the end of each year.

## 8 Escalation

If the described policy leads to inconsistencies or problems, the following defined escalation chain must be adhered to.

First escalation level	Policy Owner
Second escalation level	Head of department/area
Third escalation level	Daily Management
Fourth escalation level	Board of Directors

**In the case of compliance-relevant topics, Legal & Compliance must also be informed immediately.**

## 9 Appendix

- none