

Disclosure pursuant to § 185 para 1 no 1 of the Austrian Stock Exchange Act

Engagement policy Bank Gutmann Aktiengesellschaft

16 February 2021

Legal basis

Pursuant to § 185 para 1 no 1 of the Austrian Stock Exchange Act (Börsegesetz 2018), Bank Gutmann Aktiengesellschaft (BGAG), as asset manager, is required to develop and publicly disclose an engagement policy that describes how it integrates shareholder engagement in its investment strategy. In this engagement policy, BGAG is required to describe how it

- monitors investee companies on relevant matters, including strategy, financial and non-financial performance and risk, capital structure, social and environmental impact and corporate governance,
- conducts dialogues with investee companies,
- exercises voting rights and other rights attached to the shares,
- cooperates with other shareholders,
- communicates with relevant stakeholders of investee companies and
- manages actual and potential conflicts of interests in relation to its engagement.

On this basis, BGAG publicly releases the following engagement policy:

General information

BGAG's engagement policy covers asset management activities and investments in shares traded in a regulated market made under asset management mandates in accordance with BGAG's investment strategy. The terms and conditions of the engagement policy are specified as appropriate to the type of asset management and the scope of investment, with their application being likewise governed by this principle. The integration of shareholder engagement is hence guided in principle by the investment objectives defined, the degree of active engagement in investment decisions, the effort associated with such engagement and the proportion of share capital held in investee companies.

Monitoring on relevant matters

In asset management, the careful monitoring of investee companies is of particular importance. Investments are made on the basis of a competent and sound selection and monitoring process relying on the in-house expertise of BGAG's Chief Investment Office as well as external research. This ensures careful selection and monitoring based on high-quality information, in particular with regard to strategy, financial and non-financial performance and risk, capital structure, social and environmental impact and companies' corporate governance. Selection is focused in principle on

large leading companies with strong market capitalisation, a solid capital structure and additional excellent quality characteristics.

Dialogues with companies

Supplementary to the selection and monitoring process, dialogues may be conducted with investee companies or potential investee companies in which an investment is to be made in the future. In addition to the option of conducting dialogues in the course of attending annual general meetings and other events, if applicable, dialogues with companies may also be conducted, as the case may be, by means of one-on-one phone calls, teleconferences, on the occasion of road shows and through other channels.

Exercise of voting rights and other rights attached to shares

In the course of its asset management activities, BGAG basically does not exercise voting rights.

Cooperation with other shareholders

As the proportion of share capital held in investee companies regularly cannot be classified as material, BGAG generally does not cooperate with other shareholders of investee companies.

Communication with stakeholders

As the proportion of share capital held in investee companies regularly cannot be classified as material, BGAG generally does not communicate with other relevant stakeholders of investee companies.

Management of conflicts of interest

To prevent conflicts of interest arising, or respectively, to resolve unavoidable conflicts of interest, BGAG applies up-to-date and supervised internal directives and processes in conformity with applicable securities compliance principles and rules. The focus of BGAG's engagement policy is on investors' interests in accordance with the investment objectives pursued in asset management and BGAG's investment strategy.