

Information about conflicts of interest

A conflict of interest arises when personal interests – e.g. family, friends, or social or financial factors – influence a person's decisions so that they no longer act objectively and impartially, but are instead guided by an advantage or profit that would not otherwise be obtained. Such conflicts of interest can result in decisions being made that are not in the best interests of customers or business partners. This can lead to a loss of trust and to financial risks.

Conflicts of interest may arise for SVAG and its employees¹ in connection with the provision of consulting services. We take organisational measures to exclude such conflicts as far as possible. Where potential conflicts of interest cannot be completely ruled out, SVAG and its employees act in the interests of customers or inform them of existing conflicts of interest before concluding contracts.

SVAG is committed to fair and transparent dealings with customers and business partners. Potential conflicts of interest should therefore be identified, prevented or – if this is not possible – handled appropriately in order to avoid compromising the legitimate interests of customers and business partners.

1. Types of conflicts of interest

Conflicts of interest may arise between employees and customers, between partner companies and customers or between several customers. For example, customers with whom employees are related or have another close relationship may be given preference. Possible conflicts of interest may also arise when conducting private transactions, accepting external positions and orders, and holding financial investments.

The focus is on conflicts of interest due to the granting of financial advantages.

1.1 Compensation

Compensation from partner companies can lead to a conflict of interest when SVAG decides whether or not to include providers or their products in the range of products we offer to our

¹ We have used the term 'employees' to improve this document's readability. This should not be used to derive any assertions or conclusions regarding the classification of legal relationships (in particular distinction between contractual and employment relationships) under civil law.

customers. Likewise, different compensation rates at SVAG can lead to latent conflicts of interest when we recommend products to customers. This is because the compensation gives SVAG an incentive to include products from providers who pay compensation in the product range it offers. In addition, the compensation gives SVAG and its financial advisers an incentive to select products for which compensation is paid and – in turn – the product for which the highest compensation is received.

1.2 Other advantages

In addition to compensation, offers of gifts, goods or benefits in kind, services such as free training, information that may not be publicly available, invitations and the like can also trigger a conflict of interest.

2. Measures

SVAG takes measures to identify and avoid conflicts of interest.

An internal SVAG directive describes the procedure in the event of a conflict of interest.

In addition, SVAG's financial advisers are appropriately incentivised to ensure high-quality advice and to mitigate latent conflicts of interest.

We also prevent and minimise conflicts of interest in particular through training, internal instructions on accepting and giving gifts, organisational precautions and guidelines regarding financial advisers' duty of care and loyalty.

If a conflict of interest cannot be avoided, customers are informed immediately and transparently, for instance through contracts, information sheets, the SVAG website or in person.

3. Further information

If you have any further questions about SVAG's conduct in the event of conflicts of interest, please feel free to contact us (info@svag.com).