

## Disclosure requirements under Section 134c of the German Stock Corporation Act (Aktiengesetz – AktG)

**ICM InvestmentBank AG** qualifies as an asset manager, according to the definition of terms, within the meaning of Section 134a paragraph 1 no. 2 AktG and must therefore describe its engagement policy within the meaning of Section 134b AktG.

- The company does not exercise any shareholder rights within the meaning of Section 134b paragraph 1 no. 1 AktG which are based on engagement in the company. In particular, no rights are exercised with regard to the general meetings of stock corporations. Rights to a share in profits within the meaning of Sections 60 et seq. AktG and to subscription rights are exercised in consultation with the clients.
- Important matters of the companies within the meaning of Section 134b paragraph 1 no. 2 AktG are monitored by taking note of the reporting of the companies required by law in financial reports and ad hoc notifications.
- There is no exchange of views with the company's corporate bodies and stakeholders within the meaning of Section 134b paragraph 1 no. 3 AktG.
- There is no cooperation with other shareholders within the meaning of Section 134b paragraph 1 no. 4 AktG.
- If conflicts of interest arise within the meaning of Section 134b paragraph 1 no. 5 AktG, a disclosure takes place with respect to the affected persons in accordance with the provisions of law and further action is clarified with the same.
- There is no annual publication concerning the implementation of the engagement policy within the meaning of Section 134b paragraph 2 AktG, because there is no relevant exercise of rights.
- The voting behaviour is not published within the meaning of Section 134b paragraph 3 AktG, because there is no participation in voting.