



**POLICY  
CONFLICT OF INTEREST /  
COMPLAINTS  
MANAGEMENT**



**FS Impact Finance**  
Investing today for a better tomorrow



# POLICY CONFLICT OF INTEREST / COMPLAINTS MANAGEMENT

## 1. MANAGEMENT OF CONFLICTS OF INTEREST

### I. Background

Frankfurt School Financial Services GmbH, branded under FS Impact Finance, is a financial services institution pursuant the German Banking Act. The requirements set out by the German regulator, BaFin, apply to FS Impact Finance . The legislator requires FS Impact Finance to take precautions to deal with potential conflicts of interest that may affect investment services in order to avoid any resulting impairment of client interests.

Conflicts of interest cannot always be ruled out, particularly in the case of institutions that provide a wide range of securities services to their clients. In accordance with the requirements of the German Securities Trading Act, we therefore inform you about our precautions for dealing with these conflicts of interest. The course of business, investments and services offered are checked for possible conflicts of interest and recorded. All members of FS Impact Finance act within the framework of the legal provisions and internal guidelines established by FS Impact Finance management independently of other interests and exclusively in the interest of the investors and the integrity of the market. Nevertheless, conflicts of interest may arise during our business activities. Potential conflicts of interest should be identified as early as possible, avoided where possible or handled fairly. In case of a conflict of interest arising and triggered by FS Impact Finance, it must always be disclosed to the parties concerned.





## II. Potential conflicts within FS Impact Finance

Conflicts of interest can be caused by a variety of circumstances. FS Impact Finance is primarily active as a portfolio and asset manager and as an investment advisor. As a result, FS Impact Finance may have a variety of functions or interests that may give rise to actual or potential conflicts. Conflicts of interest may arise, inter alia,

- between various clients of FS Impact Finance,
- between the client and FS Impact Finance itself,
- between clients and individual employees of FS Impact Finance,
- between FS Impact Finance and individual employees of FS Impact Finance,
- between different divisions of FS Impact Finance and
- between brokers, trading houses or other external counterparties and FS Impact Finance.
- within the framework of fund management services, in particular:
  - allocations of block orders - in case of partial executions - to the funds,
  - allocation of new issues - for partial executions to the funds,
  - equal treatment of funds or investor groups within the framework of fund management or order execution, special agreements with brokers with regard to financial analyses or market and price information systems,
  - the treatment of benefits and fees within the meaning of the German Securities Trading Act.

### III. FS Impact Finance measures to manage conflicts of interest

Pursuant to the German Securities Trading Act, FS Impact Finance is obliged to take measures and establish appropriate processes to identify, avoid or adequately manage actual or potential conflicts of interest. Various precautions have been taken to achieve these objectives, including, in particular, procedures for dealing with and resolving potential conflicts of interest:

- Control of the handling of confidential and insider information and its disclosure, especially confidentiality areas and the corresponding processes,
- Dealing with actual, potential and apparent conflicts of interest by imposing restrictions using a restricted list,
- General disclosure of material interests to potential clients in the early stages of a business relationship in the context of individual asset management or investment advice.
- FS Impact Finance employees are required to disclose their own conflicts of interest with clients or FS Impact Finance to the FS Impact Finance Compliance Office without delay and to refrain from further action in this regard until the conflict has been resolved.
- Where potential or actual conflicts exist, decisions regarding the appropriate handling of conflicts of interest should be based on two principles:
  - ensuring fair treatment of all parties involved,
  - minimisation of legal and regulatory risks as well as reputational risks for FS Impact Finance and the Frankfurt School group.

### IV. Complaints

Complaints from existing or former customers shall be dealt with appropriately and promptly in accordance with a standard procedure and the remedies shall be documented.[1] Complaints received must always be submitted to the Managing Director and to the Compliance Officer without delay. The complaints, their handling, the measures taken, and the final decisions must be systematically recorded without undue delay. The Compliance Office of FSIF manages for this process a complaints' register in a timely manner. The records will be stored in a qualified way available for the regulator upon request for a minimum of five years.

The compliance function of FSIF reviews the data relating to complaints upon receipt and their settlement to ensure that all risks and issues are identified and addressed through the following measures:

- Analysing the root causes of each complaint to identify causes common to certain types of complaints,
- Considering whether these causes could also affect other processes or products, including those processes or products about which no complaints have been made,
- Analysing the causes as far as is reasonable and possible.

The insights gained from complaint processing must be incorporated into the risk management process and taken into account by the internal audit department. Information on the complaints handling procedure shall also be made available to clients or potential clients on request or with the acknowledgement of the complaint, submission of complaints is free of charge.

FSIF endeavors to collect and examine all evidence and information relevant to the complaint.

The Compliance Officer issues a statement on the complaint and forwards it to the management for a decision. The decision is then immediately communicated to the customer. FSIF endeavors to inform the customer within a week since filing the complaint. In case this is not possible, a status will be communicated.

## 2. CUSTOMER COMMUNICATION

The address of Frankfurt School Financial Services GmbH is: Adickesallee 32-34, 60322 Frankfurt,

Management: Mr. Martin Cremer, E-Mail: [complaints@fs-finance.com](mailto:complaints@fs-finance.com)

This e-mail will be communicated published:

On our company webpage: [www.fs-finance.com](http://www.fs-finance.com)

On FS Impact Finance product- and services-related web spaces [www.scaf-energy.org](http://www.scaf-energy.org) / [www.restorationfacility.org](http://www.restorationfacility.org) the email-address might appear differently in the context of the product.

### Sample of webspace communication

*“Complaint Process*

*Via email: Please send your complaints to us via [complaints@fs-finance.com](mailto:complaints@fs-finance.com).”*

In case of new products or web spaces to be created in the future, the publication of a complaints e-mail is mandatory.

The e-mail will be automatically re-routed to the FS Impact Finance Managing Director and the FS Impact Finance Compliance Officer.

FS Impact Finance will communicate with a customer generally by e-mail, by telephone, by letter and, if necessary, also by fax. Orders for the execution of securities orders are not accepted by e-mail.

## 3. SUPERVISORY AUTHORITY

FS Impact Finance is subject to supervision by

Federal Financial Supervisory Authority (BaFin) Marie-Curie-Strasse 24-28, 60439 Frankfurt, Germany.

#### 4. MEASURES FOR THE PROTECTION OF ENTRUSTED CLIENT ASSETS / COMPENSATION FACILITIES

FS Impact Finance only provides financial portfolio management services. It does not itself hold financial instruments or client assets in safekeeping. FS Impact Finance is not authorised to make cash dispositions, deliver securities or other assets for its own benefit or for the benefit of third parties. For this reason, measures for the separation of client funds are not initiated.

FS Impact Finance is a member of the following investor compensation scheme:

Entschädigungseinrichtung der Wertpapierhandelsunternehmen (EdW) Behrensstrasse 31, 10865 Berlin, Germany.

The amount of compensation per creditor can be found in the EdW regulations. These can be found on the EdW website ([www.e-d-w.de](http://www.e-d-w.de)).