

## Handling conflicts of interest at Invesdor

The Oneplanetcrowd International B.V. is a crowdfunding service provider within the meaning of EU-Regulation 2020/1503 ("ECSPR") and operates the crowdfunding platform on the internet presence of Invesdor INV AG.

The requirement of neutrality is ensured by these company and it has established internal regulations and measures to comply with the requirement of neutrality and to prevent conflicts of interest.

These rules are intended to avoid conflicts of interest from the beginning and to prevent any impairment of customer interests or, if this is not possible, to adequately mitigate them. In this context, the group structure in which Oneplanetcrowd International B.V. is integrated is also taken into account.

### 1. Prevention of conflicts of interest with regard to potential project owners

The Oneplanetcrowd International B.V. does not enter into any business relationships with project owners in which Oneplanetcrowd International B.V. is a shareholder.

The following persons will also not be authorised as project owner:

- a. Shareholders who directly or indirectly hold at least 20% of the capital shares or voting rights in Oneplanetcrowd International B.V.,
- b. Managing Directors of Oneplanetcrowd International B.V. or
- c. employees of Oneplanetcrowd International B.V. or companies of the Invesdor Group,
- d. Persons who are closely related to the mentioned shareholders or managing directors or employees of Oneplanetcrowd International B.V. through control relationships or in a relationship of subordination similar to a parent/subsidiary relationship. (Close connection within the meaning of Art. 4 (1) No. 35 lit. b of Directive 2014/65/ EU (MiFID / Financial Markets Directive))

Invesdor has in particular identified the following legal entities as relevant persons giving rise to a conflict of interest:

- a. Invesdor INV AG with a 100% shareholding in Oneplanetcrowd International B.V.
- b. Versorgungswerk der Zahnärztekammer Berlin K.d.ö.R with a shareholding of more than 20% in Invesdor INV AG
- c. Invesdor Services SPV 2 Oy with a shareholding of more than 20% in Invesdor INV AG

If special purpose vehicles are used for a financing project on the platforms, these regulations will be applied accordingly to the special purpose vehicles, so that no financing is offered with special purpose vehicles in which

- Oneplanetcrowd International B.V. or

- shareholders with more than 20% of the company shares of Oneplanetcrowd International B.V.,
- members of the management board or employees of Oneplanetcrowd International B.V. or
- companies of the Invesdor Group or persons closely related to Oneplanetcrowd International B.V. through control relationships (See Art. 4 (1) No. 35 lit. b Directive 2014/65/EU)

are participating in the special purpose vehicle. (See Art. 8 (2) ECSPR).

## **2. Prevention of conflicts of interest with regard to investing persons**

The possibility to invest in any offered crowdfunding projects on the crowdfunding platform of Oneplanetcrowd International B.V. exists in unrestricted form also for shareholders, members of the management and employees of the Invesdor Group as well as persons closely associated with the Invesdor Group within the meaning of Art. 4 (1) No. 35 lit. b of Directive 2014/65/EU (MiFID).

Persons of these groups are only allowed to invest in offered crowdfunding projects if they go through the same automated investment process with the same rules that are also available to other investors of the platform as the only opportunity to invest in crowdfunding projects offered on the platform of Oneplanetcrowd International B.V.. This ensures that an investment is only possible under the same conditions as for other investors on the platform.

Due to the automated investment process, it is also not possible for persons of the mentioned groups to obtain privileged access to crowdfunding offers. Investments on the platform of Oneplanetcrowd International B.V. without using the automated investment process are not possible.

All relevant informations for an investment regarding crowdfunding offers are published on the platform of Oneplanetcrowd International B.V. and in the corresponding key investment information sheet of the project owner, which also means that there is no privileged access to information on offered crowdfunding projects for the groups of affected persons.

The Oneplanetcrowd International B.V. also monitors whether conflicts of interest may arise from other circumstances not mentioned here and addresses them appropriately.

## **3. Procedures to prevent the occurrence of conflicts of interest**

In order to ensure compliance with the regulations set out above, Oneplanetcrowd International B.V. and the other companies of the Invesdor Group hold regular internal training sessions with their employees.

Employees who are involved in the due diligence process of the project owners are required to check for any possible involvement of the relevant persons in the project owner (see section 1.) and to report any such involvement immediately. Should a significant participation be identified, the

respective project owner will not be admitted to the platform of Oneplanetcrowd International B.V, so that no conflict of interest can arise in this respect.

If employees receive privileged information ("insider knowledge") about a project owner due to their field of activity, which is not accessible to other investors from the information on the platform and in particular the key investment information sheet of the project owner, these employees are excluded from an investment in the respective project owner (see section 2.). As part of the training, all employees of the Oneplanetcrowd Interantional B.V. and of the Invesdor Group are informed that own investments due to privileged information are not allowed and may have consequences according to labour law.

The Oneplanetcrowd International B.V. ensures equal treatment of investors with the measures outlined here and thereby avoid any positive or negative discrimination.

The named rules are internally evaluated and reviewed at least once a year.

All processes and regulations for the prevention of conflicts of interest are always kept up to date and are also made available to clients on a permanent data carrier in the investor portfolio for viewing and downloading.

Publication on <https://www.invesdor.com/conflict-of-interest#/> ensures that information on dealing with conflicts of interest is disclosed transparently and in a timely manner so that it can be appropriately taken into account in the decision-making process of the investor.