DISCLOSURE REPORT 2021

Disclosure in accordance with Article 431 *et seqq*. CRR including disclosure pursuant to the Remuneration Ordinance for Institutions (InstitutsVergV)



Contents

Li	st of A	bbreviations	4
1.	Intr	oduction	5
	1.1.	Frequency of disclosure (Article 433 CRR)	5
	1.2.	Means of disclosure (Article 434 CRR)	6
	1.3	Disclosure requirements not currently applied	
2	Ris	k management objectives and policies (Article 435 CRR)	
	2.1	Risk management systems (Article 435 (1) points (a) to (d) CRR)	7
	2.2	Risk declaration (Article 435 (1) points (e) and (f) CRR)	8
	2.3	Governance arrangements (Article 435 (2) CRR)	9
3.	Sco	pe of application (Article 436 points a, b, f and g CRR)	11
4	Ow	n funds structure and capital requirements	
	4.1	Own funds structure (Article 437 CRR)	14
	4.2	Capital requirements (Article 438 CRR)	22
	4.2.	Regulatory capital requirements (Article 438 point d CRR)	. 22
	4.2.	2. Internal capital adequacy (Article 438 point c CRR)	. 24
5	Key	metrics (Article 447 CRR)	
6	Rer	nuneration policy (Article 450 CRR)	
	6.1	Legal basis	28
	6.2.	Principles	29
	6.2.	1 Principle of transparency	. 29
	6.2.	Principle of living wage	. 29
	6.2.	Principle of performance and profit dependency	. 29
	6.3.	Remuneration instruments	30
	6.3.	1 Remuneration in accordance with the Collective Agreement for the Private Banking Sector	. 30
	6.3.	2. Principles of variable remuneration	. 30
	6.3.	3 Annual review of adequacy	. 32
	6.3.	4. Remuneration Control Committee	. 32
	6.3.	5. Disclosure of remuneration	. 32
	6.4.	Subsidiaries	33
	6.5.	Subsidiary Bankhaus Lampe KG	33

	6.5.1.	Remuneration structure of BHL	33
	6.5.2.	Remuneration of the members of the Management Board of BHL	33
	6.5.3.	Fixed remuneration of employees of BHL	34
	6.5.4.	Variable remuneration of employees of BHL	34
	6.5.5.	Remuneration systems of Lampe Asset Management GmbH	35
	6.5.6.	Total amounts of remuneration paid in the 2021 financial year	35
6	.6. Obli	gation	35
7.	Conclud	ling statement	36
Anı	nex		37
Lis	t of figure	S	37
Lis	t of tables		37

List of Abbreviations

€ thousand EUR thousands

AIFM Alternative Investment Fund Manager

AIFMD Alternative Investment Fund Manager Directive

ALCO Asset Liability Committee

BaFin Federal Financial Supervisory Authority (BaFin)

BHL Bankhaus Lampe KG
CoRep Common Reporting
CRO Chief Risk Officer

CRR Capital Requirements Regulation
CRSA Credit Risk Standardized Approach

CSSF Commission de Surveillance du Secteur Financier

CVA Credit valuation adjustment
EBA European Banking Authority

e.g. For example

ESMA European Securities and Markets Authority

i.e. That is

InstitutsVergV Remuneration Ordinance for Institutions

inter alia Among others

KAGB Capital Investment Code (Kapitalanlagegesetzbuch)

KWG Banking Act (Kreditwesengesetz)

LCR Liquidity coverage ratio

NSFR Net stable funding ratio

RExCo Risk Executive Committee

RWA Risk-weighted assets

SolvV Solvency Regulation (Solvabilitätsverordnung)

TREA Total Risk Exposure Amount

1. Introduction

Significant business policy event

The acquisition of Bankhaus Lampe KG, which was announced in the previous year, was completed on October 1, 2021, following approval by the regulatory authorities. The acquisition of Bankhaus Lampe KG encompasses the purchase of all shares in the company. This entails the complete takeover and integration of all employees, subsidiaries, customers and locations.

The change of name of Hauck & Aufhäuser Privatbankiers AG to Hauck Aufhäuser Lampe Privatbank AG (Hauck Aufhäuser Lampe) was entered in the commercial register in December 2021. The merger of the former Bankhaus Lampe KG into Hauck Aufhäuser Lampe Privatbank AG took place with effect as of January 1, 2022.

As part of the initial consolidation of the companies newly acquired with effect from October 1, 2021, all assets, liabilities and contingent liabilities were measured at fair value as of the acquisition date and the differences were allocated to the assets and liabilities recognized in the balance sheet.

Disclosure Report of the Hauck Aufhäuser Lampe Group

Regulation (EU) No. 575/2013 (CRR – Capital Requirements Regulation) entered into force on January 1, 2014 with the aim of creating more transparency with regard to the risks incurred by institutions. This regulation has since become applicable throughout the European Union. The regulation has now been supplemented by Regulation (EU) No. 2019/876 of May 20, 2019, which entered into force on June 28, 2021.

The Disclosure Report of the Hauck Aufhäuser Lampe Group was prepared in accordance with the provisions of Part 8 of the CRR in conjunction with Section 26a of the Kreditwesengesetz (KWG).

Article 431 *et seqq*. of the CRR places an obligation on banks to regularly publish qualitative and quantitative information on its capital, the risk exposure, risk management processes, and credit risk mitigation techniques deployed and to have formal procedures and rules in place to fulfill these disclosure obligations.

The quantitative information contained in this Report is generally the same as at the reporting date of December 31, 2021.

Hauck Aufhäuser Lampe has an overarching risk management system that integrates all companies of the Hauck Aufhäuser Lampe Group. The disclosures in this Report relate to all companies within the regulatory scope of consolidation.

The contents of this report are subject to the principle of materiality in accordance with Article 432 of the CRR and in line with the EBA guidelines of August 4, 2017 (EBA/GL/2016/11) on materiality and confidentiality regarding disclosure. Legally protected or confidential information do not form part of this Report.

If a field in the tables contains the entry "0," a value exists, but this value corresponds to zero thousand EUR due to the rounded presentation in thousand EUR. The entry "—," on the other hand, means that no value is available.

1.1. Frequency of disclosure (Article 433 CRR)

With the entry into force of the new CRR, Hauck Aufhäuser Lampe falls under "Disclosure by other institutions" in accordance with Article 433c (2) CRR. Reporting will take place as of the reporting date of December 31, 2021, with an annual reporting frequency.

Pursuant to Article 433 of the CRR and in accordance with the stipulations contained in BaFin Circular 05/2015 (BA), Hauck Aufhäuser Lampe has assessed whether disclosures are to be made in whole or in part more than once annually.

In consideration of its business model, Hauck Aufhäuser Lampe pursues a business policy focusing on continuity, which is linked to the stable and calculable development of its financial, liquidity and earnings position. For these reasons, annual disclosure is considered sufficient and it dispenses with the need for disclosure during the course of the year.

1.2. Means of disclosure (Article 434 CRR)

The information to be disclosed in accordance with Article 434 of the CRR is published on the website of Hauck Aufhäuser Lampe Privatbank AG at https://www.hal-privatbank.com/en/the-bank/about-us/investor-relations and can be accessed without requiring registration.

1.3. Disclosure requirements not currently applied

The following are disclosure requirements that, inter alia on grounds of Article 433c CRR, are currently not relevant for Hauck Aufhäuser Lampe:

- Article 437a CRR No disclosure of own funds and eligible liabilities,
- Article 439 CRR No disclosure of exposure to counterparty credit risk,
- Article 440 CRR No disclosure of countercyclical capital buffers,
- Article 441 CRR Indicators of global systemic importance Hauck Aufhäuser Lampe is not an institution of global systemic relevance,
- Article 442 CRR No disclosure of credit risk and dilution risk,
- Article 443 CRR No disclosure of encumbered and unencumbered assets.
- Article 444 CRR No disclosure of the use of the standardized approach,
- Article 445 CRR No disclosure of the market risk,
- Article 446 CRR No disclosure of the steering of operational risk,
- Article 448 CRR No disclosure of the exposure to interest rate risk on positions not included in the trading book,
- Article 449 CRR No disclosure of exposure to securitisation positions,
- Article 449a CRR No disclosure of environmental, social and governance risks,
- Article 451 CRR No disclosure of the leverage ratio,
- Article 451a CRR No disclosure of liquidity requirements,
- Article 452 CRR No disclosure of the use of the IRB Approach to credit risk the CRSA approach is used to determine credit risks,
- Article 453 CRR No disclosure of the use of credit risk mitigation techniques,
- Article 454 CRR No disclosure of the use of the Advanced Measurement Approaches to operational risk
 Hauck Aufhäuser Lampe uses the Basic Indicator Approach for operational risks,
- Article 455 CRR Use of Internal Market Risk Models Hauck Aufhäuser Lampe does not calculate its own funds requirements in accordance with Article 363 CRR (permission to use internal models).

2. Risk management objectives and policies (Article 435 CRR)

2.1. Risk management systems (Article 435 (1) points (a) to (d) CRR)

The most important components of our Group-wide risk management system for the controlling of risks and capital are:

- · Our business strategy, the business areas derived therefrom and the types of identified risk,
- The risk strategy, i.e., the capital allocated to the respective business areas taking into consideration expected returns,
- Through the risk-bearing capacity concept, the risk capital, i.e. the maximum capital available for covering risks in the Group, and the risk capital limit, i.e., the actual capital allocated to cover risks,
- Ongoing risk management and controlling processes,
- Ongoing monitoring of our risk management system by Internal Audit.

The identification of risks can be construed from the business strategy and specified through the risks defined in the risk strategy. The Hauck Aufhäuser Lampe Group distinguishes between the following categories of material risk:

- Credit risks
- Market risks
- Liquidity risks
- · Operational risks
- · Strategic risks
- Concentration risks (implicitly covered by the foregoing risks)

The Management Board bears overall responsibility for risk and capital management within the Hauck Aufhäuser Lampe Group. The Chief Risk Officer (CFO), a market-neutral member of the Management Board, is responsible for risk management in respect of our credit, market, liquidity, operational and strategic risks; this person also controls the risk capital within the Hauck Aufhäuser Lampe Group. The Supervisory Board monitors our risk and capital profile at regular intervals, at minimum, however, on a quarterly basis.

The Management Board has overall responsibility for the business strategy and the risk strategy. It presents its strategies to the Supervisory Board for discussion with the same.

Risks, in particular, adherence to the risk-bearing capacity, are monitored at the operational level by a business unit separated from the market, the Risk Controlling team. It identifies, analyses, evaluates, monitors and reports risks in order for control mechanisms to be put in place.

Risk Controlling is responsible for the methods that will be used to control risks for the Bank as a whole. The development of results/profit is controlled by our Financial Controlling unit. Investments are monitored by the Legal & Corporate Secretary department, Corporate Secretary team, in cooperation with the Accounting department.

The elements of our risk management process are:

- Risk identification (including early warning indicators) and risk inventory,
- · Risk analysis (measurement and assessment of risks),
- · Risk management, and
- Risk monitoring and communication.

Each represents a summary of the material duties within the process.

The separation of functions is assured up to the level of the Management Board through our organizational structure, methods and procedures, and our risk management processes.

The Asset Liability Committee (ALCO) and the Risk Executive Committee (RExCo) serve as overarching bodies for the decision-takers within the organizational units, who bear daily responsibility for risk management at the operational level.

A comprehensive reporting system ensures regular and timely communication on the utilization of the risk capital, thus enabling rapid reaction.

Internal Audit is responsible for risk-oriented and process-independent examination of the risk management. The Management Board reports regularly to the Supervisory Board on the material findings of Internal Audit. The audits strictly relate to all activities and processes of the Hauck Aufhäuser Lampe Group.

2.2. Risk statement (Article 435 (1) points (e) and (f) CRR)

The business activities of the Hauck Aufhäuser Lampe Group focus on the following areas:

- Holistic advice and wealth management for private and corporate investors,
- Asset management for institutional investors,
- · Comprehensive fund services for financial and real assets in Germany, Ireland and Luxembourg,
- · Cooperation with independent asset managers,
- Research, sales and trading activities specializing in small and mid-cap enterprises in German-speaking countries,
- Tailored services for initial public offerings and capital increases.

Consequently, the main focus of our economic capital requirements, including the risks of Bankhaus Lampe KG, which was acquired in 2021, is on counterparty risks (69%), followed by operational risks (15%) and market price risks (12%).

The business strategy sets out the Hauck Aufhäuser Lampe Group's targets for each of the key business activities and the measures required to achieve such targets. The risk strategy is adjusted to the nature, complexity, scope and risk inherent to such business activities and is to be viewed as a component of the risk management process that controls the earnings-focused acceptance of risk taking into account the regulatory requirements placed on the risk-bearing capacity. The risk strategy determines our propensity for risk at the Group level.

The economic risk-bearing capacity approach is aligned towards protecting creditors and, together with the regulatory capital ratios that are aligned towards business continuity (normative perspective), comprise the Hauck Aufhäuser Lampe Group's risk management approaches.

Hauck Aufhäuser Lampe provides the individual business units with only a portion of the risk capital. The non-deployed risk capital serves as a strategic risk buffer.

Pursuant to the CoRep report, the total capital ratio of the Hauck Aufhäuser Lampe Group as of the reporting date of December 31, 2021 was 14.68%. After adoption of the annual financial statements, this improved to 16.40%, while the utilization of the economic risk coverage capital amounts to 50%.

To ensure the economic risk-bearing capacity, compliance with the regulatory capital ratios and to guarantee adequate liquidity, the Hauck Aufhäuser Lampe Group has implemented a pro-active risk management system. This has been appropriately designed with regard to our business activities, our strategic alignment and the fulfillment of regulatory requirements.

2.3. Governance arrangements (Article 435 (2) CRR)

Hauck Aufhäuser Lampe Privatbank AG is majority-owned by Bridge Fortune Investment S.à r.l., based in Luxembourg, which in turn is an indirect holding of Fosun International Ltd. of Hong Kong, which is listed on the Hong Kong stock exchange. In accordance with the Bank's Articles of Association, the management of Hauck Aufhäuser Lampe is vested in the members of the Management Board.

In the 2021 financial year, the company was managed by the members of the Management Board, Michael Bentlage, Dr. Holger Sepp, and Robert Sprogies.

The Management Board manages the Company and conducts its business in accordance with the law, the Articles of Association and the Rules of Procedure laid down for the Management Board. A schedule of responsibilities defines primary responsibilities and representations.

Detailed biographies of the members of the Management Board are presented on the website of Hauck Aufhäuser Lampe under https://www.hal-privatbank.com/en/bank/about-us/organizational-structure.

Information on the directorships held by members of the management body (Article 435 (2)(a) CRR)

In addition to their duties on the Management Board, the members of the Management Board hold the following further directorships. The reporting date for all disclosures is December 31, 2021.

Table 1: Number of directorships held by members of the management body

	Number of directorships	Number of supervisory roles
Mr. Michael Bentlage	1	5
Dr. Holger Sepp		3
Mr. Robert Sprogies	3	2

Recruitment policy and diversity strategy for the selection of members of the Management Board (Article 435 (2) points (b) and (c) CRR)

Only such persons who possess the qualifications to be management board members as stipulated in Section 25c KWG and meet all other stock market/banking regulatory supervision requirements may be appointed to the Management Board of the Bank. Pursuant to the Rules of Procedure of the Supervisory Board, the Personnel Committee supports the Supervisory Board in identifying suitable candidates for appointment to an executive role. Expertise and balance play a key role, as do diversity of knowledge, skills, and experience. At December 31, 2021, the Management Board of Hauck Aufhäuser Lampe consisted of three members. The regulatory separation into Front Office and Credit Operations is guaranteed.

Details of the Risk Committee and description of the information flow on risk to the management body (Article 435 (2) points (d) and (e) CRR)

Hauck Aufhäuser Lampe has established a risk committee, the Risk Executive Committee, which meets at least on a quarterly basis. Its purpose is to support the Management Board and the Risk Committee in monitoring the risk situation with regard to Hauck Aufhäuser Lampe from an economic and regulatory perspective at the operational level. The RExCo is firmly anchored in the Company's decision-making and information processes and, as a cross-divisional source of information, is designed to guarantee regular sharing of information on all risk-related issues throughout the Bank with the involvement of key officers from the controlling, front office and support units as well as the Management Board, thus ensuring a constant flow of information to the management body.

3. Scope of application (Article 436 points a, b, f and g CRR)

The regulatory scope of consolidation for determining the aggregate capital adequacy is defined in accordance with Section 10a KWG in conjunction with Articles 18 *et seqq*. of the CRR. Accordingly, Hauck Aufhäuser Lampe Privatbank AG is to be classified as a superordinated undertaking of the Hauck Aufhäuser Lampe Group.

With the completion of the acquisition of Bankhaus Lampe KG announced in the previous year, the regulatory scope of consolidation has been expanded once again. Two banks, two securities firms and six financial institutions are now fully consolidated.

The other material Hauck Aufhäuser Lampe companies in the Group with a capital share of > 10% are not included because, in accordance with Article 19 (1) of the CRR, they are of minor importance to the net assets, financial position and results of operations of the Hauck Aufhäuser Lampe Group. No undertakings are proportionally consolidated.

The member companies of the Hauck Aufhäuser Lampe Group that are not included in the summary in accordance with Article 18 of the CRR do not exhibit shortfalls in capital within the meaning of Article 436 (g) of the CRR.

There are no current or foreseen material practical or legal impediments to the transfer of financial resources or own funds within Hauck Aufhäuser Lampe within the meaning of Article 436 (f) of the CRR.

Hauck Aufhäuser Lampe does not exercise the waiver rules stipulated under Article 7 and Article 8 of the CRR in conjunction with Section 2a KWG.

The scope of consolidation under commercial law, however, is prepared solely in accordance with the provisions of the Handelsgesetzbuch [Commercial Code].

In the following consolidation matrix, the member companies of the Hauck Aufhäuser Lampe Group covered by the regulatory scope of consolidation are juxtaposed against the scope of consolidation under commercial law. They are broken down according to classification under Article 4 of the CRR and are extended by the other undertakings that are not covered under the regulatory scope of consolidation.

Table 2: Regulatory and accounting (HGB) scope of consolidation

		Regulatory Treatment					ō
Corporate form	Name	Consolidation purs. Article 18 CRR	Exemption purs. Art. 19 CRR	Consideration purs. Article 470 (2b) and (3) CRR (threshold approach)	CET 1 deduction purs. Sec. 32 Solvency Regulation	Risk-weighted investments	Consolidation purs. accounting standards, full
Credit institution	Hauck Aufhäuser Lampe Privatbank AG	Χ	-	-	-	-	X
	Bankhaus Lampe KG	Χ	-	-	-	-	X
Investment firm	DALE Investment Advisors GmbH	Х	-	-	-	-	X
	Lampe Asset Management GmbH	Χ	-	-	-	-	X
Financial institution	Hauck & Aufhäuser Fund Platforms S.A.	Χ	-	-	-	-	Х
	Hauck & Aufhäuser Fund Services S.A.	X	-	-	-	-	Х
	FidesKapital Gesellschaft für Kapitalbeteiligungen mbH	X	-	-	-	-	Х
	Hauck & Aufhäuser Alternative Investment Services S.A.	X	-	-	-	-	X
	Lampe Alternative Investments GmbH	X	-	-	-	-	X
	Lampe Beteiligungsgesellschaft mbH	X	-	-	-	-	X
	Hauck Investment Management (Nanjing) Co., Ltd.	-	X	X	-	X	X
	Hauck Investment Management (Shanghai) Co. Ltd.	-	X	X	-	X	X
	Hauck & Aufhäuser Innovative Capital GmbH	-	Χ	X	-	X	-
	ALH European Debt Management S.à r.l.	-	Χ	X	-	Χ	-
	ALH European Equity Management S.à r.l.	-	Χ	X	-	X	-
	BHL Equity Invest I Verwaltungs GmbH	-	Χ	X	-	X	-
	BTF Beteiligungs- und Treuhandgesellschaft mbH	-	Χ	X	-	X	-
	Competo Development Fonds No. 3 GmbH & Co. KG	-	X	X	-	X	-
	Competo Development Fonds No. 3 Verwaltungsgesellschaft mbH	-	Χ	X	-	X	-
	Core Energy Infrastructure Holding GP S.à r.l.	-	X	X	-	X	-
	Crossroads Capital Management Limited	-	X	X	-	X	-
	DB PWM Private Markets I GP S.à r.l.	-	X	X	-	X	-
	Equity Invest Management II GmbH	-	X	X	-	X	-
	HI-Management S.à r.l.	-	X	X	-	X	-
	Kapital 1852 Beratungs GmbH	-	X	X	-	X	-
	Kapital 1852 General Partner S.à r.l.	-	X	X	-	X	-
	Lampe Capital Finance GmbH	-	X	X	-	X	-
	Lampe Capital UK Limited	-	X	X	-	X	-
	Lampe Investment Management GmbH	-	X	X	-	X	-
	Lampe Mittelstands Management GmbH	-	X	X	-	X	-
	Lampe Private Advisory GmbH	-	X	X	-	X	-
	Lampe Privatinvest Management GmbH	-	X	X	-	X	-
	Lampe Privatinvest Verwaltung GmbH	-	X	X	-	X	-
	Lampe Verwaltungs-GmbH	-	X	Х	-	X	-
	LBG Ventures GmbH	-	X	X	-	X	-
	LD Beteiligungs GmbH	-	X	Х	-	X	-

			Regulatory Treatment			D	
Corporate form	Name	Consolidation purs. Article 18 CRR	Exemption purs. Art. 19 CRR	Consideration purs. Article 470 (2b) and (3) CRR (threshold approach)	CET 1 deduction purs. Sec. 32 Solvency Regulation	Risk-weighted investments	Consolidation purs. accounting standards, full
	LD zweite Beteiligung GmbH	-	Х	Х	-	Х	-
	Lending GP S.à r.l.	-	Χ	X	-	X	-
	PERSEUS Capital S.à r.l.	-	X	X	-	X	-
	SEW Beteiligungs Verwaltungs GmbH	-	X	X	-	X	-
	Sino-EU Bridge Fortune S.à r.l.	-	X	X	-	X	-
	TETRARCH Aktiengesellschaft	-	X	X	-	X	-
	Vilmaris Private Investors GmbH & Co. KG	-	X	X	-	X	-
	Vilmaris Private Investors Verwaltungs GmbH	-	X	X	-	X	-
Insurance undertaking	H&A Pension Trust GmbH	-	Χ	Х	-	Х	-
Other corporate	H&A "Green Office Hamburg-Hafencity" GmbH & Co. KG	-	-	-	-	Х	-
	Hauck & Aufhäuser Verwaltungs GmbH	-	-	-	-	Χ	-
	CLEC Vermögensverwaltung GmbH	-	-	-	-	Χ	-
	FOPEX GmbH	-	-	-	-	Χ	-
	Medienlogistik Stuttgart Service GmbH	-	-	-	-	Χ	-
	Projekt Maybach Beteiligungs GmbH	-	-	-	-	Χ	-
	SI Verwaltung GmbH	-	-	-	-	X	-
	Unterstützungskasse GmbH der Bankhaus Lampe KG	-	-	-	-	X	-
	Zeitungsvertrieb München City GmbH	-	-	-	-	X	-
	ZV Service GmbH	-	-	-	-	X	-
	ZVK Zeitungsvertrieb Kirchheim GmbH	-	-	-	-	X	-
	ZVL Zeitungsvertrieb Laim GmbH	-	-	-	-	X	-
	ZVT Zeitungsvertrieb Ramersdorf GmbH	-	-	-	-	X	-
	ZVR Zeitungsvertrieb Thalkirchen GmbH	-	-	-	-	Χ	-

4. Own funds structure and capital requirements

4.1. Own funds structure (Article 437 CRR)

The following discloses information on the Group's own funds in accordance with Article 437 CRR.

As at December 31, 2021, the own funds of the Hauck Aufhäuser Lampe Group in accordance with Article 72 of the CRR are € 548.9 million and are mainly composed of Common Equity Tier 1 capital, which essentially comprises the paid-up capital, the reserves (Core Tier 1) and the special items for general banking risks in accordance with Section 340g of the HGB in the amount of € 68.9 million.

The following table shows the own funds structure of the Hauck Aufhäuser Lampe Group based on the regulatory figures according to the CoRep report and is presented in accordance with Annex VII to Commission Implementing Regulation (EU) No. 2021/637.

Table 3: EU CC1 - Composition of regulatory own funds

		a)	b)
12/3	1/2021	Amount	Source based on reference numbers / letters of the balance sheet under the regulatory scope of consolidation (EU CC2)
		Amounts	s in € thousand
Comn	non Equity Tier 1 (CET1) capital: instruments and reserves		
1	Capital instruments and the related share premium accounts	304,152	
	of which: shares	28,839	Α
	of which: capital reserves	275,313	В
2	Retained earnings	228,342	С
3	Accumulated other comprehensive income (and other reserves)		
EU-3a	Funds for general banking risks	68,972	
4	Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1		
5	Minority interests (amount allowed in consolidated CET1)		
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend		
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	601,466	Sum of rows 1 to 5a
Comn	non Equity Tier 1 (CET1) capital: regulatory adjustments		
7	Additional value adjustments (negative amount)	-1,121	
8	Intangible assets (net of related tax liability) (negative amount)	-25,055	D
9	Empty set in the EU		
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-32,665	
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value		
12	Negative amounts resulting from the calculation of expected loss amounts		

		a)	b)
12/3	1/2021	Amount	Source based on reference numbers / letters of the balance sheet under the regulatory scope of consolidation (EU CC2)
		Amounts	in € thousand
13	Any increase in equity that results from securitized assets (negative amount)		
14	Gains or losses on liabilities of the institution that are valued at fair value resulting from changes in own credit standing		
15	Defined-benefit pension fund assets (negative amount)		
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)		
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
20	Empty set in the EU		
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative $$		
EU-20k	of which: qualifying holdings outside the financial sector (negative amount)		
EU-200	of which: securitization positions (negative amount)		
EU-200	of which: free deliveries (negative amount)		
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)		
22	Amount exceeding the 17.65% threshold (negative amount)		
23	of which: direct, indirect and synthetic holdings by the institution of the CET 1 instruments of financial sector entities where the institution has a significant investment in those entities		
24	Empty set in the EU		
25	of which: deferred tax assets arising from temporary differences		
EU-25a	Losses for the current financial year (negative amount)		
EU-25k	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)		
26	Empty set in the EU		
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)		
27a	Other regulatory adjustments	-878	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	-59,719	Sum of rows 7 to 20a, 21, 22, 25a to 27a
29	Common Equity Tier 1 (CET1) capital	541,747	Row 6 minus row 28

		a)	b)
12/3	1/2021	Amount	Source based on reference numbers / letters of the balance sheet under the regulatory scope of consolidation (EU CC2)
		Amounts	s in € thousand
	ional Tier 1 (AT1) capital: instruments		
30	Capital instruments and the related share premium accounts		
31	of which: classified as equity under applicable accounting standards		
32	of which: classified as liabilities under applicable accounting standards		
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1		
	Amount of qualifying items referred to in Article 494a (1) CRR subject to phase out from AT1		
EU-33b	Amount of qualifying items referred to in Article 494b (1) CRR subject to phase out from AT1		
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties		
35	of which: instruments issued by subsidiaries subject to phase out		
36	Additional Tier 1 (AT1) capital before regulatory adjustments		Sum of rows 30, 33 to 34
Addit	ional Tier 1 (AT1) capital: regulatory adjustments		
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)		
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)		
41	Empty set in the EU		
42	Qualifying Tier 2 deductions that exceed the Tier 2 items of the institution (negative amount)		
42a	Other regulatory adjustments to AT1 capital		
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital		Sum of rows 37 to 42a
44	Additional Tier 1 (AT1) capital		Row 36 minus row 43
45	Tier 1 capital (T1 = CET1 + AT1)	541,747	Sum of rows 29 and 44
Tier 2	(T2) capital: instruments and reserves		
46	Capital instruments and the related share premium accounts		
47	Amount of qualifying items referred to in Article 484 (5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR		

a)	b)
mount	Source based on reference numbers / letters of the balance sheet under the regulatory scope of consolidation (EU CC2)
Amounts	s in € thousand
7,140	
7,140	Sum of rows 46 to 48, 50
	Sum of rows 52 to 56b
7,140	Row 51 minus row 57
548,887	Sum of rows 45 and 58
3,739,623	
14.49	
14.49	•
	mount Amount 7,140 7,140 7,140 548,887 3,739,623

		a)	b)
12/3	1/2021	Amount	Source based on reference numbers / letters of the balance sheet under the regulatory scope of consolidation (EU CC2)
		Amounts	in € thousand
64	Institution-specific buffer requirement (minimum requirement for the Common Equity Tier 1 capital ratio in accordance with Article 92 (1)(a), plus capital conservation and countercyclical buffer requirements, plus systemic risk buffer, plus the systemically important institution buffer (G-SII or O-SII), expressed as a percentage of the total risk exposure)	7.8701	
65	of which: capital conservation buffer requirement	2.50	
66	of which: countercyclical buffer requirement	0.0263	
67	of which: systemic risk buffer requirement		
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer		
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	0.84	
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	5.18	
Natio	nal minima (if different from Basel III)		
	[non-relevant in EU Regulation]		
Amou	ints below the thresholds for deduction (before risk weighting)		
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	11,180	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	12,956	
74	Empty set in the EU		
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	15,112	
Appli	cable caps on the inclusion of provisions in Tier 2		
76	Credit risk adjustments included in T2 in respect of exposures subject to standardized approach (prior to the application of the cap)	7,140	
77	Cap on inclusion of credit risk adjustments in T2 under the standardized approach	38,155	
78	Credit risk adjustments included in T2 in respect of exposures subject to the internal ratings-based approach (prior to the application of the cap)		
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach		
	al instruments subject to phase-out arrangements (only applicable between ary 1, 2022)	een January 1,	2014 and
80	Current cap on CET1 instruments subject to phase out arrangements		
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)		
82	Current cap on AT1 instruments subject to phase out arrangements		
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)		

		a)	b)
12/3	31/2021	Amount	Source based on reference numbers / letters of the balance sheet under the regulatory scope of consolidation (EU CC2)
		Amoun	ts in € thousand
84	Current cap on T2 instruments subject to phase out arrangements	-	-
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-	-

In order to meet the disclosure requirements pursuant to Article 437 point a CRR, Table 4 provides a reconciliation between regulatory own funds and the own funds items reported in the published balance sheet under commercial law on the basis of the reference letters indicated in the EU CC1 and EU CC2 reporting forms. The table only shows items that are relevant for the calculation of regulatory own funds under the CRR.

It also shows a reconciliation of the scope of consolidation for accounting purposes to the regulatory scope of consolidation. Differences between the two scopes of consolidation are attributable to the affiliated companies included in the scope of consolidation under commercial law, Hauck Investment Management (Nanjing) Co., Ltd und Hauck Investment Management (Shanghai) Co., Ltd.

Table 4: EU CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements

	a)	b)	c)
Balance sheet	Balance sheet as in published financial statements 12/31/2021	Under regulatory scope of consolidation 12/31/2021	Reference to Table 3 EU CC1
•	Amounts in	€ thousand	
Assets			
1. Cash reserve			
a) Cash at hand	133	133	
b) Balances with central banks	5,211,168	5,211,168	
	5,211,301	5,211,301	
2. Due from banks			
a) On demand	179,157	177,070	
b) Other receivables	59,037	59,037	
	238,194	236,107	
3. Due from customers	2,286,493	2,286,493	
4. Bonds and other fixed-income securities			
a) Money market instruments			
aa) Of public-sector issuers			
ab) Of other issuers	1,501	1,501	
b) Debt securities			
ba) Of public-sector issuers	1,370,044	1,370,044	
bb) Of other issuers	1,333,092	1,333,092	
	2,704,637	2,704,637	
5. Equity shares and other variable-yield securities	254,543	254,543	
5a. Trading portfolio	54,699	54,699	

	a)	b)	c)
Balance sheet	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference to Table
	12/31/2021	12/31/2021	EU CC1
	Amounts in € thousand		
6. Investments	6,811	6,811	
7. Shares in affiliated companies	17,488	20,488	
8. Associated companies	3,021	3,021	
9. Fiduciary assets	30,454	30,454	
10. Intangible assets			
a) Concessions, trademarks and similar rights and assets acquired against payment	19,175	19,175	
b) Advance payments	842	842	
	20,017	20,017	D
11. Fixed assets	19,660	19,655	
12. Other assets	830,091	829,998	
13. Prepaid expenses	33,739	33,739	
14. Deferred tax assets	47,815	47,777	
15. Excess of plan assets over pension liability	1,572	1,572	
Total assets	11,760,535	11,761,312	

	a)	b)	c)
Balance sheet	Balance sheet as in published financial	Under regulatory scope of	Reference to Table
	statements	consolidation	3 EU CC1
	12/31/2021	12/31/2021	J LO CCI
	Amounts in		
Liabilities			
1. Due to banks			
a) On demand	215,680	215,680	
b) With agreed term or period of notice	588,812	588,812	
	804,492	804,492	
2. Due to customers			
a) Saving deposits			
aa) With three months' agreed period of notice	56	56	
ab) With more than three months' agreed period of notice	-		
b) Other liabilities			
ba) On demand	8,612,585	8,612,585	
bb) With agreed term or period of notice	965,771	965,771	
	9,578,412	9,578,412	
3. Liabilities in certificate form	39	39	
3a. Trading portfolio	10,918	10,918	
4. Fiduciary liabilities	30,454	30,454	
5. Other liabilities	302,922	302,922	
6. Deferred income	38,130	38,130	
7. Provisions			
a) Provisions for pensions and similar obligations	84,803	80,403	
b) Provisions for taxation	24,740	24,740	
c) Other provisions	199,247	199,247	
	308,791	304,391	

	a)	b)	c)
Balance sheet	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference to Table 3 EU CC1
	12/31/2021	12/31/2021	
	Amounts in	E thousand	
8. Profit-participation certificates			
9. Funds for general banking risks	81,695	81,695	
10. Equity			
a) Paid-up capital	28,839	28,839	Α
b) Capital reserves	275,313	275,313	В
c) Revenue reserve			
ca) Statutory reserve	2,000	2,000	С
cb) Other revenue reserves	205,525	205,700	С
d) Difference in equity capital from currency translation	135		
e) Adjustment item for minority interests	73	73	
f) Net profit	66,641	67,379	С
	578,527	579,304	
11. Balance from capital consolidation	26,155	30,555	
Total liabilities	11,760,535	11,761,312	

After adoption of the audited financial statements, the Hauck Aufhäuser Lampe Group's own funds amount to EUR 613.4 million and are summarized as follows for the year ending December 31, 2021:

Table 5: Own funds after adoption of the audited financial statements

12/31/2021	Regulatory capital
	Amounts in € thousand
Paid-up capital	28,839
Capital reserves	275,313
Other eligible reserves	275,091
Net profit	46,750
Difference in equity capital from currency translation	
Funds for general banking risks	81,695
Common Equity Tier 1 (CET1) capital before regulatory adjustments	660,938
Value adjustment for prudent valuation	-1,121
Intangible assets	-20,017
Deferred tax assets arising from loss carryforwards	-32,665
Other regulatory adjustments	-878
Insignificant investments	
Regulatory adjustments (CET 1)	-54,681
Common Equity Tier 1 (CET1) capital	606,257
General credit risk adjustment	7,140
Tier 2 (T2) capital	7,140
Regulatory capital	613,397

4.2. Capital requirements (Article 438 CRR)

4.2.1. Regulatory capital requirements (Article 438 point d CRR)

Hauck Aufhäuser Lampe determines its regulatory capital requirements in accordance with the CRR regulations. Credit risk is determined in accordance with the Credit Risk Standardized Approach as set out in Part 3 Title II Chapter 2 of the CRR.

As a trading book institution in accordance with Article 4 (1)(86) of the CRR, Hauck Aufhäuser Lampe considers market risks to be exposures pertaining to share prices, foreign currencies, commodities, and interest rate changes in the trading book. Hauck Aufhäuser Lampe uses the regulatory standardized approach in accordance with Article 325 et seqq. of the CRR for share price/currency/commodities exposures. Interest rate risks are quantified using the maturity method in accordance with Article 339 of the CRR. The delta-plus method is used for options price risks in accordance with Article 329 of the CRR.

For regulatory purposes, the Hauck Aufhäuser Lampe Group's operational risk is calculated using the Basic Indicator Approach in accordance with Article 325 of the CRR.

The regulatory capital for the credit valuation adjustment (CVA) risk is calculated on the basis of the standardized method in accordance with Article 384 of the CRR.

In accordance with Article 438 point d CRR, the following table provides an overview of the total risk exposure amount (TREA/RWA) and the corresponding regulatory capital requirements for the individual risk exposure classes as per the CoRep report as of December 31, 2021.

Table 6: EU OV1 - Overview of risk-weighted exposure amounts

		Total Risk Exposure Amount (TREA)		Own funds requirements	
		a)	b)	c)	
		12/31/20210	9/30/2021	12/31/2021	
			ounts in € thous		
1 Credit	risk (excluding CCR)	2,865,292	916,400	229,223	
2 Of w	hich the standardized approach	2,865,292	916,400	229,223	
3 Of w	hich the Foundation IRB (FIRB) approach			- <u></u>	
4 Of w	hich slotting approach				
EU 4a Of w	hich equities under the simple risk-weighted approach				
5 Of w	hich the Advanced IRB (AIRB) approach				
6 Count	erparty credit risk - CCR	233,366	167,112	18,669	
7 Of w	hich the standardized approach	142,650	74,607	11,412	
8 Of w	hich internal model method (IMM)				
EU 8a Of w	hich exposures to a CCP	17,488	16,588	1,399	
EU 8b Of w	hich credit valuation adjustment (CVA)	44,154	15,012	3,532	
9 Of w	hich other CCR	29,073	60,905	2,326	
10-14 Empty	set in the EU				
15 Settlei	ment risk	1,017	257	81	
16 Securi	tisation exposures in the non-trading book (after the cap)			. <u></u>	
17 Of w	hich SEC-IRBA approach		- -		
18 Of w	hich SEC-ERBA (including IAA)				
19 Of w	hich SEC-SA approach				
EU 19a Of w	hich 1250% / deduction		_		
20 Positio	on, foreign exchange and commodities risks (market risk)	50,988	45,215	4,079	
21 Of w	hich the standardized approach	50,988	45,215	4,079	
22 Of w	hich IMA				
EU 22a Large	exposures				
23 Opera	tional risk	588,961	359,862	47,117	
EU 23a Of w	hich basic indicator approach	588,961	359,862	47,117	
EU 23b Of w	hich the standardized approach		_		
EU 23c Of w	hich advanced measurement approach				
24 Amour	nts below the thresholds for deduction (subject to 250% risk weight)	69,397	49,684	5,552	
	set in the EU		-,,,-		
29 Total		3,739,623	1,488,846	299,170	

The total risk exposure amount as of December 31, 2021 increased by approximately EUR 2.2 billion over the previous quarter (September 30). The increase results exclusively from the acquisition of Bankhaus Lampe KG as of October 1, 2021.

Following the adoption of the audited financial statements, our capital ratios as of December 31, 2021 are summarized as follows:

Table 7: Summary of capital adequacy

Capital	Own funds pursuant to audited financial statements	Capital requirements	Exposures	Capital ratio
		Amounts in € million		
Common Equity Tier 1 capital	606	299	3,740	16.21%
Tier 1 capital	606	299	3,740	16.21%
Total capital	613	299	3,740	16.40%

This means that each of the capital ratios are comfortably above the regulatory minimum requirements.

4.2.2. Internal capital adequacy (Article 438 point c CRR)

Our risk strategy and our risk-bearing capacity concept are used for conducting qualitative assessments of the adequacy of our available internal capital in relation to our risk profile.

The risk strategy is the general definition of targets to manage the risks of key business activities and is closely connected to the business strategy. It includes risk policy principles and determines our risk appetite, which represents the desired balance between risk tolerance and risk-bearing capacity. It defines how we deal with quantifiable and non-quantifiable risks.

Furthermore, internal capital, i.e. of the risk coverage potential, is allocated to the individual business segments/types of risk in order to monitor the risk-bearing capacity of our Group. In addition to the regulatory requirements and target returns, risk-bearing capacity is one of the key indicators of our Group's overall planning and control process.

The Group level is defined in accordance with the scope of consolidation and the commercial importance of each individual unit. Here, we use our financial risk scale, which enables us to objectively define the Group level and, hence, the risk-adjusted steering of the Hauck Aufhäuser Lampe Group.

The key factors for calculating the risk-bearing capacity are the risk coverage potential, i.e. the maximum internal capital available for hedging risks, and the risk capital limit, i.e. the internal capital actually used to cover risks. In accordance with our risk policies and in order to limit risk, only a portion of the risk capital is used to cover risks. The remaining strategic risk buffer is used to cover possible fluctuations in our risk capital and ensures room for maneuver in the context of risk management.

The risk-bearing capacity is assured when the risk coverage potential is higher than the risk capital requirement. In order to ensure this, our risk strategy stipulates limits for all risk types and roles that define the decision-takers' room for maneuver. In so doing, the limit system used in the Bank is applied to allocate limits to the individual types of risk and/or business segments. These are expressed in the form of global limits that are subdivided into individual limits. Compliance with these limits and, hence, with the risk-bearing capacity is monitored through regular reporting.

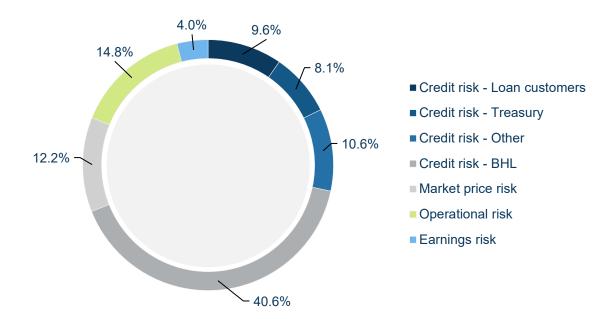
Risk capital, the risk capital limit and risk capital requirements are planned in the course of the annual business and risk strategy review. They are based on the regulatory capital planning, the strategic earnings targets and the risk capital requirements calculated on the basis of the key future business activities.

The economic risk-bearing capacity is calculated monthly with a 99.9% level of confidence and for a risk analysis horizon of one year.

The decrease in the utilization of the risk coverage potential at the Group level from 61% at December 31, 2020 to 50% at the balance sheet date results from greater risk capital requirements mainly due to an increase in equity in the course of the acquisition of Bankhaus Lampe KG. In 2021, the average utilization was 53% (73% in 2020).

The following chart shows the breakdown of the risk capital requirements relative to the individual types of risk of the Hauck Aufhäuser Lampe Group quantified in the risk-bearing capacity.

Figure 1: Breakdown of the total exposure



5. Key metrics (Article 447 CRR)

Upon entry into force of the revised CRR, an overview of the regulatory key parameters required in accordance with Article 447 points a) to g) CRR and Article 438 point b) CRR is required. As disclosure in this form is being made for the first time, the values of the previous quarters will be disclosed from June 30, 2021. The history of the comparative reporting dates will be compiled successively.

The following table shows the Hauck Aufhäuser Lampe Group's key parameters pursuant to the CoRep report and is presented in accordance with Annex I to Commission Implementing Regulation (EU) No. 2021/637.

Table 8: EU KM1 - Key metrics

		a)	b)	c)
		12/31/2021	09/30/2021	06/30/2021
Availabl	le own funds (amounts)	Α	mounts in € thousand	d
	, ,	E 11 7 17	204 722	202 206
1	Common Equity Tier 1 (CET1) capital	541,747	291,733	293,306
2	Tier 1 capital (T1)	541,747	291,733	293,306
3	Total capital	548,887	294,384	295,957
	ighted exposure amounts	0.700.000	4 400 040	4 007 000
4	Total risk-weighted exposure amount	3,739,623	1,488,846	1,267,929
Capital	ratios (as a percentage of risk-weighted exposure amount)			
5	Common Equity Tier 1 ratio (%)	14.49	19.59	23.13
6	Tier 1 ratio (%)	14.49	19.59	23.13
7	Total capital ratio (%)	14.68	19.77	23.34
	nal own funds requirements to address risks other than the risk ore amount)	f excessive levera	ge (as a percentage	e of risk-weighted
схрози	Additional own funds requirements to address risks other than the			
EU 7a	risk of excessive leverage (%)	1.50	1.50	1.50
EU 7b	Of which: to be made up of CET1 capital (percentage points)	0.84	0.84	0.84
EU 7c	Of which: to be made up of Tier 1 capital (percentage points)	1.13	1.13	1.13
EU 7d	Total SREP own funds requirements (%)	9.50	9.50	9.50
Combin	ed buffer and overall capital requirement (as a percentage of risk	-weighted exposu	re amount)	
8	Capital conservation buffer (%)	2.50	2.50	2.50
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)			
9	Institution specific countercyclical capital buffer (%)	0.03	0.07	0.06
EU 9a	Systemic risk buffer (%)			
10	Global Systemically Important Institution buffer (%)			
EU 10a	Other Systemically Important Institution buffer (%)			
11	Combined buffer requirement (%)	2.53	2.57	2.56
EU 11a	Overall capital requirements (%)	12.03	12.07	12.06
12	CET1 available after meeting the total SREP own funds requirements (%)	5.18	10.27	13.84
Leverag	e ratio			
13	Total exposure measure	8,208,611	5,087,318	4,764,078
14	Leverage ratio (%)	6.60	5.73	6.16
	nal own funds requirements to address the risk of excessive leve			ıre measure

Hauck Aufhäuser Lampe - Disclosure Report 2021

		a)	b)	c)
		<u> </u>	09/30/2021	06/30/2021
			ounts in € thousan	d
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)			
EU 14b	of which: to be made up of CET1 capital (percentage points)			
EU 14c	Total SREP leverage ratio requirements (%)	4.37	4.37	3.00
Leverage	e ratio buffer and overall leverage ratio requirement	(as a percentage	of total exp	oosure measure)
EU 14d	Leverage ratio buffer requirement (%			
EU 14e	Overall leverage ratio requirement (%)	4.37	4.37	3.00
Liquidity	Coverage Ratio			
15	Total high-quality liquid assets (HQLA) (weighted value-average)	6,501,335	5,821,080	5,177,194
EU 16a	Cash outflows – total weighted value	5,947,789	5,870,956	4,941,560
EU 16b	Cash inflows – total weighted value	1,248,222	1,358,875	1,039,437
16	Total net cash outflows (adjusted value)	4,699,568	4,512,081	3,902,123
17	Liquidity coverage ratio (%)	138.34	129.01	132.68
Net Stab	le Funding Ratio			
18	Total available stable funding	4,453,315	2,407,029	2,466,184
19	Total required stable funding	2,569,326	1,225,733	1,117,217
20	NSFR ratio (%)	173.33	196.37	220.74

6. Remuneration policy (Article 450 CRR)

In line with the Institutsvergütungsverordnung (InstitutsVergV) [Remuneration Ordinance for Institutions], in the course of the annual appraisals of the remuneration system, we evaluated the incentive and remuneration systems of Hauck Aufhäuser Lampe, and compiled the principles of our remuneration policy and salary systems. It serves to document the key principles and current instruments, and forms the basis for the practical implementation of our remuneration systems as well as providing guidance for the further development of these systems.

The remuneration systems for the employees and the management of Hauck Aufhäuser Lampe are linked to the sustainable and value-oriented alignment of the business model and are structured in such a way that they avoid giving management and employees incentives for taking disproportionately high risks while at the same time rewarding good performance and the long-term commitment of our employees.

Our remuneration policy is derived from this corporate policy. It is our intention to foster in our employees in equal measure both a long-term, values-oriented approach and entrepreneurial engagement. It is, therefore, bound to the principles of transparency and basic income as well as being performance and profit related.

Our employees are key to the success of our company. Together, we have developed a corporate culture of responsible action in which each makes a positive contribution and each has a positive impact. Sustainability and social aspects play a key role in the development of incentive systems at Hauck Aufhäuser Lampe. Hauck Aufhäuser Lampe's remuneration policy is aligned to our business and risk strategy, the goals and interests of the Group and comprises measures to avoid conflicts of interest.

The remuneration system is reviewed at least once a year and, where necessary, adapted in order to guarantee its appropriateness and compliance with statutory requirements.

It is also our intention that, in keeping with Regulation (EU) 2019/2088 of 27 November 2019 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector, our remuneration policy provides more transparency in terms of quality or quantity with regard to the remuneration policy at Hauck Aufhäuser Lampe as a participant on the financial markets and financial adviser concerning asset management and risk management. It shall promote solid and effective risk management with regard to sustainability by ensuring that the remuneration structure does not encourage excessive risk-taking with regard to sustainability risks, and sanction any violations of ESG principles, such as employee misconduct or the taking of reputational risks.

Hauck Aufhäuser Lampe's goal is to make a genuine, active contribution to a more environmentally friendly and fairer world. For this reason, Hauck Aufhäuser Lampe's remuneration policy supports the appropriate management of all relevant business risk through the inclusion of sustainability risks as defined in the Disclosure Regulation.

6.1. Legal basis

Hauck Aufhäuser Lampe is not a major institution within the meaning of Section 1(3c) KWG, because its average total assets over the last four years have been clearly below € 15 billion and is not classified as such. It was also not classified as such within the meaning of Section 1(3c) KWG for the 2021 financial year. In the 2021 financial year, Hauck Aufhäuser Lampe identified risk-takers pursuant to Section 25a(5b) KWG.

Furthermore, the remuneration policies for employees of capital management companies are applied as follows: On grounds of the corporate alignment of Hauck Aufhäuser Lampe, with regard to the principle of proportionality, a decision has been taken to not apply the provisions relating to the disbursement process and the remuneration committee.

Further legal bases within the Group considered as being generally binding are the remuneration policies for employees of capital management companies in accordance with Section 37 of the Kapitalanlagegesetzbuch (KAGB) [Capital Investment Code] in conjunction with Article 13 and Annex II of Directive 2011/61/EU on Alternative Investment Fund Managers (Alternative Investment Fund Manager (AIFM) Directive) and the final

report "Guidelines on Key Concepts of the AIFMD" of the European Securities and Markets Authority (ESMA) as well as guidelines issued by the Federal Financial Supervisory Authority (BaFin).

6.2. Principles

6.2.1. Principle of transparency

Hauck Aufhäuser Lampe's target remuneration comprises two remuneration components: a monthly basic salary and a variable remuneration component.

The basic salary is determined according to the roles of the employees and their classification into membership of a collective agreement group or non-collectively agreed remuneration.

The variable remuneration granted to employees who are subject to collective agreement is linked to the net operating profit.

The variable remuneration for employees not subject to collective agreements is aligned to a contractually agreed target value. By way of exception, in the Investment Banking division, HAIR, which was integrated in 2015, the fully discretionary system was continued. Performance-related variable remuneration payments are calculated in a quantitative procedure on the basis of the achievement of individual targets and the operating profit of the Bank.

6.2.2. Principle of living wage

The monthly salary serves to secure the living standards of the employees. It is measured through application of the Collective Agreement for the Private Banking Sector and the Principles of Non-Collectively Agreed Remuneration in such a way that it enables a secure standard of living. Employees who are not subject to collective agreement are paid 12 monthly salary installments; employees subject to collective agreement are paid 13 monthly salary installments.

In addition to this, there is also the prospect of variable remuneration. This aligns with each Company Agreement in force. The maximum permissible amount of variable remuneration is equal to the amount of fixed salary.

Thus, the ratio of variable to fixed remuneration for employees in roles of particular responsibility not subject to collective agreement is aligned towards performance but does not result in increased employee dependency on variable remuneration. The ratio is generally significantly weighted in favor of the fixed remuneration components.

Employees subject to collective agreement receive a uniform additional variable salary payment.

6.2.3. Principle of performance and profit dependency

The variable remuneration under the Company Agreement for employees both subject and not subject to collective agreement is an annual, discretionary single payment. The amount of remuneration is dependent on the personal performance of employees in positions of particular responsibility as well as business performance. Employees in roles of particular responsibility include department managers, employees not subject to collective agreement in Investment Banking, relationship managers from Private Banking & Asset Servicing, branch managers, traders and all employees not subject to collective agreement from Financial Markets and employees from Treasury, Internal audit and Compliance.

Employees not subject to collective agreement who are not in roles of particular responsibility and employees subject to collective agreement do not have any individual performance-related component and receive variable remuneration dependent on the profitability of the company.

The performance-related component is based on the individual performance of each employee in a role of particular responsibility not subject to collective agreement, which is based on the stipulation of individual

goals, 60% of which are KPI-related or derived from the (risk) strategy and 40% of which consist of individually set goals, with due regard given to quantitative and qualitative targets.

The profit component reflects the operating profit of the Hauck Aufhäuser Lampe Group and is intended to encourage employees to ensure that, in addition to reaching their targets, they always keep the profitability of the Hauck Aufhäuser Lampe Group as a whole in mind and do not take any disproportionate risks.

It enables employees to share in the success of the company and limits the payment of performance-related variable remuneration in periods of difficulty.

The profit component comprises the Hauck Aufhäuser Lampe Group Factor, which is based on key performance indicators (KPIs) at Group level. Furthermore, a Business Unit Factor is formed, which is determined on the basis of a number of KPIs for Front Office and Credit Operations.

In accordance with the agreement between the Management Board and employee representatives, the following targets are to be achieved through performance and profit-related remuneration:

- An incentive to improve performance and/or reach a higher performance level,
- Greater opportunities for individuals to increase their income through improved personal performance.
- Fostering cooperative behavior, both with regard to teams and the upstream/downstream business units,
- Performance-related differentiation in remuneration,
- Support for the implementation of the company's commercial and corporate policy objectives,
- Enhancement of the quality of planning processes,
- Improving the competitive position of the company on the employment market through an attractive remuneration system,
- Equitable remuneration within the meaning of the principle of equal opportunity through uniform procedural rules for calculating the variable remuneration component, and
- Supporting employee development through the flexible development of individual remuneration.

For employees subject to collective agreement and employees not subject to collective agreement in roles of particular responsibility, the variable remuneration is calculated solely on the basis of the net operating profit of Hauck Aufhäuser Lampe.

6.3. Remuneration instruments

6.3.1. Remuneration in accordance with the Collective Agreement for the Private Banking Sector

Hauck Aufhäuser Lampe is a member of the German Private Bank Employers Association and applies the Collective Agreement for the Private Banking Sector. The social partners in the banking sector have examined the provisions contained therein and determined that the remuneration instruments withstand scrutiny in line with the strictest standards currently under discussion at the international and national level.

The basic remuneration of employees subject to collective agreement is regularly revised through collective wage settlements.

6.3.2. Principles of variable remuneration

The remuneration system, which consists of a fixed salary and performance-related variable remuneration, was developed jointly by the Management Board and the Human Resources Department.

The variable remuneration for employees not subject to collective agreement is based on the contractually agreed target value. For employees subject to collective agreement, the variable remuneration is based on the monthly fixed salary.

In addition to their gross annual income, employees in roles of particular responsibility who are not subject to collective agreement may receive variable remuneration that is dependent on their personal performance (Individual Performance Factor), the success of their business unit (Business Unit Factor) and the success of the Hauck Aufhäuser Lampe Group (Hauck Aufhäuser Lampe Group Factor).

Employees not subject to collective agreement who are not in roles of particular responsibility and employees subject to collective agreement may receive variable remuneration that is comprised from the Hauck Aufhäuser Lampe Group Factor and the Business Unit Factor. These two employee categories may be granted a Recognition Award for outstanding performance during the course of the year.

The Recognition Award provides an incentive for outstanding contributions by individuals or teams. The recognition Remuneration may be paid in a financial or non-financial payment instrument.

The Management Board and the Human Resources Department examined the Company Agreements and the practical implementation thereof on the basis of the criteria of the MaRisk [Minimum Requirements for Risk Management] and the InstitutsVergV and established that the Company Agreements on remuneration ("Principles of Variable Remuneration") fulfill the requirements in an exemplary manner. In particular, the following points were emphasized:

- The remuneration system places the focus on the personal performance of all employees in roles of particular responsibility and determines the amount of performance-related variable remuneration on the basis of both the achievement of targets as well as on the profit of the Bank.
- Targets are agreed over the long term as annual targets. Thus, the employees in roles of particular
 responsibility are given a broad amount of scope for achieving their targets. Focusing on short-term daily
 or monthly targets does not accord with our aspiration to provide independent and sustainable advisory
 services.
- The performance of our client advisers is measured through their contribution to the company's success
 and not according to sales of specific products. This prevents an incentive being created to sell specific
 forms of investment or financing to clients without the clients specifically needing such forms of
 investment or financing.
- Taking into consideration the success of the Bank as a whole in calculating the target value for
 performance-related remuneration ensures that the individual performance-related remuneration
 payments for employees in roles of particular responsibility will not lead to any excessive burdens being
 placed on the Bank's profitability.

Hauck Aufhäuser Lampe's remuneration systems are designed in such a way that they avoid giving incentives for taking disproportionately high risks and the oversight function of the employees of the controlling units is not compromised by their remuneration. In particular, the variable remuneration of employees in the controlling units is not directly dependent on the results of the units they oversee, but are linked to the targets set for their controlling unit. The controlling units were continuously involved in the appraisal of the remuneration systems that were conducted under the guidance of the Human Resources department in the reporting period.

Bonuses are determined using, among other things, the qualitative and quantitative individual performance of the employees in roles of particular responsibility and the profit of the business unit and the Bank as a whole.

The following criteria are used to determine bonus payments: the level of individual target achievement, the net operating profit of the Bank as a whole and the relevant business unit. These elements constitute a formula according to which the bonus is calculated. In so doing, compliance with the limits as stipulated in Section 25a KWG is assured.

If a bonus is guaranteed in connection with the establishment of an employment relationship, this guarantee will be determined at most for the first year of employment. Furthermore, in accordance with Section 5(3)(2) InstitutsVergV, in the event of termination of employment, our Bank does not establish in individual contracts

any entitlement to payments, which remain unchanged despite any negative individual performance contributions.

6.3.3. Annual review of adequacy

Furthermore, Hauck Aufhäuser Lampe has an overarching committee composed of representatives from the Risk Controlling, Compliance, Internal Audit, and Human Resources departments which serves as a forum for formally reviewing and appraising Hauck Aufhäuser Lampe's remuneration system. The intention of this review and appraisal is to promote and enhance consistency between the variable remuneration agreements and the stability and solidity of Hauck Aufhäuser Lampe and its subsidiaries as well as the alignment of these agreements to pertinent regulatory recommendations and requirements.

Such a review was last conducted in the 2021 financial year. The Supervisory Board of Hauck Aufhäuser Lampe was informed about, among others, the remuneration system at its meeting on May 26, 2021, and approved the relevant statements for the record. Furthermore, the employees are informed in a suitable manner of the remuneration system that applies to them.

6.3.4. Remuneration Control Committee

A Remuneration Control Committee was not formed. Hauck Aufhäuser Lampe is not a major institution as defined in Section 17(1) InstitutsVergV. Furthermore, the legislator is of the opinion that such institutions have the right to waive the formation of a Remuneration Control Committee without requiring the approval of the Federal Financial Supervisory Authority if the administrative and supervisory body contains less than ten members.

6.3.5. Disclosure of remuneration

With reference to the classification of Hauck Aufhäuser Lampe as a non-major institution and taking into account its size, internal organizational structure, the nature, scope and complexity of its area of business (application of Article 450 (2) of Regulation (EU) 575/2013 in conjunction with Directive 95/46/EC), the following aggregate figures are published for the 2021 financial year:

- Fixed remuneration paid for the 2021 financial year, Article 450 (1)(h)(i)
- Variable remuneration paid for the 2021 financial year, Article 450 (1)(h)(i)
- The number of beneficiaries of fixed and variable remuneration, Article 450 (1)(h)(i)

Group-wide, the total amount of all remuneration paid for the 2021 financial year was approximately € 124 million, with approximately € 92 million in fixed remuneration and approximately € 32 million in variable remuneration paid to 793 beneficiaries.

Table 9: Remuneration broken down by company (1)

Company	Fixed salary	Variable remuneration	Beneficiaries
	Amounts i	n € thousand	In FTE
Hauck Aufhäuser Lampe Privatbank AG – Frankfurt	54,997	26,304	403
Hauck Aufhäuser Lampe Privatbank AG – Luxembourg	19,120	3,137	206
Hauck & Aufhäuser Fund Services S.A.	9,331	1,486	94
Hauck & Aufhäuser Alternative Investment Services S.A.	7,943	1,182	90

Four of the employees of Hauck Aufhäuser Lampe and its subsidiaries received remuneration in excess of € 1 million in the 2021 financial year.

6.4. Subsidiaries

This documentation also applies to the majority-owned domestic subsidiaries.

Special nature/derogations of the Luxembourg subsidiaries

In addition to the German provisions, the stipulations of Circular CSSF 10/437 "Guidelines concerning the remuneration policies in the financial sector" and Circular CSSF 18/698 "Authorisation and organisation of investment fund managers incorporated under Luxembourg law" also apply.

The remuneration system recognizes the principles of the parent group. Analogous to the regulations applicable to the German companies of the Hauck Aufhäuser Lampe Group, the Bank-wide collective agreement applicable in Luxembourg applies to the Luxembourg branch and to the subsidiaries.

Pursuant to Section 27(3) InstitutsVergV, in individual cases, a subordinated company may not be considered when establishing the Group-wide remuneration strategy provided that, due to its business activities, this ordinance cannot be applied in a reasonable manner to the subordinated company.

6.5. Subsidiary Bankhaus Lampe KG

The acquisition of Bankhaus Lampe KG (hereinafter referred to as "BHL") by Hauck Aufhäuser Lampe Privatbank AG was completed with effect from September 30, 2021. As of this effective date, BHL became part of the Hauck Aufhäuser Lampe Group. However, BHL will continue to apply its existing compensation system beyond this effective date until further notice.

BHL was not a major institution within the meaning of Section 1(3c) KWG, because its average total assets over the last four years were clearly below € 15 billion and it was not classified as such pursuant to Section 1(3c) KWG.

As a non-significant institution with total assets of just over EUR 3.3 billion on average over the last three years, BHL's disclosure obligation is governed by Section 16 (2) InstitutsVergV.

6.5.1. Remuneration structure of BHL

The remuneration strategy applicable within the BHL Group was essentially only editorially revised as per November 30, 2021.

In 2021, due to a change in the pension provider, the previous company pension plan for employees who joined the company on or after April 1, 2021 was changed in such a way that it is no longer purely employer-funded. Instead, employees who joined the company after this date will receive a company pension whose contributions (in line with the practice at Hauck Aufhäuser Lampe) are 2/3 employer-funded and 1/3 employee-funded.

The remuneration systems of the Bankhaus Lampe Group were structured as follows:

6.5.2. Remuneration of the members of the Management Board of BHL

The total remuneration of the personally liable partners of BHL also includes variable remuneration. The remuneration of the personally liable partners is additionally oriented towards the sustainable development of the company and takes into account internal and external benchmarks to ensure objectivity.

6.5.3. Fixed remuneration of employees of BHL

Employees remunerated under collective agreements

Salaries were determined in accordance with the provisions of the Collective Agreement for the Private Banking Sector and Public Banks, as amended. Under this collective agreement, 13 salaries are paid per year. The fixed remuneration could be supplemented by a fixed bonus over and above the collective agreement.

Employees not remunerated under collective agreements

Fixed salaries were determined within appropriate ranges, taking into account qualifications and experience along with the salary structure and market conditions. The annual fixed compensation consists of 13 salary payments.

6.5.4. Variable remuneration of employees of BHL

Organizational framework

BHL's remuneration systems were designed in such a way that incentives to take disproportionately high risks were avoided and the remuneration of employees in controlling units, including the Finance and Internal Audit departments, Risk Control, Compliance and MaRisk Compliance, IT Security and Data Protection, and Human Resources departments, did not run counter to their oversight function.

The controlling units were also involved in the annual review of the bonus system in the reporting period and were involved in monitoring the variable compensation systems. Such a review last took place in October 2021.

In most cases, the remuneration systems were structured in such a way that the bonuses at no point exceeded 100% of the annual salaries. However, on grounds of a shareholder resolution (by the shareholders of the Oetker Group, to which BHL belonged as of this reporting date), a limited number of employees of BHL and Lampe Asset Management GmbH (hereinafter "LAM") received bonuses of up to 200% of their annual salaries.

Employees remunerated under collective agreements

This variable remuneration stems from a Company Agreement under which the personally liable partners decide each year whether and by which amount a special payment above the standard pay scale is to be made for the respective year under review. In addition, employees subject to collective agreements may receive a performance bonus as a further variable salary component, the determination of which is governed accordingly.

Employees not remunerated under collective agreements

This variable remuneration comprises primarily so-called bonuses that are based on a Company Agreement (hereinafter "Company Agreement").

The employees of BHL not subject to collective agreements receive bonuses from an aggregate bonus pool in accordance with uniform principles. The aggregate bonus pool is dependent on the so-called team-related results of BHL.

The amount of the respective bonus pool for an organizational unit is determined in arrears for the respective preceding financial year through what is known as cascading. Starting at the top level, a budget is set for each organizational unit and its subunits. This procedure is repeated at the next level until the lowest organizational level has been reached.

The direct line manager uses his or her reasonable discretion to allocate the individual bonus on the basis of the bonus pool made available for the respective organizational unit through the cascading process. An important element when determining individual bonuses is the achievement of the targets agreed with the

employees for the respective financial year. The bonus is also determined on the basis of factors such as compliance with the bank's strategic orientation, the employee's qualifications, customer satisfaction, soft skills (the employee's work ethic and social behavior), and adherence to legal and compliance requirements.

6.5.5. Remuneration systems of Lampe Asset Management GmbH

Fixed remuneration of employees of LAM

The rule applicable to remuneration at BHL apply accordingly to LAM.

Variable remuneration of employees of LAM

With regard to variable remuneration, LAM has a Company agreement that is structured in the same way as BHL's bonus system. The bonus system at LAM is used to pay bonuses to both employees subject to collective agreements and employees not subject to collective agreements.

6.5.6. Total amounts of remuneration paid in the 2021 financial year

With reference to the classification of BHL as a non-major institution and taking into account its size, internal organizational structure, the nature, scope and complexity of its area of business (application of Article 450(2) CRR), the following aggregate figures are published for the 2021 financial year:

Remuneration paid broken down by company

Group-wide, the total amount of all remuneration paid for the 2021 financial year was approximately € 43 million, with approximately € 40 million in fixed remuneration and approximately € 3 million in variable remuneration paid to 510 beneficiaries.

For LAM, the total amount of all remuneration paid for the 2021 financial year was approximately € 5 million, with approximately € 4 million in fixed remuneration and approximately € 1 million in variable remuneration paid to 45 beneficiaries.

Table 10: Remuneration broken down by company (2)

Company	Fixed salary	Variable remuneration	Beneficiaries
	Amounts i	Amounts in € thousand	
Bankhaus Lampe KG	39,800	3,131	510
Lampe Asset Management GmbH	4,034	1,127	45

Two of the employees of BHL and its subsidiaries received remuneration in excess of € 1 million in the 2021 financial year.

6.6. Obligation

The principles and rules set out in this documentation are part of the corporate culture of Hauck Aufhäuser Lampe. They oblige the Management Board and all managerial employees to consistently interpret and apply the existing instruments in the spirit of these basic principles.

7. Concluding statement

The Management Board of Hauck Aufhäuser Lampe declares by means of affixing its signature that the risk management methods and procedures used by Hauck Aufhäuser Lampe are a suitable means of providing a comprehensive picture at all times of the Bank's risk profile. In particular, the models deployed make it possible to ensure the long-term risk-bearing capacity of the Bank.

Michael Bentlage Chairman of the Management Board Oliver Plaack Member of the Management Board Madeleine Sander Member of the Management board

Dr. Holger SeppMember of the
Management Board

Robert Sprogies Member of the Management Board

Annex

List of figures

Figure 1: Breakdown of the total exposure	25
List of tables	
Table 1: Number of directorships held by members of the management body	g
Table 2: Regulatory and accounting (HGB) scope of consolidation	12
Table 3: EU CC1 – Composition of regulatory own funds	14
Table 4: EU CC2 – Reconciliation of regulatory own funds to balance sheet in the audited financial statements	19
Table 5: Own funds after adoption of the audited financial statements	22
Table 6: EU OV1 – Overview of risk-weighted exposure amounts	23
Table 7: Summary of the capital adequacy	24
Table 8: EU KM1 – Key metrics	26
Table 9: Remuneration breakdown by company (1)	32
Table 10: Remuneration breakdown by company (2)	35

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