

Brockhaus Capital Management AG**Addition to the 2020 Declaration of Compliance****Addition to the Declaration of Compliance with the German Corporate Governance Code by the Executive Board and the Supervisory Board of Brockhaus Capital Management AG pursuant to section 161 of the AktG**

The Executive Board and Supervisory Board of Brockhaus Capital Management AG (the “**Company**”) declared in December 2020 that the Company complied and will comply with the recommendations of the German Corporate Governance Code (the “**Code**”) in the current version dated 16 December 2019, which was published in the Federal Gazette on 20 March 2020, since its admission to the regulated market of the Frankfurt Stock Exchange on 10 July 2020, with the departures described in the declaration. That declaration is supplemented as follows.

The consolidated financial statements and the Group management report shall be made publicly accessible within 90 days from the end of the fiscal year (F.2 of the Code)

Due to the additional accounting and disclosure requirements, the consolidated financial statements and the Group management report for fiscal year 2020 have not been published within 90 days from the end of the fiscal year. For reasons that include the first-time preparation of a combined management report and the first-time creation of ESEF XBRL files, the publication of the consolidated financial statements and the Group management report within a shorter period would require the use of considerable financial and personnel resources that would not be in reasonable proportion to the information needs of the shareholders of a company of this size.

Interim financial information shall be made publicly accessible within 45 days from the end of the reporting period (F.2 of the Code)

Due to its very recent admission to the regulated market of the Frankfurt Stock Exchange and due to quality assurance requirements, the Company departed in fiscal year 2020 from the recommendation to make interim financial information publicly accessible within 45 days from the end of the reporting period. For fiscal year 2021, the Company does not declare any departures from the recommendation to make interim financial information publicly accessible within 45 days from the end of the reporting period.

Frankfurt am Main, March 2021

Executive Board

Supervisory Board

Marco Brockhaus
Chairman of the Executive Board

Dr. Othmar Belker
Chairman of the Supervisory Board