

Code of Conduct Exemption Request Form

Internet Corporation for Assigned Names and Numbers (“ICANN”)
12025 Waterfront Drive, Suite 300
Los Angeles, California 90094
Attention: New gTLD Program Staff

RE: Request for Exemption from Registry Operator Code of Conduct

Deutsche Vermögensberatung Aktiengesellschaft (“DVAG”) (“Registry Operator”), in connection with the execution of the Registry Agreement for the .POHL TLD (the “Registry Agreement”), hereby requests an exemption from the obligations of the Registry Operator Code of Conduct set forth in Specification 9 to the Registry Agreement (the “Code of Conduct”). Pursuant to such request, Registry Operator confirms that each of the following statements is true and correct (collectively, referred to as the “Statements”):

1. All domain name registrations in the TLD shall be registered to, and maintained by, Registry Operator for the exclusive use of Registry Operator or its Affiliates (as defined in the Registry Agreement);
2. Registry Operator shall not sell, distribute or transfer control or use of any registrations in the TLD to any third party that is not an Affiliate of Registry Operator; and
3. Application of the Code of Conduct to the TLD is not necessary to protect the public interest for the following reasons:

The TLD ultimately is intended to provide interested members of the Internet community with access to information concerning DVAG’s founder and the company’s core values, as well as other activities such as its philanthropic and charitable undertakings. The space will be organized in an intuitive, easy-to-navigate manner.

The “.POHL” TLD will be managed under the direct control of DVAG. In general, DVAG intends for users to perceive the TLD as a trustworthy and intuitive indicator of the source of its online information and resources. DVAG intends to use advanced technical and policy measures to ensure the security and reliability of online transactions and communications, and to ensure that domain names in the TLD are only used for authorized purposes. DVAG intends to provide a safe and trustworthy Internet space, enhancing user experience by mitigating security-associated risks. This is particularly important in the “.POHL” space, as the users of the associated websites may be potential or current financial clients, and consequently it is important to DVAG that all communications through the site remain confidential and secure.

All domain name registrations within the “.POHL” space shall be held by DVAG, under a single-registrant model. The company may, from time to time and in its sole discretion, elect to license domain name registrations to its affiliates, but the registrant of record for all domain names within the TLD space shall remain DVAG. All such licensees shall be required to use the domains for the purposes specified by DVAG under the terms of their relevant license agreements and as set

out in the Domain Name Registration and Use Policy for “.POHL”, which is provided in Exhibit A at the end of this document. DVAG intends that no domain name in the “.POHL” space shall be used in a manner which:

- Infringes any other third parties' rights
- Is in breach with any applicable laws, government rules or requirements

or for the purposes of:

- Undertaking any illegal or fraudulent actions, including spam or phishing activities
- defaming DVAG or its businesses, affiliates, brokers, employees, etc.

The content and use of all registered “.POHL” domain names will be monitored by DVAG on an ongoing basis, and compliance with the contractual restrictions and guidelines will be enforced. Violations of any restrictions, guidelines or other contractual conditions may result in termination of the relevant domain name license by DVAG.

Registry Operator represents that the registration policies attached hereto as Schedule A are a true and correct copy of the Registry Operator's registration policies for the TLD. Registry Operator agrees to notify ICANN promptly in writing in the event any of the Statements has become untrue (whether before or after an exemption has been granted). Registry Operator further acknowledges and agrees that the Exemption will be void if at any time any of the Statements has become untrue.

Submitted by:

[Redacted]

Position:

Mitglied des Vorstandes (Executive Officer)

[Redacted]

Dated:

[Redacted]

Email:

[Redacted]

Submitted by:

[Redacted]

Position:

Mitglied des Vorstandes (Executive Officer)

[Redacted]

Dated:

[Redacted]

Email:

[Redacted]

Schedule A

Registry Operator hereby acknowledges that the following are the true and correct registration policies for the TLD:

Domain Name Registration and Use Policy for “.POHL”

I. General principles

1. Purpose

The “.POHL” Top Level Domain (“TLD”) is established by and for the use of Deutsche Vermögensberatung (“DVAG”), the Registry Operator for the TLD space. DVAG will, with the advice and assistance of the Registry Service Provider, KSregistry GmbH, and relevant governmental bodies, develop, maintain and enforce effective TLD management strategies to manage the “.POHL” space.

This Policy is intended to be updated and revised regularly to reflect the needs of DVAG and the TLD.

The registration of domain names within the “.POHL” TLD shall be restricted to DVAG itself, thus following a single-registrant model. DVAG may, in its sole discretion, elect to license the use of registrations within this space to any affiliated party.

2. Registration Policy

As indicated above, the “.POHL” space will follow a single-registrant model. Thus, DVAG shall be the only entity eligible to register domain names within the “.POHL” TLD.

II. Domain Allocation Rules

3. String Requirements

Registry Operator, via Registry Service Provider, will not accept a Registration unless the applied-for Domain Name meets the applicable requirements as defined under the Registry Agreement, Specifications 5 and 6, including the following technical and syntax requirements. The Domain Name Label must:

- if ASCII, consist exclusively of the letters A-Z, the numbers 0-9, and hyphens;
- if non-ASCII (e.g., IDN), consist of language scripts offered by the Registry;
- not exceed 63 characters;
- contains at least one character; and

- not contain hyphens in the third and fourth position, except if they represent valid internationalized domain names in their ASCII encoding, namely where two consecutive hyphens (-) are used in the 3rd and 4th positions, when preceded by "xn" and followed by a label that corresponds with an IDN containing characters referred to above.

4. Reserved Names

Registry Operator may reserve, and not allow the Registration of any labels which appear or are referenced by the Schedule of Reserved Names set forth in Specification 5 of the Registry Agreement

However, DVAG may propose the release of any reservations, in compliance with applicable processes established by or in accordance with ICANN policies or procedures (if applicable).

5. Name Collisions

If any “.POHL” domain name is identified by ICANN as a potential name collision risk, pursuant to the Registry Operator’s rights and responsibilities under the Registry Agreement, Specification 6, § 6, the Registry Operator reserves the right to take all necessary and proper steps to resolve the conflict, including the blocking of any affected domain name.

III. Registration and Licensing Rules

6. Registration period and renewals

A “.POHL” domain name may be registered, and renewed at the end of each registration period, subject to the current terms and conditions offered by the concerned Registrar.

7. Licensing of domain name registrations

DVAG may, in its sole discretion, elect to license the use of domain name registrations within the “.POHL” space to appropriate corporate divisions and other affiliated entities. In all cases, however, DVAG will remain the registrant of record for all domain name registrations within the TLD, and shall retain the authority to modify or terminate such registrations at any time via the concerned registrar.

IV. Acceptable Usage Guidelines for “.DVAG” Domain Names

8. Acceptable Use

The “.POHL” space is intended to function as the DVAG’s online communications platform, and as such the registrations therein should generally support the goals and mission of the organization.

DVAG intends that no domain name in the “.POHL” space shall be used in a manner which:

- infringes any other third parties rights
- is in breach with any applicable laws, government rules or requirements

or for the purposes of:

- undertaking any illegal or fraudulent actions, including spam or phishing activities, or
- defaming DVAG or its businesses, affiliates, brokers, employees, etc.

DVAG will routinely monitor the use of all domain names registered in the “.POHL” space to ensure that the content displayed thereon is in the best interests of the company and its business endeavors. Failure to comply with the terms and conditions set out in this Registration and Use Policy may result in the immediate cancellation, transfer, deletion or suspension of a registered “.POHL” domain. The Registry Operator reserves the right to make any necessary changes to a domain name registration in the event of breach of the provisions herein established.

9. Dispute Resolution

The Registry Operator for “.POHL” will comply with all dispute resolution mechanisms as defined in the Registry Agreement Specification 7 article 2, and as revised from time to time by ICANN consensus policies and procedures. Registrants of “.POHL” domain names hereby agree to be bound by all applicable domain name dispute policies, as outlined in this Registration and Use Policy.

These dispute mechanisms include, but are not limited to:

- the Trademark Post-Delegation Dispute Resolution Procedure (“PDDRP”);
- the Uniform Rapid Suspension system (“URS”); and
- the Uniform Domain Name Dispute Resolution Policy (“UDRP”).