

Legal structure

Umbrella FCP (*Fonds Commun de Placement*) pursuant to Part I of the Luxembourg Law of 17 December 2010 on undertakings for collective investment in its latest version ("**Law of 17 December 2010**").

Notes

Units of the investment fund **MEAG FlexConcept** (the "**Fund**") and its sub-funds (the "**Sub-funds**") described in this sales prospectus (the "**Sales Prospectus**") and in the Management Regulations contained in Annex III are, as shown in Annex I for each Sub-fund, may be reserved for natural persons, professional investors who qualify as such in accordance with Luxembourg laws and regulations and/or institutional investors pursuant to Article 174 of the Luxembourg Law of 17 December 2010, e.g. for management and insurance companies, fund of fund managers and finance sector professionals, as defined from time to time by the Luxembourg financial sector supervisory authority, the *Commission de Surveillance du Secteur Financier* (the "**CSSF**"), which act in their own name and on their own behalf, but based on agreed asset management contracts for third party assets which can be invested in Sub-fund units. The Management Company of the Fund reserves the right to compulsorily redeem any units from investors at the redemption price (as described in Chapter 17) if an investor does not satisfy the applicable requirements for the respective Sub-fund.

The Fund or a Sub-fund may be part of a unit-linked life insurance product offered by an **insurance group**. Part of this product is a reinsurance contract between the insurance group's companies and New Reinsurance Company Ltd. Zurich, a 100% subsidiary of "Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft in München". In order to be able to undertake the calculations connected with the performance of the Fund under the reinsurance policy, New Reinsurance Company Ltd. and Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft in München receive the statements of assets and the lists of portfolio data as well as inflows and outflows on a daily basis. In order to make management of the life insurance product as efficient as possible, New Reinsurance Company Ltd. and Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft in München receive the up-to-date trading parameters and order data for each respective trading day before trading is carried out. For administrative purposes and calculations relating to the unit-linked life assurance product, the respective insurance group receives the statement of assets and the lists of portfolio data as well as inflows and outflows for the relevant Sub-fund on a daily basis.

Only those employees of New Reinsurance Company Ltd, Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft in München and the insurance group, are given access to the aforementioned information (statements of assets, lists of portfolio data and inflows and outflows, up-to-date trading parameters and order data, hereinafter referred to as "**Information**"), to the aforementioned extent, who are involved in the calculations relating to the reinsurance policy and the unit-linked life assurance product and/or corresponding administrative tasks, and who must therefore have access to the Information. In accordance with the Core

Principles of Munich Re Group, these employees may only use the Information for the aforementioned calculations and administrative tasks, and they are subject to corresponding insider rules, which oblige them to observe confidentiality when handling the Information and forbid them to pass the Information to third parties without authorisation or to use the Information for personal transactions.

Depending on the context, the term "**Fund**" should also be read and understood as referring to the Fund's Sub-funds.

This Sales Prospectus, the Key Information Document and the Management Regulations are only valid in conjunction with the respective most recently published annual report, the reporting date of which may not be more than 16 months ago. If the reporting date of the annual report is more than 8 months ago, the buyer must also be provided with the semi-annual report. Units are purchased based on the Fund's Sales Prospectus and Management Regulations. The Sales Prospectus, the Key Information Document, the Management Regulations and the most recent annual or semi-annual report are offered to investors before they subscribe for the units, and, at the investor's request, delivered to them free of charge as a printed version and/or in electronic form.

This Sales Prospectus may be translated into other languages. If there are any contradictions or ambiguities in a translation, the English version takes precedence.

The Sales Prospectus comprises a general section and Annexes. The provisions of the general section apply to all the Sub-funds set up under the Fund unless specified otherwise for the respective Sub-fund in Annex I. Investors investing in a specific Sub-fund should therefore also take note of the information concerning the respective Sub-fund that is contained in Annex I.

The Sales Prospectus, the Key Information Document, the Management Regulations and the applicable annual or semi-annual report can be obtained without charge from the Management Company, the Depositary, the sales agents and the Central Administrative Agent in paper or electronic form.

It is not permitted to provide information or statements that differ from the Sales Prospectus. Any purchase of units based on information or declarations not contained in the Sales Prospectus or the documents referred to therein is made solely at the investor's risk.

Investors are advised to stay informed about any legal or tax consequences, foreign exchange restrictions or controls under the legislation of the state of which they are a citizen or where they reside or have their usual place of residence, as these pertain to the subscription, purchase, ownership, redemption or transfer of units.

In the Sales Prospectus, reference is made to the investment risks associated with investing in the Fund. Investors should read and consider these risks carefully before purchasing any units.

No guarantee can be given that the objectives of the investment policy will be achieved.

By purchasing a unit, the investor acknowledges the Sales Prospectus, the Key Information Document, the Management Regulations and all approved and published changes thereto.

Future investors should read through this Sales Prospectus carefully. In case of questions, in particular regarding the investment principles set out in Chapter 7 and Annex I, or of questions relating to the risk information shown in Chapter 9, they should seek advice from their lawyer, tax adviser and/or financial adviser.

The approval of the Fund by the CSSF must under no circumstances or in any way be construed as suggesting a positive assessment by the CSSF of the quality of the units offered for sale.

The sale of the Sub-funds described in this Sales Prospectus may be or become restricted, or be made subject to restrictions, under other legal systems. Investors must inform themselves about such restrictions and comply with them. This Sales Prospectus does not constitute an offer in those legal systems where such an offer is prohibited or vis à vis persons to whom it would be illegal to make such an offer.

The Management Company may restrict or prevent the ownership of units by specific persons if in its opinion such ownership could damage the Fund or constitute a breach of Luxembourg or foreign laws or legal provisions, or if the Fund could thereby be made subject to the laws (for instance tax laws) of a state other than Luxembourg.

Units of the Sub-funds referred to in this Sales Prospectus may not be offered, sold or supplied within the United States of America or to US citizens.

In particular, the units are not intended to be sold or distributed in the United States of America or to US citizens. Natural persons who are considered subject to US taxation include those who, for instance,

- were born in the USA or one of its territories or dependencies,
- are naturalised citizens (e.g. Green Card holders),
- were born abroad as the child of a citizen of the USA,
- reside mainly in the USA although they are not citizens of the USA, or
- are married to a US citizen.

Legal entities considered subject to taxation in the USA include, for instance:

- companies and corporations founded under the laws of one of the 50 US federal states or the District of Columbia,
- companies or partnerships founded under an Act of Congress, or
- pension funds founded as US trusts if:
 - (a) a court within the USA is able to exert primary oversight over the administration of the trust; and
 - (b) one or more US citizen(s) is/are authorised to make all the material decisions relating to the trust.

Contents

1. The Fund	5	21. Publications	29
2. Management Company	5	22. Fund taxes	30
3. Depositary and Paying Agent	5	23. Fund fees and costs	32
4. Investment management	6	24. Financial Year	34
5. Central administrative agent and Registrar and Transfer Agent	7	25. Fund term	34
6. Investment objective and policy	7	26. Liquidation and merger of the Fund and Sub-funds	34
7. Investment principles and limits	8	27. Coming into force of and changes to the Management Regulations	35
8. Risk management procedure	14	28. Data protection	35
9. Risk information	15	29. Data transfers in the context of outsourcing	36
10. Units, unit classes	22	30. Applicable law, jurisdiction and contractual language	36
11. Dividend policy	23	Annex I: Special Section relating to the individual Sub-funds	38
12. Net Asset Value	23	MEAG FlexConcept – Basis	39
13. Determination of the Net Asset Value	23	MEAG FlexConcept – Wachstum	43
14. Issue of units	24	MEAG FlexConcept – EuroGrowth	48
15. Prevention of Money Laundering and Terrorist Financing	26	MEAG FlexConcept – EuroBond	53
16. Late Trading and Market Timing	26	MEAG FlexConcept – BESTioUSD	65
17. Redemption of units	27	Annex II: Additional information for investors	75
18. Conversion of units	28	Additional information for investors	75
19. Subscription, conversion and redemption orders	28	Additional information for investors in the Federal Republic of Germany	75
20. Suspension of the issue, conversion and redemption of units, and suspension of the calculation of net asset value	28	Annex III: Management Regulations	76
		Annex IV: Data Protection Notice for investors (version dated June 2022)	94

Organisation and administration

Management Company

Hauck & Aufhäuser Fund Services S.A.
R.C.S. Luxembourg NR. 28878
1c, rue Gabriel Lippmann
L-5365 Munsbach
Grand Duchy of Luxembourg

Board of Managers of the Management Company

Elisabeth („Lisa“) Backes
Christoph Kraiker
Wendelin Schmitt

Investment Managers as indicated in the Special Section for each Sub-fund

MEAG MUNICH ERGO Kapitalanlagegesellschaft mbH
Am Münchner Tor 1
D-80805 Munich
Federal Republic of Germany

Munich Re Investment Partners GmbH
Königinstraße 107
D-80802 Munich
Federal Republic of Germany

Depository and paying agent in Luxembourg

Hauck Aufhäuser Lampe Privatbank AG, Niederlassung Luxembourg
1c, rue Gabriel Lippmann
L-5365 Munsbach
Grand Duchy of Luxembourg

Central Administrative Agent and Registrar and Transfer Agent

Hauck & Aufhäuser Fund Services S.A.
1c, rue Gabriel Lippmann
L-5365 Munsbach
Grand Duchy of Luxembourg

Facilities agent in the Federal Republic of Germany

Hauck & Aufhäuser Fund Services S.A.
1c, rue Gabriel Lippmann
L-5365 Munsbach
Grand Duchy of Luxembourg

Auditor of the Fund

Ernst & Young S.A.
35E, Avenue John F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

Supervisory authority of the Fund and the Management Company

Commission de Surveillance du Secteur Financier
283, Route d'Arlon
L-2991 Luxembourg
Grand Duchy of Luxembourg

1. The Fund

MEAG FlexConcept (the "**Fund**") described in this Sales Prospectus is an investment fund (*fonds commun de placement*) with several Sub-funds (the "**Sub-funds**") that is set up under Luxembourg law as an "umbrella fund". It has been established for an indefinite period of time and is registered with the Trade and Companies Register of Luxembourg (RCSL) under number K 306. The Fund falls within the scope of Part I of the Law of 17 December 2010.

The Management Regulations of the Fund are appended to this Sales Prospectus as Annex III. The Management Regulations entered into force on 3 April 2013 and a notice of filing with the Trade and Companies Register of Luxembourg was published on 5 April 2013 in the "*Mémorial, Recueil des Sociétés et Associations*", the Official Gazette of the Grand Duchy of Luxembourg ("*Mémorial*").

The Management Regulations were last amended on 1 October 2022 with effect from 1 October 2022, and the amended version was filed with the Trade and Companies Register of the Luxembourg District Court. Notice of this filing was published in the *Recueil Electronique des Sociétés et Associations* ("*RESA*").

By acquiring units in the respective Sub-fund, investors accept the Fund's contractual terms as contained in this Sales Prospectus and the Management Regulations.

The minimum capital of the Fund, which must be attained within six months of its approval by the CSSF, is 1,250,000.00 euros at the time of completion of this Sales Prospectus.

2. Management Company

The Fund is managed by Hauck & Aufhäuser Fund Services S.A. Hauck Aufhäuser Lampe Privatbank AG is the sole shareholder of this company.

The Management Company was incorporated for an unlimited period in the form of a joint-stock company under Luxembourg law on 18 July 1989. It is based in Luxembourg. The articles of the Management Company were published in *Mémorial C, Recueil des Sociétés et Associations* of 22 September 1989 and are filed in the commercial and companies register. Interim amendments have been published in *Mémorial C, Recueil des Sociétés et Associations*.

The purpose of the Management Company is to launch and manage Undertakings for Collective Investment ("UCIs") according to Luxembourg law and to perform all activities pertaining to the launch and management of these UCIs. Moreover, the Management Company performs activities as defined in the Luxembourg law of 12 July 2013 on alternative investment fund managers (AIFM Law). In particular, these include the activities described in Annex I, clause 1. of the aforementioned law, as well as the partial activities specified

under additional administrative functions in Annex I, clause 2. a).

The Management Company's responsibilities include any general administrative tasks that arise in the course of the Fund management and that are required by Luxembourg law. These tasks comprise, in particular, calculating the net asset value of the units of the Sub-funds and Fund accounting.

On 1 December 2011 the Management Company transferred, at its own cost and under its own responsibility and control, the calculation of the net asset value, the Fund accounting and reporting to Hauck Aufhäuser Lampe Privatbank AG, Niederlassung Luxemburg, with registered offices at 1c, rue Gabriel Lippmann, L-5365 Munsbach, as of 1 December 2011.

The IT administration of the Hauck Aufhäuser Lampe Group is distributed across the locations of Luxembourg and Germany.

Client deposits may only be received by the Depositary or the paying agents.

3. Depositary and Paying Agent

Hauck Aufhäuser Lampe Privatbank AG, Niederlassung Luxemburg, based at 1c, rue Gabriel Lippmann, 5365 Munsbach, Grand Duchy of Luxembourg, and entered in the Luxembourg commercial and companies register under the number B 175937, was appointed as the Depositary and principal paying agent of the Fund (the "Depositary") by way of a written agreement. The Depositary is a branch of Hauck Aufhäuser Lampe Privatbank AG, Kaiserstr. 24, 60311 Frankfurt am Main, Germany, a German credit institution with a full banking licence under the terms of the German Banking Act (KWG) and under the terms of the Luxembourg Law of 5 April 1993 on the Financial Sector (as most recently amended). It is entered in the commercial register of Frankfurt am Main Local Court under the number HRB 108617. Both Hauck Aufhäuser Lampe Privatbank AG and its branch in Luxembourg are supervised by the Federal Financial Supervisory Authority (BaFin).

Hauck Aufhäuser Lampe Privatbank AG, Niederlassung Luxemburg, is also subject to the supervision of the CSSF in terms of liquidity, money laundering and market transparency.

All of the Depositary's tasks and obligations are executed by the branch. Its function particularly complies with the Law of 17 December 2010, the CSSF 16/644 circular, the Depositary Bank agreement and the Sales Prospectus. As the paying agent, to the Depositary shall pay out any distributions and the redemption price on redeemed units and other payments.

According to Article 3 of the Management Regulations the Depositary may transfer the performance of its task of keeping

financial instruments and other assets in safe custody to another company ("Sub-Custodian"). A corresponding overview of any Sub-Custodians appointed is provided on the Management Company's website (<https://www.hal-privatbank.com/impressum>).

The Management Company has not been made aware by the Depositary of any conflicts of interests relating to Sub-Custodians.

During the performance of its tasks, the Depositary acts independently, honestly, fairly and professionally, as well as in the interests of the Fund and its investors. This obligation is particularly reflected in the duty to carry out and organise activities as the Depositary in such a way that potential conflicts of interests are largely minimised. The Depositary does not perform any tasks relating to the Fund or the Management Company acting on the Fund's behalf that might create conflicts of interests between the Fund, the investors in the Fund, the Management Company and itself, even if the performance of its tasks as Depositary is functionally and hierarchically separate from its potentially conflicting tasks, and even if the potential conflicts of interests are properly identified, managed, observed and disclosed to the investors in the Fund.

The tasks of the Management Company and of the Depositary may not be performed by one and the same company.

Conflicts of interests may arise due to there being a corporate link between the Management Company and the Depositary. If Hauck Aufhäuser Lampe Privatbank AG, Niederlassung Luxemburg, does perform the Depositary function, it is obligated to protect the interests of the Fund and the unitholders.

Potential conflicts of interests may arise if the Depositary transfers individual depositary or sub-custodian tasks to another outsourcing company. If this other outsourcing company is a company affiliated with the Management Company or the Depositary (e.g. parent company), this might result in potential conflicts of interests in interactions between this outsourcing company and the Management Company or the Depositary (e.g. the Management Company or the Depositary might give preference to a company affiliated with itself when awarding depositary tasks or might prefer another equivalent provider when selecting the Sub-Custodian). If such a conflict of interests or another conflict of interests relating to the sub-custody of the assets of the Fund is identified in the future, the Depositary will disclose the detailed circumstances and the measures taken to prevent or minimise the conflict of interests in the document available via the above-mentioned link.

Conflicts of interests may also arise if the Depositary performs administrative tasks as per Annex II, second indent of the Law of 17 December 2010, e.g. tasks of the registrar and transfer agent, fund accounting. In order to manage these potential conflicts of interests, the relevant area of responsibility is divisionally separate from the Depositary function.

The Management Company and the Depositary have appropriate and effective measures (e.g. procedural instructions and organisational measures) in order to ensure that potential conflicts of interests are largely minimised. If conflicts of interests cannot be prevented, the Management Company and the Depositary shall identify, manage, observe and disclose these conflicts of interests in order to eliminate any damage to investors' interests. Compliance with these measures is monitored by an independent compliance

function.

The Management Company must be made aware by the Depositary of the aforementioned information regarding the conflicts of interests relating to the sub-custody of the Fund. The Management Company has checked the plausibility of the information. It is, however, dependent on the Depositary providing information and cannot check that it is correct and complete in detail. The aforementioned list of Sub-Custodians may change at any time. Updated information relating to the Depositary, its Sub-Custodians and any conflicts of interests pertaining to the Depositary that arise due to the transfer of the Depositary function is available from the Management Company or the Depositary upon request.

The assets of the Fund are held in safe custody by the Depositary within its network of depositaries.

Any bank deposits held by credit institutions other than the Depositary may conceivably not be protected by any institution for securing deposits.

4. Investment management

The Management Company is responsible for investing the Sub-fund assets. However, the Management Company may appoint one or more investment managers or use the services of investment advisers in the day-to-day implementation of the investment policy.

The Management Company may appoint an investment manager for each Sub-fund, acting under the supervision and responsibility of the Management Company.

"Investment Manager" means

- MEAG MUNICH ERGO Kapitalanlagegesellschaft mbH, Am Münchner Tor 1, D-80805 Munich, Germany;
- Munich Re Investment Partners GmbH, Königinstraße 107, D-80802 Munich, Germany

or such other entity, that may subsequently be appointed as investment manager of the Fund or a Sub-Fund by the Management Company. Hereinafter referred to individually as the "Investment Manager".

MEAG MUNICH ERGO Kapitalanlagegesellschaft mbH is a limited liability company according to the law of the Federal Republic of Germany and an investment firm within the meaning of the German Kapitalanlagegesetzbuch (KAGB) which is supervised by the Federal Financial Supervisory Authority (BaFin) in Germany. Its activities are the administration, on behalf of others and with decision-making authority, of individual assets that are invested in financial instruments or real estate (financial and real estate portfolio management) as well as the provision of advice to other people regarding investments in financial instruments or real estate (investment advice). As at 31 December 2022 the Investment Manager manages a total of approx. 99.5 billion euros for private and institutional clients. Under company law the Investment Manager is a 100% subsidiary of MEAG MUNICH ERGO AssetManagement GmbH.

Munich Re Investment Partners GmbH is a limited liability company according to the law of the Federal Republic of Germany and an investment firm within the meaning of the Investment Firm Act ((Wertpapierinstitutsgesetz - WpIG) which is supervised by the

Federal Financial Supervisory Authority (BaFin) in Germany. Under company law the Investment Manager is a 100% subsidiary of Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft in München.

Such Investment Manager will be responsible for purchasing, selling and managing investments for the account of each Sub-fund, subject to compliance with the Investment Objective, Investment Policy and Investment Powers and Restrictions. This includes the analysis of suitable investment instruments, and the taking and implementation of investment decisions, in particular the purchase, sale, subscription, conversion and acceptance of assets, and the exercising of all the rights directly or indirectly associated with the Sub-fund assets.

5. Central administrative agent and Registrar and Transfer Agent

In its role as the Fund's central administrative agent and Registrar and Transfer Agent (collectively the "**Central Administrative Agent**"), Hauck & Aufhäuser Fund Services S.A. will in particular undertake or be responsible for the bookkeeping, including the calculation of the net asset value and the drawing up of the annual and semi-annual reports for the Fund and/or the Sub-funds, and it will keep and update any unit registers and undertake the transfer of units in connection with the issue and redemption of units.

In connection with its duties, the Central Administrative Agent may use the services of a third party, subject to it retaining responsibility and oversight, and the approval of the Board of Managers of the Management Company. Remuneration for third party services connected to the transfer of tasks is paid exclusively by the Central Administrative Agent.

6. Investment objective and policy

The Management Company determines the investment objective and investment policy of the Sub-funds as follows.

6.1 Investment objective

The aim of the Sub-funds' investment policy is to achieve continual, long-term growth in value. This entails the Fund assets being invested – in accordance with the principle of risk diversification and the investment principles and restrictions set out in Chapter 7 – in securities and/or other liquid financial investments within the meaning of the Law of 17 December 2010.

he Sub-funds' investment objectives are laid down in Annex I of this Sales Prospectus.

6.2 Investment policy

The Sub-funds' investment policies are shown in Annex I of this Sales Prospectus.

6.3 Investment process

As part of the investment process, the Investment Manager includes all relevant financial risks in its investment decision and evaluates them on an ongoing basis. This also takes into account all relevant

sustainability risks that can have a significant negative impact on the return on an investment, as well as the most important adverse effects of an investment decision on sustainability factors. Sustainability factors include environmental, social and employee issues, respect for human rights and the fight against corruption and bribery.

Relevant financial risks

The relevant financial risks include in particular

- Market risk
- Counterparty risk
- Credit risk
- Liquidity risk

These relevant and other financial risks are laid down in section 9. 'risk information' and are examined as part of the securities analysis, which is part of the investment process, before the investment decision is made. The check is based on balance sheet figures, the profit and loss accounts or fundamental balance sheet and company analysis.

Relevant sustainability risks

A sustainability risk is an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the Sub-fund, the Index or an investment. The Investment Manager evaluates sustainability risks on the basis of ESG sustainability ratings and ESG reports, provided by an external data provider. These analyse the financially material opportunities and risks, which are based on environmental, social and corporate governance factors. ESG ratings are used as a source of specialized information to identify and assess ESG risks. A detailed analysis based on these reports enables the identification of optimal management practices in a sector comparison and identification of hidden ESG risks and opportunities that traditional financial analysis does not capture. ESG Ratings examine the extent to which issuers are exposed to special and, above all, material risks and what they do to manage these risks. Issuers that are exposed to higher risks must have advanced risk management strategies in order to achieve a good rating. In addition, the rating process examines how the respective issuer succeeds in using opportunities in the environmental and social field as a competitive advantage.

Where the sustainability risk assessment leads to the conclusion that there are no sustainability risks deemed to be relevant to the Fund or Sub-fund, the reasons for this are explained.

Where the sustainability risk assessment leads to the conclusion that the corresponding risks are relevant, the extent to which sustainability risks can influence the performance of the financial product is disclosed. For more information, see the Special Section in the sales prospectus relating to the specific Sub-fund.

Further information on the inclusion of sustainability risks in the investment processes, including the aspects of organization, risk management and the management of such processes, can be found on the Internet at www.MEAG.com and www.munichreinvestmentpartners.com.

6.4 Main adverse effects on sustainability factors

Investment decisions and advice might cause, contribute to or be directly linked to effects on sustainability factors that are negative, material or likely to be material.

Principal adverse impacts on sustainability are those impacts of investment decisions that result in negative effects on sustainability factors.

Further information from the Management Company on the measures taken to identify and prioritise the main adverse effects on sustainability factors and the measures taken to address them, as well as information on the participation policy of the Management Company and the Investment Managers will be published at the website: www.hal-privatbank.com, www.MEAG.com and www.munichreinvestmentpartners.com.

Information on the main adverse impacts on sustainability factors of the Fund and its Sub-funds will be published in the annual report from the initial inclusion.

6.5 Investor profile/Fund risk category/Investment risk

The profile of the typical investor is shown for each Sub-fund in Annex I.

Due to its investment strategy and policy, the Fund is in particular associated with the risks that arise in relation to investments in bonds, equities and money markets. However, the Investor's attention is drawn to the fact that the investment policy can be implemented through the use of derivatives. The use of derivatives entails an increased investment risk. Therefore, attention has to be paid in particular to the risks in connection with derivatives transactions and swaps (see clauses 9.25 and 9.26) in connection with this Fund. Finally, the risks of a change in taxation conditions for a private investor liable to taxation in Germany should be emphasised in connection with the achievement of the investment objective.

7. Investment principles and limits

7.1 The following definitions apply:

"Non-EU member state": A non-EU member state is any state which is not an EU member state.

"First Class Financial Institution": Financial institutions deemed to be first-class are financial counterparties selected by the Management Company which have at least a single A rating, are subject to continuous supervision by a public body, and have experience in this type of transaction. In addition, these counterparties must be financially sound and have the organisational structure and resources that they need in order to provide the services on behalf of the Fund. Insurance and reinsurance companies are likewise included in this definition.

"Money market instruments": Instruments usually traded on the money market, which are liquid, and the value of which can be precisely determined at any time.

"Regulated market": A market within the meaning of Directive 2004/39/EC of the European Parliament and the Council of 21 April 2004 on markets in financial instruments.

"Member state": A member state of the European Union. States that are party to the Agreement on the European Economic Area but are not members of the European Union are treated within the limits of this agreement and associated contracts as being equivalent to the member states of the European Union.

"UCI": Undertaking for collective investment.

"UCITS": Undertaking for collective investment in transferable

securities, which is subject to Directive 2009/65/EC.

"Directive 2009/65/EC": Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of legal and administrative regulations relating to certain undertakings for collective investment in transferable securities (UCITS) (including subsequent amendments and supplements).

"Transferable securities":

- shares and other securities that are equivalent to shares ("**shares**")
- debenture bonds and other certified debt securities ("**debt securities**")
- any other marketable securities which provide an entitlement to purchase securities through subscription or conversion, with the exception of the techniques and instruments listed in clause 7.7. below.

For clarification purposes, we point out that also in this section, depending on the context, the term "Fund" may also have to be read and understood as also referring to the Sub-funds.

7.2 The Fund's investments may only consist of:

- (a) transferable securities and money market instruments which are admitted to or traded on a regulated market;
- (b) transferable securities and money market instruments traded on another market in a member state which is regulated, operates regularly and is recognised and open to the public;
- (c) transferable securities and money market instruments admitted to official listing on a stock exchange of a state in Europe, Asia or Oceania (including Australia), the American continents or Africa or traded on another market of a state in Europe, Asia or Oceania (including Australia), the American continents or Africa, which is regulated, operates regularly, is recognised and open to the public;
- (d) newly issued transferable securities and money market instruments, provided that:
 - the terms of the issue include an undertaking that application will be made for admission to official listing on a stock exchange or on another regulated market referred to in paragraphs (a) to (c) of this section; which operates regularly, is recognised and open to the public, and
 - the admission is secured within one year of issue.
- (e) units of UCITS which are authorised according to Directive 2009/65/EC, and/or of other UCIs within the meaning of Article 1 (2) (a) and (b) of Directive 2009/65/EC, whether or not established in a member state, provided that:
 - such other UCIs are authorised under laws which provide that they are subject to supervision considered by the CSSF to be equivalent to that laid down under European Union law (currently the United States of America, Canada, Switzerland, Norway, Hong Kong and Japan), and that cooperation between authorities is sufficiently ensured;
 - the level of protection for unitholders in other UCIs is equivalent to that provided for unitholders in a UCITS and, in particular, the rules on asset segregation, borrowing, lending and uncovered sales of transferable securities and money market instruments are equivalent to the requirements of Directive 2009/65/EC;
 - the business of the other UCIs is reported in semi-annual and annual reports to enable assessment of the assets and liabilities, income and operations over the reporting period;
 - no more than 10% of the assets of the UCITS or of other UCI,

whose acquisition is contemplated, can, according to their management regulations or constitutive documents, be invested in aggregate in units of other UCITS or UCIs;

- (f) deposits with a credit institution which are repayable on demand or have the right to be withdrawn, and maturing in no more than 12 months, provided that the credit institution has its registered office in a member state of the EU or – if the registered office of the credit institution is in a non-EU member state, provided that it is subject to prudential rules considered by the CSSF to be equivalent to those laid down in European Union law;
- (g) financial derivative instruments ("**derivatives**"), including equivalent cash-settled instruments traded on regulated market referred to in the aforementioned items (a), (b) and c), and/or financial derivative instruments which are not traded on a stock exchange ("**OTC derivatives**"), in accordance with the investment policies and investment objectives of the Sub-fund as stated in Annex I, provided that:
- the underlying assets consist of instruments within the meaning of items (a) to (h) or financial indices, interest rates, foreign exchange rates or currencies;
 - the counterparties to OTC derivative transactions are institutions subject to prudential supervision, and belonging to the categories approved by the CSSF;
 - the OTC derivatives are subject to reliable and verifiable valuation on a daily basis, and can, at any time and at the initiative of the Fund, be sold, liquidated, or closed by an offsetting transaction at any time at their fair value, and
 - Unless otherwise set forth in the Special Section for each Sub-fund, the counterparty in relation to the financial derivative instruments is a financial institution that has to fulfil the following conditions:
 - being authorised by and subject to ongoing supervision by a public financial authority;
 - either being located in the European Economic Area, Switzerland or in a country belonging to the group of ten leading industrial nations (G10);
 - having at least an investment grade rating; and
 - being experienced in such transactions.
- (h) money market instruments that are not traded on a regulated market and do not fall within the above definition, provided that the issuer or the issuer of such instruments is itself regulated for the purpose of protecting investors and savings, and provided they:
- are issued or guaranteed by a central, regional or local authority or the central bank of a member state, the European Central Bank, the EU or the European Investment Bank, a non-EU country or, in the case of a federal state, by one of the members making up the federation, or by an international body with public character to which at least one member state belongs, or
 - are issued by an undertaking, the securities of which are traded on regulated markets as defined in (a), (b) and (c) above, or
 - are issued or guaranteed by an establishment subject to official supervision in accordance with the criteria laid down in EU law, or by an establishment that is subject to and complies with prudential rules which, in the view of the CSSF, are at least as stringent as those laid down by European Union law, or
 - are issued by other bodies belonging to a category approved by the CSSF, provided that investor protection rules apply to

investments in such instruments which are equivalent to those of the first, second or third indent and provided that the issuer is either a company whose capital and reserves amount to at least ten million euros (EUR 10,000,000) and which compiles and publishes its annual accounts in compliance with the provisions of Directive 2013/34/EU, or is an entity within a group of companies which includes one or more listed companies and is responsible for the financing of this group or is an entity dedicated to the financing of securitization vehicles that benefit from a banking liquidity line.

7.3 The Fund may also:

- (a) invest up to 10% of its net assets in securities and money market instruments other than those stated in clause 7.2 above;
- (b) hold up to 20% of its net assets in liquid funds;
- (c) take out short-term loans up to the equivalent of 10% of its net assets. Hedging transactions in connection with the sale of options or the purchase or sale of futures contracts and futures are not deemed to be borrowings within the meaning of this investment restriction;
- (d) acquire foreign currency through a back-to-back transaction (i.e. a sale that is immediately covered by a purchase).

7.4 In addition, the Fund shall abide by the following investment restrictions when investing its assets:

- (a) The Fund may invest a maximum of 10% of its net assets in transferable securities or money market instruments issued by the same body. It may invest a maximum of 20% of its net assets in deposits made with one and the same body.

The risk exposure to a counterparty of the Fund in OTC derivatives transaction with the one and the same counterparty may not exceed 10% of its net assets when the counterparty is a credit institution within the meaning of clause 7.2 (f). In other cases, the maximum limit is 5% of the Fund's net assets.

- (b) The total value of the transferable securities and money market instruments of issuers with each of which the Fund invests more than 5% of its net assets shall not exceed 40% of the value of its net assets. This restriction does not apply to deposits and OTC derivatives transactions made with financial institutions subject to prudential supervision.

Notwithstanding the individual limits stated in (a), the Fund shall not combine the following if this leads to an investment of more than 20% of its net assets with the same institution:

- investments in transferable securities or money market instruments issued by that body, and/or
- deposits with that body, and/or
- exposures arising from OTC derivatives transactions undertaken with that institution.

- (c) The upper limit stated in the first sentence of clause 7.4 (a) is a maximum of 35% if the transferable securities or money market instruments are issued or guaranteed by a member state of the European Union or its local authorities, by a non-EU member state, or by public international bodies to which one or more member states belong.

- (d) The upper limit stated in the first sentence of clause 7.4 (a) is a maximum of 25% for certain bonds if they are issued by a credit institution with its registered office in a member state of the European Union and which, on the basis of legal provisions for the protection of holders of such bonds, is subject to specific public supervision designed to protect bondholders. In

particular, sums deriving from the issue of those bonds must be invested in accordance with the law in assets which, during the whole period of validity of the bonds, are capable of covering claims attaching to the bonds and which, in the event of bankruptcy of the issuer, would be used on a priority basis, for the reimbursement of the principal and payment of the accrued interest .

Where the Fund invests more than 5% of its net assets in bonds within the meaning of the first sub-paragraph which are issued by a single issuer, the total value of such investments may not exceed 80% of the value of the net assets of the UCITS.

- (e) The transferable securities and money market instruments referred to in clause 7.4 (c) and (d) shall not be taken into account when applying the investment limit of 40% stipulated in clause b) above.

The limits specified in clause 7.4 (a) to (d) shall not be combined; thus investments in transferable securities or money market instruments of one and the same issuer or in deposits or derivative instruments made with such issuer or issued by it carried out in accordance with clause 7.4 (a), (b), (c) and (d), shall not exceed in total 35% of the net assets of the Fund.

Companies that belong to the same group of companies for the purposes of consolidated accounts as defined in accordance with Directive 2013/34/EU or according to recognised international accounting rules, shall be regarded as a single body for the purpose of calculating the investment limits set out in clause (a) to (e) above.

The Fund may cumulatively invest up to a limit of 20% of its net assets in transferable securities and money market instruments within the same group.

- (f) Notwithstanding the investment limits set out in clause 7.4 (k), (l) and (m) below, the upper limits for investments in equities and/or debt securities of a single issuer as are specified in clause 7.4 (a) to (e) are raised to a maximum of 20% for investments in shares and/or debt securities issued by the same body when the aim of the Fund's investment policy is to replicate the composition of a certain stock or debt-security index that is recognised by the CSSF, on the following basis

- the composition of the index is sufficiently diversified;
- the index represents an adequate benchmark for the market to which it refers;
- the index is published in an appropriate manner.

- (g) The limit laid down in clause 7.4 (f) is raised to 35% if this is justified based on exceptional market conditions and, in particular, in regulated markets where certain transferable securities or money market instruments are highly dominant.

An investment up to this limit is only permitted for a single issuer.

- (h) **By way of derogation from the provisions of clause 7.4 (a) to (e), the Fund may, in accordance with the principle of risk-spreading, invest up to 100% of its net Sub-Fund assets in securities and money-market instruments of various issues issued or guaranteed by a Member State or its local authorities, or by an OECD country or public international bodies to which one or more Member States belong, provided that (i) such securities have been issued within the framework of at least six different issues; and (ii) not more than 30% of the net assets of the Fund are invested in securities of a single issue.**

- (i) The Fund may acquire units of other UCITS and/or other UCIs within the meaning of clause 7.2 (e) provided that it does not invest more than 20% of its net assets in a single UCITS or other UCI. When applying this investment limit, each Sub-fund of an umbrella fund is to be considered as a separate issuer, provided that the principle of segregation of the obligations of the various Sub-funds vis-à-vis third parties is ensured.

- (j) Investments in units of UCIs other than UCITS may not in aggregate exceed 30% of the Fund's net assets. If the Fund acquires units of a UCITS and/or other UCI, the assets of the respective UCITS and/or other UCIs do not have to be combined for the purposes of the limits laid down in clause 7.4 (a) to (e).

If the Fund acquires units of other UCITS and/or other UCIs which are managed, directly or indirectly by delegation, by the same management company or another company with which the management company is linked by common management or control or by a substantial direct or indirect holding, then that management company or other company may not charge subscription or redemption fees on account of the Fund investment in units of such other UCITS and/or other UCIs.

If the Fund invests a substantial proportion of its net assets in units of other UCITS and/or other UCIs, the maximum level of the management fees that may be borne by the Fund itself and by the other UCITS, and/or other UCIs in which the Management Company intends to invest the Fund Assets, the maximum proportion of management fees charged to both the Fund itself and to the UCITS and/or other UCI in which it invests must not exceed 4% in respect of such investments.

The maximum share of the management fees that may be charged to the Fund Assets and to the UCITS or and/or other UCIs in which the Fund Assets may be invested, is mentioned in the Fund's annual report as applicable.

- (k) The Fund may not acquire any shares carrying voting rights which would enable it to exercise significant influence over the management of the issuer.

- (l) Furthermore, the Fund may acquire no more than:

- 10% of the non-voting shares of the same issuer;
- 10% of the debt securities of the same issuer;
- 25% of the units of the same UCITS and/or other UCI;
- 10% of the money market instruments of any single issuer.

The investment limits stated in the second, third and fourth indents may be disregarded at the time of acquisition or if at that time the gross amount of debt securities or money market instruments or the net amount of units issued cannot be calculated.

- (m) The provisions in 7.4 (k) and (l) above are waived in relation to:

- transferable securities and money market instruments issued or guaranteed by a member state or its local authorities;
- transferable securities and money market instruments issued or guaranteed by a non-EU member state;
- securities and money market instruments issued by public international bodies of which one or more member states of the European Union belong(s);
- shares held by the Fund in the capital of a company incorporated in a non-EU member state, provided that (1) such company invests its assets mainly in securities of issuers having their registered office in that state, (2) where under

the legislation of that state, such a holding represents the only way in which the Fund can invest in the securities of issuing bodies of that state, and (3) in making its investments this company observes the investment restrictions set out in items (a) to (e) and (i) to (l) above.

- (n) The Fund must not acquire any precious metals or certificates relating to them.
- (o) The Fund must not invest in real estate, but investments in securities secured by real estate, and the related interest, and investments in securities issued by companies that invest in real estate, and related interest, are permitted.
- (p) Neither loans nor guarantees for third parties may be issued which are to be borne by the Fund, but this investment restriction does not prohibit the Fund from investing its net assets in securities, money market instruments or other financial instruments within the meaning of clause 7.2 (e), (g) and (h) which are not fully paid-up.
- (q) No short sales of securities, money market instruments or other financial instruments listed in clause 7.2 (e), (g) and (h) above may be carried out.

7.5 Irrespective of contrary provisions contained herein:

- (a) the Fund does not need to adhere to the investment limits specified in clauses 7.3 to 7.4 above when exercising subscription rights that are linked to securities or money market instruments;
- (b) and notwithstanding its obligation to adhere to the principle of risk diversification, the Fund may, during a period of six months following its approval by the CSSF, deviate from the provisions set out in clause 7.4 (a) to (j) above;
- (c) the Fund must, if these provisions are exceeded due to reasons outside the control of the Management Company or due to subscription rights, primarily strive to rectify the situation through its sale transactions, taking account of the interests of its investors;
- (d) if an issuer forms a legal entity incorporating several Sub-funds in which the Fund's assets only bear any liability in respect of the claims made by investors in this Sub-fund and creditors whose claim has arisen as the result of the foundation, term or liquidation of the Sub-fund, each Sub-fund is to be regarded as an independent issuer for the purposes of applying the risk diversification rules contained in clause 7.4 (a) to (g) and clause 7.4 (i) and (j).

The Management Company is entitled to apply additional investment restrictions if it is necessary to do so in order to comply with the legal and administrative provisions in countries where Fund units are offered for sale or sold.

7.6 Investments in Sub-funds

The Sub-funds may subscribe to, acquire and/or hold units which are to be issued or have been issued by one or more other Sub-funds if:

- the target Sub-fund is not itself invested in the Sub-fund which invests in that target Sub-fund, and
- the total share of the assets which the target Sub-funds that it is intended to purchase may, according to their Management Regulations, invest in units of other UCIs does not exceed 10%, and
- the voting right that may be associated with the units in question is suspended for as long as they are held by the Sub-fund

concerned, irrespective of any appropriate consideration in the end of year accounts and periodic reports; and

- the value of these units is not taken into account in the calculation of the net asset value of the Sub-fund which must be undertaken according to the Law of 17 December 2010 for the purpose of determining the minimum net asset value according to the Law of 17 December 2010 if these units are held by the respective Sub-fund; and
- there is no multiple charging of the fees for administration/ subscription or redemption, either at the level of the Sub-fund which has invested in the target Sub-fund, or at the level of the target Sub-fund.

7.7 Derivatives, techniques and instruments for efficient portfolio management

(a) General provisions

Unless otherwise provided for in the specific information for the individual Sub-fund, the Management Company may, for the account of the Fund, for the purposes of efficient portfolio management or the maturity or risk management of the portfolio, use derivatives that are approved for trading on a stock exchange or another organised market and for over-the-counter (OTC) transactions in accordance with the applicable laws and regulations, and the framework specified in this chapter, and in accordance with the investment objective and investment policy of the Sub-funds, including the provisions of the amended CSSF circular 08/356, and the ESMA Guidelines on ETFs and other UCITS issues (ESMA/2014/937) (the "ESMA guidelines").

Total return swaps are agreements in which one party (total return payer) transfers the total financial performance of a reference obligation to the other party (total return receiver). Total financial performance includes income from interest and fees, gains or losses from market movements, and credit losses. In general, total return swaps are unfunded derivatives, i.e. no upfront payment is made by the total return receiver at inception. However, a total return swap can be traded in a funded fashion, where the total return receiver pays an upfront amount in return for the total return of the reference asset. An unfunded total return swap allows both parties to gain exposure to a specific asset in cost-effective manner (the asset can be held without having to pay additional costs). In contrast, a funded total return swap is relatively costlier due to the upfront payment requirement. The total return swap transactions which may currently be entered into by each Sub-fund are unfunded OTC-total return swap transactions. By entering into the total return swap transactions, the Sub-funds participate in the performance of an index in return for payment of a variable monthly interest as further set out in the Special Section for each Sub-fund. The total return swap transaction does not imply the assets of the relevant Sub-fund's portfolio (i.e. bonds or other assets) as underlying of such transactions and the Sub-fund does not receive any assets from the swap counterparty, but participates in the index performance by the monthly payment of the return arising from the index performance, if any. As a consequence, there are no assets held in custody by the depositary, the counterparty or any third parties linked to the swap transactions.

Each Sub-fund may incur costs and fees in connection with total return swaps. In particular, a Sub-fund may pay fees to agents and other intermediaries, which may be affiliated with the Management Company, Depositary or Investment Manager in consideration for the functions and risks they assume. The

amount of these fees may be fixed or variable. Information on direct and indirect operational costs and fees incurred by each Sub-fund in this respect, as well as the identity of the entities to which such costs and fees are paid and any affiliation they may have with the Management Company, Depositary or Investment Manager, if applicable, may be available in the annual report of the Fund and, to the extent relevant and practicable, in the Special Section.

All revenues arising from total return swaps, net of direct and indirect operational costs and fees, will be returned to the relevant Sub-fund. Further information, to the extent relevant and practicable, may be disclosed in the Special Section of the respective Sub-fund.

If these transactions relate to the use of derivatives or financial instruments with derivative components within the meaning of Article 10 (1) of Directive 2007/16/EC, the conditions and limits must comply with the provisions of the preceding paragraphs and be derived from assets that may be purchased for the Fund, or from financial indices within the meaning of Article 9 (1) of Directive 2007/16/EC, interest rates, exchange rates or currencies.

Furthermore, the provisions of Chapter 8 below concerning risk management procedures in relation to derivatives must be taken into account.

All the income from the use of techniques and instruments for efficient portfolio management, less direct and indirect operational costs, accrues to the Fund in order to be reinvested in accordance with the Fund's investment policy.

The counterparties under the contracts for using techniques and instruments for efficient portfolio management are selected according to the principles for carrying out orders relating to the company's financial instruments (the "**Best Execution Policy**") based on the following criteria:

- price of the financial instrument,
- costs associated with order processing,
- speed of order processing,
- probability of order being carried out,
- quality of order handling,
- order size/scope of the orders,
- type of order,
- generation of ideas,
- service and
- research.

Orders can be executed regularly using various methods at various performance locations and with various counterparties (banks, brokers) in Germany or abroad. These counterparties will mainly be recipients of the direct and indirect costs and fees that are incurred in this context. The costs and fees to be paid to the respective counterparty or other third parties are negotiated according to market conditions.

Under no circumstances may the use of derivatives or other techniques and instruments for efficient portfolio management lead to the Fund deviating from its investment policy as described in this Sales Prospectus, or expose the Fund to significant additional risks which are not outlined in this Sales Prospectus.

The Fund may – in accordance with the provisions of the applicable laws and regulations, including CSSF circular 08/356 as amended by CSSF circular 11/512 and the ESMA guidelines –

reinvest cash which it receives as collateral in connection with the use of techniques and instruments for efficient portfolio management, so as to limit the previously described counterparty risks.

Furthermore, the reinvestment of cash which the Fund receives as collateral in connection with the use of techniques and instruments for efficient portfolio management is subject to the provisions of the following section (d) "Administration of collateral".

Every Sub-fund may incur costs and fees in connection with the use of techniques and instruments for efficient portfolio management. This may specifically lead to a Sub-fund having to pay fees to representatives or other agents which may be in a relationship with the Depositary, the Investment Manager or the Management Company – in recognition of the role carried out by them and the risk which they bear. These fees may either be of a fixed amount or be variable. Information relating to direct or indirect operational fees and costs incurred by each Sub-fund in this context as well as the identity of the parties to which they have been allocated and any relationship they may have to the Depositary, the Investment Manager and/or the Management Company, can be seen in the semi-annual and annual reports.

If one or more of the Sub-funds use derivatives or techniques and instruments for efficient portfolio management as described in this section 7.7 which fall within the scope of Regulation (EU) 2015/2365 of the European Parliament and Council of 25 November 2015 on Transparency of Securities Financing Transactions and of Reuse ("**SFTR**"), amending Regulation (EU) No 648/2012, the specific information referred to in Section B of the Annex to the aforementioned Regulation will be published in Annex I of this Sales Prospectus.

(b) Administration of collateral

For the purposes of this section, all the assets which the Fund receives in connection with the use of techniques and instruments for the efficient management of the portfolio are deemed to be "collateral". The Fund may accept any assets as a collateral which are listed in Section 2 (b) of CSSF circular 08/356, provided that these assets meet the requirements that are set out under the following clause (a) to (j). When concluding transactions involving OTC derivatives and using techniques and instruments for the efficient management of the portfolio, the Fund ensures that all the collateral used to reduce the counterparty risk fulfils the following conditions at all times:

- a. Liquidity – any non-cash collateral is highly liquid and traded on a regulated market or in a multilateral trading system with transparent setting of prices so that it can be sold promptly and at a price which is virtually equal to the pre-sale valuation. Collateral must also fulfil the provisions of Article 48 of the Law of 17 December 2010. The Sub-funds may receive and post collateral in the form of cash and non-cash collateral.
- b. Valuation – collateral is daily valued on each Business Day of the respective Sub-fund, and assets which are exposed to considerable price fluctuations are not accepted as collateral unless appropriate conservative valuation haircuts apply.
- c. Credit rating of the issuer – securities have a high credit rating.
- d. Independence – the collateral is provided by companies that are independent of the counterparty and do not display a high correlation with the performance of the counterparty.
- e. Collateral spread (concentration of assets) – It must be

ensured that the collateral is appropriately diversified in terms of countries, markets and issuers. The criterion of appropriate diversification in relation to the concentration of issuers is considered to be met if in the case of efficient portfolio management or of transactions involving OTC derivatives the Fund receives a collateral basket from a counterparty which limits the maximum exposure to a specific issuer to 20% of the net asset value. If the Fund has various counterparties, the various collateral baskets have to be aggregated in order to calculate the 20% threshold for the exposure to a single issuer. Notwithstanding this indent, the Fund may be fully collateralised by various securities and money market instruments belonging to or issued or guaranteed by a member state, one or more of its regional authorities, by a member State of the OECD or the Group of Twenty (G20) such as the United States of America, by the Republic of Singapore, by the Hong Kong Special Administrative Region of the People's Republic of China, or by an international public-law organisation to which at least one member state of the European Union belongs. In such cases the Fund will hold as collateral, securities which have been issued in at least six different issues, and the value of securities forming part of a single issue must not exceed 30% of the net asset value of the Fund. If the Fund seeks full collateralisation provided by securities that are issued or guaranteed by a member state, this fact will be stated in this Sales Prospectus. Furthermore, the relevant Sales Prospectus will specifically state which member state, or which regional authorities or public international bodies, issue(s) or guarantee(s) the securities which the Fund accepts as collateral for more than 20% of its net asset value.

- f. Risks in connection with the management of collateral, e.g. operational and legal risks, are identified and managed as part of the Fund's risk management process, and measures are taken to reduce these risks.
- g. If ownership of the collateral is transferred, the collateral concerned is held by the Depositary or one of the sub-custodians to which the Depositary has delegated the holding of the collateral. For other types of collateral (e.g. pledges), the relevant collateral may also be held by a third party depositary subject to proper supervision and independent of the party providing the collateral.
- h. The Fund may realise collateral at any time without the counterparty's consent being required.
- i. Collateral not provided in the form of cash is neither sold, reinvested or pledged.
- j. Collateral in the form of cash is only:
 - deposited with the companies listed in Article 41 (f) of the Law of 17 December 2010;
 - invested in high-quality government bonds;
 - used for buy/sell-back transactions if such transactions are carried out with credit institutions subject to proper supervision and if the Fund is at all times able to demand repayment of the full cash amount on an accrual basis;
 - invested in short-term money market funds.

Collateral posted by the Fund in relation to these transactions may be reinvested by the counterparty. The case being, further details will be provided in the Special Section.

Reinvested collateral in the form of cash is spread according to the diversification rules for non-cash collateral, and it can only be

invested in financial instruments listed in Section 3 of CSSF circular 08/356, and only as set out in point j. above.

The reinvestment of collateral may produce a leverage effect which is taken into account when determining the market risk exposure of the Fund.

In addition, the Fund may enter into OTC derivative transactions which are cleared by a central clearing house that acts as the central counterparty. In general, centrally processed OTC derivative transactions can be carried out using the agency model or the *principal-to-principal* model. The *principal-to-principal* model is normally understood to be a transaction between the Fund and its clearing broker, and a back-to-back transaction between the clearing broker and the central counterparty. The agency model is understood to be a transaction between the Fund and the central counterparty. For these transactions the Fund issues/receives collateral on behalf of the Sub-fund in the form of a margin payment in accordance with the clearing broker's regulations and the rules for this type of collateral, including the rules relating to the amount of the collateral, its value, and any haircut that applies. In this context, the Fund ensures that the clearing broker's margin payment is in accordance with the relevant Fund rules. Central processing is intended to lower the counterparty default risk and increase liquidity compared to bilaterally cleared OTC derivatives. However, centrally cleared OTC derivatives cannot totally eliminate the risks that are specified in Section 9.25. of the Sales Prospectus.

e. Scope of the collateralisation

Level of collateral

The level of collateral required for financial derivatives transactions will be determined as per the agreements in place with the individual counterparties, taking into account factors including the nature and characteristics of transactions, the creditworthiness and identity of counterparties and prevailing market conditions. In general, the counterparty exposure not covered by collateral will remain below 5% of the Net Asset Value of the Fund. In case the counterparty is a First Class Financial Institution either located in an EU-member state, a member state of the European Economic Area or country belonging to the G10 subject equivalent regulatory provisions or having at least a rating not lower than single A selected by the Management Company, the counterparty exposure not covered by collateral will remain below 10%. The actual level of collateral will be set out in the semi-annual and annual report of the Fund.

Collateral will be valued on each Business Day of the respective Sub-fund, using available market prices and taking into account appropriate discounts which will be determined for each asset class based on the haircut policy adopted by the Management Company. The policy takes into account a variety of factors, depending on the nature of the collateral received, such as the issuer's credit standing, the maturity, currency, price volatility of the assets and, where applicable, the outcome of liquidity stress tests carried out under normal and exceptional liquidity conditions.

Unless otherwise set forth for an individual Sub-fund in the Special Section and in accordance with its haircut policy, the Management Company expects that the discount percentages specified in the table below will be used in the calculation of the value of collateral received by the Sub-fund:

Category of collateral	Haircut percentage
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Cash in eligible currencies	100%
Government bonds with a remaining term of less than one year	99%
Government bonds with a remaining term of more than one year	98%
Bonds issued by public supranational institutions with one or more member states belonging to the EU and covered bonds	98%
Corporate bonds	96%

The discount percentages which are used in the calculation of the value of collateral received by the Sub-fund are reviewed in relation to its appropriateness on a regular basis, i.e. at least once a year, and will be amended accordingly, if required.

Further details as to the discount percentages may be obtained from the Management Company without charge at any time.

Stress tests

Where a Sub-fund receives collateral for at least 30% of its assets, regular stress tests will be carried out under normal and exceptional liquidity conditions to assess the liquidity risk attached to the collateral.

7.8 Special provisions for UCITS set up in a master-feeder structure

- (a) A feeder UCITS is a UCITS which, notwithstanding Article 2 (2) hyphen 1 of the Law of 17 December 2010 and clauses 7.2, 7.3, and 7.4, invests at least 85% of its assets in units of another UCITS or of a Sub-fund forming part of another UCITS ("**master UCITS**").
- (b) A feeder UCITS can hold up to 15% of its assets in one or more of the following assets:
- ancillary liquid assets as specified in clause 7.3 (b);
 - financial derivative instruments as per 7.2 (g) and Article 42 (2) and (3) of the Law of 17 December 2010 which may exclusively be used for hedging purposes.
- (c) For the purposes of complying with Article 42 (3) of the Law of 17 December 2010, the feeder UCITS calculates its global exposure relating to derivative financial instruments using a combination of its own direct risk and own risk determined according to clause 7.8 (b) in conjunction with:
- the actual master UCITS risk in terms of derivative financial instruments in proportion to the amount invested by the feeder UCITS in the master UCITS, or
 - the master UCITS potential maximum global exposure to financial derivative instruments provided for in the master UCITS management regulations or constitutive documents in proportion to the feeder UCITS investment into the master UCITS.
- (d) A master UCITS is a UCITS which
- has at least one feeder UCITS among its unitholders,
 - is not itself a feeder UCITS, and
 - does not hold any units in a feeder UCITS.

If a master UCITS has at least two feeder UCITS as unitholders, Article 2 (2) first indent and Article 3 second indent of the Law of 17 December 2010 do not apply.

8. Risk management procedure

The Management Company is obliged to employ a risk management procedure which enables it to monitor and assess at all times the level of risk associated with the respective Sub-fund's investment holdings and their respective share of the Fund's total risk profile. This procedure, insofar as it is applicable, enables a precise, independent evaluation of the value of OTC derivatives to be made.

For the types of derivatives in the Sub-fund's portfolio, the Management Company must, in accordance with this risk management procedure, regularly inform the CSSF of the types of risk associated with the respective underlying assets, the investment limits, and the methods used to measure the risks associated with the derivatives transactions.

Under Luxembourg law, UCITS are required to measure such risk exposure using either a "**Commitment Approach**" or a "**Value-at-Risk ("VaR") Approach**".

The Value-at-Risk ("**VaR**") approach is an approach for measuring risk or Global Exposure based on Value-at-Risk or VaR, which is a measure of the maximum potential loss that can arise at a given confidence level over a specific time period under normal market conditions.

"**Global Exposure**" refers to a measure of the risk exposure for a UCITS sub-fund that factors in the market risk exposure of underlying investments, including the market risk exposure and implied leverage associated with financial derivative instruments if and where held in the portfolio.

VaR may be expressed in absolute terms as a currency amount specific to a portfolio, or as a percentage when the currency amount is divided by the total net assets. VaR may also be expressed in relative terms, where the VaR of the Fund (expressed in percentage terms) is divided by the VaR of its relevant benchmark (also expressed in percentage terms), generating a ratio known as relative VaR. Under Luxembourg law, absolute VaR limits are currently 20% of total net assets and relative VaR limits are currently twice or 200% of the benchmark VaR.

Method used to calculate the market risk exposure

Unless otherwise described for the respective Sub-fund in the corresponding Annex, the Management Company uses the relative "*Value-at-Risk*" approach in order to calculate the market risk exposure.

This involves comparing the market risk of the respective Sub-fund with the market risk of the associated reference portfolio. The reference assets are a virtual portfolio which generally does not contain any derivatives and whose value always exactly matches the current value of the Sub-fund, but which does not include any increases in or hedging of the market risk through the use of derivatives. The composition of the reference portfolio must also be in accordance with the investment objectives and investment policy that apply to the respective Sub-fund.

The market risk of the respective Sub-fund and its reference portfolio are each determined with the aid of a suitable risk model. The modelling procedure used is historical simulation. This is a full revaluation approach which does not make any explicit distribution assumption regarding the risk drivers. Instead, the empirical distribution of the risk drivers over a past period is used to determine the value at risk. This involves the company recording all the market price risks from all the transactions. It uses the risk model to quantify the change in value over time of the assets held in the Fund. The value at risk thereby provides a limit, which is expressed in monetary units, for the potential losses of a portfolio

between two specified points in time. This change in values is determined on the basis of random events, i.e. future market price developments, and therefore cannot be predicted with certainty. The market risk that has to be ascertained can only be estimated with a sufficiently high level of probability in each case.

Leverage

Funds which measure Global Exposure using a Value-at-Risk approach disclose their expected level of leverage. The expected level of leverage is not a regulatory limit and should be used for indicative purposes only. The level of leverage is measured as the sum of notionals of all financial derivative contracts entered into by the respective Sub-fund expressed as a percentage of the Sub-fund's Net Asset Value. The expected level of the leverage may range from 0 to 200 percent per Sub-fund, but may be higher or lower than this expected level at any time as long as the respective Sub-fund remains in line with its risk profile and complies with its VaR limit.

The annual report will provide the actual level of leverage over the past period and additional explanations on this figure. The leverage is a measure of the aggregate derivative usage and therefore does not take into account other physical assets directly held in the portfolio of the respective Sub-fund.

Level of Leverage is defined in the applicable CESR guidelines as the sum of the notionals of the derivatives used by the respective Sub-fund. This way of calculating the level of leverage leads to conservative results since some derivatives that may be used for hedging purposes are incorporated into the calculation and therefore lead to artificially raised level of leverage amounts. In some cases this level of leverage may therefore be substantial, and it doesn't necessarily reflect the precise actual level of leverage risk to which the investors are exposed. In the above paragraph, the expected level of leverage is expressed as a percentage of the net asset value of the Sub-fund, and it is based on historical data. Under certain circumstances, a higher level of leverage may be reached for the respective Sub-fund (e.g. in the case of very low market volatility).

More detailed information about the derivative-free reference portfolio and the calculation of the market risk exposure can be found in Annex I "Special Section relating to the individual Sub-funds" and can be obtained without charge from the Fund's registered office.

Liquidity management

The Management Company has an adequate liquidity management system for the Sub-funds and has established written principles and procedures for the Sub-funds to monitor the Sub-funds' liquidity risks and ensure that the liquidity profile of each Sub-fund's investments is consistent with the underlying liabilities of the relevant Sub-fund. The principles and procedures include:

- The Management Company monitors the liquidity risks that may arise at the level of the Sub-funds or assets. It shall assess the liquidity of the assets held in the Sub-funds and determine a liquidity ratio for this purpose. The assessment of liquidity includes, for example, market capitalisation and rating of the security.
- The Management Company monitors the liquidity risks that may arise from increased investor's redemption request of units. In doing so, it develops expectations about net changes in each Sub-fund, taking into account experience from historical net changes in each Sub-fund.

The Management Company has set adequate limits for liquidity risks for the Sub-funds. It monitors compliance with these limits and has established procedures for exceeding or possible exceeding the limits. The procedures established by the Management Company ensure consistency between the liquidity ratio, the liquidity risk limits and the expected net cash changes. The Management Company regularly reviews and updates these principles.

The Management Company regularly conducts stress tests at least once a month to assess the Sub-funds' liquidity risks in order to identify factors material to the future risk management of the Sub-fund such as:

- quantifying the sensitivity of the Sub-fund's liquidity risk;
- identifying factors impacting liquidity risk; and
- identifying metrics/key risk indicators to monitor liquidity risk going forward.

The liquidity stress tests shall enable the Management Company to assess not only the time and/or cost to liquidate assets in the portfolio of the Sub-fund, but also whether such an activity would be permissible taking into account:

- the objectives and investment policy of the Sub-fund;
- the obligation to manage the Sub-fund in the interests of the Investors;
- any applicable obligation to liquidate assets at limited cost; and
- the obligation to maintain the risk profile of the Sub-fund following liquidation of a portion of its assets.

The Management Company carries out the stress tests on the basis of reliable and up-to-date quantitative or, if this is not appropriate, qualitative information. The stress tests may simulate a lack of liquidity of the assets in the Sub-funds and the number and extent of investors' atypical redemption request of units. They cover market risks and their impact, including margin claims, collateral requirements or credit lines. They take into account price volatility under stressful conditions. They shall be carried out in a frequency appropriate to the type of Sub-fund, taking into account the investment strategy, liquidity profile, type of Investor and redemption principles of each Sub-fund. The redemption and conversion right of units in normal and exceptional circumstances and the suspension of redemption and conversion of units are set out in the sections "Subscription, conversion and redemption orders" and "Suspension of the issue, conversion and redemption of units, and suspension of the calculation of net asset value". The associated risks are presented in the sections "Risk of suspension of redemption" and "Liquidity risk".

The liquidity profile of each Sub-fund can be taken from the Special Section relating to the Sub-fund of this Sales Prospectus.

9. Risk information

An investment in units of the Sub-funds is associated with risks. The risks may include or be associated with share and bond market risks, exchange rate, interest, credit and volatility risks, and political risks. In the case of the Sub-funds, particular attention must be paid to the risks connected with derivative transactions and swaps (clauses 9.25 and 9.26). Each of these risks may also occur in combination with other risks. Some of these risk factors are briefly examined below.

The following are the risks that may be applicable to a UCITS in general. In the Special Section relating to the Sub-fund of this Sales Prospectus, the section "Special Risk Information" describes the

risks that are of particular importance in terms of the specific design of a Sub-fund.

Potential investors should have experience investing in instruments that are used as part of the intended investment policy. Investors should also be clear about the risks associated with investing in the units and only make an investment decision once they have obtained sufficient advice from their legal, tax and financial advisers, auditors or other advisers about (i) the suitability of making an investment in the units in view of their personal financial and tax situation and other circumstances, (ii) the information contained in this Sales Prospectus, and (iii) the Sub-funds' investment policy.

An issuer of securities may be domiciled in a country other than the country in the currency of which the instrument is denominated. The values and relative yields of investments in the securities markets of different countries, and their associated risks, are expected to change independently of each other. These risks may be greater in emerging markets.

In addition to the risks and uncertainties described below or elsewhere in the Sales Prospectus, the performance of the Fund may be affected by various other risks and uncertainties that are not currently known.

The order in which the risks are listed below does not contain any statement of the likelihood of their occurrence or the extent or importance of individual risks.

If the investor sells shares in the Fund at a time when the prices of the assets in the Fund have fallen compared to the date of the purchase of the Fund's units, he shall not or not fully recover the capital he has invested in the Fund. The investor may thus lose some of the capital invested in the Fund, or even completely in individual cases. Value gains cannot be guaranteed. The investor's risk is limited to the amount of money invested. There is no obligation to make a margin beyond the capital invested by the investor.

The following describes the risks that are typically associated with investing in a UCITS. These risks may adversely affect the value of the Fund, the capital invested by the investor and the planned holding period by the investor.

The value per unit of a Sub-fund is calculated from the value of that Sub-fund divided by the number of units in circulation for that Sub-fund. The value of the Sub-fund is equal to the sum of the market values of all assets held by that Sub-fund less the sum of the market values of all that Sub-fund's liabilities. The Sub-fund value per unit is therefore dependent on the value of the assets held in the Sub-fund and the amount of the Sub-fund's liabilities. If the value of these assets falls or the value of liabilities increases, the Sub-fund value per unit falls.

It should be noted that in addition to the opportunities for price increases and return on the invested capital, investments in the Sub-funds also entail risks and a potential for loss. The Sub-fund units are securities, the value of which is determined by the price fluctuations of the assets contained in them. The value of the units may accordingly rise or fall in relation to the purchase price.

It cannot be guaranteed that the investor will achieve his desired investment success. The value of the Fund may fall and lead to losses on the investor. There is no guarantee from the Management Company or any third party with respect to a certain minimum payment commitment on return, positive performance or investment success of the Fund. Investors could thus get back a lower amount than the amount originally

invested. In addition, a premium paid on the subscription of units or a redemption fee paid in the event of the sale of units may reduce the success of an investment or even consume it in individual cases, in particular in case of a short holding period. Therefore, no guarantee can be given that the objectives of the investment policy will be achieved.

9.1 Market risk

The market price of securities owned by the Sub-funds may go up or down, sometimes rapidly or unpredictably. Securities may decline in value due to factors affecting securities markets generally or particular industries represented in the securities markets, which in turn are influenced by the general situation of the world economy and the economic and political conditions in the respective countries. The value of a security may decline due to general market conditions that are not specifically related to a particular company, such as real or perceived adverse economic conditions, changes in the general outlook for corporate earnings, changes in interest or currency rates, change of an issuer's interest rates, exchange rates or creditworthiness or adverse investor sentiment generally. It may also decline due to factors affecting a particular industry or industries, such as labour shortages, increased production costs or competitive conditions within an industry. Fluctuations in exchange and market values may also be due to changes in an issuer's interest rates, exchange rates or creditworthiness. During a general downturn in the securities markets, multiple asset classes may decline in value simultaneously. Irrational factors such as sentiment, opinions and rumours have an effect on general price performance, particularly on an exchange market.

9.2 Issuer Risk

The value of a security may decline for a number of reasons which directly relate to the issuer, such as management performance, financial leverage and reduced demand for the issuer's goods or services or change of an issuer's interest rates, exchange rates or creditworthiness.

9.3 Equity price risk

Experience has shown that equities are subject to strong price fluctuations and thus also to the risk of price declines. These price fluctuations are influenced in particular by the development of a company's profits, as well as developments in the sector and macroeconomic developments. The confidence of market participants in a company can also influence the price development. This applies in particular to companies whose equities are only admitted to trading on the stock exchange or any other organised market for a shorter period of time; even small changes in forecasts can lead to strong price movements. If a company has a limited number of freely tradable shares available for trading (so-called free float), even smaller purchase and sale orders can have a strong impact on the market price and thus lead to higher price fluctuations.

9.4 Country or transfer risk

A country risk describes the situation where a foreign debtor, despite being solvent, is unable to make payments on time or at all owing to a lack of transfer capability or readiness on the part of its country of domicile. As a result, payments to which the Sub-fund is entitled may, for example, be made in a currency that is no longer convertible due to foreign exchange restrictions, or those payments may not be

made at all.

9.5 Dissolution of monetary unions or the withdrawal of individual countries from monetary unions risk

If the Fund invests in assets denominated in a currency issued by a monetary union, there is a risk that, if the monetary union is dissolved, a substitute currency will replace the original currency. This may lead to a devaluation of the asset concerned. Furthermore, if a country leaves a monetary union, there is a risk that the monetary union currency, and hence the asset held in the monetary union currency, will experience a devaluation.

9.6 Settlement risk

Particularly in the case of investment in unlisted securities or processing via a transfer agent, there is a risk that the processing through a transfer system might not be carried out according to expectations because a payment or delivery is delayed or not made as agreed.

9.7 Liquidity risk

Risks of the Sub-funds' limited or increased liquidity and risks associated with increased subscriptions or redemptions (liquidity risk) are presented below. There is a risk that a position in a Sub-fund's portfolio cannot be sold, liquidated or closed within a sufficiently short period of time. This may result in the Sub-fund being unable to meet its payment obligations temporarily or permanently, or as a result of the Sub-fund's temporary or permanent failure to meet investors' redemption requests (see also the section "Risk of suspension of redemption"). The investor may not be able to keep to its planned holding period and the invested capital or parts thereof may not be available to the investor for an indefinite period.

The realisation of liquidity risks could also reduce the value of the Sub-fund's assets and thus the unit value, for example if the Sub-fund is forced to sell assets below market value to the extent permitted by Luxembourg law. If the Sub-fund is unable to meet the investors' redemption requests, this may also result in the suspension of the redemption and, in extreme cases, the subsequent dissolution of the Sub-fund.

Risk from investing in assets

The Sub-funds may also acquire assets, which are not admitted to trading on a stock exchange or are admitted to or included in another organised market. These assets may only be resold with high price reductions, a delay or no resale at all. Assets admitted to trading on a stock exchange may not be sold, or only at high price reductions, depending on the market situation, volume, timeframe and planned costs. Although only assets may be acquired for the Sub-funds which can in principle be sold at any time, it cannot be excluded that these can only be sold temporarily or permanently at a loss.

Risks from large subscriptions or redemptions

Subscription and redemption requests from investors generate inflows and outflows from the Sub-funds' assets. Inflows and outflows may result in a net inflow or outflow of the Fund's liquid assets after netting. This net inflow or outflow may cause the Sub-funds to buy or sell assets, resulting in transaction costs. This applies in particular if the inflows or outflows exceed or fall below a quota of liquid funds provided for by the Management Company for the Sub-funds. The resulting transaction costs are charged to the relevant Sub-fund and may affect the performance of that Sub-fund.

In the case of inflows, increased fund liquidity may have a negative impact on the performance of the Sub-fund if the Sub-fund is unable to invest the funds or is unable to invest the funds on reasonable terms in a timely manner.

Risk for holidays in certain regions/countries

The Sub-funds may focus on acquiring assets of only a few regions/countries. Due to local holidays in these regions/countries, there may be discrepancies between trading days on exchanges of these regions/countries and valuation days of the Sub-funds. The Sub-fund may not be able to respond to market developments in the regions/countries on the same day on a day that is not a trading day in these regions/countries, or on a valuation day that is not a trading day in these regions/countries, on the market there. This may prevent the Sub-funds from selling assets within the required time. This may adversely affect the Sub-funds' ability to comply with redemption requests or other payment obligations.

9.8 Counterparty risk

The default of an issuer or counterparty could cause losses for the Sub-fund assets. Issuer risk refers to the impact of particular developments concerning the respective issuer that affect the price of a transferable security, in addition to the influence exerted by general trends in the capital markets. Even when the securities are carefully selected, losses due to the financial collapse of issuers cannot be ruled out. The counterparty risk includes the risk of a party to a reciprocal contract defaulting on all or part of its own debt. This applies to all contracts that are concluded on behalf of the Sub-funds.

Certain markets in which the Sub-funds may effectuate their transactions are "over-the-counter" or "interdealer" markets. The participants in such markets are typically not subject to credit evaluation and regulatory oversight as are members of "exchange-based" markets. To the extent a Sub-fund invests in swaps, derivative or synthetic instruments, or other over-the-counter transactions, on these markets, such Sub-fund may take credit risk with regard to parties with whom it trades and may also bear the risk of settlement default. These risks may differ materially from those entailed in exchange-traded transactions which generally are backed by clearing organization guarantees, daily marking-to-market and settlement, and segregation and minimum capital requirements applicable to intermediaries. Transactions entered directly between two counterparties generally do not benefit from such protections. This exposes the Sub-funds to the risk that a counterparty will not settle a transaction in accordance with its terms and conditions because of a dispute over the terms of the contract (whether or not bona fide) or because of a credit or liquidity problem, thus causing the Sub-fund to suffer a loss. Such "counterparty risk" is accentuated for contracts with longer maturities where events may intervene to prevent settlement, or where the Management Company has concentrated its transactions with a single or small group of counterparties. In addition, in the case of a default, the respective Sub-fund could become subject to adverse market movements while replacement transactions are executed. The Sub-funds are not restricted from dealing with any particular counterparty or from concentrating any of their transactions with one counterparty. Despite of the careful selection of counterparties by the Management Company, a potential loss due to a defaulting counterparty cannot be eliminated.

9.9 Currency risk

Investments of the Sub-funds may be made in other currencies than

the Reference Currency of the relevant Sub-fund and therefore be subject to currency fluctuations which affect the Net Asset Value of the Sub-fund. Currencies of certain countries may be volatile and therefore may affect the value of securities denominated in such currencies, which means that the Sub-funds' Net Asset Value could decline as a result of changes in the exchange rates between foreign currencies and the Reference Currency of the relevant Sub-fund.

It should also be noted that investments in foreign currencies are subject to a transfer risk. The transfer risk is the risk that a foreign debtor of the Fund is prevented from meeting its interest payment and repayment obligations, despite having the required liquid funds available, because its home country has banned payments in foreign currencies as a result of exchange control regulations imposed by the relevant government, or the required technical means are no longer available. The reasons for this may be economic or political instability in the country where the debtor is based.

9.10 Custody risk

The safekeeping of assets, particularly abroad, is associated with a risk of loss which may result from the event of insolvency, violation of due diligence, breach of duty of care, wrongful or improper conduct on the part of the depositary or any of its sub-custodians.

9.11 Concentration and diversification risk

Although the Sub-funds are subject to certain investment restrictions, there may be a concentration in a particular issuer, industry, markets or country/regions. If any Sub-fund elects to concentrate the Sub-fund's investments in a particular issuer, industry, markets or country/regions., the Sub-fund will become more susceptible to high fluctuations in value or market tightness resulting from adverse economic conditions affecting that particular issuer, industry, markets or country/regions. The annual report of the Fund provides retrospective information on the content of the investment policy for the past year.

9.12 Specific industry risk

Sub-funds that focus on a particular industry are subject to the risk factors which affect that particular industry.

Especially in the case of investments in sectors that are highly dependent on development and research (e.g. biotechnology, pharmaceutical, chemical industry) or comparatively new, developments with industry-wide effects can lead to hasty reactions from investors resulting in significant price fluctuations. The success of these industries is often based on speculation and expectations regarding future products. However, if these products do not meet expectations or other setbacks occur, there may be abrupt declines in value across the industry. However, there may also be dependencies in other sectors, which lead to a significant fluctuation in value in the event of unfavorable developments such as supply bottlenecks, shortages of raw materials or tightening of legal regulations.

9.13 Inflation risk

Inflation constitutes a devaluation risk for all assets. This also applies to the assets held in the Fund. The inflation rate may be higher than the value added of the Fund.

9.14 Legal and tax risk

The legal and tax treatment of Sub-funds may change in a manner

which is unpredictable and cannot be influenced. The tax treatment of capital gains depends on the individual circumstances of the respective investor and may be subject to changes in the future. For individual questions, in particular taking into account the individual tax situation, the investor should contact his personal tax adviser.

9.15 Exchange of information

The Fund is subject to the provisions of the Luxembourg Law of 18 December 2015 ("CRS Law") on the implementation of Council Directive 2014/107/EU which is in turn based on the Common Reporting Standard ("CRS") of the Organisation for Economic Co-operation and Development ("OECD").

The CRS Law in Luxembourg governs the automatic exchange of financial account information within the European Union which has been in force since 1 January 2016, and it implements the Multilateral Convention which has been signed by Luxembourg and concluded between the responsible authorities concerning the automatic exchange of information in line with the OECD's CRS ("**Multilateral Convention**").

According to the CRS Law, a Reporting Financial Institution (*Institution financière déclarante*) is, among other things, obliged to undertake certain reporting and due diligence duties.

In particular, as from 30 June 2017, Reporting Financial Institutions must report certain personal and financial information to the Luxembourg tax authorities every year regardless of any applicable data protection provisions. This information includes, among other things, the identification of participations held and payments made to (i) Reportable Persons (*Personnes devant faire l'objet d'une déclaration*) and (ii) Controlling Persons (*Personnes détenant le contrôle*) by Passive Non-Financial Institutions (*passive NFIs*), which themselves are likewise Reportable Persons. Finally, the information to be reported is listed in Article 4 of the CRS Law ("**Information**"), and it includes Personal Data relating to Reporting Persons.

By contrast, there are no reporting duties if the Reporting Financial Institution can invoke certain exemptions allowed by the CRS Law. Subject to all the units being held by Deemed Compliant Investors according to the CRS, it is expected that the Fund will be treated under the CRS Law as an Exempt Collective Investment Vehicle (*Organisme de placement collectif dispensé*). Consequently, according to the CRS Law, the Fund will not be obliged to report information about the investors and their units.

In order to ensure that the investors in the Fund remain restricted to CRS Deemed Compliant Investors, investors are obliged to provide the necessary information to the Fund together with all the required written proof. The investors are explicitly advised that the Fund, as the person responsible for data processing, requires this information for the purposes of the CRS Law.

If the CRS status changes from being a Non-Reporting Financial Institution (*Institution financière non déclarante*) to a Reporting Financial Institution, the investors will be informed of the change and the Sales Prospectus will be amended accordingly.

The investors undertake to inform the Fund of any facts that may prejudice the CRS status (including imprecise information) within thirty (30) days of becoming aware of them. Furthermore, if any of the information changes, the investors undertake to notify the Fund by means of corresponding written evidence without delay, and to make such evidence available to the Fund.

Any investor failing to comply with the Fund's requests for

information and written evidence may be held liable for any penalties levied against the Fund as a result. The Fund may in this case repurchase units as it sees fit.

9.16 Foreign Account Tax Compliance Act ("FATCA")

The Fund is subject to the Hiring Incentives to Restore Employment Act ("HIRE Act") that was passed by the United States of America in March 2010. The HIRE Act contains regulations which are generally known as the FATCA provisions.

The FATCA provisions state that certain information must be reported to the Internal Revenue Service of the United States of America ("IRS"). This reporting duty includes information about non-US financial institutions which do not comply with the FATCA provisions, and about US accounts and non-US legal entities which are indirectly or directly the property of specific United States citizens. A breach of this reporting duty could potentially lead to the imposition of a special withholding tax of thirty percent (30%) on certain income (including dividends and interest) originating in the United States.

According to the FATCA rules, the Fund is treated as a *Foreign Financial Institution "FFI"* within the meaning of the FATCA provisions. The Management Company assumes that the Fund qualifies as a *"Restricted Fund"* and a *"Deemed Compliant FFI"* under the FATCA provisions. If this is the case, the Fund will be exempt from withholding tax under FATCA.

The Fund will however be obliged to supply certain information about its investors to the Luxembourg authorities under the terms of the intergovernmental agreement between the governments of Luxembourg and the United States (the *"Luxembourg IGA"*).

The Fund may oblige the investors to provide proof of their residence for tax purposes and any other information which appears to be required in order to comply with the above provisions.

Subject to contrary provisions in this Sales Prospectus, the Management Company is entitled to take the following measures:

- The Fund may retain all taxes or similar levies insofar as this is necessary in order to fulfil its legal or other obligations (in relation to the Fund's holdings);
- The Fund may demand from each investor or beneficial owner that it provide, without delay, all the personal information that the Fund deems necessary to fulfil its legal obligations and/or to ascertain the amount to be retained;
- The Fund is entitled to forward Personal Data and information to any tax authority, insofar as this is legally required or stipulated by a tax authority;
- The Fund may withhold the payment to an investor of dividends or proceeds from the redemption or repurchase of the units until the company has sufficient information to enable it to determine the amount to be withheld.

Subject to certain conditions, the Management Company may compel investors to sell or transfer their units. Any taxes incurred because an investor fails to fulfil its FATCA obligations must be borne by the investor concerned.

9.17 Amendments to the Management Regulations; dissolution or merger

The Management Company can amend the Management Regulations. Furthermore, in accordance with the Management

Regulations, it may also completely dissolve the Fund or merge it with another Fund or investment company. The same applies at Sub-fund level. The risk for the investor therefore includes the possibility that it will not be able to keep to its planned holding period.

In case of a merger, the investor may (i) redeem, (ii) remain invested, with the effect of becoming an investor in the acquiring fund, or (iii) ask for the conversion of their units from one Sub-fund into another Sub-fund in accordance with the section "Conversion of units". This also applies if the Management Company transfers all assets of another UCITS to the Fund. The investor must therefore make a new investment decision in the context of the transfer. Income taxes may be incurred upon the redemption of their units. When the units are converted into units in a sub-fund with comparable investment principles, the investor may be taxed, for example, if the value of the units received is higher than the value of the converted units at the time of purchase.

9.18 Transfer of the Fund to another management company

The Management Company may transfer the Fund to another management company. The Fund remains unchanged, as does the position of the investor. However, the investor must decide in the context of the transfer whether he considers the new management company to be as suitable as the previous one. If he does not wish to remain invested in the Fund under new administration, he must redeem his units. Income taxes may be incurred.

9.19 Amendments to the investment conditions and/or investment policy

The Management Company may amend the investment conditions and /or the investment policy (by amending the prospectus and/or management regulations of the Fund) with the approval of the CSSF. This may also affect investor rights. For example, the Management Company may change the Fund's investment objective or policy or may increase the costs to be incurred by the Fund. In both cases, investors are informed in paper or electronic form. This may change the content of the risk associated with the Fund.

9.20 Risk of suspension of redemption

Investors may apply for redemption of their units held in the Sub-fund on every Subscription or Redemption Day. However, the Management Company has the right to suspend the redemption of units, as well as calculation of the Net Asset Value per unit of the Sub-fund, if and while circumstances exist that make this suspension necessary and justified, should extraordinary circumstances occur, and buy back the units only at a later point in time at the price which is then valid. This price may be lower than the price before the suspension of the redemption.

Unitholders will be informed promptly of the suspension and will then be notified immediately once the suspension is repealed. Investors will then receive the redemption price that is then current.

A suspension can be followed directly by a liquidation of the Sub-fund without the redemption of units being dealt with, for instance if the Management Company decides to liquidate and dissolve a Sub-fund. Therefore, the risk for the investor includes the possibility that he will not be able to keep to its planned holding period and that significant parts of the invested capital will not be available to him for an indefinite period or will be lost altogether.

9.21 Key person risk

The investment performance achieved by the Sub-funds, which may be very positive in a given period, is also due to the suitability of the people acting on its behalf, and consequently due to the right decisions being taken by the people managing the Sub-funds. However, the management personnel may change. The actions of new decision-makers may then be less successful.

9.22 Operational risks

Human or technical errors occurring within or outside the Fund or its Management Company, and other events (e.g. natural disasters and legal risks) can result in losses for the Fund or its Sub-funds. The Fund may be exposed to a risk of loss resulting, for example, from inadequate internal processes and from human error or system failures at the Fund, the Management Company, the Investment Manager or external third parties. These risks may adversely affect the performance of a sub-fund and thus also adversely affect the net asset value per unit and the capital invested by the investor.

9.23 Change in interest rate risk

Investing in securities offering a fixed rate of interest is connected with the possibility that the market interest rate at the time when a security is issued may change. If the market interest rates increase compared to the interest rates at the time of issue, fixed rate securities will generally decrease in value. Conversely, if the current interest rate falls, fixed rate securities will increase. These price changes mean that the current yield of fixed rate securities roughly corresponds to the current interest rate. However, such fluctuations can have different consequences, depending on the term/maturity of the fixed-rate securities. Fixed-rate securities with short maturities bear lower price risks than those with long maturities. On the other hand, fixed-rate transferable securities with short maturities generally have smaller yields than those with long maturities.

If over 35% of the value of a Sub-fund is invested in securities issued by a single issuer, this is associated with an increased counterparty and concentration risk. Money market instruments tend to have lower price risks due to their short maturity.

In addition, interest rates of different interest-related financial instruments denominated in the same currency with comparable residual maturity may develop differently.

9.24 Negative Interest rate Risk

The Management Company shall invest the Sub-Funds' liquid assets with the Depositary or potentially other banks on behalf of the Sub-funds. For these bank balances, an interest rate minus a certain margin may be agreed. If this interest rate falls below the agreed margin or if this interest rate becomes negative, this will result in negative interests on the relevant Sub-fund's account. Depending on the evolution of the central banks' interest rate policy, both short-, medium- and long-term bank balances can generate negative interest rates.

9.25 Risks associated with derivative transactions

If the market developments that are expected in connection with the use of derivatives do not occur, this may result in a loss. In unfavourable circumstances this loss may exceed the amount invested in the derivative.

The purchase and sale of options in particular, and the conclusion of

futures or forward contracts or swaps, entail the following risks:

- Changes in the value of the underlying instruments can diminish or completely extinguish the value of an option right or futures or forward contract. If the value decreases and the derivative completely extinguishes as a result, the Management Company may be forced to forfeit the acquired rights. The respective Sub-fund may also suffer losses through changes in the value of an asset forming the basis of a swap.

A liquid secondary market for a given instrument may not be available. A position in derivatives may not be economically neutralized (closed).

- If it is necessary to conduct a back-to-back transaction (offsetting), this is associated with costs.
- The leverage effect of options can influence the value of the respective Sub-fund assets more than would be the case with the direct purchase of underlying assets.
- The purchase of options carries the risk that the option will not be exercised because the prices of the underlying assets do not progress as expected, so that the option premium paid by the respective Sub-fund is forfeited. With the sale of options, there is a danger that the respective Sub-fund will be obliged to accept assets at a higher market price than the current one, or to supply assets at a lower market price than the current one. The respective Sub-fund assets will then suffer a loss amounting to the difference in price minus the option premium received.
- In the case of futures contracts, there is the risk that the respective Sub-fund assets may suffer losses at maturity due to an unexpected change in the market price. The risk of loss cannot be determined at the time of conclusion of the futures contract.
- The forecasts of the future development of underlying assets, interest rates, rates and foreign exchange markets may subsequently prove to be incorrect.
- The assets underlying the derivatives cannot be bought or sold at a favorable time or must be purchased or sold at an unfavorable time.

In the case of OTC transactions, the following additional risks occur:

- there is no organised market, which may lead to problems when selling to third parties financial instruments that have been purchased in the OTC market;
- the offsetting of commitments made may be difficult to carry out or associated with considerable costs due to the specific agreement involved (liquidity risk);
- the economic success of the OTC transaction may be endangered by the default of the counterparty (counterparty risk). This risk is generally mitigated by the transfer or pledging of securities in favour of the Sub-fund. However, the value of securities may vary and they may be hard to sell. Therefore, there is no guarantee that the value of the securities will be sufficient to cover the amount owed to the Fund.

The extent of the risks varies in the case of the purchase and sale of options and the concluding of futures contracts, depending on the position taken for the respective Sub-fund.

Accordingly, the respective Sub-fund's losses may

- be limited to the price paid for an option right, or
- far exceed the securities provided (e.g. margins) and require

additional securities;

- lead to indebtedness, and consequently encumber the respective Sub-fund without the risk of loss always being able to be determined in advance.

The Sub-fund may enter into OTC derivative transactions that are cleared by a clearing house which acts as the central counterparty. Central clearing is intended to lower the counterparty default risk and increase liquidity compared to bilaterally cleared OTC derivatives. Nevertheless, it doesn't completely eliminate these risks. The central counterparty will demand a margin payment from the clearing broker, which will in turn demand a margin payment from the Fund. The Fund is exposed to the risk of losing its margin payment and variation margin payments if the clearing broker with which the Sub-fund holds an open position defaults, or if the margin payment is not identified or cannot be correctly assigned to the Fund, in particular if a margin payment is held in a collective account that is held by the clearing broker with the central counterparty. In the event of insolvency of the clearing broker, the Fund may not be able to transfer its positions to another clearing broker.

Regulation (EU) No 648/2012 on OTC derivatives, central counterparties and trade repositories (known as the "EMIR" - European Market Infrastructure Regulation) requires that certain OTC derivatives are submitted to regulated central counterparty clearing houses for clearing, and that specific details are reported to trade repositories. In addition, EMIR specifies requirements relating to appropriate rules and procedures for measuring, monitoring and reducing operational risks and counterparty risks associated with OTC derivatives which do not necessarily have to be cleared. These requirements may cover the exchange and separation of the securities by the parties. While some of the obligations resulting from EMIR have already come into force, there are transition periods for other obligations, and other key questions had not yet been resolved at the time when this Sales Prospectus was drawn up. It is still impossible to predict how the OTC derivatives market will react to the new regulatory regime. A statement of position by ESMA demands that the UCITS guideline be adapted to reflect the EMIR requirements, and in particular the clearing obligation. So far it is not clear when and in what form such changes will take effect. Therefore, it is still not possible to estimate the overall effects on the Fund of EMIR - which may also lead to an increase in the costs associated with OTC derivatives.

Investors should therefore be aware that the regulatory changes demanded by EMIR, and other provisions which stipulate central clearing of OTC derivatives, may in due course adversely affect the ability of the Sub-funds to adhere to their investment objectives and policies.

9.26 Risks associated with swap transactions

The Management Company may conclude swaps on behalf of the Sub-funds in line with the investment principles and restrictions, for example interest, equity or total return swaps. Swaps are exchange contracts which involve swapping a transaction's underlying payment flows or risks between the contracting parties. They may for instance be used to shorten or extend the maturity structure of interest-bearing securities, and consequently to manage the interest rate change risk in the respective Sub-fund. In addition, currency risks can be altered through the use of swaps if assets are changed into another currency.

In particular, exchange contracts entail a counterparty risk in the

form of the contractual partner not fulfilling its payment obligations, or only doing so partially, or not meeting the deadline for doing so. In addition, swaps contain a market risk which results from changes in recognised stock market indexes, exchange rates and interest rates.

In the case of swaps that are convertible into foreign currency, there are also exchange rate opportunities and risks. Furthermore, these swaps are subject to a transfer risk, which is also present in other swaps involving cross-border transactions.

Every Sub-fund may incur costs and fees in connection with total return swaps or other derivative financial instruments with similar characteristics through the undertaking of a total return swap and/or the increase or reduction of the nominal value. These fees may either be of a fixed amount or be variable. Information relating to fees and costs incurred by each Sub-fund in this context, and the identity of the parties to which they have been allocated and any relationship they may have to the Depositary, the Investment Manager or the Management Company, can be seen in the semi-annual and annual reports.

9.27 Risks related to receiving collateral

The Management Company receives collateral for derivatives transactions, and from the use of techniques and instruments for the efficient management of the portfolio.

Cash collateral received may be invested as specified in 7.7 (d) j. In the case of such investments, the credit institution that has custody of the bank deposits may default, and government bonds and money market funds may decrease in value. At the end of the transaction, the invested collateral may consequently no longer be fully available, despite the obligation of the Sub-fund's Management Company to return the original amount of it. The Sub-fund in question would then have to bear the losses sustained on the collateral.

9.28 Risks related to investing in other UCITS or UCIs

The risks related to investing in other UCITS or UCIs (so-called "target funds") are closely related to the risks of the assets contained in those target funds or the investment strategies pursued by them. However, since the managers of the individual target funds act independently of each other, it may also happen that several target funds pursue the same or opposite investment strategies. This can cumulate existing risks, and opportunities could be offset. As a general rule, it is not possible for the Sub-fund to control the management of the target funds. Their investment decisions may not necessarily be consistent with the Sub-fund's assumptions or expectations. The Sub-fund may not be aware of the current composition of the target funds in a timely manner. If the composition does not meet its assumptions or expectations, it may only be able to react by redeeming target fund shares with a significant delay. There is also the possibility that open-ended target funds in which a Sub-fund subscribes may temporarily suspend the redemption of their shares. The Sub-fund is then prevented from selling the shares in the target fund and from receiving payment of the redemption price.

9.29 Risks associated with ring fencing

The Fund's assets are separate from the Management Company's assets and hence shall not be liable for the obligations of the Management Company. In relation to creditors, each individual Sub-fund is solely liable for its own debts, obligations and liabilities

and those which relate to it. In the relationship between the unitholders, the Sub-funds are each treated as being independent of each other. Since this provision is a legal rule in Luxembourg, it still not be ruled out that legal proceedings in foreign legal systems will have practical consequences for the separation of assets and liabilities between Sub-funds.

9.30 Sustainability risks

A sustainability risk within the meaning of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the "SFDR") is an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the Sub-fund, its assets, the Index or an investment as well as on the reputation of a company and thus on the value of the investment. Sustainability risks can affect all known types of risk and contribute as a risk factor to the materiality of all the financial risk categories. Examples of risk types described in the following sections are market risk, liquidity risk, counterparty risk and operational risk.

10. Units, unit classes

Each Sub-fund will issue fully paid-up units in registered form only. Such units may be of different classes and fractions of units up to three decimal places will be issued.

Each unit being linked to one of the Sub-funds and registered in the register of units and unitholders by the Management Company or by a person empowered to do so by the Management Company.

The right of ownership of registered units is effected through registration of the investor's name in the register of units. The register of units contains the names of each owner of registered shares, their home and/or company address or usual place of residence, and the number of units held by them. In addition, owners of registered units may receive, upon request, written confirmation of the registration of the units held by them from the Management Company or the Registrar and Transfer Agent through the issuance of certificates or letters of confirmation of the unitholders' holding of units. The register of units is conclusive evidence of ownership of the units and the Management Company will treat the registered owner of units as the owner thereof. Such certificates will not have any value other than constituting a simple confirmation of such unitholder's holding of units at the date of its issue. Every transfer and return of registered units must be registered in the register of units. The transfer of registered units is effected by means of registration in the register of units.

Units of each Sub-fund are issued to Eligible Investors only, as more fully described in the Special Section for the respective Sub-fund.

The Management Company will make sure that Investors qualify as Eligible Investors.

The Management Company may restrict or prevent the ownership of units in the Fund by any Prohibited Person.

"Prohibited Person" means any person, firm, corporation, limited liability company, trust, partnership, estate or other corporate body, if in the sole opinion of the Management Company, the holding of units of the Sub-fund by that person, firm, corporation, limited liability company, trust, partnership, estate or other corporate body may be detrimental to the interests of the existing unitholders or of

the Sub-fund, if it may result in a breach of any law or regulation, whether Luxembourg or otherwise, or if as a result thereof the Sub-fund may become exposed to tax or other regulatory disadvantages, fines or penalties that it would not have otherwise incurred. The term "Prohibited Person" includes any person, firm, corporation, limited liability company, trust, partnership, estate or other corporate body, which does not meet the definition of Eligible Investors (including, but not limited to natural persons and entities in which one or several natural person(s) hold an interest, unless such entity qualifies as a corporation) and any US person and any FATCA Prohibited Investor.

Units may only be transferred to Eligible Investors, provided that units may not be transferred to a Prohibited Person.

Units may not be transferred without the prior written consent of the Management Company (given in the form of a Management Company consent letter), which consent may not be unreasonably withheld.

The Management Company reserves the right to offer only one or more classes for subscription to a certain group of potential Investors, for instance Investors in any particular jurisdiction in order to conform to local law, customs or business practice or for fiscal or any other reason.

Every owner of registered units must provide an address to the Management Company. All notifications and announcements to the owners of registered units may be sent to the address entered in the register of units. If there are joint owners of units, only the address of the first subscriber is entered in the register of units. The intention is to hold the units via Clearstream Banking S.A., Luxembourg. If units are not held via Clearstream Banking S.A., Luxembourg, the units concerned must not be held by, or sold or transferred to a FATCA Prohibited Investor (as defined below) unless such units are held through a participating foreign financial institution (a "FFI") as defined in the Luxembourg IGA.

"FATCA Prohibited Investor" means (i) a "specified U.S. person", (ii) a "non-participating foreign financial institution" or (iii) a "passive nonfinancial foreign entity with one or more substantial U.S. owners", each such term as defined in the Treasury Regulations under FATCA or the Luxembourg IGA.

Clearstream Banking S.A., Luxembourg, (and every investor which does not hold its units via Clearstream Banking S.A., Luxembourg and which acts as a sales agent as defined below), must notify the Management Company within 90 days of any change in its FATCA status.

For the purposes of the preceding paragraph, a sales agent means: an underwriter, broker, dealer or any other person who is involved in the sale of the units based on a contractual agreement with the Fund and who acts as a Fund nominee.

The Management Company is authorised to issue an unlimited number of fully paid up units without granting the existing investors a preferential right to subscribe for units that are to be newly issued. The Management Company is authorised to empower third parties to accept the subscription of units, to accept the price for these units, and to issue new units.

The Management Company may issue two or more different classes of units within each Sub-fund, the assets of which are jointly invested within any Sub-fund. The different classes of units within each Sub-fund may carry different rights and obligations, for example with regard to the fee structure, their minimum investment and holding amounts, the distribution policy, the conditions to be met by the investors, the currency of the unit class, their target

Investors as more fully described in the Special Section or other special characteristics which are determined by the Management Company in each case. The net asset value per unit is individually calculated for each class of unit that is issued.

At the time of completion of this Sales Prospectus, the Sub-funds do not comprise different classes of units.

The Management Company may, at any time and in its sole discretion, decide to launch additional classes in a Sub-fund and, in such cases, the Sales Prospectus will be updated or supplemented accordingly with notes stating the specific characteristics and rights of such class(es). The formation and closure of unit class(es) in a Sub-fund is at the discretion of the Management Company. They can be formed at any time, but only closed subject to certain conditions (see the "Liquidation and merger of the Fund" section).

However, when new classes of any Sub-fund are formed, the rights of investors that have purchased units within existing classes of units are not affected. Only the investors in such a new class of units may be charged costs that are connected with the introduction of a new class of units in a Sub-fund.

Unitholders of the same class in a Sub-fund will be treated pro-rata to the number of units held by them in the relevant class. The amounts invested in the different classes in each Sub-fund are themselves invested in a common underlying portfolio of investments.

Before investing in a specific class of any Sub-fund, Investors should ensure that such class best suit their needs and consider the local tax implications subject to their personal circumstances and local tax laws. Investors are recommended to contact a tax advisor or their financial advisor for further information.

11. Dividend policy

The Management Company determines for the respective Sub-fund or class of units whether accumulating or distributing units are issued. Whether accumulating and/or distributing units have been issued in relation to a particular Sub-fund is indicated in the Special Section.

In the case of accumulating units, the income is continually reinvested and will be capitalised in the relevant Sub-fund for the benefit of the respective units and/or unit classes.

For the respective units and/or unit classes entitled to distributions, the Management Company determines the timing and size of distributions. The Management Company will in its discretion decide whether and to what extent special and interim distributions are to be paid out of the Sub-fund's assets. Ordinary earnings minus costs ("ordinary net earnings") and net realised price gains can be applied for distribution. Furthermore, unrealised price gains and other assets can also be distributed, provided that the Fund's net assets do not, as a result of the distribution, fall below the minimum level specified in the Law of 17 December 2010, which is 1,250,000 euros at the time of completion of this Sales Prospectus.

The dividend policy for the Sub-funds and/or respective unit classes is mentioned in the corresponding Annex for each Sub-fund.

12. Net Asset Value

The Fund's accounting currency will be the EUR and the total Net Asset Value of the Fund is equal to the sum of the net assets of the

various Sub-Funds converted into EUR.

The Net Asset Value per unit of each class and/or Sub-fund will be denominated in the reference currency of the respective Sub-fund ("**Reference Currency**"), or if applicable, in the corresponding currency of the respective class of units, as specified for each Sub-fund in the Special Section. The Management Company may however decide to express the Net Asset Value per unit for certain Sub-funds/Classes in the other denomination currency as further detailed for the respective Sub-Funds/Classes in the Special Section.

The Net Asset Value per unit of the respective Sub-fund/unit class is calculated in the Reference Currency or the corresponding currency of the respective Sub-fund and/or the respective unit class in accordance with the provisions of Article 9 of the Management Regulations and in accordance with Luxembourg generally accepted accounting principles ("**Lux GAAP**").

Unless otherwise set forth in the Special Section, the Net Asset Value per unit of each class and/or Sub-fund shall be calculated by the Central Administrative Agent under the supervision of the Depositary and the Management Company on each **Valuation Day**. "**Valuation Day**" means each day, on which the Net Asset Value of a Sub-fund is calculated and is defined in the corresponding Annex for each Sub-fund ("**valuation date**" or "**Valuation Day**").

The Management Company may decide to determine the Net Asset Value on 24 and 31 December of any year or any other Business Day without these calculations constituting calculations of the Net Asset Value on a Valuation Day within the meaning of the preceding sentence. Consequently, the investors cannot demand the issue and/or redemption of units based on a Net Asset Value determined on 24 or 31 December of any year or any other Business Day which is not a Subscription and Redemption Day.

The Management Company is also allowed to temporarily suspend the calculation of the Net Asset Value. A detailed description of the circumstances in which a temporary suspension may occur is contained in Chapter 20 of this Sales Prospectus.

13. Determination of the Net Asset Value

- 1) The value of a unit ("unit value") is denominated in the currency for the unit class ("unit class currency") specified in the overview of the relevant Sub-Fund provided in the Sales Prospectus. It is calculated by the Management Company or by a third-party commissioned by the Management Company under the supervision of the Custodian on each Valuation Day. The calculation of the Sub-Fund and its unit classes is performed by dividing the net Sub-Fund assets of the particular unit class by the number of units of this unit class that are in circulation on the Valuation Day. Insofar as annual and semi-annual reports and other financial statistics have to provide information on the situation of the Fund assets as a whole, on the basis of legal regulations or the stipulations of the Management Regulations, such details are provided in Euro, and the assets of each Sub-Fund are converted into the Accounting Currency.
- 2) The net Sub-Fund assets shall be calculated in accordance with the following principles:
 - (a) The target fund units contained in the respective Sub-Fund will be valued using the latest calculated and available unit price or redemption price.

- (b) The value of cash balances or bank deposits, certificates of deposit and outstanding claims, prepaid expenses, cash dividends and declared or accrued interest not yet received corresponds to the full amount, unless it is likely that this cannot be paid or received in full, in which case the value is determined with inclusion of an appropriate reduction to achieve the actual value.
- (c) The value of assets that are listed or traded on a stock exchange or another regulated market is defined on the basis of the most recently available price, unless stipulated otherwise below.
- (d) If an asset is not listed or traded on a stock exchange or on another regulated market or if the prices corresponding to the rulings in c) do not adequately reflect the actual market value of the assets that are listed or traded on a stock exchange or on another market as mentioned above, then the value of such assets is defined on the basis of the reasonably foreseeable selling price according to a cautious estimate.
- (e) The liquidation value of futures, forwards or options that are not traded on stock exchanges or other organised markets will be equal to the respective net liquidation value, as determined on a consistent basis for all different types of contracts in accordance with the Board of Managers guidelines. The liquidation value of futures, forwards or options that are traded on stock exchanges or other organised markets is calculated on the basis of the most recently available conclusion prices of such agreements on the stock exchanges or organised markets on which these futures, forwards or options are traded by the Fund; if a future, a forward or an option cannot be liquidated on a day for which the net asset value is defined, then the basis of valuation for such an agreement is defined by the Board of Managers in an appropriate and reasonable manner.
- (f) Interest swaps are valued at their market value, which is determined with reference to the respective applicable interest rate curves. Swaps which relate to indices and financial securities are valued at their market value which is determined according to the respective index or financial security. The valuation of a swap agreement relating to an index or financial security is based on the market value of this swap transaction, which is determined according to the procedure specified by the Board of Managers based on the principle of good faith.
- (g) Money market instruments may be rated at their respective market value as defined by the Management Company in good faith and according to generally recognised valuation rules that can be verified by auditors.
- (h) All other securities or other assets are valued at their reasonable market price, as defined in good faith in accordance with the procedure that is to be issued by the Management Company.
- (i) The accrued pro rata interest on transferable securities will be taken into account unless considered in the price (dirty pricing).

The value of all assets and liabilities not stated in the Sub-Fund's currency will be converted into this currency at the most recently available exchange rate. If such exchange rates are not available, the exchange rate is determined in all good faith and in accordance with

the procedure to be published by the Management Company.

The Management Company may approve other measurement principles at its discretion if it deems such other measurement principles to be in the interest of a more adequate measurement of an asset of the Sub-Fund.

If the Management Company believes that the unit value defined on a certain Valuation Day does not reflect the actual value of the Sub-Fund's units or if considerable movements have occurred in the relevant stock exchanges and/or markets since the Unit Value was defined, the Management Company can decide to update the unit value on the same day. Under the circumstances, all applications for subscriptions and redemptions received for that Valuation Day are fulfilled on the basis of the unit value that has been updated according to the principle of good faith.

- 3) Where two or more unit classes have been set up for the respective Sub-Fund in accordance with Article 10 of the Management Regulations, the following specific provisions shall apply in relation to the unit price calculation:
 - (a) The unit price will be calculated separately for each unit class in accordance with the criteria listed under paragraph 2 of this Article.
 - (b) The influx of cash on the basis of the issue of units increases the particular unit class's percentage share in the total value of the net Sub-Fund assets. The outflow of cash on the basis of the redemption of units decreases the particular unit class's percentage share in the total value of the net Sub-Fund assets.
 - (c) In the event of a distribution, the unit value of unit class entitled to distribution drops by the amount of the distribution. The percentage share that this unit class holds in the value of the net Sub-Fund assets thus also drops simultaneously, while the percentage share of one or more unit classes not entitled to distribution holds in the net Sub-Fund assets increases.
- 4) An income settlement process can be performed for the particular Sub-Fund.
- 5) The Management Company may define the unit price for extensive redemption requests that cannot be fulfilled from cash and cash equivalents and permitted loans of the relevant Sub-Fund based on the prices on the Valuation Day on which it performs the necessary security sales for the Fund; this also applies to subscription requests received simultaneously for the Sub-Fund.

14. Issue of units

The Management Company is at all times fully authorised to issue units forming part of the respective Sub-fund.

The Initial Issue Date and the Initial Subscription Day, if applicable, the Initial Subscription Period for the Sub-funds or any new unit classes that are set up, is determined by the Management Company, and the characteristics are mentioned in the corresponding Special Section of each Sub-fund.

"**Initial Subscription Day**" means the day on which applications for the initial subscription of units of any Class and any Category may be received as specified for each Class and Category of the Sub-fund in the Special Section.

"Initial Issue Date" means the set-up date of a Sub-fund, during which the units of any Class and any Category may be issued at the Initial Subscription Price as specified for each Class and Category of any Sub-fund in the Special Section.

The Management Company may decide, at its own discretion before the set-up date, to withdraw the offer in respect of the respective Sub-fund. The Management Company may likewise decide to withdraw the offer to subscribe for a new unit class. Furthermore, the Management Company reserves the right to suspend the issue and sale of units at any time. In this case, investors that have already submitted a subscription order will be duly notified, and any subscription amounts already paid will be refunded. In this context, it is pointed out that interest is not applied to these amounts up until the time when they are refunded.

The Management Company may furthermore specify that after the initial subscription no more units of a Sub-fund or a specific unit class will be issued.

An Eligible Investor's first subscription for units must be made in writing directly to the Management Company, the Registrar and Transfer Agent or other duly appointed agent of the Management Company by completion of the Application Form and submission of other relevant documents (provided that the original Application Form is received by the Management Company, the Registrar and Transfer Agent or other duly appointed agent of the Management Company). Processing of the applications for subscriptions will only start once the duly completed Application Form has been received by the Management Company, the Registrar and Transfer Agent or other duly appointed agent of the Management Company together with all other information and documents reasonably required by the Management Company, the Registrar and Transfer Agent or other duly appointed agent of the Management Company.

On the Initial Subscription Day or during the Initial Subscription Period, units of any Sub-fund will be offered at the Initial Issue Price as specified for each Sub-fund in the Special Section. The Initial Issue Price may be increased by a sales charge. Such sales charge is detailed for each Sub-fund in the Special Section.

Calculation example:

Net Asset Value per unit	€ 100.00
Sales charge (e.g.: 2%)	€ 2.00
Issue price	€ 102.00

A Minimum Investment, Minimum Subsequent Investment and the Minimum Holding Amount for each class may be specified in the Special Section for each Sub-fund. The Management Company may however, at its discretion, waive or modify such minimum limits.

Application for subsequent subscription may be made otherwise in writing (including facsimile), provided that all information and documents required is given to the satisfaction of the Management Company, the Registrar and Transfer Agent or other duly appointed agent of the Management Company.

Payments by Eligible Investors can be made via electronic bank transfer net of bank charges to the bank account of the Fund with the Depositary, as indicated in the Application Form.

Subsequent subscriptions are issued at a price which is based on the Net Asset Value per unit of the respective Sub-fund and/or the respective unit class and is determined on each specified Valuation Day. The subscription price may be increased by any applicable sales charge, as stated in the corresponding Annex for each Sub-fund.

The sales charge is levied for the benefit of the sales agents. The sales charge may be increased by fees or other charges that may be payable in the particular countries where the Sub-fund/unit class is on sale. If the laws of a country specify lower sales charges, the acting sales agents in that country can sell the units with the highest sales charge that is permitted there.

At its discretion and with due regard for the principle of equal treatment of investors, the Management Company reserves the right to waive regulations relating to Minimum Investment, Minimum Subsequent Investment and the Minimum Holding Amounts for initial and subsequent subscriptions.

The issue price is payable to the Depositary in the currency of the corresponding class of units, within 2 Business Days (as defined for each Sub-fund in the corresponding Annex) following the applicable Valuation Day.

Immediately after the receipt of the full issue price by the Depositary, the units will be allocated on behalf of the Management Company and the appropriate number of units will be transferred to the investor on behalf of the Management Company.

Subscription orders must be submitted according to the provisions listed in Chapter 19.

The Management Company may, under its own responsibility and in agreement with this Sales Prospectus, accept securities as payment for a subscription ("**investment in kind**") provided that it assumes this to be in the investors' interests.

The securities which are taken as payment for a subscription must however conform to the investment policy and the investment restrictions of the Fund and/or the respective Sub-fund. The Management Company is obliged to have a valuation report drawn up by the auditor which specifies in particular the quantity, designation and value of these securities and the valuation method used in relation to them. The securities taken as payment for a subscription are valued in relation to the transaction at the last market price on the valuation date, which is used as a basis for determining the net asset value of the units that are to be issued. The Board of Managers of the Management Company may at its discretion reject all of the securities – or alternatively individual securities – which are offered as payment for a subscription, without stating its reasons for doing so. All the costs caused by the investment in kind (including the costs of obtaining the valuation report, the brokerage costs, expenses and commissions etc.) must be borne in their entirety by the subscriber.

The issuing of the units may be restricted, suspended, or temporarily or permanently stopped, for the reasons and subject to the conditions set out in Chapter 20. A subscription order may be rejected subject to the conditions set out in Articles 10 and 11 of the Management Regulations.

Furthermore, as part of their legal obligation to combat money laundering and counter terrorist financing, the Management Company, the Registrar and Transfer Agent and the Depositary and/or Central Administrative Agent reserve the right to demand information about and proof of investors' identity. If the investors do not accede to this request in a timely manner, the subscription order may be rejected.

The Management Company may at any time and at its own discretion reject a subscription order or temporarily restrict, suspend or permanently terminate the issue of units if this appears to be necessary in the interests of the investors, in the public interest, or in order to protect the Fund and/or the respective Sub-

fund or the investors.

Furthermore, in return for payment of the redemption price, the Management Company may at any time redeem units held by any Prohibited Person.

15. Prevention of Money Laundering and Terrorist Financing

Pursuant to international rules and Luxembourg laws and regulations, obligations have been imposed on all professionals of the financial sector to prevent the use of undertakings for collective investment for money laundering and terrorist financing purposes ("AML/CFT").

Measures aimed towards the prevention of money laundering and terrorist financing, as provided by (but not limited to) the law of 12 November 2004 relating to the fight against money laundering and terrorist financing, as amended ("**2004 Law**"), the Grand-Ducal Regulation of 10 February 2010 providing details on certain provisions of the 2004 Law, as amended, the CSSF Regulation N°12-02 of 14 December 2012 on the fight against money laundering and terrorist financing, as amended, ("CSSF Regulation 12-02") and the relevant circulars and regulations of the CSSF in the field of AML/CFT (collectively referred to as the "AML/CFT Provisions"), require to establish and verify the identity of a potential investors, and, as the case may be, of any person acting on behalf of such unitholder as well as of the beneficial owner (the "customer due diligence").

In accordance with the AML/CFT Provisions, this customer due diligence will be performed by the Registrar and Transfer Agent, under the ultimate supervision and responsibility of the Management Company. The identity of any investor should be verified on the basis of documents, data or information obtained from a reliable and independent source. Therefore, investors must prove their identity and the Management Company or the Registrar and Transfer Agent may request the information and documents necessary to establish and verify the identity and the profile of an investor, the nature and the intended purpose of the business relationship and the origin of subscription proceeds and in any case have the right to request additional information and documents deemed necessary to comply with the AML/CFT Provisions. In accordance with the law of 13 January 2019 establishing a Register of Beneficial Owners ("**RBE**") for Luxembourg registered entities ("**RBE Law**"), entities registered with the Trade and Companies Register ("**RCS**"), including mutual funds (*fonds communs de placement*), have to comply with the provisions of the RBE Law and are required to provide the RBE with relevant information on their ultimate beneficial owners ("**UBOs**"), as provided by the 2004 Law.

The Fund has (i) the obligations to obtain and hold information on its UBOs at the registered office and (ii) the obligation to file information with the register of UBOs including adequate, accurate and up-to-date information accessible to the public and to the Luxembourg authorities within the scope of their duties.

The Management Company and the Registrar and Transfer Agent reserve the right to request such additional information as they see fit to carry out the AML/CFT due diligence. In the event of delay or failure by the applicant to produce any information required for verification purposes, the Management Company shall refuse to accept the application and will not be liable for any interest, costs or compensation.

A subscription order may only be accepted upon a complete and proper full identification of the subscribing investors and the UBO in accordance with the applicable AML/CFT Provisions. If the Management Company rejects an application, for any reason, in whole or in part, the application monies or any balance thereof will be returned without unnecessary delay to the applicant by transfer to the applicant's designated account or, if such account is not known to the Management Company, by post at the applicant's risk, provided the identity of the applicant can be properly verified pursuant to the AML/CFT Provisions. In such event, the Management Company will not be liable for any interest, costs or compensation.

Pursuant to Article 3 of the 2004 Law, the Management Company and the Registrar and Transfer Agent are obliged to conduct an ongoing monitoring of the transactions and the business relationship with its unitholders. Ongoing monitoring includes, inter alia, the obligation to verify and, where appropriate, to update, within an appropriate timeframe, the documents, data or information gathered while fulfilling the unitholder's due diligence obligations. The Management Company and the Registrar and Transfer Agent may only be in a position to fulfil their legal obligation to conduct an ongoing monitoring of the transactions and the business relationship with its unitholders if the unitholders provide the Management Company or the Registrar and Transfer Agent with the relevant information and documents in order to verify and, where appropriate, update collected data and thus may request investors to provide additional or updated identification documents from time to time. In case of any lack of cooperation of a unitholder, the Registrar and and/or the Management Company may take the measures that it considers to be appropriate and in particular the Management Company would be obliged to block such unitholder's account until the receipt of the information and documents required by the Management Company or the Registrar and Transfer Agent (i.e. when units are issued, they cannot be redeemed or converted until full details of registration and anti-money laundering documents have been completed or updated, and failure to provide proper documentation may result in the withholding of redemption proceeds by the relevant Sub-fund). Any costs, including in particular account maintenance costs, which are related to non-cooperation of such unitholder will be borne by the respective unitholder.

Until the potential investors or the beneficiaries of a transfer have been definitively identified by the Registrar and Transfer Agent, it reserves the right to refuse to issue units or to refuse to accept units via a securities transfer. This applies equally to pay-outs in connection with the redemption of units. Such payments are made only once the duty to provide identification has been complied with in full. In all such cases the Registrar and Transfer Agent cannot be held liable for potential late payment interest, costs that are incurred, or for other compensation.

In the event of delay or of inadequate proof of identity being provided, the Registrar and Transfer Agent may initiate appropriate measures as it sees fit and proper.

Any information provided to the Fund in this context is collected and recorded for AML/CFT compliance purposes only.

16. Late Trading and Market Timing

In accordance with the Luxembourg laws and regulations and the

CSSF circular 04/146 on the protection of undertakings for collective investment and their investors against late trading and market timing practices, the following shall apply:

Late Trading

The Fund determines the price of its units on a forward basis. This means that it is not possible to know in advance the Net Asset Value per unit at which units will be bought or sold (exclusive of any subscription fees). Subscription applications have to be received and will be accepted only in accordance with the provisions of the Special Section and the Cut-Off-Time rules as laid down in this Sales Prospectus.

Market Timing

The Management Company does not allow any market timing practices for the Fund and its Sub-funds. Market timing is understood to mean the arbitrage technique through which an investor systematically subscribes for and sells units in the Sub-fund over a short period of time, exploiting time lags and/or imperfections/weaknesses in the system for calculating the net asset value of the respective Sub-fund. This can harm the interests of the other investors. If it suspects the use of market timing practices, the Management Company will take appropriate measures to protect the other investors in the Fund and/or the respective Sub-fund.

The Sub-funds are not designed for Investors with short term investment horizons. Activities which may adversely affect the interests of the Fund's unitholders (for example activities that disrupt investment strategies or impact expenses) such as market timing or the use of the Fund as an excessive or short term trading vehicle are not permitted.

Whilst recognising that unitholders may have legitimate needs to adjust their investments from time to time, the Management Company may, if it reasonably deems that such activities adversely affect the interests of the Fund's unitholders, take action as appropriate to deter such activities.

Accordingly if the Management Company determines or suspects that a unitholder has engaged in such activities, it may suspend, cancel, reject or otherwise deal with that unitholder's subscription or conversion applications, if any, and take any action or measures as necessary to protect the Fund and its unitholders.

The Depositary shall pay back, without adding interest, payments made for subscription orders which are not executed.

17. Redemption of units

Investors may at any time demand the redemption of all or part of their units of any Sub-fund on the valuation dates specified in Chapter 12 and in the corresponding Annex for each Sub-fund.

Investors are entitled to demand the redemption of their units at any time from the Management Company, the Registrar and Transfer Agent or other duly appointed agent authorised by the Management Company.

Written redemption requests will only be processed once the original requests are received by the Management Company, the Registrar and Transfer Agent or any other duly appointed agent of the Management Company in Luxembourg.

The redemption request must state the total amount or the number

of units the Unitholder wishes to redeem and the class, Category and Sub-funds from which such units are to be redeemed as well as all necessary references enabling the payment of the redemption proceeds.

From the investor's viewpoint, the redemption orders are without exception, deemed to be legally binding and irrevocable. All the documents required for redemption, as well as any unit certificates issued, must be enclosed with the application. It can only be revoked if the calculation of Net Asset Value, or the issue, conversion or redemption of units is suspended.

For all the Sub-Funds, redemption requests received by the Management Company, the Registrar and Transfer Agent or any other duly appointed agent of the Management Company on a Redemption Day before the relevant Cut-Off-Time (as defined in the Special Section) will be dealt with on the next following Valuation Day at the redemption price of the relevant class of each Sub-Fund prevailing on that Valuation Day. Any redemption requests received after the relevant Cut-Off-Time will be processed on the Valuation Day following the next valuation date.

The redemption price per unit of any class in a Sub-fund will be the Net Asset Value per unit of the relevant Sub-fund and/or the respective class of units concerned on the relevant Valuation Day. The redemption price may be reduced by a redemption fee charged in relation to their sale. The current rate is specified as applicable in the corresponding Annex for the respective Sub-fund.

Calculation example:

Net Asset Value per unit	€ 100.00
Redemption fee (e.g.: 2%)	€ 2.00
Redemption price	€ 98.00

If a Minimum Investment, Minimum Subsequent Investment and/or the Minimum Holding Amount is specified in the relevant Annex for individual Sub-funds or unit classes, and if it is not reached due to redemption orders, the Management Company has the right to regard them as redemption orders for all the units held by the respective investors, and consequently to initiate the redemption of all that investor's units at the relevant redemption price.

The redemption price is paid within 2 Business Days of the relevant Valuation Day or after the date on which all the necessary documents have been received by the Central Administrative Agent, whichever occurs last. The Depositary is obliged to make a payment only insofar as no legal provisions prevent it from transferring the redemption price to the applicant's country or restrict such a transfer, e.g. exchange control regulations or other circumstances beyond the control of the Depositary.

The redemption price is payable in the currency of the respective class of units. The redemption price may be less or more than the price paid at the time of subscription or purchase.

Compulsory redemption

If the Minimum Holding Amount of the Sub-fund is not maintained due to a redemption or conversion of units, the Management Company acting on behalf of the Sub-fund may compulsorily redeem any issued or remaining units at their current Net Asset Value per unit and make payment of the redemption proceeds to the respective unitholder.

If the Management Company discovers at any time that units are owned by a Prohibited Person, either alone or in conjunction with any other person, whether directly or indirectly, the Management Company acting on behalf of the Fund may at its discretion and

without liability, compulsorily redeem the units pursuant to the procedure set forth in the Management Regulations after giving notice, and upon redemption, the Prohibited Person will cease to be the owner of those units.

The Management Company may require any unitholder to provide it with any information that it may consider necessary for the purpose of determining whether or not such owner of units is or will be a Prohibited Person.

The Management Company may redeem units at any time, as it sees fit, and in particular subject to the conditions set out in the provisions of Article 11 of the Management Regulations. In this case, the investor is obliged to return the units. In particular, the Management Company reserves the right to be able to redeem units from investors at the redemption price if an investor does not meet the authorisation requirements of a Sub-fund, for example if it is not deemed to be an institutional investor according to Article 174 of the Law of 17 December 2010 if the Sub-fund concerned is restricted to institutional investors.

The Management Company shall ensure that the respective Sub-fund assets have sufficient liquid funds available to enable the redemption of units at the request of investors to take place without delay under normal circumstances.

Significant redemption

However, if on a single Valuation Day redemption orders are received, the value of which individually, or together with other orders received, exceeds 10% of the net Sub-fund assets ("**Significant Redemption**"), the Management Company is entitled to temporarily suspend the redemption in order to safeguard the investors' interests, i.e. only to undertake the Significant Redemption in relation to the Sub-fund concerned once corresponding assets forming part of the Sub-fund concerned have been sold without delay in a way which safeguards the investors' interests. In this case, the redemption takes place at the redemption price applicable at this time. Corresponding provisions apply to applications for the exchanging of units. The processing of such applications is given precedence over later applications that are received for subsequent valuation dates.

The redemption of units may be temporarily suspended for the reasons specified in Chapter 20.

During the temporary suspension of the redemption of units, no units are issued. The issuing of units resumes only once all the unit redemption orders have been carried out.

18. Conversion of units

Subject to meeting the respective eligibility criteria for the respective Sub-fund (e.g. the restriction to institutional investors), investors may request the conversion of some or all of their units from one Sub-fund into another Sub-fund or another class of units (if available) via the Management Company. They are converted on the basis of the Net Asset Value of the respective class of units, which is calculated on the next Valuation Day following receipt of the conversion application before Cut-Off-Time. However, a conversion fee may be charged in this context.

The conversion of units may be temporarily suspended for the reasons specified in Chapter 20.

19. Subscription, conversion and redemption orders

Subscription, conversion and redemption orders are received by the Management Company, Central Administrative Agent and by the Depositary, the sales agents and the paying agents.

Units may be purchase, converted or redeemed at each Subscription and Redemption Day. Unless otherwise set forth in the Special Section for each Sub-fund, "**Subscription and Redemption Day**" means, in relation to any Sub-fund, each Valuation Day of the Sub-fund on which applications for subscriptions, conversion or redemption of units of any class may be received.

Subscription, conversion and redemption orders received by the Management Company, the Registrar and Transfer Agent, Central Administrative Agent or any other duly appointed agent of the Management Company in Luxembourg on a Subscription and Redemption Day before the relevant order Cut-Off-Time (the "**Cut-Off-Time**") as specified in the corresponding Annex for each Sub-fund will be dealt with on the next valuation date at the issue, redemption and conversion prices of the relevant class of each Sub-fund of that Valuation Day (plus any applicable sales, conversion or redemption charge).

Subscription, conversion and redemption orders received by the Management Company, the Registrar and Transfer Agent, Central Administrative Agent or any other duly appointed agent of the Management Company in Luxembourg on a Subscription and Redemption Day after the relevant Cut-Off-Time will be processed on the valuation date following the next valuation date on the basis of the issue, redemption and conversion prices per unit determined on such Valuation Day (plus any applicable sales, conversion or redemption charge).

If subscription, conversion or redemption orders are processed by the Depositary or sales or paying agents, other procedures and time limits may apply; however, the aforementioned time limits remain unchanged in the case of the Central Administrative Agent. The complete subscription, conversion and redemption conditions can be obtained from the Management Company, the Registrar and Transfer Agent, Central Administrative Agent, the sales agents or any other duly appointed agent of the Management Company.

It is ensured that subscription, conversion and redemption orders can be surrendered at an as yet unknown Net Asset Value.

20. Suspension of the issue, conversion and redemption of units, and suspension of the calculation of net asset value

The Management Company is authorised to temporarily suspend calculation of the net asset value and the issue, redemption and conversion of units if and as long as circumstances exist which necessitate such a suspension. This is the case in particular:

- during the period when a stock exchange or another regulated, recognised market open to the public, which operates properly and on which a significant part of the assets of the Sub-fund are listed or traded, is closed (except on customary weekends or holidays), or during the period when trading on that stock exchange or that market is suspended or restricted;

- in emergencies, if the Management Company cannot access the Sub-funds' assets or is unable to freely transfer the equivalent value of the asset purchases or sales, or to properly calculate the net asset value;
- to the extent to which such a suspension is justified for the protection of the investors following the publication of the convening of an extraordinary general meeting with the aim of merging the Fund or a Sub-fund, or following the publication of the notification to investors of a decision taken by the Management Company concerning the merging of the Fund or a Sub-fund; or
- during the period in which the usual means of communication or the aids that are usually used for calculating the net asset value of the Sub-funds, or for calculating prices on the stock exchanges or the markets on which a significant portion of the Sub-funds' assets are listed/traded, are disrupted.

In addition, a feeder UCITS and/or a feeder Sub-fund is entitled to suspend the redemption, pay-out, subscription or conversion of its units irrespective of the preceding conditions during the same period as its master UCITS.

No units will be redeemed by any Sub-fund during any period in which the determination of the Net Asset Value per unit of such Sub-fund is suspended pursuant to the powers contained in the Management Regulations and as indicated under "Suspension of the determination of the Net Asset Value" below.

Notice of suspension will be given to the redeeming unitholders, and redemption requests made or pending during a suspension period may be withdrawn by notice in writing received by the Management Company prior to the end of the suspension period. Redemption requests not withdrawn will be processed by the Management Company, the Registrar and Transfer Agent or other duly appointed agent of the Management Company on the first Valuation Day following the end of the suspension period, on the basis of the Net Asset Value per unit of the relevant Sub-fund and class determined on such Valuation Day.

21. Publications

The issue and redemption price of the Sub-fund units, the Management Regulations, the Sales Prospectus and the Key Information Document can be obtained without charge from the Management Company, the Depositary, the paying agent and, if applicable, the sales agents.

If legally required or if it is so determined by the Management Company, the issue and redemption price of the Sub-funds are each published in a daily newspaper in those countries designated by the Management Company where the units are publicly marketed.

The Sales Prospectus including the Management Regulations, the Key Information Document, and the latest reports and current issue and redemption prices together with further information about the Fund are published online in English at www.hal-privatbank.com and they can be obtained without charge from the Management Company in Luxembourg.

At the latest 4 months after the end of the Fund's financial year, the Management Company will provide an audited annual report which provides information about the net Sub-fund assets, their management, and the results achieved. The first audited annual

report was drawn up as at 30 September 2014.

At the latest 2 months after the end of the first half of each financial year of the Fund, the Management Company will provide an unaudited semi-annual report which provides information about the net Sub-fund assets, their management, and the results achieved during the corresponding half year. The first unaudited semi-annual report was drawn up as at 30 September 2013.

The Fund's annual report and semi-annual report can be obtained by investors without charge from the Management Company, the depositary, the sales agents and the paying agents.

In addition, the Management Company's Articles of Association are available for viewing at the Management Company's registered office during normal business hours.

21.1 Basic procedure in the case of conflicts of interest

The Management Company offers its customers numerous securities services and it maintains extensive business relationships with companies both inside and outside its own corporate group. The Investment Managers and specific business partners in relation to financial transactions are part of the Munich Re Group ("**Associated Parties**").

The interests of the Sub-funds may clash with the interests of members of the Board of Managers, managers and employees of the Management Company, the Investment Manager, the Depositary and the Central Administrative Agent, and those of Associated Parties as well as representatives or agents of the aforementioned bodies.

The Management Company checks for any potential conflicts of interest as a matter of principle before embarking upon a new activity for a fund or assigning an activity to a service provider. Changes in fields of activity or in the remuneration provided for activities may give rise to conflicts of interest and are appropriately reviewed. If potential conflicts of interest are ascertained, they must be drawn to the attention of the Management Company's Compliance Department. The Compliance Department will then take over the handling of the conflict of interest in the interests of the investors. The Compliance Department has hierarchical independence for this purpose, and in accordance with the Management Company's compliance policy it cannot assume operational responsibility for the day-to-day business of the Management Company. The Compliance Department can refer directly to the Board of Managers with its findings on conflicts of interest and other issues of relevance to the investors, the Fund, or the respective company. As a matter of principle, employees in other departments can also use this option in the case of conflicts of interest, in addition to mandatory reporting to the Compliance Department.

If the Compliance Department or the Board of Managers of the Management Company concludes that a conflict of interest exists which cannot be avoided through the use of contractual or organisational measures, this is disclosed to the investors concerned. Disclosure is automatically provided by the Management Company without delay, either in written form or through publication on the Management Company's website at www.hal-privatbank.com. The corresponding notification or publication is worded in a sufficiently detailed manner to give the investor a clear picture of the conflict. All the conflicts of interest that are known of at the time of completion of the Sale Prospectus are listed in the

respective current version of the Sales Prospectus, and new conflicts of interest are always entered in the next update.

Extracts from the guidelines for handling conflicts of interest can be found on the Management Company's website at <https://www.hal-privatbank.com/rechtliche-hinweise>. The detailed guidelines may also be requested from the Management Company, and they will be provided without charge either electronically or as a printed version.

The Management Company must treat the Fund's investors fairly. It shall not place the interests of any group of investors above the interests of another group of investors in the context of the management of liquidity risk and the redemption of shares.

The procedures by which the Company ensures the fair treatment of investors are presented in the sections relating to the issue, redemption and conversion of units and "Liquidity management".

21.2 Remuneration policy

In compliance with the Law of 17 December 2010, in particular, in observance of the principles set down in article 111 of the Law of 17 December 2010, the Management Company has compiled a remuneration policy that is compatible with, and conducive to, robust and effective risk management. This remuneration system is aligned with the Hauck Aufhäuser Lampe Group's sustainable and entrepreneurial corporate strategy and is, therefore, not intended to provide any incentive to assume risks that are not compatible with the risk profiles and Management Regulations of the investment funds managed by the Management Company. The remuneration system must always be in alignment with the business strategy, objectives, values and interests of the Management Company and those of the funds it manages and the investors in these funds and it includes measures to avoid conflicts of interest. In particular, the variable remuneration elements are not coupled with the performance of the investment funds managed by the Management Company. There is a reasonable balance between the fixed and variable components of the overall remuneration, with the fixed components representing a sufficient share of the overall remuneration to provide full flexibility in relation to the variable remuneration components, including the option of choosing not to pay a variable component. The remuneration system is reviewed at least once a year and is adapted as necessary.

The details of the current remuneration policy, including a description of how the remuneration and other benefits are calculated and the identity of the persons responsible for allocation of the remuneration and other benefits, together with the composition of the remuneration committee if such a committee exists, is made available on the website of the Management Company (www.hal-privatbank.com/rechtliche-hinweise). In addition, a hard copy will be provided by the Management Company free of charge on request.

21.3 Voting rights policy

The Management Company has developed adequate principles and effective strategies for determining when and how any voting rights held in the Fund's portfolios are to be exercised to the exclusive benefit of the Fund and its Investors.

The strategy for the exercise of voting shall include but will not be limited to the following measures and procedures for:

- monitoring relevant corporate actions;
- ensuring that the exercise of voting rights is in accordance with the investment objectives and policy of the Fund/Sub-

funds;

- preventing or managing any conflicts of interest arising from the exercise of voting rights.

A summary of these principles and strategies in relation to each Sub-fund, and details of the measures taken on the basis of these principles and strategies, can be obtained from the Management Company upon request, and they are published online at <https://www.hal-privatbank.com/rechtliche-hinweise>.

22. Fund taxes

22.1 General

Income and net wealth taxes

The Fund which has no legal personality is fiscally transparent and is not liable to any income and net wealth taxes in Luxembourg on profits or income.

Subscription tax

In accordance with Art. 174 (1) of the Law of 17 December 2010, in the Grand Duchy of Luxembourg, the Fund Assets are subject to a tax ("*Taxe d'Abonnement*") of 0.05% p.a. payable every quarter on the stated net Sub-fund assets at the end of each quarter. In relation to funds, Sub-funds and unit classes which are reserved for institutional investors, the *Taxe d'Abonnement* is 0.01% p.a. This tax is payable on the part of the Sub-fund assets which is invested in shares or units of Luxembourg investment funds which are already subject to the *Taxe d'Abonnement* according to the relevant provisions of Luxembourg law.

Withholding tax

Under current Luxembourg tax law, no dividend withholding taxes are levied on distributions by the Fund to the unitholders.

The Fund may be subject to withholding taxes on dividends, interest and tax on capital gains in the country of origin of its investments. As the Fund itself is not subject to income tax, withholding tax levied at source, if any, would not be creditable/refundable in Luxembourg and the Fund itself would not be able to benefit from Luxembourg's double tax treaties network.

Taxation of unitholders in Luxembourg

Distributions made by the Fund to the unitholders are not subject to withholding tax in Luxembourg and furthermore do not qualify as taxable income in Luxembourg when paid to non-resident unitholders. Likewise, capital gains realised by a non-resident unitholder, except for those having a permanent establishment or a permanent representative in Luxembourg to which or to whom the units are attributable, on the redemption and/or transfer of such units in the Fund should not be subject to Luxembourg taxes.

Unitholders should inform themselves of, and when appropriate consult their professional advisors on, the possible tax consequences of subscribing for, buying, holding, or otherwise disposing of units under the laws of their country of citizenship, residence, domicile or incorporation.

Other taxes

No stamp duty or other tax is generally payable in Luxembourg on the issue of units by the Fund against cash.

The Management Company is however subject to a fixed registration duty of EUR 75 in Luxembourg upon incorporation and any subsequent amendment to its articles of association.

22.2 Value Added Tax

In Luxembourg, regulated investment funds such as UCI-FCPs have the status of taxable persons for value added tax ("VAT") purposes. Accordingly, the Fund and its Management Company are considered in Luxembourg as one single taxable person for VAT purposes without any input VAT deduction right. A VAT exemption applies in Luxembourg for services qualifying as fund management services. Other services supplied to the Fund and/or the Management Company could potentially trigger VAT and require the VAT registration of the Management Company in Luxembourg. As a result of such VAT registration, the Management Company/the Fund will be in a position to fulfil their duty to self-assess the VAT regarded as due in Luxembourg on taxable services (or goods to some extent) purchased from abroad.

No VAT liability arises in principle in Luxembourg in respect of any payments by the Fund to its unitholders, as such payments are linked to their subscription to the units and do therefore not constitute the consideration received for taxable services supplied.

22.3 Foreign Account Tax Compliance Act ("FATCA")

The FATCA provisions of the Hiring Incentives to Restore Employment Act ("HIRE") which were passed by the U.S. government generally impose a new reporting regime, and potentially a 30% withholding tax with respect to (i) certain U.S. source income (including dividends and interest) ("**Withholdable Payments**") and (ii) foreign passthru payments made to a recalcitrant account holder or a non-participating foreign financial institution ("**Passthru Payments**").

The new rules are designed to require direct and indirect ownership by U.S. persons of non-U.S. accounts and non-U.S. entities, and non-U.S. financial institutions that do not comply with FATCA, to be reported to the U.S. *Internal Revenue Service*, ("IRS"). The 30% withholding tax regime applies if there is a failure to provide certain information.

Generally, these new provisions will subject all Withholdable Payments and Passthru Payments received by a *foreign financial institution*, an "FFI", to 30% withholding tax (including the share that is allocable to non-U.S. investors) unless the FFI enters into an agreement with the IRS (a "**FFI agreement**") or complies with the terms of an applicable Intergovernmental Agreement (an "IGA") or is otherwise exempt from FATCA. Under an FFI agreement or an applicable IGA, an FFI will generally be required to provide information, representations and waivers of non-U.S. law as may be required to comply with the new provisions of the rules, including information regarding its direct and indirect U.S. account holders.

The governments of Luxembourg and the United States have entered into an IGA regarding FATCA (the "**Luxembourg IGA**"). Provided the Fund adheres to any applicable terms of the Luxembourg IGA, the Fund will not be subject to withholding or generally required to withhold amounts on payments it makes under FATCA. Additionally, under the Luxembourg IGA, an FFI will not have to enter into an FFI agreement with the IRS and instead it will report information about its investors to the Luxembourg authorities, which will in turn report such information to the IRS.

The Management Company expects the Fund to be classified as a *restricted fund and a deemed compliant* FFI under the FATCA rules. If correct, the Fund will generally be exempt from being withheld upon under FATCA, payments it makes will generally be exempt from FATCA withholding and the Fund will not be required to report information on its account holders to the Luxembourg tax

authorities under the Luxembourg IGA.

In certain circumstances, the Management Company may compulsorily redeem or transfer investors' units. Any tax caused by an investor's failure to comply with FATCA will be borne by such investor. Each prospective investor should consult its own tax advisers regarding the requirements under FATCA with respect to its own situation.

Against this background, each investor is obliged to provide all the information, declarations and forms reasonably demanded by the Fund, in the requested manner (including in the form of electronically issued certificates) and at the relevant point in time in order to help the Fund obtain exemptions, reductions or reimbursements of withholding taxes or other taxes. The relevant taxes may be withholding taxes and other taxes that are levied by the financial or other administrative authorities in relation to the Fund, on payments to the Fund or on payments by the Fund to the respective investors (including withholding taxes that are due under HIRE or based on laws similar to HIRE, based on successor legislation to HIRE, or based on agreements that are concluded on the basis of such laws).

If an investor does not provide such information, declarations or forms to the Fund, the Board of Managers is fully authorised to take one or more, or all of, the following measures:

- (a) deduction of taxes on the amounts to be distributed to such an investor where such retention by the Fund is required in relation to the investor according to applicable regulations, guidelines or agreements. These withheld amounts are treated as if they have been distributed to the respective investor and paid by the investor to the responsible tax authority. If the Fund is obliged to retain taxes on amounts which are not currently distributed to such investor, the investor is obliged to pay the Fund an amount equal to the amount which must be retained by the Fund. The Board of Managers may also retain this amount in respect of subsequent distributions. Sentence 1 applies accordingly in this case; and
- (b) deduction of external costs which the Fund incurs under the reporting and withholding tax deduction regime (such as tax adviser costs) from the amounts to be distributed to the investor concerned. These deducted amounts are treated as if they have been distributed to the respective investor. If no amounts are distributed to the investor, the investor is obliged to pay a corresponding amount to the Fund. If external costs incurred by several investors cannot be directly assigned to the respective investor, they are divided proportionately (pro rata) according to their share of the fund assets.

If requested to do so by the Fund, an investor will sign all the documents, statements of position, instruments or certificates which the Fund reasonably requests or which are otherwise required in order to be able to carry out the aforementioned measures.

The members of the Board of Managers are authorised to disclose information about any investors to any tax authority or other government body in order to ensure that the Fund complies with applicable laws, regulations, and agreements with administrative authorities, and each investor waives all the rights which he may have under applicable banking secrecy, data protection and comparable provisions and which would prevent such disclosure.

The members of the Board of Managers are authorised to conclude agreements on behalf of the Fund with responsible tax authorities (including agreements based on HIRE and corresponding

subsequent legislation or an intergovernmental agreement between the United States and other countries in relation to the FATCA provisions), provided that they are of the opinion that such agreements are in the best interests of the Fund or the investors.

22.4 Common Reporting Standard

The Fund is subject to the provisions of the Luxembourg Law of 18 December 2015 ("**CRS Law**") on the implementation of Council Directive 2014/107/EU which is in turn based on the Common Reporting Standard ("**CRS**") of the Organisation for Economic Co-operation and Development ("**OECD**").

The CRS Law in Luxembourg governs the automatic exchange of financial account information within the European Union which has been in force since 1 January 2016, and it implements the Multilateral Convention which has been signed by Luxembourg and concluded between the responsible authorities concerning the automatic exchange of information in line with the OECD's CRS ("**Multilateral Convention**").

According to the CRS Law, a Reporting Financial Institution (*Institution financière déclarante*) is, among other things, obliged to undertake certain reporting and due diligence duties.

In particular, as from 30 June 2017, Reporting Financial Institutions must report certain personal and financial information to the Luxembourg tax authorities every year regardless of any applicable data protection provisions. This information includes, among other things, the identification of participations held by and payments made to (i) Reportable Persons (*Personnes devant faire l'objet d'une déclaration*) and (ii) Controlling Persons (*Personnes détenant le contrôle*) by Passive Non-Financial Institutions (passive NFIs), which themselves are likewise Reportable Persons. Finally, the information to be reported is listed in Article 4 of the CRS Law ("**Information**"), and it includes Personal Data relating to Reporting Persons.

By contrast, there are no reporting duties if the Reporting Financial Institution can invoke certain exemptions allowed by the CRS Law. Subject to all the units being held by Deemed Compliant Investors according to the CRS, it is expected that the Fund will be treated under the CRS Law as an Exempt Collective Investment Vehicle (*Organisme de placement collectif dispensé*). Consequently, according to the CRS Law, the Fund will not be obliged to report information about the investors and their units.

In order to ensure that the investors in the Fund remain restricted to CRS Deemed Compliant Investors, investors are obliged to provide the necessary information to the Fund together with all the required written proof. The investors are hereby explicitly advised that the Fund, as the person responsible for data processing, requires this information for the purposes of the CRS Law.

If the CRS status changes from being a Non-Reporting Financial Institution (*Institution financière non déclarante*) to a Reporting Financial Institution, the investors will be informed of the change and the Sales Prospectus will be amended accordingly.

The investors undertake to inform the Fund of any facts which may prejudice the CRS status (including imprecise information) within thirty (30) days of becoming aware of them. Furthermore, if any of the information changes the investors undertake to notify the Fund by means of corresponding written proof without delay, and to make such proof available to the Fund.

Any investor failing to comply with the requests by the Fund for

information and written proof may be held liable for any penalties levied against the Fund as a result.

23. Fund fees and costs

The below mentioned fees, expenses and indemnifications may be charged between the various Sub-funds and classes, on the basis of their respective net assets, within such a period, on such terms and in such a manner as the Management Company thinks fair and reasonable provided that each class of a Sub-fund and/or each Sub-fund will bear its own fees, expenses and indemnifications which are directly and exclusively attributable to it.

Management Fee

The Management Company will be entitled to a management fee, the amount of which is specified for each class of each Sub-fund in the Special Section.

In return for its management of the Fund, the Management Company receives remuneration of up to 0.05% p.a. of the net Sub-fund assets in respect of each Sub-fund, which is calculated on each Business Day and paid out monthly in arrears.

The Management Fee is including the Central Administrative Agent Fee.

Investment Management Fee

The Investment Manager and the investment adviser, if any, will be paid an investment management fee, the amount of which is specified for each class of each Sub-fund in the Special Section.

Organisational Expenses

The Fund shall bear all Organisational Expenses and/or reimburse the Management Company, its Affiliates and/or other intermediaries having borne all or part thereof for all Organisational Expenses incurred by them in relation to the setting up of the Fund.

The Organisational Expenses may in accordance with and to the extent provided for under the generally accepted Luxembourg accounting standards be written off by the Fund over a period not exceeding five years.

Operation and Administration Expenses

The Fund shall bear all Operation and Administration Expenses. Certain administrative costs incurred by the Management Company or the Investment Manager in the name of the Fund and other disbursements will be refunded by the Fund and treated as disbursements of the Fund. The Fund pays all expenses, liabilities and costs incurred by the Fund, the Management Company or the Investment Manager, provided that these are incurred directly in connection with the transactions or the management of the Fund.

Investment-Related Expenses

The Fund shall bear all Investment-Related Expenses and the Management Company, as the case may be, shall be reimbursed by the Fund for all Investment-Related Expenses incurred by it.

Administration Fees

The Registrar and Transfer Agent shall be entitled to be paid out of the Fund's assets, such fees as shall be disclosed to the unitholders in the annual reports.

Depository Fee

The Depository shall be entitled to be paid out of the Fund's assets, such fees as shall be determined from time to time by agreement with the Management Company and disclosed to the unitholders in the annual reports.

The remuneration of the Depository up to 0.015% p.a. of the proportionate net Sub-fund Assets. This service fee may however be higher or lower than the aforementioned value, depending on the net Sub-fund Assets concerned.

In addition, the expenses and expenditure incurred by the Fund and/or the Sub-funds may be charged.

Value Added Tax

All fees and expenses pursuant to the above are exclusive of value added taxes or other chargeables thereon, which shall be paid by the Fund as required.

Indemnification

The Fund will indemnify the Management Company, its officers, directors, managers, employees and associates and all persons serving on the Management Company Board (each an "Indemnitee") against all claims, liabilities, reasonable cost and expenses incurred in connection with their role as such, other than arising directly or indirectly from negligence, fraud, bad faith or wilful misconduct of an Indemnitee. Any obligation of the unitholders with respect to such indemnification will be limited to their investments in the Fund.

Within the limits of Luxembourg law, the Indemnitees shall have no liability for any loss incurred by the Fund or any unitholder howsoever arising in connection with the service provided by them in accordance with the Fund Documents, and each Indemnitee shall be indemnified and held harmless out of the assets of the Fund against all actions, proceedings, reasonable costs, charges, expenses, losses, damages or liabilities incurred or sustained by an Indemnitee in or about the conduct of the Fund's business affairs or in the execution or discharge of their duties, powers, authorities or discretions in accordance with the terms of the appointment of the Indemnitee, including without prejudice to the generality of the foregoing, any reasonable costs and expenses, losses or liabilities incurred by them in defending (whether successfully or otherwise) any civil proceedings concerning the Fund or its affairs in any court whether in Luxembourg or elsewhere, unless such actions, proceedings, costs, charges, expenses, losses, damages or liabilities arise directly or indirectly from negligence, bad faith, wilful misconduct or fraud of an Indemnitee.

The Management Company may charge the following costs to the Fund and/or the Sub-funds:

- costs incurred in connection with the purchase, holding or sale of assets, in particular customary bank charges for securities transactions and other assets and rights of the Fund and/or Sub-fund and for their custody, as well as customary bank charges for the custody of foreign investment units abroad; in this context, the Management Company and/or Investment Manager will in particular place purchase and sale orders for securities and financial instruments on behalf of the Fund and/or the Sub-funds directly with brokers and dealers. The trading parties are selected according to market conditions and at the discretion of the Management Company/ Investment Manager in the best interests of the Fund, the Sub-funds and the investors. However, the selection process takes

account not only of the stock prices offered, the commissions payable and other fees, but also relevant factors affecting the transaction price, such as implementation possibilities, analysis services, statistical services, and other broker and dealer services. The analysis service may in addition include the analysis of companies, technical analysis, company information, market news, and economic and market research. All these services that are provided are regularly reviewed. They provide useful investment management support for the Management Company.

- all the third party management and custody fees (in particular deposit fees) charged by other correspondent banks and/or clearing houses (e.g. *Clearstream Banking S.A.*) in relation to the assets of the Fund and/or Sub-funds in their custody, and all the third party processing, shipping and insurance expenses incurred in connection with the Fund's and/or Sub-funds' transactions in fund units;
- all the taxes levied on the assets, income and expenses of the Fund and/or the Sub-funds;
- own expenses and other costs incurred by the Depository, the Central Administrative Agent and the Registrar and Transfer Agent in connection with the Fund Assets, and the costs and other expenses arising from the necessary use of third party services. In addition, the Depository receives customary banking expenses;
- the costs, fees and expenses arising from the necessary use of third party services for regulatory reporting and clearing;
- usual brokerage and bank charges, in particular stock commissions, which are incurred for transactions involving securities and other assets of the Fund and/or the Sub-funds, and for currency and securities hedging transactions;
- accounting and bookkeeping costs and the costs of calculating the net asset value and its publication;
- the costs of obtaining advice, which are incurred by the Management Company or the Depository when they act in the interests of the investors in the Sub-funds;
- the costs and expenses in connection with the founding of the Fund and/or the Sub-funds, set-up costs, fees payable to index providers, index license holders or index calculation agents, the costs of any stock exchange listing or registration in Germany or abroad, and insurance premiums, interest and brokerage costs;
- the fees of the Fund's auditor;
- the costs of drawing up, filing and publishing the Management Regulations and other documents concerning the Fund and/or the Sub-funds, including registration notifications, brochures or written explanations submitted to any registration and supervisory authorities and stock exchanges (including local securities dealer associations), which have to be undertaken in connection with the Fund and/or the Sub-funds or the offering of the units;
- the printing and distribution costs of the annual reports and semi-annual reports, the costs of any reports produced for investors in all the necessary languages and the printing and distribution costs of all further reports and documents required according to the applicable laws or the regulations of the stated authorities;
- the costs of the publications intended for the investors;
- insurance costs;
- the fees of the representatives of the Fund and/or the Sub-

funds abroad;

- a reasonable share of the costs of advertising and of those costs which are directly connected with offering and selling of units as well as sales agent remuneration;
- remuneration, expenses and other costs of the paying agent, the sales agents and other bodies that have to be set up abroad which are incurred in connection with the Fund Assets;
- interest incurred in connection with loans that may be taken out in accordance with the investment policy and investment restrictions;
- expenses of any investment committee;
- costs for any credit rating of the Fund and/or the Sub-funds by nationally and internationally recognised rating agencies;
- costs of establishing the Fund and/or the Sub-funds and for the initial issue of units. These costs may be written off over a period of five years.
- All costs and charges shall first be charged to the current income, then to net capital gains, and lastly to the Fund and/or the Sub-fund Assets.

The costs, remuneration, levies and extraordinary expenses incurred in connection with a specific Sub-fund or class of units are allocated to the corresponding Sub-fund and/or the corresponding class of units. In particular, these include any currency exchange rate hedging transactions which are concluded exclusively for the benefit of a single Sub-fund or class of units.

The costs, remuneration, levies and extraordinary expenses that cannot be allocated to a specific Sub-fund or specific class of units within the Fund are charged to the Sub-funds and/or classes of units within the Fund in proportion to the net assets of the corresponding Sub-funds and/or classes of units.

24. Financial Year

The Fund's financial year begins on 1 October and ends on 30 September each year. The first financial year began when the Fund was established on 3 April 2013 and ended on 30 September 2014.

25. Fund term

The Fund is set up for an indefinite period. The term of the Sub-fund is stated in the corresponding Annex.

26. Liquidation and merger of the Fund and Sub-funds

26.1 Liquidation

Neither investors nor their heirs or legal successors can request the dissolution and/or division of the Fund or a Sub-fund.

The Fund and the Sub-funds may at any time be wound up by the Management Company acting as the liquidator in such cases. Liquidation must take place in the legally prescribed cases, and if the Management Company is wound up. The liquidation of the Fund is published in accordance with the statutory provisions by the Management Company in the RESA and in at least two daily newspapers. One of these daily newspapers must be published in

Luxembourg. If a situation occurs which leads to the dissolution of the Fund or a Sub-fund, the issue of units shall be discontinued. The redemption of the units of a Sub-fund remains possible if the equal treatment of the investors is ensured. In the event of the liquidation of Sub-funds, the investors will be informed.

The liquidation of the Fund and/or of Sub-funds may be decided upon in the following cases:

- (a) if, on a valuation date, the net Sub-fund Assets fall below an amount determined by the Management Company in its judgement to be the minimum level for the Fund and/or the Sub-fund to be operated in an economically efficient manner; or
- (b) if, due to a significant change or substantial modification in political, economic or monetary environment relating to the Fund that would have material adverse consequences on the investments of the Fund or due to reasons of commercial viability, continuing to manage the Fund and/or the Sub-fund no longer seems to make commercial sense.

The Depositary shall distribute the liquidation proceeds, minus the liquidation costs and fees, among the investors according to their respective shares as instructed by the Management Company or, if applicable, by the receivers appointed by it or by the Depositary with the agreement of the supervisory authority. Any net liquidation proceeds, the payment of which is not demanded by unitholders upon the completion of liquidation proceedings, shall, if required by law, be converted into euros, and following the completion of liquidation proceedings they shall be deposited by the Depositary on behalf of the entitled unitholders at the *Caisse des Consignations* in Luxembourg. These amounts shall then be forfeited if they are not claimed there within the statutory time limit.

26.2 Provisions relating to master UCITS and feeder UCITS

If a master UCITS is liquidated, divided into two or more UCITS, or merged with another UCITS, the feeder UCITS shall also be liquidated unless the CSSF approves:

- (a) the investment of at least 85% of the assets of the feeder UCITS in units of another master UCITS, or
- (b) the amendment of the Management Regulations in order to enable it to convert into a UCITS which is not a feeder UCITS.

Irrespective of specific national provisions relating to compulsory liquidations, the liquidation of a master UCITS takes place at the earliest three months after the time when the master UCITS has informed all its unitholders or shareholders and the CSSF of the binding liquidation decision.

26.3 Merger

"Mergers" are transactions in which

- (a) one or more UCITS or Sub-fund(s) thereof, "the transferring UCITS", transfers all its assets and liabilities to another existing UCITS or a Sub-fund of that UCITS, "the absorbing UCITS", when it is wound up without being liquidated, and in return its unitholders receive units in the absorbing UCITS and, if applicable, a cash payment amounting to a maximum of 10% of the Net Asset Value of these units;
- (b) two or more UCITS or Sub-funds thereof, "the transferring UCITS", transfer all their assets and liabilities to a UCITS formed by them or a Sub-fund of that UCITS, "the absorbing UCITS", when they are wound up without being liquidated, and in return

their unitholders receive units of the absorbing UCITS and, if applicable, a cash payment amounting to a maximum of 10% of the Net Asset Value of these units;

- (c) one or more UCITS or Sub-funds thereof, "the transferring UCITS", which continue to exist until the liabilities have been discharged, transfer(s) its/their net assets to another Sub-fund within the same UCITS, to a UCITS formed by it/them, or to another existing UCITS or a Sub-fund of that UCITS, "the absorbing UCITS".

Such mergers may be carried out in the forms specified in the Law of 17 December 2010 and in accordance with the methods and information duties specified therein; the legal consequences of a merger are specified by the Law of 17 December 2010.

If the Fund or a Sub-fund exists as a master UCITS, a merger can only take effect if the Fund or Sub-fund concerned provides the legally specified information to its investors to the responsible authorities in the member state where its feeder UCITS originates up to 60 days before the proposed date on which it is to take effect. In this case, the Fund or Sub-fund in question also gives the feeder UCITS the possibility of taking back or alternatively paying out all the units before the merger and/or division takes effect, unless the responsible authorities in the country of origin of the feeder UCITS approve an investment in units of the master UCITS which is produced through the split or merger.

In accordance with the following conditions, the Management Company may decide by decision of the Board of Managers to incorporate or merge the Fund and/or a Sub-fund into another Sub-fund or into another fund or its Sub-fund which is managed by either the same or a different Management Company, or to incorporate or merge it into an investment company. The merger may be decided on in the following cases:

- if, on a valuation date, the net Sub-fund Assets fall below an amount determined by the Management Company in its judgement to be the minimum level for the Fund and/or the Sub-fund to be operated in an economically efficient manner; or
- if, due to a significant change or substantial modification in the political, economic or monetary environment relating to the Fund that would have material adverse consequences on the investments of the Fund or due to reasons of commercial viability, continuing to manage the Fund and/or the Sub-fund no longer seems to make commercial sense.

The decision by the Management Company to merge the Fund and/or Sub-fund is published in a newspaper specified by the Management Company in those countries where the units of the Fund or Sub-fund to be incorporated are marketed. A merger that has taken effect according to the provisions of the Law of 17 December 2010 may no longer be declared void.

The investors in the Fund and/or Sub-fund to be incorporated have the right during a period of 30 days to demand the redemption without charge of all or some of their units at the relevant net asset value. The units of the investors who have not demanded the redemption of their units are replaced by units in the receiving UCITS and/or Sub-fund on the basis of the net asset value on the date when the merger takes effect. If necessary, the investors receive a settlement of the balance.

This right shall be effective from the date on which the unitholders of the merging UCITS and the unitholders of the receiving UCITS have been informed of the planned merger, and it expires five working days before the date of calculation of the exchange ratio.

Furthermore, the Management Company may decide to temporarily

suspend the issue, redemption or pay-out of units in the Sub-fund if such a suspension appears to be justified in order to protect the investors. The investors in the Fund and/or Sub-fund which is to be incorporated have the right during a period of 30 days to demand the redemption without charge of all or some of their units at the relevant net asset value.

The Board of Managers of the Management Company may decide to convene an extraordinary general meeting and to propose to it the incorporation of the Fund and/or a Sub-fund into a foreign fund, or the merger of a foreign fund with the Fund and/or a Sub-fund.

The investors are responsible for making the decision to merge the Fund and/or a Sub-fund with a foreign fund. The invitation to the investors' meeting is published by the Management Company at least 8 days before the meeting in a daily newspaper that is specified by the Management Company in those countries where the Sub-fund's units are marketed. The decision to merge the Fund and/or a Sub-fund with a foreign fund is subject to a quorum of 50% of the units in circulation, and is taken by a 2/3 majority of those present or of the units represented by proxy, and only those investors who have voted in favour of the merger are bound by the resolution. In the case of investors who have not attended the meeting and any investors who did not vote for the merger, it is assumed that they have offered their units for redemption.

26.4 Conversion of existing funds into feeder UCITS and changing of existing master UCITS funds

In the case of the conversion of existing funds and/or Sub-funds into feeder UCITS and the changing of existing master UCITS funds and/or Sub-funds, the legally prescribed information must be provided to the unitholders within the legally specified periods. Within a period of 30 days thereafter, the investors have the right to demand that their units be redeemed or paid out without charge, except for the costs of covering the sales.

27. Coming into force of and changes to the Management Regulations

The Management Regulations of the Fund, which comply with the provisions of the Law of 17 December 2010, entered into force on 3 April 2013, and a notice of filing in the Trade and Companies Register in Luxembourg was published on 5 April 2013 in the "*Mémorial Recueil des Sociétés et Associations*", the Official Gazette of the Grand Duchy of Luxembourg ("*Mémorial*").

The Management Regulations were last amended on 1 October 2022 with effect from 1 October 2022, and the amended version was filed with the Trade and Companies Register of the Luxembourg District Court. Notice of this filing was published in the RESA.

The Management Company may, at any time, wholly or partially amend the Management Regulations of the Fund. Unless otherwise stated, the changes to the Fund's Management Regulations shall come into force on the date of signing. Changes to the Management Regulations are filed with the Trade and Companies Register in Luxembourg. In addition, reference to the respective filing is published in the RESA.

28. Data protection

Purpose and legal basis

The unitholder or potential unitholder is obliged to provide the Company with the personal data required for the investment (including, but not limited to, name, address and amount invested by an investor). These may be collected, recorded, stored, transferred, processed and otherwise used in electronic and paper form, by the Company and by third parties appointed by the Company.

Personal data will be used, in particular, for the administration of accounts, the processing of subscription, redemption and conversion applications, the management of the share register, the provision of services relating to the Company and compliance with applicable laws or regulations, in Luxembourg and other legal systems, including, but not limited to, applicable company law, laws and regulations relating to the fight against money laundering and terrorist financing and tax law, such as Foreign Account Tax Compliance Act (FATCA), Common Reporting Standard (CRS) or similar laws or regulations.

If a unitholder or potential unitholder does not provide such personal data in the form desired by the general partner of the Company, the company may limit or prohibit ownership of the shares of the Company as described in this sales prospectus. In such event, the unitholder or potential unitholder shall be responsible for and pay compensation for the costs incurred by the Company, by third parties authorised by the Company, or the Depositary for such action.

The data are neither used for marketing purposes nor passed on to unauthorized third parties.

The collection, storage and processing of personal data and information of natural persons shall be governed at all times by the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data Traffic and repealing Directive 95/46/EC (the "General Data Protection Regulation" or "GDPR"), which is supplemented by any applicable national law (the "Data Protection Act").

Additional recipients of the data

The Company may entrust another legal entity with the processing of personal data. The Company undertakes not to transfer personal information to third parties other than the delegate, unless required by law or approved by the unitholders. If, in order to fulfil its contractual obligations, the Company uses the services of a processor within the meaning of the GDPR to perform certain processing activities for the Company/Fund, and if data or information are processed by natural persons, the Company undertakes to indemnify this processor by way of a contract or other legal instrument, under Union or national law of the member state, to impose the same data protection obligations that the Company would have if it were itself a processor. The Company undertakes, when selecting the processor(s), to ensure that adequate guarantees are provided that the appropriate technical and organizational measures are carried out in such a way that processing takes place in accordance with the requirements of the GDPR.

Rights of affected persons and contact

Upon written request of the unitholder/investor, the latter will be granted access to his own personal data provided to the Company. In the same way, the unitholder can assert all the rights to which he is entitled under the GDPR. This desire is always to be met.

The current version of the privacy policy of the Company is available on the management company's website (<https://www.hal-privatbank.com/en/data-privacy>). The rights of the unitholder/investor within the meaning of the GDPR can be viewed either on the subscription agreement or the membership application or on the website of the management company's privacy policy <https://www.hal-privatbank.com/en/data-privacy>. The current contact details of the data protection officer appointed by the managing company can be viewed at <https://www.hal-privatbank.com/en/data-privacy>.

By subscribing to units of the Fund, each unitholder agrees to the processing of his/her personal data. This consent is formally granted in writing on the underlying subscription agreement.

29. Data transfers in the context of outsourcing

The Management Company or the Depositary may outsource certain functions and systems to third party service providers in- or outside Hauck Aufhäuser Lampe group (the "Sub-contractors"), while retaining full responsibility and overall control of all outsourced tasks and all data stored outside of Luxembourg. The outsourced functions may include transfer agent and shareholders services (incl. global reconciliation), treasury and market services, IT infrastructure (hosting services, including cloud services), IT system management/operation services, IT services (incl. development and maintenance services), reporting as well as Investor services activities. As part of those outsourcing arrangements, the Management Company or the Depositary may be required to disclose and transfer personal and confidential information and documents about the unitholder, the investor and individuals related to the unitholder and the investor (the "**Related Individuals**") (the "**Data transfer**") (such as identification data – including the investor and/or the Related Individual's name, address, national identifiers, date and country of birth, etc. – and account information, contractual and other documentation and transaction information) (the "Confidential Information") to the Sub-contractors that are established in the countries described above. Further information on the Data transfer by the Management Company or the Depositary is included in the Data Protection Notice.

30. Applicable law, jurisdiction and contractual language

The Fund's Management Regulations are subject to Luxembourg law. Any legal dispute between investors, the Management Company and the Depositary is subject to the jurisdiction of the responsible court in the city of Luxembourg.

The Management Company and the Depositary are entitled to subject themselves and the Fund to the jurisdiction and law of any country where Fund units are publicly marketed in relation to claims by investors resident in the country concerned, and in relation to matters relating to the subscription and redemption of units.

Only the English version of the Sales Prospectus and Management Regulations is definitive, and in the event of any inconsistency with a translation, the English version is decisive.

In relation to units which have been sold to investors in the

respective country, the Management Company and the Depositary are entitled to declare translations into the languages of such countries where Fund units are publicly marketed to be binding on themselves and the Fund.

I

Annex I: Special Section relating to the individual Sub-funds

At the time of completion of this Sales Prospectus, the Fund comprises the following Sub-funds:

MEAG FlexConcept – Basis;

MEAG FlexConcept – Wachstum;

MEAG FlexConcept – EuroGrowth;

MEAG FlexConcept – EuroBond;

MEAG FlexConcept – BEST10USD;

If further Sub-funds are set up, this Annex will be supplemented accordingly.

MEAG FlexConcept – Basis

1. Investment objective

The investment objective of the Sub-fund is to achieve a return in line with the European money market rate whilst ensuring that the invested money retains its value, although the retention of value cannot be legally guaranteed.

2. Investment policy

The Sub-fund assets mainly consist of money market instruments issued by issuers based in Europe, interest-bearing securities, liquid funds and/or sight deposits. The assets may be denominated and/or traded in a foreign currency.

Up to 49% of the value of the Sub-fund assets may be invested in equities.

In addition, up to 10% of the value of the Sub-fund assets may be invested in units of other UCITS or other UCIs. These other UCITS or other UCIs must, according to their contractual conditions or Articles of Association, be predominantly invested in securities.

Derivatives (in the form of stock exchange-listed derivatives and/or OTC derivatives) may be used in connection with the Sub-fund assets for investment and hedging purposes, but the overall risk must not exceed 200%.

The Sub-fund will not make use of securities or commodities lending and securities or commodities borrowing, repurchase or reverse repurchase transactions, buy-sell back transactions or sell-buy back transactions or margin lending transactions.

The Sub-Fund may include up to 20% of liquid funds depending on the financial market situation. That limit may be temporarily exceeded for a period which is absolutely necessary, if circumstances require this due to exceptional market conditions and if exceeding the limit is justified by the interests of investors, for example in very serious circumstances such as the attacks of 11 September 2001 or the insolvency of Lehman Brothers in 2008.

Liquid funds are deposits at sight that are available at all times at a bank in order to make current and extraordinary payments, as well as payments relating to the disposal of permissible assets in accordance with Article 41(1) of the Law of 17 December 2010.

Furthermore, for liquidity management purposes the Sub-Fund may invest in money market funds, hold deposits at sight in the form of overnight deposits and deposits at notice in the meaning of Article 5 of the Management Regulations and invest in money market instruments in the meaning of Article 5 of the Management Regulations.

The Sub-fund does not have as its objective sustainable investment nor does it actively promote environmental or social characteristics.

The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Potential sustainability risks derive from the assessment of a company or an issuer with respect to sustainability aspects. For this reason, on the basis of the current composition of the Sub-fund assets, each company or issuer will be made subject to a sustainability classification, relying on the data of ESG Research and the Investment Manager, and, on an aggregated level, the probability of the occurrence of a potential sustainability risk and of its impacts on the returns of the Sub-fund will be determined.

At the time of drawing up the Sales Prospectus, the likely impacts of sustainability risks on the returns of the Sub-fund are considered as being moderate.

3. Investment Manager

The Management Company has appointed as the Investment Manager of the Sub-fund:

MEAG MUNICH ERGO Kapitalanlagegesellschaft mbH
Am Münchner Tor 1
D-80805 Munich
Federal Republic of Germany

4. Benchmark Index and Administrator

The Sub-fund is actively managed with the objective to achieve a performance comparable to €STR, the euro short-term rate (the “**Benchmark Index**”), which, however, is not achieved by tracking the return of the Benchmark Index. The Investment Manager has full discretion over the portfolio composition.

There will be a difference in the performance between the Sub-fund and the Benchmark Index, which can be positive or negative, and may be material or differ completely from the Benchmark Index over a holding period of twelve months.

Status of the Benchmark Administrator

The Benchmark Index is being provided by the European Central Bank (ECB) (the “**Benchmark Administrator**”), in its capacity as administrator as defined in the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds, as may be amended or supplemented from time to time (the “**Benchmarks Regulation**”) of the Benchmark Index. The Benchmark Administrator is located in the European Union. It is not listed in the register of all administrators located in the European Union, referred to in article 36 of the Benchmarks Regulation, as it is exempt from the scope of the Benchmarks Regulation pursuant to article 2(2) of the Benchmarks Regulation.

The Benchmark Administrator is an unrelated party to the Management Company and the Investment Manager.

Contingency Plans

The Management Company has adopted written plans setting out actions, which it will take with respect to the Sub-fund in the event that the Benchmark Index materially changes or ceases to be provided (the “**Contingency Plans**”), as required by article 28(2) of the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial

instruments and financial contracts or to measure the performance of investment funds, as may be amended or supplemented from time to time. Unitholders may access the Contingency Plans at the registered office of the Management Company.

5. Term of the Sub-fund

The Sub-fund has been set up for an indefinite period.

6. Unit classes

At the time of drawing up the Sales Prospectus, the Sub-fund does not comprise different unit classes.

7. Form of the units

The units in the Sub-fund are issued as registered units and may be issued in allocations of up to three decimal places.

8. Issue, redemption and conversion of units

Initial issue date/initial issue phase

The initial issue took place on 3 April 2013.

Initial issue price

The initial issue price was 50.00 euros per unit.

Minimum investment amount

The minimum investment amount is 100,000.00 euros.

Issue, redemption and conversion of units

Subscription, redemption and conversion orders which are received by the Central Administrative Agent no later than 16:00 hours CET on a Subscription and Redemption Day will be dealt with on the next following Valuation Day at the issue, redemption and conversion prices of that valuation date.

Subscription, redemption and conversion orders which are received by the Central Administrative Agent after 16:00 hours CET on a Subscription and Redemption Day will be processed on the Valuation Day following the next valuation date on the basis of the issue, redemption and conversion prices determined on such Valuation Day.

Sales charge

The sales charge which is used to cover marketing costs is up to 2% of the unit value in the case of the Sub-fund. At the time of completion of the Sale Prospectus, no sales charge is charged.

Redemption fee

No redemption fee is charged for the Sub-fund. The redemption price equals the unit value.

9. Eligible Investors

The Sub-fund is reserved for Eligible Investors, as described below, who, on the basis of the Sales Prospectus and the management regulations, have made their own assessment of the conditions of their participation in the Sub-fund.

Eligible Investor means investors who qualify as

- institutional investors, according to Article 174 of the Law of 17 December 2010;

AND

- professional investors within the meaning of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments ("MiFiD 2") and in accordance with Luxembourg laws and regulations;

10. Profile of the typical investor

The investment horizon should be at least two years.

The Sub-fund targets professional clients and eligible counterparties who pursue a goal of capital investment and capital optimisation and who have an investment horizon of at least two years. The Sub-fund is suitable for investors with basic knowledge and/or experience with transferable securities. The potential investor can bear financial losses and does not rely on protection of capital.

The Sub-fund is not suitable for retail investors, investors with very little interest in risk nor those who seek capital protection.

11. Dividend policy

The Sub-fund reinvests in the Sub-fund assets the interest, dividends and other earnings which have accrued to the Sub-fund during the financial year and are not used to cover costs – taking account of the associated earnings adjustment – and the capital gains (plough-back).

12. Reference Currency

The Reference Currency of the Sub-fund is the euro.

13. Risk management procedure

Method used to calculate the market risk exposure

The Sub-fund may undertake derivatives transactions for the purpose of hedging, for the efficient management of the portfolio (Chapter 2 of this Annex to the Sales Prospectus), and for the achieving of additional earnings, i.e. also for investment purposes.

The use of derivatives allows the market risk exposure of the Sub-fund to be increased. However, it may never exceed the maximum

value of 200% of the market risk exposure of a derivative-free reference asset. The market risk exposure ("**value at risk**") is understood to mean the potential losses due to the realisation of the market risk. The market risk is understood to mean the risk which results from the unfavourable development of market prices for the Sub-fund.

The risks associated with the use of derivatives are managed through a risk management procedure which enables the level of risk associated with the investment holdings, and its respective share of the total investment portfolio risk profile, to be monitored and measured at all times.

Irrespective of the mandatory upper limit, the Sub-fund always strives to ensure that the market risk exposure of the Sub-fund does not generally exceed 180% of the market risk exposure of a derivative-free reference asset. Nevertheless, the market risk exposure does vary according to the market conditions, so that despite continual monitoring by the Sub-fund the targeted margins may be exceeded.

The derivative-free reference assets are a virtual portfolio, the value of which matches the current value of the Sub-fund assets but which does not incorporate any increases in or hedging of the market risk through the use of derivatives. In all other respects, the composition of the reference assets must also be in accordance with the investment objectives and investment policy that apply to the respective Sub-fund.

The "**portfolio ex derivatives**" method is used to determine the derivative-free reference assets for this Sub-fund. In this method the

reference assets match the holdings of the Sub-fund portfolio excluding its derivative units.

Taking into account the Sub-fund's investment strategy (see the General Sections "6. Investment objective and policy" and "7. Investment principles and limits", as well as sections "1. Investment objective" and "2. Investment policy" in this Special Section relating to the Sub-fund) and the Sub-fund's redemption principles (see the section "Issue, redemption and conversion of units" in this Special Section relating to the Sub-fund, the Sub-fund may be described as liquid.

14. Special risk information

Price changes in bond markets.

The performance of the Sub-fund is influenced in particular by the following factors, which give rise to opportunities and risks:

- Developments on the money and capital markets.
- Changes in yield and/or price changes in the bond markets.
- Credit-rating of issuers.
- Changes in the exchange rates of non-euro currencies against the euro.

A more detailed risk description of the Sub-fund can be found in the General section of the Sales Prospectus.

The Sub-fund - an overview

Fund name	MEAG FlexConcept – Basis
International Securities Identification Number	LEI: 529900H52SGPVH5EJV68 ISIN: LU0887262433 WKN: A1KCHC
Set-up date	3 April 2013
Reference Currency	EUR
Type of units	Registered units, no bearer certificates
Eligible Investors	Exclusively institutional and professional investors
Initial issue date	3 April 2013
Initial issue price	EUR 50.00
Sales charge	No sales charge is currently charged for the Sub-fund.
Redemption fee	No redemption fee is currently charged for the Sub-fund.
Dividend policy	Earnings reinvested, currently only accumulating units are issued for the Sub-fund.
Business Day	Any day that is simultaneously a bank business and trading day in Luxembourg, Munich and Frankfurt am Main with the exception of 24 and 31 December each year
Valuation Day	Any Business Day
Subscription and Redemption Days	Any Business Day
Cut-Off-Time	Applications for the subscription, redemption and conversion of Sub-fund units which are received by 16:00 hours CET on a Subscription and Redemption Day will be dealt with on the next following Valuation Day at the issue, redemption and conversion prices of that valuation date. Applications for the subscription, redemption and conversion of units which are received after 16:00 hours CET on a Subscription and Redemption Day will be processed on the Valuation Day following the next valuation date on the basis of the issue, redemption and conversion prices determined on such Valuation Day.
Management Fee (including the Central Administrative Agent Fee)	Up to 0.05% p.a. of the net Sub-fund assets
Investment Manager Fee	0.030% p.a. of the net Sub-fund assets
Remuneration of the Depositary	up to 0.015% p.a. of the net Sub-fund assets
Countries where marketed	Grand Duchy of Luxembourg Federal Republic of Germany

MEAG FlexConcept – Wachstum

1. Investment objective

The Sub-fund's objective is to achieve continuous capital appreciation and earnings over the long term by investing in German bond and equities markets.

Investment by the Sub-fund is based on a dynamic concept. The aim of the concept is a 50% participation of the Sub-fund's Net Asset Value in the performance of the German bond markets, and a participation of up to 50% of the Sub-fund's Net Asset Value in the performance of the German equity markets. For the part of the Sub-fund's Net Asset Value relating to the equity market participation, the aim is to achieve volatility of between 10% and 14% ("**target volatility**"). The realized volatility equals an annual volatility rate of fluctuation of the daily yields within an observation period.

The investment policy – and consequently the participation of the Sub-fund's Net Asset Value in the performance of the German bond and equity markets and the achieving of the target volatility for the equity component – is implemented in particular through the use of derivatives. This enables the investment level, and consequently the price risk of the Sub-fund assets, to be managed.

The investment level may be increased by purchasing equities, interest-bearing securities, bond futures, equity futures, financial futures contracts on an equity index and/or purchase options on financial futures contracts, and it may be reduced by their sale. However, the use of other types of derivatives is not ruled out.

A continuous and full participation in the performance of the equity and/or bond markets cannot be achieved due to the structure of the Fund.

It must be borne in mind that market movements may occur which mean that the intended strategy cannot be implemented, or can only be implemented in a delayed or partial manner.

No guarantee can be given, however, that the aforementioned objectives of the investment policy will be reached.

2. Investment policy

The Sub-fund may be fully invested in interest-bearing securities, equities, and/or money market instruments. The assets may be denominated and/or traded in a foreign currency.

In addition, up to 10% of the value of the Sub-fund assets may be invested in units of other UCITS or other UCIs.

Derivatives (in the form of stock exchange-listed derivatives and/or OTC derivatives) may be used in connection with the Sub-fund assets for investment and hedging purposes.

The Sub-fund will not make use of securities or commodities lending and securities or commodities borrowing, repurchase or reverse repurchase transactions, buy-sell back transactions or sell-buy back transactions or margin lending transactions.

The Sub-Fund may include up to 20% of liquid funds depending on the financial market situation. That limit may be temporarily exceeded for a period which is absolutely necessary, if circumstances require this due to exceptional market conditions and if exceeding the limit is justified by the interests of investors, for example in very serious circumstances such as the attacks of 11 September 2001 or the insolvency of Lehman Brothers in 2008.

Liquid funds are deposits at sight that are available at all times at a bank in order to make current and extraordinary payments, as well as payments relating to the disposal of permissible assets in accordance with Article 41(1) of the Law of 17 December 2010.

Furthermore, for liquidity management purposes the Sub-Fund may invest in money market funds, hold deposits at sight in the form of overnight deposits and deposits at notice in the meaning of Article 5 of the Management Regulations.

The Sub-fund does not have as its objective sustainable investment nor does it actively promote environmental or social characteristics.

The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Potential sustainability risks derive from the assessment of a company or an issuer with respect to sustainability aspects. For this reason, on the basis of the current composition of the Sub-fund assets, each company or issuer will be made subject to a sustainability classification, relying on the data of ESG Research and the Investment Manager, and, on an aggregated level, the probability of the occurrence of a potential sustainability risk and of its impacts on the returns of the Sub-fund will be determined.

At the time of drawing up the Sales Prospectus, the likely impacts of sustainability risks on the returns of the Sub-fund are considered as being moderate.

3. Investment Manager

The Management Company has appointed as the Investment Manager of the Sub-fund:

MEAG MUNICH ERGO Kapitalanlagegesellschaft mbH
Am Münchner Tor 1
D-80805 Munich
Federal Republic of Germany

4. Benchmark Index and Administrator

The Sub-fund is actively managed in reference to a basket of sub-indices: 15,00% €STR, the euro short-term rate; 35,00% Dax 30; 50% IBOXX EURO SOVEREIGN GERMANY 7-10Y - TR (the "**Benchmark Index**"), where the Investment Manager has discretion over the portfolio composition and is not limited to investing in accordance with the composition of the Benchmark Index in order to take advantage of specific investment opportunities.

There will be a difference in composition of the portfolio and performance between the Sub-fund and the Benchmark Index, which might be positive or negative, and may be material or differ completely from the Benchmark Index over a holding period of five

years.

Status of the Benchmark Administrators

The Benchmark Sub-Index **€STR**, the euro short-term rate is being provided by the European Central Bank (ECB) (the "**Benchmark Administrator**"), in its capacity as administrator as defined in the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds, as may be amended or supplemented from time to time (the "**Benchmarks Regulation**") of the Benchmark Index. The Benchmark Administrator is located in the European Union. It is not listed in the register of all administrators located in the European Union, referred to in article 36 of the Benchmarks Regulation, as it is exempt from the scope of the Benchmarks Regulation pursuant to article 2(2) of the Benchmarks Regulation.

The Benchmark Sub-Index **Dax 30** is being provided by STOXX Ltd. (the "**Benchmark Administrator**"), in its capacity as administrator as defined in the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds, as may be amended or supplemented from time to time (the "**Benchmarks Regulation**") of the Benchmark Index. The Benchmark Administrator is located in Switzerland and listed in the register of all administrators referred to in article 36 of the Benchmarks Regulation, it is recognised under Article 32 of the Benchmarks Regulation.

The Benchmark Sub-Index **IBOXX EURO SOVEREIGN GERMANY 7-10Y - TR** is being provided by Markit N.V. (the "**Benchmark Administrator**"), in its capacity as administrator as defined in the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds, as may be amended or supplemented from time to time (the "**Benchmarks Regulation**") of the Benchmark Index. The Benchmark Administrator is located in the European Union and listed in the register of all administrators located in the European Union, referred to in article 36 of the Benchmarks Regulation, which have been authorised or registered pursuant to Article 34 of the Benchmarks Regulation.

The Benchmark Administrators are unrelated parties to the Management Company and the Investment Manager.

Contingency Plans

The Management Company has adopted written plans setting out actions, which it will take with respect to the Sub-fund in the event that the Benchmark Index materially changes or ceases to be provided (the "**Contingency Plans**"), as required by article 28(2) of the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds, as may be amended or supplemented from time to time. Unitholders may access the Contingency Plans at the registered office of the Management Company.

5. Term of the Sub-fund

The Sub-fund has been set up for an indefinite period.

6. Unit classes

At the time of drawing up the Sales Prospectus, the Sub-fund does not comprise different unit classes.

7. Form of the units

The units in the Sub-fund are issued as registered units and may be issued in allocations of up to three decimal places.

8. Issue, redemption and conversion of units

Initial issue date/initial issue phase

The initial issue took place on 3 April 2013.

Initial issue price

The initial issue price was 50.00 euros per unit.

Minimum investment amount

The minimum investment amount is 100,000.00 euros.

Issue, redemption and conversion of units

Subscription, redemption and conversion orders which are received by the Central Administrative Agent no later than 16:00 hours CET on a Subscription and Redemption Day will be dealt with on the next following Valuation Day at the issue, redemption and conversion prices of that valuation date.

Subscription, redemption and conversion orders which are received by the Central Administrative Agent after 16:00 hours CET on a Subscription and Redemption Day will be processed on the Valuation Day following the next valuation date on the basis of the issue, redemption and conversion prices determined on such Valuation Day.

Sales charge

The sales charge which is used to cover marketing costs is up to 4% of the unit value in the case of this Sub-fund. At the time of completion of the Sale Prospectus, no sales charge is levied.

Redemption fee

No redemption fee is charged for the Sub-fund. The redemption price equals the unit value.

9. Eligible Investors

The Sub-fund is reserved for Eligible Investors, as described below, who, on the basis of the Sales Prospectus and the management regulations, have made their own assessment of the conditions of their participation in the Sub-fund.

Eligible Investor means investors who qualify as

- institutional investors, according to Article 174 of the Law

of 17 December 2010;

AND

- professional investors within the meaning of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments ("MiFiD 2") and in accordance with Luxembourg laws and regulations;

10. Profile of the typical investor

The investment horizon should be at least five years.

The Sub-fund targets professional clients and eligible counterparties who pursue a goal of capital investment and capital optimisation and who have a medium term investment horizon of at least 5 years. The Sub-fund is suitable for investors with basic knowledge and/or experience with transferable securities. The potential investor can bear financial losses and does not rely on protection of capital.

The Sub-fund is not suitable for retail investors, investors with a short investment horizon or investors with very little interest in risk nor those who seek capital protection.

11. Dividend policy

The Sub-fund reinvests in the Sub-fund assets the interest, dividends and other earnings which have accrued to the Sub-fund during the financial year and are not used to cover costs – taking account of the associated earnings adjustment – and the capital gains (plough-back).

12. Reference Currency

The Reference Currency of the Sub-fund is the euro.

13. Risk management procedure

Method used to calculate the market risk exposure

The Sub-fund may undertake derivatives transactions for the purpose of hedging, for the efficient management of the portfolio (Chapter 2 of this Annex to the Sales Prospectus), and for the achieving of additional earnings, i.e. also for investment purposes.

The use of derivatives allows the market risk exposure of the Sub-fund to be increased. However, it may never exceed the maximum value of 200% of the market risk exposure of a derivative-free reference asset. The market risk exposure ("**value at risk**") is understood to mean the potential losses due to the realisation of the market risk. The market risk is understood to mean the risk which results from the unfavourable development of market prices for the Sub-fund.

The risks associated with the use of derivatives are managed through

a risk management procedure which enables the level of risk associated with the investment holdings, and its respective share of the total investment portfolio risk profile, to be monitored and measured at all times.

Irrespective of the mandatory upper limit, the Sub-fund always strives to ensure that the market risk exposure of the Sub-fund does not generally exceed 180% of the market risk exposure of a derivative-free reference asset. Nevertheless, the market risk exposure does vary according to the market conditions, so that despite continual monitoring by the Sub-fund the targeted margins may be exceeded.

The derivative-free reference assets are a virtual portfolio whose value matches the current value of the Sub-fund assets but which does not incorporate any increases in or hedging of the market risk through the use of derivatives. In all other respects, the composition of the reference assets must also be in accordance with the investment objectives and investment policy that apply to the respective Sub-fund.

Reference assets designed in this way (dynamic reproduction of the investment strategy based on the underlying) have the following characteristics:

- they conform to the investment strategy of the Sub-fund,
- they are derivative-free, and
- they are formed according to clear rules.

The "benchmark" method is used to determine the derivative-free reference assets for this Sub-fund.

The Sub-fund's benchmark is composed of bond components (IBOXX EURO SOVEREIGN GERMANY 7-10 YRS - PRICE INDEX), a DAX component, and a proportion of €STR, the euro short-term rate. The units are adjusted every day so that half of the benchmark consists of the bond components and the other half consists of a combination of DAX components and €STR, the euro short-term rate, the volatility of which, i.e. the degree of fluctuation of the combination of DAX and €STR, equals the target volatility of the share portion of the Sub-fund. The benchmark weighting is consequently variable, and it follows transparent deterministic calculation rules which reflect the investment strategy of the Sub-fund assets.

Taking into account the Sub-fund's investment strategy (see the General Sections "6. Investment objective and policy" and "7. Investment principles and limits", as well as sections "1. Investment objective" and "2. Investment policy" in this Special Section relating to the Sub-fund) and the Sub-fund's redemption principles (see the section "Issue, redemption and conversion of units" in this Special Section relating to the Sub-fund, the Sub-fund may be described as liquid.

14. Special risk information

The performance of the Sub-fund is influenced in particular by the following factors, which give rise to opportunities and risks:

- Developments on the money and capital markets.
- Changes in yield and/or price changes in the bond markets.
- Developments in the share markets.
- Credit-rating of issuers.
- Company-specific developments.
- Changes in the exchange rates of non-euro currencies against

the euro.

A more detailed risk description of the Sub-fund can be found in the General section of the Sales Prospectus.

The Sub-fund - an overview

Fund name	MEAG FlexConcept – Wachstum
International Securities Identification Number	LEI: 5299006S5BFJ218T1L27 ISIN: LU0887262516 WKN: A1KCHD
Set-up date	3 April 2013
Reference Currency	EUR
Type of units	Registered units, no bearer certificates
Eligible Investors	Exclusively institutional and professional investors
Initial issue date	3 April 2013
Initial issue price	EUR 50.00
Sales charge	No sales charge is currently charged for the Sub-fund.
Redemption fee	No redemption fee is currently charged for the Sub-fund.
Dividend policy	Earnings reinvested, currently only accumulating units are issued for the Sub-fund.
Business Day	Any day that is simultaneously a bank business day and trading day in Luxembourg, Munich and Frankfurt am Main with the exception of 24 and 31 December each year
Valuation Day	Any Business Day
Subscription and Redemption Days	Any Business Day
Cut-Off-Time	Applications for the subscription, redemption and conversion of Sub-fund units which are received by 16:00 hours CET on a Subscription and Redemption Day will be dealt with on the next following Valuation Day at the issue, redemption and e conversion prices of that valuation date. Applications for the subscription, redemption and conversion of units which are received after 16:00 hours CET on a Subscription and Redemption Day will be processed on the Valuation Day following the next valuation date on the basis of the issue, redemption and conversion prices determined on such Valuation Day.
Management Fee (including the Central Administrative Agent Fee)	Up to 0.05% p.a. of the net Sub-fund assets
Investment Manager Fee	0.060% p.a. of the net Sub-fund assets up to 0.015% p.a. of the net Sub-fund assets
Remuneration of the Depositary	
Countries where marketed	Grand Duchy of Luxembourg Federal Republic of Germany

MEAG FlexConcept – EuroGrowth

1. Investment objective

The Sub-fund's objective is to achieve continuous capital appreciation and earnings over the long term by investing in European bond and equities markets.

Investment by the Sub-fund is based on a dynamic, risk-adjusted investment concept. The aim of the concept is a participation of up to 75% of the Sub-fund's Net Asset Value in the performance of the European bond markets, and a participation of up to 60% of the Sub-fund's Net Asset Value in the performance of the European equity markets.

For the Sub-fund assets, the aim is to achieve volatility of between 7% and 10% ("target volatility"). The realized volatility equals an annual volatility rate of the fluctuation of the daily yields within the observation period.

No guarantee can be given, however, that the aforementioned objectives of the investment policy will be achieved.

2. Investment policy

The implementation of the investment policy – and consequently the participation of the Sub-fund assets in the performance of the European bond and equity markets and the achieving of the target volatility for the equity component – is undertaken through the trading of equities and interest-bearing securities, money market instruments and/or the purchase of units in other UCITS/UCIs (and in particular ETFs).

At least 50% of the Net Asset Value of the Sub-fund shall be invested in equities listed on a stock exchange or admitted to, or traded on, regulated markets within the meaning of Directive 2004/39/EC of the European Parliament and of the Council of 21 April 2004 on markets in financial instruments and which are not units or shares in a UCI.

The Sub-fund assets may also be invested in interest-bearing securities and money market instruments. The assets may be denominated and/or traded in a foreign currency.

In addition, up to 49% of the value of the Sub-fund assets may be invested in units of other UCITS, or up to 30% in other UCIs, as described in clause 7.2 (e) and 7.4 (i) – (j). Derivatives (in the form of stock exchange-listed futures) may be used in connection with the Sub-fund assets for hedging purposes only. The Sub-fund will not make use of securities or commodities lending and securities or commodities borrowing, repurchase or reverse repurchase transactions, buy-sell back transactions or sell-buy back transactions or margin lending transactions.

The Sub-Fund may include up to 20% of liquid funds depending on the financial market situation. That limit may be temporarily exceeded for a period which is absolutely necessary, if circumstances require this due to exceptional market conditions and if exceeding the limit is justified by the interests of investors, for example in very

serious circumstances such as the attacks of 11 September 2001 or the insolvency of Lehman Brothers in 2008.

Liquid funds are deposits at sight that are available at all times at a bank in order to make current and extraordinary payments, as well as payments relating to the disposal of permissible assets in accordance with Article 41(1) of the Law of 17 December 2010.

Furthermore, for liquidity management purposes the Sub-Fund may invest in money market funds, hold deposits at sight in the form of overnight deposits and deposits at notice in the meaning of Article 5 of the Management Regulations.

This Sub-Fund promotes environmental and social characteristics and qualifies as a product in accordance with article 8(1) of Regulation (EU) 2019/2088 on sustainability related disclosures in the financial services sector. The pre-contractual disclosure template for the Sub-Fund contains further information concerning the relevant requirements.

Potential sustainability risks derive from the assessment of a company or an issuer with respect to sustainability aspects. For this reason, on the basis of the current composition of the Sub-fund assets, each company or issuer will be made subject to a sustainability classification, relying on the data of ESG Research and the Investment Manager, and, on an aggregated level, the probability of the occurrence of a potential sustainability risk and of its impacts on the returns of the Sub-fund will be determined.

At the time of drawing up the Sales Prospectus, the likely impacts of sustainability risks on the returns of the Sub-fund are considered as being relatively low.

3. Investment Manager

The Management Company has appointed as the Investment Manager of the Sub-fund:

MEAG MUNICH ERGO Kapitalanlagegesellschaft mbH
Am Münchner Tor 1
D-80805 Munich
Federal Republic of Germany

4. Benchmark Index and Administrator

The Sub-fund is actively managed in reference to a basket of sub-indices: 70,00% IBOXX EURO SOVEREIGN ALL MATURITIES - TR; 19,50% EURO STOXX 50 Net Return Index EUR; 6,00% Deutsche Börse AG Mid-Cap Index; 4,50% Swiss Market Total Return Index (the "**Benchmark Index**"), where the Investment Manager has discretion over the portfolio composition and is not limited to investing in accordance with the composition of the Benchmark Index in order to take advantage of specific investment opportunities.

There will be a difference in composition of the portfolio and performance between the Sub-fund and the Benchmark Index, which might be positive or negative, and may be material or differ completely from the Benchmark Index over a holding period of five years.

Status of the Benchmark Administrators

The Benchmark Sub-Index **IBOXX EURO SOVEREIGN ALL MATURITIES - TR** is being provided by **Markit N.V.** (the "**Benchmark Administrator**"), in its capacity as administrator as defined in the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds, as may be amended or supplemented from time to time (the "**Benchmarks Regulation**") of the Benchmark Index. The Benchmark Administrator is located in the European Union and listed in the register of all administrators located in the European Union, referred to in article 36 of the Benchmarks Regulation, which have been authorised or registered pursuant to Article 34 of the Benchmarks Regulation.

The Benchmark Sub-Indices **EURO STOXX 50 Net Return Index EUR** and **Deutsche Börse AG Mid-Cap Index** are being provided by **STOXX Ltd.** (the "**Benchmark Administrator**"), in its capacity as administrator as defined in the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds, as may be amended or supplemented from time to time (the "**Benchmarks Regulation**") of the Benchmark Index. The Benchmark Administrator is located in Switzerland and listed in the register of all administrators referred to in article 36 of the Benchmarks Regulation, it is recognised under Article 32 of the Benchmarks Regulation.

The Benchmark Sub-Index **Swiss Market Total Return Index** is being provided by **Six Financial Information AG** (the "**Benchmark Administrator**"), in its capacity as administrator as defined in the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds, as may be amended or supplemented from time to time (the "**Benchmarks Regulation**") of the Benchmark Index. The Benchmark Administrator is located in Switzerland and listed in the register of all administrators referred to in article 36 of the Benchmarks Regulation, it is recognised under Article 32 of the Benchmarks Regulation.

The Benchmark Administrators are unrelated parties to the Management Company and the Investment Manager.

Contingency Plans

The Management Company has adopted written plans setting out actions, which it will take with respect to the Sub-fund in the event that the Benchmark Index materially changes or ceases to be provided (the "**Contingency Plans**"), as required by article 28(2) of the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds, as may be amended or supplemented from time to time. Unitholders may access the Contingency Plans at the registered office of the Management Company.

5. Term of the Sub-fund

The Sub-fund has been set up for an indefinite period.

6. Unit classes

At the time of drawing up the Sales Prospectus, the Sub-fund does not comprise different unit classes.

7. Form of the units

The units in the Sub-fund are issued as registered units and may be issued in allocations of up to three decimal places.

8. Issue, redemption and conversion of units

Initial issue date/initial issue phase

The initial issue took place on 15 January 2015.

Initial issue price

The initial issue price was 100.00 euros per unit.

Minimum investment amount

The minimum investment amount for initial subscriptions is 1,000,000.00 euros.

Issue, redemption and conversion of units

Subscription, redemption and conversion orders which are received by the Central Administrative Agent no later than 16:00 hours CET on a Subscription and Redemption Day will be dealt with on the next following Valuation Day at the issue, redemption and conversion prices of that valuation date.

Subscription, redemption and conversion orders which are received by the Central Administrative Agent after 16:00 hours CET on a Subscription and Redemption Day will be processed on the Valuation Day following the next valuation date on the basis of the issue, redemption and conversion prices determined on such Valuation Day.

Sales charge

The sales charge which is used to cover marketing costs is up to 4% of the unit value in the case of this Sub-fund. At the time of completion of the Sale Prospectus, no sales charge is levied.

Redemption fee

No redemption fee is charged for the Sub-fund. The redemption price equals the unit value.

9. Eligible Investors

The Sub-fund is reserved for Eligible Investors, as described below, who, on the basis of the Sales Prospectus and the management regulations, have made their own assessment of the conditions of their participation in the Sub-fund.

Eligible Investor means investors who qualify as

- institutional investors, according to Article 174 of the Law of 17 December 2010;

AND

- professional investors within the meaning of Directive

2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments ("MiFID 2") and in accordance with Luxembourg laws and regulations;

10. Profile of the typical investor

The investment horizon should be at least five years.

The Sub-fund targets professional clients and eligible counterparties who pursue a goal of capital investment and capital optimisation and who have a medium term investment horizon of at least 5 years. The Sub-fund is suitable for investors with basic knowledge and/or experience with transferable securities. The potential investor can bear financial losses and does not rely on protection of capital.

The Sub-fund is not suitable for retail investors and investors with a short investment horizon. It is also not suitable for investors with very little interest in risk nor those who seek capital protection.

11. Dividend policy

The Sub-fund reinvests in the Sub-fund assets the interest, dividends and other earnings which have accrued to the Sub-fund during the financial year and are not used to cover costs – taking account of the associated earnings adjustment – and the capital gains (plough-back).

12. Reference Currency

The Reference Currency of the Sub-fund is the euro.

13. Risk management procedure

Method used to calculate the market risk exposure

The Sub-fund may undertake derivatives transactions for the purpose of hedging.

The use of derivatives allows the market risk exposure of the Sub-fund to be increased. However, it may never exceed the maximum value of 200% of the market risk exposure of a derivative-free reference asset. The market risk exposure ("value at risk") is understood to mean the potential losses due to the realisation of the market risk. The market risk is understood to mean the risk which results from the unfavourable development of market prices for the Sub-fund.

The risks associated with the use of derivatives are managed through a risk management procedure which enables the level of risk associated with the investment holdings, and its respective share of the total investment portfolio risk profile, to be monitored and measured at all times.

Irrespective of the mandatory upper limit, the Sub-fund always strives to ensure that the market risk exposure of the Sub-fund does

not generally exceed 180% of the market risk exposure of a derivative-free reference asset. Nevertheless, the market risk exposure does vary according to the market conditions, so that despite continual monitoring by the Sub-fund the targeted margins may be exceeded.

The derivative-free reference assets are a virtual portfolio whose value matches the current value of the Sub-fund assets but which does not incorporate any increases in or hedging of the market risk through the use of derivatives. In all other respects, the composition of the reference assets must also be in accordance with the investment objectives and investment policy that apply to the respective Sub-fund.

The "**portfolio ex derivatives**" method is used to determine the derivative-free reference assets for this Sub-fund. In this method the reference assets match the holdings of the Sub-fund portfolio excluding its derivative units.

Taking into account the Sub-fund's investment strategy (see the General Sections "6. Investment objective and policy" and "7. Investment principles and limits", as well as sections "1. Investment objective" and "2. Investment policy" in this Special Section relating to the Sub-fund) and the Sub-fund's redemption principles (see the section "Issue, redemption and conversion of units" in this Special Section relating to the Sub-fund, the Sub-fund may be described as liquid.

14. Additional investment limits of the Sub-fund

1. No more than 20% of the relevant investments which are defined below in Numbers 2 to 4 below may be denominated in a currency other than the euro.
2. No more than 75% of the relevant assets may be invested within the following limits and according to the following methods in debenture bonds and other certified debt securities which may be traded in the capital market, and in mortgage loans and in cash deposits:
 - They may be invested in bonds and other certified debt securities that are denominated in euros or the currency of a member state of the European Economic Area and which are issued by a member state of the European Economic Area or by one of its political subdivisions, by other public institutions of a member state of the European Economic Area or by a supranational organisation to which one or more of the member states of the European Economic Area belongs, or, in respect of the principal and interest, which have an unrestricted guarantee issued by a member state of the European Economic Area or one of its political subdivisions, by other public institutions of a member state of the European Economic Area or by a supranational organisation to which one or more of the member states of the European Economic Area belongs, or in mortgage loans denominated in euros or the currency of a member state of the European Economic Area.
 - No more than 40% of the total of (i) these bonds and other certified debt securities that can be traded on the capital market, and (ii) these mortgage loans and these cash deposits, may consist of assets which are denominated in euros or the currency of a member state of the European Economic Area and which are issued by public or private

companies of a member state of the European Economic Area, or of cash deposits with a term of more than one year which are held in euros or the currency of a member state of the European Economic Area with a credit institution which is approved and monitored by a supervisory authority of such a member state.

- No more than 40% of all these debenture bonds and other certified debt securities that can be traded on the capital market, and of these mortgage loans and these cash deposits, may consist of assets which are denominated in the currency of a state which is not a member of the European Economic Area and which are issued by state which is not a member of the European Economic Area or by other public institutions of a state which is not a member of the European Economic Area, or by a supranational organisation which does not belong to a member state of the European Economic Area, or in respect of which the principal and interest have an unrestricted guarantee issued by a state which is not a member of the European Economic Area, by other public institutions of a state which is not a member of the European Economic Area, or by a supranational organisation to which none of the member states of the European Economic Area belongs, or of assets with a term of more than one year which are denominated in the currency of a state which is not a member of the European Economic Area and which are issued by public or private companies of the same state, or of cash deposits with a term of more than one year which are placed in the currency of a state which is not a member of the European Economic Area with a credit institution which is approved and monitored by a supervisory authority of such state.

For clarification purposes it is pointed out that the Sub-fund may not invest in mortgage loans.

3. No more than 75% of the assets concerned may be invested, in accordance with the following limits and methods, directly in shares and other securities that are comparable to shares:
 - No more than 70% of all these shares and securities may directly consist of shares and other securities that are comparable to shares which are issued by companies which are subject to the law of a member state of the European Economic Area and have a market capitalisation of over EUR 3,000,000,000, or the equivalent value in the currency of a member state of the European Economic Area, and which are listed in a regulated market.

- No more than 30% of all these shares and securities may consist of shares and other securities which are comparable to shares of companies which are subject to the law of a member state of the European Economic Area and have a market capitalisation of less than EUR 3,000,000,000, or the equivalent value in the currency of a member state of the European Economic Area, and which are listed in a regulated market.
- No more than 20% of all these shares and securities may directly consist of shares which are not denominated in euros or a currency of a member state of the European Economic Area, or of other securities which are comparable to shares and are issued by companies which are subject to the law of a state that is not a member of the European Economic Area, and which are listed on a regularly operating market supervised by authorities which are recognised by the public authorities of a member state of the Organisation for Economic Co-operation and Development.

4. No more than 10% of Net Asset Value of the fund may be invested in an account denominated in euros or a currency of a member state of the European Economic Area held with a credit institution that is approved and monitored by the supervisory authority of a member state of the European Economic Area.

15. Special risk information

The performance of the Sub-fund is influenced in particular by the following factors, which give rise to opportunities and risks:

- Developments on the money and capital markets.
- Changes in yield and/or price changes in the bond markets.
- Developments in the share markets.
- Credit-rating of issuers.
- Company-specific developments.
- Changes in the exchange rates of non-euro currencies against the euro.

A more detailed risk description of the Sub-fund can be found in the General section of the Sales Prospectus.

The Sub-fund - an overview

Fund name	MEAG FlexConcept – EuroGrowth	
International Securities Identification Number	LEI: 529900YJ20JVRLETEQ61	
	ISIN: LU1136925028	
	WKN: A14MKS	
Set-up date	15 January 2015	
Reference Currency	EUR	
Type of units	Registered units, no bearer certificates	
Eligible Investors	Exclusively institutional and professional investors	
Initial issue date	15 January 2015	
Initial issue price	EUR 100.00	
Minimum investment amount	EUR 1,000,000.00 for initial subscriptions	
Sales charge	No sales charge is currently charged for the Sub-fund.	
Redemption fee	No redemption fee is currently charged for the Sub-fund.	
Dividend policy	Earnings reinvested, currently only accumulating units are issued for the Sub-fund.	
Business Day	Any day that is simultaneously a bank business day in Luxembourg, Munich and Frankfurt am Main with the exception of 24 and 31 December each year	
Valuation Day	Any Business Day	
Subscription and Redemption Days	Any Business Day	
Cut-Off-Time	<p>Applications for the subscription, redemption and conversion of Sub-fund units which are received by 16:00 hours CET on a Subscription and Redemption Day will be dealt with on the next following Valuation Day at the issue, redemption and conversion prices of that valuation date.</p> <p>Applications for the subscription, redemption and conversion of units which are received after 16:00 hours CET on a Subscription and Redemption Day will be processed on the Valuation Day following the next valuation date on the basis of the issue, redemption and conversion prices determined on such Valuation Day.</p>	
Management Fee (including the Central Administrative Agent Fee)	Up to 0.05% p.a. of the net Sub-fund assets	
Investment Manager Fee	Net assets of the Sub-fund	Investment Manager Fee
	Core slice: net assets up to EUR 100 million	0.200% p.a.
	Net assets between EUR 100 - 250 million	0.150% p.a.
	Net assets between EUR 250 – 1 billion	0.120% p.a.
	Top slice: net assets above EUR 1 billion	0.090% p.a.
Remuneration of the Depositary	up to 0.015% p.a. of the net Sub-fund assets	
Countries where marketed	Grand Duchy of Luxembourg	

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environment-tally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Template pre-contractual disclosure for financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph of Regulation (EU) 2020/852

Product name:
MEAG Flex Concept EuroGrowth

Legal entity identifier:
529900MXSLX0BDWVE091

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes No

<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: ____% <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy 	<input type="checkbox"/> It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ____% of sustainable investments. <ul style="list-style-type: none"> <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective
<input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: ____%	<input checked="" type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments



Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

What environmental and/or social characteristics are promoted by this financial product?

The sub-fund MEAG Flex Concept EuroGrowth (the “Sub-Fund” or “financial product”) will predominantly (at least 51% of the net asset value of the Sub-Fund) hold investments that comply with below defined minimum standards in respect to environmental, social and corporate governance characteristics. The Sub-Fund promotes relevant environmental characteristics (in particular the reduction of fossil fuel exposure) and social characteristics (in particular relating to the compliance with human rights) and takes into account selected principal adverse impacts (“PAIs”) on sustainability factors as further detailed in subsequent sections.

The Sub-Fund neither seeks to make investments as defined by article 2 (17) of the Sustainable Finance Disclosure Regulation (“SFDR”) nor does the Sub-Fund aim to make sustainable investments as per the EU Taxonomy Regulation. Therefore it is not considering the EU criteria for environmentally sustainable economic activities as defined under the EU Taxonomy Regulation in its investment decisions.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product.

● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

In order to assess the suitability of investments in relation to the contribution of the environmental and social characteristics promoted the Sub-Fund seeks to use a selection of sustainability indicators for the choice of investments. External data on such sustainability indicators is obtained from the MSCI Group Entity(ies) (hereafter "MSCI").

The Sub-Fund applies the following elements within its framework of portfolio management, i.e. in the context of the investment selection as well as the management of existing investments:

1) Negative screening

The limits that are taken into account for 100% of the Sub-Fund's investments in equity and bond positions are detailed further below as part of the binding elements of the investment strategy. The exclusion criteria in relation to corporate issuers are partly based on thresholds in terms of admissible revenue.

Exclusion criteria
Corporate issuers
Revenue derived from the mining or external sale of thermal coal
Revenue derived from thermal coal based power generation
Revenue derived from unconventional oil and gas
Revenue derived from conventional oil and gas
Revenue derived from arctic gas production
Revenue derived from arctic oil production
Revenue derived from weapons systems, components, and support systems and services
No tie to controversial weapons (blinding laser weapons, non-detectable fragments, biological and chemical weapons, cluster munitions, anti-personnel mines, incendiary weapons and / or depleted uranium munitions)
No industry tie to nuclear weapons
Revenue derived from tobacco-related business activities
Revenue derived from adult entertainment
Revenue derived by the ownership or operation of gambling facilities
No serious violations of the UN Global Compact (without positive perspective)
Adherence to "Labor Compliance" (based on the International Labor Organisation's ("ILO") fundamental principles and broader set of labor standards)
Adherence to "Human Rights Compliance" (based on the UN Guiding Principles for Business and Human Rights ("UNGPs"))
Assessment of notable controversies related to companies' operations and / or products and the severity of environmental and / or social impacts of such
Government issuers
No serious violations of democratic and human rights (based on the assessment as "not free" according to the Freedom House Index)

2) ESG Rating

Investments that comply with the above described exclusion criteria will be assessed in a next step with regard to their MSCI ESG rating.

MSCI is determining an ESG rating based on the identification and assessment of material specific ESG risks and opportunities relevant to both corporate issuers and government issuers. The assessment is based on a scale which ranges from "AAA" (best rating) to "CCC" (worst rating).

At least 51% of the Sub-Fund's net asset value must be rated minimum "BB".

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The financial product intends to promote environmental and social characteristics but neither seeks to make investments as defined in article 2 (17) SFDR nor does the Sub-Fund aim to make any sustainable investments as per the EU Taxonomy Regulation.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

The financial product intends to promote environmental and social characteristics but neither seeks to make investments as defined by article 2 (17) SFDR nor does the Sub-Fund aim to make any sustainable investments as per the EU Taxonomy Regulation.

How have the indicators for adverse impacts on sustainability factors been taken into account?

The financial product intends to promote environmental and social characteristics but neither seeks to make investments as defined by article 2 (17) SFDR nor does the Sub-Fund aim to make any sustainable investments as per the EU Taxonomy Regulation.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

The financial product intends to promote environmental and social characteristics but neither seeks to make investments as defined by article 2 (17) SFDR nor does the Sub-Fund aim to make any sustainable investments as per the EU Taxonomy Regulation.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



Does this financial product consider principal adverse impacts on sustainability factors?

- X Yes, the Sub-Fund takes into account selected principal adverse impacts (“PAIs”) on sustainability factors via negative screening criteria employed by the Sub-Fund. The consideration of PAIs is ensured by embedding exclusion criteria with individual assessment criteria, such as in relation to corporate issuers partly based on thresholds in terms of admissible revenue. As procedures put in place to mitigate principal adverse impacts on sustainability factors, the Sub-Fund will apply negative screening for 100% of the Sub-Fund’s investments in equity and bond positions.

#	PAI
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS	
4	Exposure to companies active in the fossil fuel sector
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS	
10	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises

14	Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)
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Information on principal adverse impacts on sustainability factors will be disclosed as an annex as part of the Sub-fund's annual report in accordance with Article 11(2) SFDR, under the section titled "Periodic disclosure for financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph of Regulation (EU) 2020/852".

■ No



What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The ESG strategy of the Sub-Fund takes into account the following elements for investments that are to be assessed as "#1 Aligned with E/S characteristics" accounting for at least 51% of the Sub-Fund's net asset value:

- Negative screening (exclusion criteria)
- Positive screening (ESG rating)
- Consideration of PAIs

For additional information on the Sub-Fund's investment process and its implementation, please refer to the Sub-Fund's prospectus and the relevant sections of this pre-contractual disclosure.

● **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

In order to assess the suitability of investments in relation to the contribution of the environmental and social characteristics promoted, the Sub-Fund seeks to use a selection of sustainability indicators for the choice of investments. Data on such sustainability indicators is obtained from the external data provider MSCI, relevant to corporate and government issuers, including countries, federal, regional or local authorities, and other (inter)national organizations, state-linked or other similar issuers.

The Sub-Fund applies the following elements within its framework of portfolio management, i.e. in the context of the investment selection as well as the management of existing investments. Both negative screening and positive screening as well as consideration of PAI are applicable for at least 51% of the net asset value of the Sub-Fund as regards the investment allocation towards "#1 Aligned with E/S characteristics":

1) Negative screening

100% of the Sub-Fund's equity and bond positions need to respect the exclusion criteria detailed below. An exclusion criterion is applicable if an investment does not comply with the respective limit.

Exclusion criteria	Limit
Corporate issuers	
Revenue derived from the mining or external sale of thermal coal	≤ 10%
Revenue derived from thermal coal based power generation	≤ 10%
Revenue derived from unconventional oil and gas	≤ 10%
Revenue derived from conventional oil and gas	≤ 30%
Revenue derived from arctic gas production	≤ 10%
Revenue derived from arctic oil production	≤ 10%
Revenue derived from weapons systems, components, and support systems and services	≤ 10%

No tie to controversial weapons (blinding laser weapons, non-detectable fragments, biological and chemical weapons, cluster munitions, anti-personnel mines, incendiary weapons and/or depleted uranium munitions)	
No industry tie to nuclear weapons	
Revenue derived from tobacco-related business activities	≤ 5%
Revenue derived from adult entertainment	≤ 10%
Revenue derived by the ownership or operation of gambling facilities	≤ 10%
No serious violations of the UN Global Compact (without positive perspective)	
Adherence to “Labor Compliance” (based on the International Labor Organisation’s (“ILO”) fundamental principles and broader set of labor standards)	
Adherence to “Human Rights Compliance” (based on the UN Guiding Principles for Business and Human Rights (“UNGPs”))	
Assessment of notable controversies related to companies’ operations and / or products and the severity of environmental and / or social impacts of such	
Government issuers	
No serious violations of democratic and human rights (based on the assessment as “not free” according to the Freedom house index)	

2) ESG Rating

Investments that comply with the above detailed exclusion criteria will be assessed in a next step with regard to their MSCI ESG rating.

MSCI is determining an ESG rating based on the identification and assessment of material specific ESG risks and opportunities relevant to both corporate issuers and government issuers. The assessment is based on a scale which ranges from "AAA" (best rating) to "CCC" (worst rating).

At least 51% of the Sub-Fund's net asset value must be rated minimum “BB”.

● **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

The Sub-Fund has not committed to a minimum rate to reduce the scope of the investments.

● **What is the policy to assess good governance practices of the investee companies?**

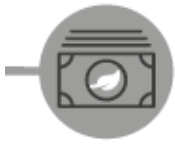
Good governance practices of investee companies are assessed via exclusion criteria in terms of MSCI data on the basis of the MSCI module “Controversies & Global Norms”, applicable for 100% of the Sub-Fund’s equity and corporate bond positions (see “ 1) Negative Screening”).

Such assessment consists of five individual assessment factors, covering the screening for compliance with the UN Global Compact code, human rights compliance, labor compliance and related environmental and / or social controversies.

In a first step, all of the Sub-Fund’s investments in corporates are screened with regard to MSCI’s so called “overall score”, signaling notable controversies related to companies’ operations and / or products and the severity of environmental and / or social impacts of such. In a second step, corporate investments are assessed in terms of “No serious violations of the UN Global Compact (without positive perspective)”, “Adherence to “Labor Compliance”, based on the International Labor Organisation’s (“ILO”) fundamental principles and broader set of labor standards” and “Adherence to “Human Rights Compliance” (based on the UN Guiding Principles for Business and Human Rights (“UNGPs”))”.

All of the Sub-Fund’s investments in corporates shall be assessed for the above described individual assessment factors.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



What is the asset allocation planned for this financial product?

The Sub-Fund will predominantly (at least 51% of the net-asset value of the Sub-Fund) hold investments that contribute to the promoted environmental and / or social characteristics (#1 Aligned with E/S characteristics).

The Sub-Fund is neither pursuing sustainable investments in accordance with article 2 (17) SFDR nor considering the EU criteria for environmentally sustainable economic activities as defined under the EU Taxonomy Regulation in its investment decisions.

The asset allocation “#2 Other” may account for bank balances, derivatives for the purpose of hedging or efficient portfolio management techniques, in addition to other investments that do not meet the sustainability indicators or do not have sufficient information available to allow an appropriate assessment.

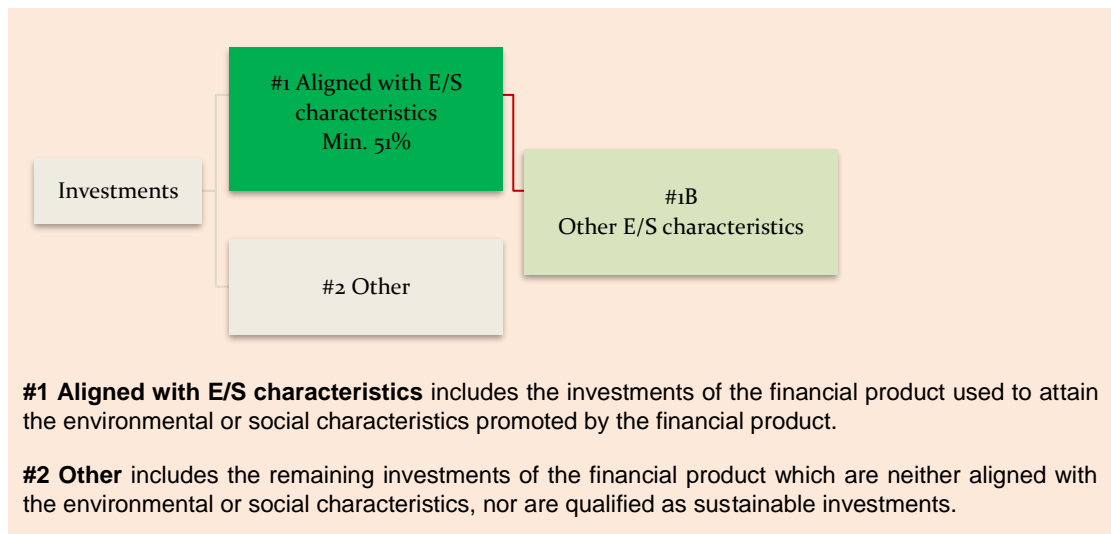
No additional screening criteria as regards environmental or social minimum safeguards are set for the proportion of “#2 Other”, which is capped at a maximum of 49% of the Sub-Fund’s net-asset value.

Asset allocation

describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



● How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Derivatives are not used to attain the promoted environmental and / or social characteristics.



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Sub-Fund does not intend to make sustainable investments that are aligned with the EU Taxonomy Regulation, i.e. the investments do not take into account the EU criteria for environmentally sustainable economic activities.

The minimum extent is 0%.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy¹?**

Yes:

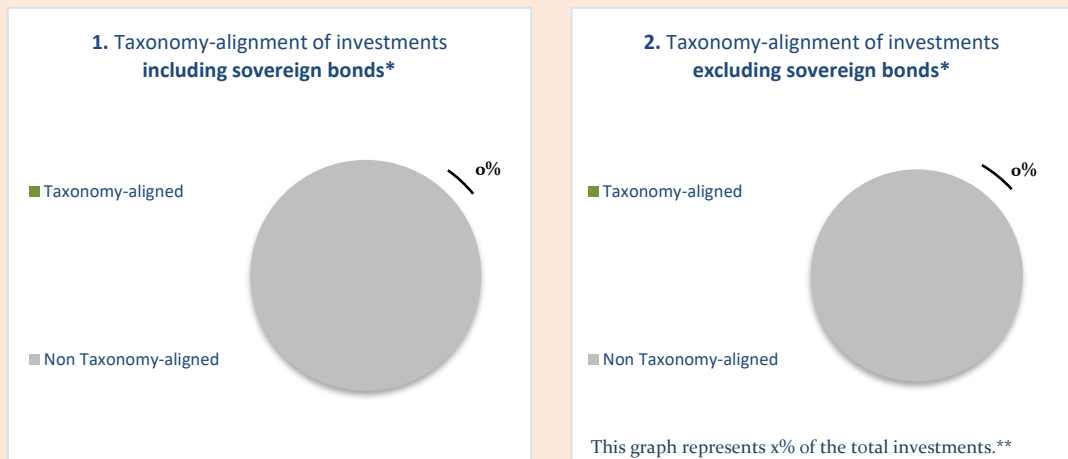
In fossil gas

In nuclear energy

No

The Sub-Fund does not seek to make taxonomy-aligned investments, in particular in fossil gas and/or nuclear energy. Nevertheless, it may also invest in companies that are in any case also active in these areas as part of the investment strategy.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures


** As the Sub-Fund does not intend to make sustainable investments that are aligned with the EU Taxonomy Regulation, the figures across graphs do not differ.

● **What is the minimum share of investments in transitional and enabling activities?**

The Sub-Fund does not intend to make sustainable investments that are aligned with the EU Taxonomy Regulation, i.e. the investments do not take into account the EU criteria for environmentally sustainable economic activities.

The minimum extent is 0%.

¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The Sub-Fund intends to promote environmental and social characteristics and does not intend to invest in sustainable investments pursuant to article 2 (17) SFDR.



What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The asset allocation “#2 Other” may account for bank balances, derivatives for the purpose of hedging or efficient portfolio management techniques, in addition to other investments that do not meet the sustainability indicators or do not have sufficient information available to allow an appropriate assessment.

No additional screening criteria as regards environmental or social minimum safeguards are set for the proportion of “#2 Other”.



Where can I find more product specific information online?

More product-specific information can be found on the website: www.hal-privatbank.com

MEAG FlexConcept – EuroBond

1. Investment objective

The investment objective of the Sub-fund is the generation of a yield through investments in the European bond markets.

2. Investment policy

The Sub-fund mainly invests in interest-bearing securities issued by issuers based in Europe. The assets are denominated and/or can be traded in euros. The remaining part of the Net Asset Value may also be invested worldwide including emerging markets.

The Sub-Fund is actively managed without any reference to a benchmark index.

Up to 49% of the Net Asset Value of the Sub-fund may consist of money market instruments of issuers based in Europe, cash and/or sight deposits.

The purchase of equities is only permitted through the exercising of subscription rights, option rights and conversion rights arising from interest-bearing securities. Equities purchased in this way must however be sold within an appropriate period on a discretionary basis.

In addition, up to 10% of the Net Asset Value of the Sub-fund may be invested in units of other UCITS or other UCIs.

Derivatives (in the form of stock exchange-listed derivatives) may be used in connection with the Sub-fund assets for investment and hedging purposes.

The Sub-fund will not make use of securities or commodities lending and securities or commodities borrowing, repurchase or reverse repurchase transactions, buy-sell back transactions or sell-buy back transactions or margin lending transactions.

The Sub-Fund may include up to 20% of liquid funds depending on the financial market situation. That limit may be temporarily exceeded for a period which is absolutely necessary, if circumstances require this due to exceptional market conditions and if exceeding the limit is justified by the interests of investors, for example in very serious circumstances such as the attacks of 11 September 2001 or the insolvency of Lehman Brothers in 2008.

Liquid funds are deposits at sight that are available at all times at a bank in order to make current and extraordinary payments, as well as payments relating to the disposal of permissible assets in accordance with Article 41(1) of the Law of 17 December 2010.

Furthermore, for liquidity management purposes the Sub-Fund may invest in money market funds, hold deposits at sight in the form of overnight deposits and deposits at notice in the meaning of Article 5 of the Management Regulations.

The Sub-fund does not have as its objective sustainable investment nor does it actively promote environmental or social characteristics.

The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Potential sustainability risks derive from the assessment of a company or an issuer with respect to sustainability aspects. For this reason, on the basis of the current composition of the Sub-fund assets, each company or issuer will be made subject to a sustainability classification, relying on the data of ESG Research and the Investment Manager, and, on an aggregated level, the probability of the occurrence of a potential sustainability risk and of its impacts on the returns of the Sub-fund will be determined.

At the time of drawing up the Sales Prospectus, the likely impacts of sustainability risks on the returns of the Sub-fund are considered as being relatively low.

3. Investment Manager

The Management Company has appointed as the Investment Manager of the Sub-fund:

MEAG MUNICH ERGO Kapitalanlagegesellschaft mbH
Am Münchner Tor 1
D-80805 Munich
Federal Republic of Germany

4. Term of the Sub-fund

The Sub-fund has been set up for an indefinite period.

5. Unit classes

At the time of drawing up the Sales Prospectus, the Sub-fund does not comprise different unit classes.

6. Form of the units

The units in the Sub-fund are issued as registered units and may be issued in allocations of up to three decimal places.

7. Issue, redemption and conversion of units

Initial issue date/initial issue phase

The initial issue took place on 20 July 2015.

Initial issue price

The initial issue price was 100.00 euros per unit.

Minimum investment amount

The minimum investment amount for initial subscriptions is 10,000,000.00 euros.

Issue, redemption and conversion of units

Subscription, redemption and conversion orders which are received by the Central Administrative Agent no later than 16:00 hours CET on a Subscription and Redemption Day will be dealt with on the next following Valuation Day at the issue, redemption and conversion prices of that valuation date.

Subscription, redemption and conversion orders which are received by the Central Administrative Agent after 16:00 hours CET on a Subscription and Redemption Day will be processed on the Valuation Day following the next valuation date on the basis of the issue, redemption and conversion prices determined on such Valuation Day.

Sales charge

The sales charge which is used to cover marketing costs is up to 2% of the unit value in the case of the Sub-fund. At the time of completion of the Sale Prospectus, no sales charge is levied.

Redemption fee

No redemption fee is charged for the Sub-fund. The redemption price equals the unit value.

8. Eligible Investors

The Sub-fund is reserved for Eligible Investors, as described below, who, on the basis of the Sales Prospectus and the management regulations, have made their own assessment of the conditions of their participation in the Sub-fund.

Eligible Investor means investors who qualify as

- institutional investors, according to Article 174 of the Law of 17 December 2010

AND

- professional investors within the meaning of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments ("MiFiD 2") and in accordance with Luxembourg laws and regulations;

9. Profile of the typical investor

The investment horizon should be at least five years.

The Sub-fund targets professional clients and eligible counterparties who pursue a goal of capital investment and capital optimisation and who have a medium term investment horizon of at least 5 years. The Sub-fund is suitable for investors with basic knowledge and/or experience with transferable securities. The potential investor can bear financial losses and does not rely on protection of capital.

The Sub-fund is not suitable for retail investors and investors with a short investment horizon. It is also not suitable for investors with very little interest in risk nor those who seek capital protection.

10. Dividend policy

Within three months of the end of each financial year, the Sub-fund distributes to the investors the interest, dividends and profits which have been earned on investment units and which have been accrued on behalf of the Sub-fund during the financial year without being used to cover costs, and the earnings from loan and pension transactions – taking account of the associated earnings adjustment. Realised capital gains and other income – taking account of the associated earnings adjustment – may also be used for the distribution.

11. Reference Currency

The Reference Currency of the Sub-fund is the euro.

12. Risk management procedure

Method used to calculate the market risk exposure

The Sub-fund may undertake derivatives transactions for the purpose of hedging, for the efficient management of the portfolio (Chapter 2 of this Annex to the Sales Prospectus), and for the achieving of additional earnings, i.e. also for investment purposes.

The use of derivatives allows the market risk exposure of the Sub-fund to be increased. However, it may never exceed the maximum value of 200% of the market risk exposure of a derivative-free reference asset. The market risk exposure ("value at risk") is understood to mean the potential losses due to the realisation of the market risk. The market risk is understood to mean the risk which results from the unfavourable development of market prices for the Sub-fund.

The risks associated with the use of derivatives are managed through a risk management procedure which enables the level of risk associated with the investment holdings, and its respective share of the total investment portfolio risk profile, to be monitored and measured at all times.

Irrespective of the mandatory upper limit, the Sub-fund always strives to ensure that the market risk exposure of the Sub-fund does not generally exceed 180% of the market risk exposure of a derivative-free reference asset. Nevertheless, the market risk exposure does vary according to the market conditions, so that despite continual monitoring by the Sub-fund the targeted margins may be exceeded.

The derivative-free reference assets are a virtual portfolio whose value matches the current value of the Sub-fund assets but which does not incorporate any increases in or hedging of the market risk through the use of derivatives. In all other respects, the composition of the reference assets must also be in accordance with the investment objectives and investment policy that apply to the respective Sub-fund.

The "portfolio ex derivatives" method is used to determine the derivative-free reference assets for this Sub-fund. In this method the reference assets match the holdings of the Sub-fund portfolio excluding its derivative units.

Taking into account the Sub-fund's investment strategy (see the General Sections "6. Investment objective and policy" and "7. Investment principles and limits", as well as sections "1. Investment

objective" and "2. Investment policy" in this Special Section relating to the Sub-fund) and the Sub-fund's redemption principles (see the section "Issue, redemption and conversion of units" in this Special Section relating to the Sub-fund), the Sub-fund may be described as liquid.

13. Special risk information

The performance of the Sub-fund is influenced in particular by the following factors, which give rise to opportunities and risks:

- Developments on the money and capital markets.
- Changes in yield and/or price changes in the bond markets.
- Credit-rating of issuers.
- Changes in the exchange rates of non-euro currencies against the euro.

A more detailed risk description of the Sub-fund can be found in the General section of the Sales Prospectus.

The Sub-fund - an overview

Fund name	MEAG FlexConcept – EuroBond
International Securities Identification Number	LEI: 529900UDA4SB553AZE92 ISIN: LU1227599039 WKN: A14SMJ
Set-up date	20 July 2015
Reference Currency	EUR
Type of units	Registered units, no bearer certificates
Eligible Investors	Exclusively institutional and professional investors
Initial issue date	20 July 2015
Initial issue price	EUR 100.00
Minimum investment amount	EUR 10,000,000.00 for initial subscriptions
Sales charge	No sales charge is currently charged for the Sub-fund.
Redemption fee	No redemption fee is currently charged for the Sub-fund.
Dividend policy	Earnings distributed, currently only distributing units are issued for the Sub-fund.
Business Day	Any day that is simultaneously a bank business day in Luxembourg, Munich and Frankfurt am Main with the exception of 24 and 31 December each year
Valuation Day	Any Business Day
Subscription and Redemption Day	Any Business Day
Cut-Off-Time	Applications for the subscription, redemption and conversion of Sub-fund units which are received by 16:00 hours CET on a Subscription and Redemption Day will be dealt with on the next following Valuation Day at the issue, redemption and conversion prices of that valuation date. Applications for the subscription, redemption and conversion of units which are received after 16:00 hours CET on a Subscription and Redemption Day will be processed on the Valuation Day following the next valuation date on the basis of the issue, redemption and conversion prices determined on such Valuation Day.
Management Fee (including the Central Administrative Agent Fee)	Up to 0.05% p.a. of the net Sub-fund assets
Investment Manager Fee	0.030% p.a. of the net Sub-fund assets up to 0.015% p.a. of the net Sub-fund assets
Remuneration of the Depositary	
Countries where marketed	Grand Duchy of Luxembourg

MEAG FlexConcept – BEST₁₀USD

1. Investment objective

The Sub-fund aims to achieve capital growth in the mid to long term by maintaining exposure to equity and bond markets using a rules-based investment strategy with the objective to participate in the performance of the Systematix BEST 10% RC USD Index (the "Index").

2. Investment policy

In order to achieve its investment objective, the Sub-fund will

- (1) invest up to 100% of its Net Asset Value in a portfolio of permissible assets with a rating not lower than A- as laid down under item A below, where the Investment Manager has discretion over the composition of the portfolio and hedging transactions, and in combination,
- (2) be managed in reference to the Index by using a derivative-based strategy, set out under item B below, with the objective to participate in the performance of the Index, described in the section 'Index objective and overview', where the Investment Manager has discretion over the exposure to the Index.

As a consequence of the two layers, which are independent of each other, the Sub-fund will be actively managed, generates cumulative returns and there will be a difference in performance between the Sub-fund and the Index. This deviation of the Sub-fund performance from the Index performance may be material over a holding period of five years. The annualized tracking error of the Sub-fund relative to the Index is expected not to exceed 15.00% per annum. The tracking error is the standard deviation of the difference between the return of the Sub-fund and the Index and is monitored by the Investment Manager.

- A. The Sub-fund invests up to 100% of its Net Asset Value in U.S. dollar and/or JPY-denominated securities, more specifically, interest-bearing securities, government bonds, government and/or treasury bills, government and/or treasury notes and money market instruments that generally meet the minimum credit rating requirement of A- by the credit rating agencies selected by the Management Company Board.

The Sub-fund's assets may also be held cash and bank deposits as specified in Art. 41 of the Law of 17 December 2010. The currency risk associated with investments in a currency other than the Sub-fund's Reference Currency may be hedged by the use of derivatives, including FX-Forward transactions.

- B. Furthermore, the Sub-fund implements a derivative-based strategy in order to participate in the performance of the Index by entering into unfunded OTC-total return swap transactions, whose underlying is the Index (the "**Total Return Swap Transactions**"). Moreover, the index

performance is based on the performance of a number of exchange listed derivative contracts contained within the Index and especially independent of the interest rate prevailing during the corresponding period as the Index does not contain a compounding component.

The participation in the performance of the Index shall be achieved by using the Index as a benchmark for the performance of the Sub-fund, meaning the Sub-fund will not physically replicate the Index. There will not be a direct exposure to the underlying components and counterparty risk of the Index.

The counterparty to each Total Return Swap Transaction will be initially New Reinsurance Company Ltd. with registered office in Zurich, Switzerland ("**New Re**" or the "**Counterparty**"). The counterparty in relation to the financial derivative instruments is a financial institution that has to fulfil the following conditions:

- being authorised by and subject to ongoing supervision by a public financial authority;
- either being located in the European Economic Area, Switzerland or in a country belonging to the group of ten leading industrial nations (G10);
- having at least an investment grade rating; and
- being experienced in such transactions.

For the avoidance of doubt, such Financial Institutions may also include re-insurance companies. There are no specific requirements as to the legal status of the eligible counterparties (i.e. the corporate form of incorporation of the counterparty) and the Counterparty shall not assume any discretion over the composition of the investment portfolio of the Sub-fund or the Index as underlying of the Total Return Swap Transactions.

The Sub-funds' agreements with the Counterparty to the Total Return Swap Transactions can be individually negotiated and structured to increase or decrease the overall volatility of the Sub-funds' portfolio by adjusting the exposure to the Index.

As the Total Return Swap Transactions consist of the participation in the performance of the Index in return for the payment on a monthly basis, such transactions may not be correlated with the underlying securities positions held by the Sub-fund and are not linked to the assets held by the Sub-fund, meaning the USD or JPY-denominated securities, as underlying of the transactions. The maximum value of the ratio of the sum of the notional amounts of the Total Return Swap Transactions and the Net Asset Value of the Sub-fund is 125%.

Within the Total Return Swap the Counterparty, which is a related entity to the Investment Manager and the Index Owner, pays to the Sub-fund the index return.

In turn, the Sub-fund pays to the Counterparty:

- (a) a variable interest rate equal to the 1-month USD OIS swap rate or
- (b) if the NAV of the Sub-Fund exceeds USD 25mio, the rate per (a) plus, if positive, the 1-month USD/JPY OIS cross-currency basis spread (50 day moving average), net of trading fees, as applicable.

Depending the interest rate level and the terms agreed with the Counterparty, the variable amount paid in exchange for the index

return by the Total Return Swap will have an impact on the Sub-fund's overall performance which might be positive or negative.

Beyond that, the Index contains the following cost components (the "Index-related Cost Components"):

- Index management fee of 42 basis points per annum;
- Index transaction costs per trade.

The Index management fee is deducted from the level of the Index on a pro-rata basis.

In addition, Index transaction costs of trades executed for the purpose of implementing the investment strategy are reflected in the performance of the Index and deducted from the level of the Index. The transaction costs of a trade are calculated as the number of contracts traded times the respective futures contract's tick value, multiplied by the number of ticks, as specified in the Index handbook.

Such Index-related Cost Components and fees factored into those Total Return Swap Transactions with the Counterparty will be disclosed in the Semi-annual and Annual Accounts of the Fund.

After deduction of the Index-related Cost Components, 100% of the return generated by Total Return Swap Transactions, net of direct and indirect fees paid within those Total Return Swap Transactions to the Counterparty, is returned to the Sub-fund.

The Sub-fund will not make use of securities or commodities lending and securities or commodities borrowing, repurchase or reverse repurchase transactions, buy-sell back transactions or sell-buy back transactions or margin lending transactions.

The Sub-fund may include up to 20% of liquid funds depending on the financial market situation. That limit may be temporarily exceeded for a period which is absolutely necessary, if circumstances require this due to exceptional market conditions and if exceeding the limit is justified by the interests of investors, for example in very serious circumstances such as the attacks of 11 September 2001 or the insolvency of Lehman Brothers in 2008.

Liquid funds are deposits at sight that are available at all times at a bank in order to make current and extraordinary payments, as well as payments relating to the disposal of permissible assets in accordance with Article 41(1) of the Law of 17 December 2010.

Furthermore, for liquidity management purposes the Sub-Fund may invest in money market funds, hold deposits at sight in the form of overnight deposits and deposits at notice in the meaning of Article 5 of the Management Regulations.

The Sub-fund does not have as its objective sustainable investment nor does it actively promote environmental or social characteristics.

The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

The Sub-fund considers principal adverse impacts on sustainability factors (hereinafter also referred to as 'Principal Adverse Impacts' or 'PAIs') in the sense of Regulation (EU) 2019/2088 in the investment decision-making process as part of the corporate PAI policy of the Portfolio Manager. The aim of the PAI strategy is to limit the negative impacts on sustainability factors associated with the investments of the Sub-Fund. To this end, systematic procedures for measuring and evaluating, as well as measures for dealing with PAIs in investment processes, are applied. However, it is made explicit that PAIs are not part of the Sub-Fund's strategy as no binding ESG

commitments for the Sub-Fund is made and therefore do not give rise to the promotion of environmental or social characteristics.

Potential sustainability risks derive from the assessment of a company or an issuer with respect to sustainability aspects. For this reason, on the basis of the current composition of the Sub-fund assets, each company or issuer will be made subject to a sustainability classification, relying on the data of ESG Research and the Investment Manager, and, on an aggregated level, the probability of the occurrence of a potential sustainability risk and of its impacts on the returns of the Sub-fund will be determined.

At the time of drawing up the Sales Prospectus, the likely impacts of sustainability risks on the returns of the Sub-fund are considered as being relatively low.

3. Investment Manager

The Management Company has appointed as the Investment Manager of the Sub-fund:

Munich Re Investment Partners GmbH
Königinstraße 107
D-80802 Munich
Federal Republic of Germany

4. Index objective and overview

The Systematix BEST 10% RC USD Index is an Index denominated in USD, representing the performance of a systematic strategy based on investments in American, Canadian, European and Asian bond and equity markets, whose detailed allocation/calculation algorithm is laid down in the Index handbook.

The Index Start Date is 2 January 1996. On this date, the Index is initialized with a starting value of 100 USD. The Index Administrator began calculating the Index on 22 July 2019.

The Index is published on Bloomberg via the page SXBESTEN <Index>. The constituents of the index and their respective weightings are published at the publicly accessible website: www.solactive.com.

More specifically, the Index performance will be based to the return of a number of exchange listed derivative contracts, namely

- **bond futures** (CME 5Y T-Note, CME 10Y T-Note, CME 30Y T-Note, TMX 10Y CGB, Eurex 5Y Euro-BOBL, Eurex 10Y Euro-BUND, Eurex 30Y Euro-BUXL, ICE Europe 10Y Long Gilt, OSE 10Y JGB) and
- **equity index futures** (OSE Nikkei 225, CME E-mini S&P 500, CME E-mini NASDAQ-100, Eurex EURO STOXX 50 and HKFE Hang Seng),

where the exposure to individual equity index futures will be based on a momentum signal, i.e. the relation between the current value of the individual equity index in relation to its average value over a period of fixed length in the past. The sum of the exposures to equity index futures is expected to be between 0% and 150% relative to the Index value, however, this level of exposure might be exceeded in some cases.

Utilizing an exponentially weighted volatility estimator based on

historical observations to generate (re-)allocation on a daily basis, the Index aims for a target volatility of 10%. In order to achieve this, the Index might use a target leverage of up to 300% with respect to the Index value, hence the sum of the exposures to bond futures and equity index futures will be limited to 300% of the Index value. Under certain circumstances, this level might be exceeded in exceptional cases.

On each monthly Rebalancing Day, the 200 days simple moving average ("SMA") of each equity index LEFRI (price of a continuous futures time series) is compared to the most recent value of the respective LEFRI. In case the most recent value is above its SMA, the respective equity index market is assumed to be in an uptrend and the equity index futures receive a weight budget of 1/5 in the Equity Sub-Index. In all other cases, the respective equity index market is assumed to be in a downtrend and the respective equity index futures do not receive the weight budget of 1/5; rather, this weight budget is shifted to the Bond Sub-Index then and distributed evenly between all Bond Sub-Index members.

Contingency Plans

The Management Company has adopted written plans setting out actions, which it will take with respect to the Sub-fund in the event that the Index materially changes or ceases to be provided (the "Contingency Plans"), as required by article 28(2) of the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds, as may be amended or supplemented from time to time. Unitholders may access the Contingency Plans at the registered office of the Management Company.

5. Index management and administration

The Index Owner is Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft in München, Germany ("**Munich Re**"). Munich Re, as the index owner of the Systematix BEST 10% RC USD Index, does not make any representation or warranty, expressed or implied, as to results obtained from the usage of the Index and/or a current or future level of the index, index components, or the importance of Index components at a certain time of a certain day or otherwise.

Status of the Index Administrator

The Index is being provided by the Index Administrator, in its capacity as administrator as defined in the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds, as may be amended or supplemented from time to time (the "**Benchmarks Regulation**") of the Index (the "**Index Administrator**"). The Index Administrator is located in the European Union and listed in the register of all administrators located in the European Union, referred to in article 36 of the Benchmarks Regulation, which have been authorised or registered pursuant to Article 34 of the Benchmarks Regulation.

The Index Administrator and Index Calculation Agent are unrelated parties to the Management Company, the Investment Manager, the Counterparty and the Index Owner.

The Index Administrator is initially Solactive AG. The Index Owner has delegated the day-to-day management and maintenance of the Index to the Index Administrator, and the Index Administrator's

determinations in the application of the methodology, laid down in the Index handbook, shall be final. Whilst the Index Administrator currently employs the rules, procedures and methodology described in the index rules, no assurance can be given that market, regulatory, judicial, fiscal or other circumstances will not arise that would, in the view of the Index Administrator, necessitate a modification or change to these index rules. There is no guarantee that Solactive AG will continue to manage and maintain the Index, in which case a successor Index Administrator may be chosen by the Index Owner in its sole and absolute discretion.

The Index Calculation Agent is initially Solactive AG. The Index Owner has delegated the day-to-day calculation and publication of the Index to the Index Calculation Agent. There is no guarantee that Solactive AG will continue to calculate and publish the Index, in which case a successor Index Calculation Agent may be chosen by the Index Owner in its sole and absolute discretion. The Index Calculation Agent uses its best efforts to ensure that the Index is calculated correctly. The Index Calculation Agent does not warrant the accuracy or completeness of any information contained herein.

The Index Calculation Agent has no obligation to point out errors in the Index to third parties including but not limited to investors and/or financial intermediaries of any financial instrument using the Index. The calculation and publication of the Index by the Index Calculation Agent for the purpose of use in connection with a financial instrument does not constitute a recommendation by the Index Calculation Agent to invest capital in the aforementioned financial instrument nor does it in any way represent an assurance or opinion of the Index Calculation Agent with regard to any investment in such a financial instrument. Current and future economic and other market events concerning an investment product or the Index may cause the information provided herein to be incorrect.

Past performance is not indicative of future results and should never be relied upon in making an investment decision or recommendation. Any investments or strategies referenced herein do not take into account the investment objectives, financial situation or particular needs of any specific person. Munich Re explicitly disclaims any responsibility for product suitability or suitability determinations related to individual investors.

Back-testing and other statistical analysis material that is provided in connection with the Index use simulated analysis and hypothetical circumstances to estimate how it may have performed prior to its actual existence. The results obtained from "back-testing" information should not be considered indicative of the actual results that might be obtained from an investment or the participation in a financial instrument or transaction referencing the Index. Neither the Index Calculation Agent nor Munich Re provide assurance or guarantee that any product linked to the Index will operate or would have operated in the past in a manner consistent with these materials. The hypothetical historical levels presented herein have not been verified by an independent third party, and such hypothetical historical levels have inherent limitations. Alternative simulations, techniques, modelling or assumptions might produce significantly different results and prove to be more appropriate. Actual results will vary, perhaps materially, from the simulated returns presented in this document.

The value of the Index shall always be rounded to the two nearest decimals (0.005 being rounded up) and shall be expressed as an amount in USD. The level of the Index will be available on Bloomberg or any successor financial information service as determined by the Index Administrator in its sole and absolute

discretion. If an erroneous Index Value is published, the Index Administrator reserves the right to publish any corrected Index Value determined by the Index Calculation Agent. Details on the Index, including on the index calculation, the rebalancing of the index, the index rules and the handling of market disruption events are available for Investors in the Sub-fund free of charge at the registered office of the Management Company and/or via the following website: www.solactive.com.

6. Collateral

All collateral received by the Sub-fund shall be used to reduce counterparty risk exposure. The Sub-fund may receive and post collateral in the form of cash and non-cash collateral.

Where the Sub-fund enters into OTC financial derivative transactions, such collateral must be in the form of USD cash. In general, cash collateral which is nominated in the Sub-fund's Reference Currency will not be subject to a Haircut.

Part of the assets of the Sub-fund may be used as collateral. Collateral posted by the Sub-fund in relation to these transactions may be reinvested by the counterparty. Cash collateral received by the Sub-fund may be reinvested. The criteria for collateralisation will be strictly monitored at all times by the Management Company.

7. Term of the Sub-fund

The Sub-fund has been set up for an indefinite period.

8. Business Days, Valuation Days, Subscription and Redemption Days

"**Business Day**" means, in relation to the Sub-fund,

each day, on which banks are open for business in Luxembourg, Munich, Frankfurt am Main and Singapore, excluding 24 December and 31 December, and the settlement of transactions in Luxembourg.

"**Valuation Day**" means, in relation to the Sub-fund, each day, on which all of the following conditions are fulfilled:

- 1) a day on which banks are open for business in Luxembourg, Munich, Frankfurt am Main, Singapore, Tokyo and Zurich, excluding 24 December and 31 December.

AND

- 2) a day on which the US Federal Reserve Bank is open for business on the previous business date.

AND

- 3) a day on which all of the following exchanges are full-time open for business in respect of Systematix BEST 10% RC USD Index components traded at the Eurex Exchange, ICE Europe, TMX Canada and Hong Kong Futures Exchange (HKFE) for the previous business date.

"**Subscription and Redemption Day**" means, in relation to the

Sub-fund,

each Valuation Day of the Sub-fund.

9. Unit classes

The Sub-fund is comprised of the unit classes "USD" and "SGD".

Additional notes regarding currency hedging in the unit class SGD

The Management Company performs currency hedging at unit class level for the unit classes SGD of the MEAG Flex Concept - BEST10USD. This is done taking the opinion of the European Securities and Markets Authority with the reference ESMA34-43-296 into consideration.

The unit class SGD is denominated in SGD, while USD is the currency of the Sub-Fund. The change in the SGD / USD exchange rate can thus result in both currency translation losses and currency translation gains for the investors in the said unit classes. The exchange rate risk with regard to the Sub-Fund currency is hedged for the unit class currency during the course of currency hedging. This hedging can be achieved by means of various strategies (such as forward exchange transactions). Investors wishing to invest in the said unit classes should be aware that a currency hedging process is not able to provide precise or complete hedging of the said exchange rate risk. Particularly severe turbulence on the market or major fluctuations with regard to unit certificates have an impact on currency hedging. Therefore, no guarantee can be given that the hedging by the Management Company will be successful in all aspects.

10. Form of the units

The units in the Sub-fund are issued as registered units and may be issued in allocations of up to three decimal places.

11. Issue, redemption and conversion of units

Initial Issue Date

The initial issue of the Sub-fund took place 22 January 2020.

Initial Issue Price

Unit class USD: 100.- USD per unit;

Unit class SGD: 100.- SGD per unit.

Initial Minimum Subscription Amount

Unit class USD: 20,000,000.- USD;

Unit class SGD: 25,000,000.- SGD.

However, the Management Company may, at its discretion, permit smaller subscriptions.

Minimum Holding Amount

Unit class USD: 20,000,000.- USD;

Unit class SGD: 25,000,000.- SGD.

The Minimum Holding Amount has to be reached within the first twelve month following the Initial Subscription Day.

However, the Management Company may at its discretion permit smaller Minimum Holding Amount.

Issue, redemption and conversion of units

An Eligible Investor, as described below, must make the first subscription for units in writing directly to the Management Company, the Registrar and Transfer Agent or other duly appointed agent of the Management Company by completion of the application form and submission of other relevant documents.

Initial Subscription Day means the day on which applications for the initial subscription of Units of any Class and any Category may be received as specified for each Class and Category of the Sub-fund.

On the Initial Subscription Day, application for initial subscriptions must be received before the relevant Cut-Off-Time: 9.00 a.m. Luxembourg time.

The payment of the Initial Issue Price must be effected no later than 11.00 a.m. on the Initial Issue Date of the Sub-fund.

After the Initial Issue Date, the units of the Sub-fund are issued at the Net Asset Value calculated on the applicable Valuation Day in relation to such units.

For the avoidance of doubt, the Investors will be provided with a calendar of Valuation Days, Subscription and Redemption Days of the Sub-fund which may be modified by the Management Company as required, to be determined by the Management Company in good faith.

Cut-off-Time: 12.00 p.m. noon, Luxembourg time for applications for subscriptions or redemption prior to the relevant Valuation Day on which the subscription or redemption will take effect.

Units may only be purchased by Eligible Investors provided that the request has been made on the Subscription Day before the Cut-off-Time.

Subscription, redemption or conversion requests received by the Management Company, the Registrar and Transfer Agent or any other duly appointed agent of the Management Company on a Valuation Day before the relevant Cut-Off-Time will be dealt with on the next following Valuation Day at the Net Asset Value per unit of the Sub-fund prevailing on that Valuation Day.

Any application received after the relevant Cut-Off-Time will be processed on the Valuation Day following the next Valuation Day on the basis of the Net Asset Value per unit determined on such Valuation Day.

For the avoidance of doubt, no payment of redemption proceeds in kind will be authorised for the Sub-fund.

Compulsory redemption

If the minimum holding amount of the Sub-fund is not maintained due to a redemption or conversion of units, the Management Company acting on behalf of the Sub-fund may compulsorily redeem any issued or remaining units at their current Net Asset Value per unit and make payment of the redemption proceeds to the respective Unitholder.

Sales charge

No sales charge is charged for the Sub-fund. The subscription price equals the applicable Net Asset Value of the units.

Redemption fee

No redemption fee is charged for the Sub-fund. The redemption price equals the applicable net asset value of the units.

12. Eligible Investors

The Sub-fund is reserved for Eligible Investors, as described below, who, on the basis of the Sales Prospectus and the Management Regulations, have made their own assessment of the conditions of their participation in the Sub-fund.

Eligible Investor means investors who qualify as:

- professional investors within the meaning of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments ("MiFiD 2");

AND

- institutional investors, in accordance with Luxembourg laws and regulations, i.e. Article 174 of the Law of 17 December 2010;

AND

- who are investing seed capital or life insurance premiums in the Sub-fund as part of their unit-linked insurance product and enter into a reinsurance contract with Munich Re group.

13. Profile of the typical investor

The investment horizon should be at least five years.

The Sub-fund targets professional clients and eligible counterparties who pursue a goal of capital investment and capital optimisation and who have a medium term investment horizon of at least 5 years. The Sub-fund is suitable for investors with basic knowledge and/or experience with transferable securities. The potential investor can bear financial losses and does not rely on protection of capital.

The Sub-fund is not suitable for retail investors and investors with a short investment horizon. It is also not suitable for investors with very little interest in risk nor those who seek capital protection.

14. Dividend policy

The Sub-fund issues accumulating units only and thus reinvests earnings which have accrued in the Sub-fund during the financial year in the Sub-fund's specific eligible assets. However, the Management Company reserves a right to decide on extraordinary distributions and to pay dividends.

15. Reference currency

The Reference Currency of the Sub-fund is the USD.

16. Risk management procedure

Method used to calculate the market risk exposure

The Sub-fund may undertake derivatives transactions for the purpose of hedging, for the efficient management of the portfolio (Chapter 2 of this Annex to the Sales Prospectus), and for the achieving of additional earnings, i.e. also for investment purposes.

The use of derivatives allows the market risk exposure of the Sub-fund to be increased. The market risk of the proposed Sub-fund will be monitored by using a VaR- methodology. The absolute Value-at-Risk (VaR) approach is used to limit market risk (global exposure) in the Sub-fund. The absolute VaR of the Sub-fund is limited to 20% of the Sub-fund's total net assets with the parameters of a 20-day holding period and a 99% confidence level.

Where the Sub-fund uses financial derivatives, the Sub-fund shall ensure that the risks related to such financial instruments are duly measured, monitored and managed on an ongoing basis.

Leverage

Funds which measure Global Exposure using a Value-at-Risk approach disclose their expected Level of Leverage. The expected Level of Leverage is not a regulatory limit and should be used for indicative purposes only. The level of leverage in the Sub-fund may be higher or lower than this expected level at any time as long as the Sub-fund remains in line with its risk profile and complies with its VaR limit.

The annual report will provide the actual level of leverage over the past period and additional explanations on this figure. The leverage is a measure of the aggregate derivative usage and therefore does not take into account other physical assets directly held in the portfolio of the Sub-fund. The expected Level of Leverage is measured as the Sum of Notionals.

Leverage is not expected to exceed twice the value of the Sub-fund's assets. The leverage effect is calculated using the sum of notional approach (absolute (notional) amount of each derivative position divided by the net present value of the portfolio). However, the expected Level of Leverage disclosed in the Sales Prospectus might not reflect adequately the risk profile of the Sub-fund and need to be seen in conjunction with the Investment Policy and the Investment Objective of the Sub-fund.

Taking into account the Sub-fund's investment strategy (see the General Sections "6. Investment objective and policy" and "7. Investment principles and limits", as well as sections "1. Investment objective" and "2. Investment policy" in this Special Section relating to the Sub-fund) and the Sub-fund's redemption principles (see the section "Issue, redemption and conversion of units" in this Special Section relating to the Sub-fund), the Sub-fund may be described as liquid.

17. Additional investment limits of the Sub-fund

Notwithstanding anything in the General Section and this Annex (including without limitation this Chapter of this Annex)

(a) the Sub-fund shall not invest in securities of the Eligible Investor, the Management Company or the Investment Manager or any of their respective related corporations;

(b) the Sub-fund shall not grant loans; and

(c) each of the Management Company and the Investment Manager shall not act as, and shall ensure that the Eligible Investor is not, the counterparty of an over-the-counter financial derivative that is invested into by Sub-fund.

18. Special risk information

Before making an investment decision with respect to this Sub-fund, prospective Investors should carefully consider the risks of investing set out in the General Section.

The Sub-fund's investment portfolio may fall in value due to any of the key risk factors and therefore your investment in the fund may suffer losses. There is no guarantee of the repayment of principal.

In addition, prospective Investors should pay particular attention to the following risk factors:

Total return swap

The underlying of the Total Return Swap Transactions will be a futures-based index.

Whilst the Index Administrator currently employs the rules, procedures and methodology described above, no assurance can be given that market, regulatory, judicial, fiscal or other circumstances will not arise that would, in the view of the Index Administrator, necessitate a modification or change to these Index rules.

There is no guarantee that the Index Calculation Agent will continue to calculate and publish the Index and the Index Calculation Agent gives no representation or assurance, and is under no obligation or commitment, to provide such research at any point in the future. In the event of a discontinuation of the calculation and publication of the Index, the constituents of the Index may either remain static, i.e., no rebalancing takes place, or a successor publication may be chosen by the Index Administrator in its sole and absolute discretion. The Index-related Cost Components, representing the costs associated with the implementation of the index investment strategy by the use of Total Return Swap Transactions, and the interest rate paid in exchange for the index return for the Total Return Swap Transactions will have an impact on the Sub-fund performance.

Total Return Swap Transactions may be subject to various types of risks, including, but not limited to market risk, liquidity risk, the risk of non-performance by the counterparty, including risks relating to the financial soundness and creditworthiness of the counterparty, risks arising in connecting with the valuation, collateral management, performance of the underlying reference rate or Index, legal risk and operations risk. Associated risks can change independently of each other and more than one risk factor may have simultaneous effects. The value of the derivatives may fluctuate and result in a substantial decrease in value or even a total loss.

Index performance risk

The Index performance will be based to the return of a number of exchange listed derivative contracts. There will not be a direct exposure to the underlying components and counterparty risk of the Index. The Index may not outperform an investment in individual constituents. Changes in rates of exchange, rates of interest and prices of any Index components, among other things, may have an adverse effect on the value of the Index. The past performance of an

Index is not necessarily a guide to its future performance. The Index is utilising an exponentially weighted volatility estimator, aims for a target volatility and might use a target leverage. The leverage contained in the Index may result in larger fluctuations in the Index value and therefore entails a higher degree of risk. No assurance can be given that the Index selected parameters will produce better performance than if other parameters were selected.

Tracking error risk

The Sub-fund may be subject to tracking error risk, which is the risk that its performance may not track that of the index. This tracking error may result from the investment strategy used, and fees and expenses. The Investment Manager will monitor such tracking error.

High leverage risk

The Sub-fund may have a net leveraged exposure of more than 100% of the NAV of the Sub-fund. This will further magnify any potential negative impact of any change in the value of the underlying asset on the Sub-fund and also increase the volatility of the Sub-fund's price and may lead to a higher risk of significant losses.

Credit exposure

The Sub-fund is exposed to the credit/default risk of issuers of the securities that the Sub-fund may invest in. In the event of the insolvency or default of the Counterparty, the Sub-fund could suffer a loss if it is unable to fully mitigate this through the realization of sufficient proceeds through the sale of collateral that it holds.

Collateral risk

The Counterparty may provide collateral in order to provide protection to the Sub-fund in respect of its exposure to the Counterparty under the relevant transactions. In the event of the default or insolvency of the Counterparty, the Sub-fund will have recourse to the collateral provided by the Counterparty and will therefore be exposed to the general risks applicable to an investment in such collateral.

Market risk

The Sub-fund is subject to general market risks, whose value may fluctuate due to various factors, such as changes in investment sentiment, political and economic conditions and issuer-specific factors. It must be taken into account that there may be market conditions during which the planned strategy may not be implemented or may be implemented only with delays or only partially. Please also refer to the General Section of the Sales Prospectus.

Interest rate risk

Investment in the Sub-fund is subject to interest rate risk. In general, the prices of debt securities rise when interest rates fall, whilst their prices fall when interest rates rise.

Currency risk

Where an investor invests in a Sub-fund with a reference currency different from the investor's currency, changes in the respective currency exchange rates could reduce investment gains or increase investment losses. Exchange rates can fluctuate rapidly and unpredictably.

Furthermore, investments of the Sub-fund may be made in other currencies than the Reference Currency of the relevant Sub-fund and therefore be subject to currency fluctuations which affect the Net Asset Value of the Sub-fund. Currencies of certain countries may be volatile and therefore may affect the value of securities denominated in such currencies, which means that the Sub-funds' Net Asset Value

could decline as a result of changes in the exchange rates between foreign currencies and the Reference Currency of the relevant Sub-fund.

Sub-fund may invest in forward contracts, which are not traded on exchanges, and are not standardized; rather, banks and dealers act as principals in these markets, negotiating each transaction on an individual basis.

Trading in unregulated exchange contracts and investing in OTC derivatives may be subject to more risks than trading on regulated exchanges, including, but not limited to, the risk of default due to the failure of a counterparty with which the Sub-fund has contracts. The failure by such counterparty to fulfil its contractual obligation could expose the Sub-fund to unanticipated losses. The principals who deal in these markets are not required to continue to make markets in the currencies they trade and these markets can experience periods of illiquidity, sometimes of significant duration. There have been periods during which certain participants in these markets have refused to quote prices for certain financial instruments and currencies or have quoted prices with an unusually wide spread between the price at which they were prepared to buy and that at which they were prepared to sell. Disruptions can occur in any market traded by the Sub-fund due to unusually high or low trading volume, political intervention or other factors.

Credit rating risk

Credit ratings assigned by rating agencies are subject to limitations and do not guarantee the creditworthiness of the security and/or issuer at all times.

The Management Company shall not solely or mechanically rely on credit ratings issued by credit rating agencies as defined in Article 3(1)(b) of Regulation (EC) No 1060/2009 of the European Parliament and of the Council of 16 September 2009 on credit rating agencies, for assessing the creditworthiness of the UCITS' assets.

Reliance on the same group risk

The Investment Manager, the Index Owner and certain counterparties to financial transactions are part of Munich Re group (the "Affiliated Person").

Although separate legal entities and operationally independent, each of the Affiliated Persons are presently part of the same financial group. In the event of a financial catastrophe or the insolvency of any member of the group, the NAV and liquidity of the Sub-fund may be adversely affected and its operation may be disrupted.

Given that the Affiliated Persons are all members of the same group, conflicts of interest in respect of the Sub-fund may arise from time to time amongst any of them. The Management Company will vigorously manage any such conflict in the best interest of investors.

19. Conflicts of Interest

The Management Company is not prohibited to enter into any contract or enter into any financial, banking or other transaction with the Interested Parties or with the Sub-fund, including transactions with the Affiliated Person, provided that such transactions are carried out as if effected on normal commercial terms negotiated at arm's length.

Moreover, the Management Company or the Investment Managers are not prohibited to purchase or to provide advice to purchase any products on behalf of the Sub-funds where the issuer, dealer and/or

distributor of such products is part of the Affiliated Person provided that such transactions are carried out in the best interest of the Sub-fund as if effected on normal commercial terms negotiated at arm's length.

Entities of the Affiliated Person may act as counterparty and as calculation agent in respect of financial derivative contracts entered into by the Sub-fund and in relation to the Index. Investors should be aware that to the extent the Sub-fund trades with the Affiliated Person as dedicated counterparty, the Sub-fund may incur costs and fees in connection with such transactions and the Affiliated Person will make a profit from the price of the financial derivative contract and payment of the Interest Rate in exchange for the index return for such transactions which may not be the best price available in the market, irrespective of the best execution principles. Beyond that, the Index contains a negative drift, representing the costs associated with the implementation of the index investment strategy by the use of Total Return Swap Transactions. Such costs are paid to the Counterparty which is a related entity to the Investment Manager and the Index Owner.

A conflict of interests shall arise where a Sub-fund is presented with (i) an investment proposal involving an asset owned (in whole or in part), directly or indirectly, by a member of the Management Company Board, the Investment Manager, or (ii) any disposition of assets to member of the Management Company Board, or the Investment Manager.

Therefore, the Management Company takes extensive measures to avoid and to deal with such conflicts of interest. The Management Company undertakes, by means of appropriate organisational measures, to eliminate the risk of conflicts of interest between relevant persons and parties where possible, and to keep a close eye on conflicts of interest within the company group.

The Management Company also obliges its staff to observe high ethical standards. It expects the greatest of care and integrity from them at all times, lawful and professional conduct, the upholding of market standards and especially observance of the clients' best interests.

In order to counteract potential conflicts of interest before they arise, the Management Company took care to ensure separation of functions when structuring its organisation, especially of functions that are incompatible with each other. The principle of functional separation applies all the way up to Management Company Board level. The Management Company also has a compliance function to identify, prevent and manage conflicts of interest.

The Management Company and the Investment Manager, do not enter into transactions based on soft commission agreements. Any transaction must be executed in the best interests of the unitholders.

20. Access to information and notification requirements

The Sub-fund is reserved for Eligible Investors, who are investing life insurance premiums in the Sub-fund as part of their unit-linked insurance product and enter into a reinsurance contract with Munich Re group.

20.1 Access to information

In that content, the Sub-fund will provide access to information and may enter into an agreement, standing arrangements and internal conduct of business rules between the Sub-fund and the Eligible

Investor and, as the case may be, the reinsurance company:

- (a) how and when the Sub-fund provides the Eligible Investor with a copy of its Sales Prospectus, Management Regulations and Key Information Document or any amendment thereof;
- (b) where applicable, how and when the Sub-fund provides the Eligible Investor with internal operational documents, such as its risk management process and its compliance reports;
- (c) what details of breaches by the Sub-fund of applicable laws and regulations, the Sales Prospectus, Management Regulations or the agreement between the Sub-fund and the Eligible Investor the Sub-fund shall notify the Eligible Investor of and the manner and timing thereof;
- (d) how and when the Sub-fund will provide the Eligible Investor with up-to-date information about the Sub-fund, its Net Asset Value, asset allocation, statement of assets, portfolio data, the actual exposure to financial derivative instruments, collateral, performance data, historical data, fees, costs and charges and any other relevant information based on legal requirements or only at the request of the Eligible Investor, to enable the Eligible Investor to calculate its own exposure, level of leverage, risk indicators, risk and reward profiles, performance analysis, to apply a look through approach and/or to fulfil its own information and disclosure requirements;
- (e) the manner and timing of notice by the Sub-fund of a planned or proposed liquidation, merger, or division.

20.2 Notification requirements

- (i) Subject to permissibility under the applicable Luxembourg laws, regulations and the CSSF approval, the Eligible Investor shall be notified by the Sub-fund not less than sixty (60) calendar days before material changes to the Specific Section of the Sub-fund become effective. Such material changes may include, but are not limited to, the following:
 - (a) a material change in the sections 'investment objective', 'investment policy', 'index objective and overview', 'index management' and 'collateral';
 - (b) an increase or decrease of the Management Fee (including the remuneration of the Investment Manager) and the calculation methodology;
 - (c) the replacement, removal or appointment of a new management company or investment manager;
 - (d) a new form of remuneration, costs or expense payable out of the Sub-funds' assets, which is not described in the Sales Prospectus;
 - (e) any variation in the rights or obligations of the Eligible Investor laid down in the Specific Section of the Sub-fund, where the variation is materially prejudicial to such unitholder;
 - (f) a planned or proposed liquidation, merger, or division of the Sub-fund at least ninety (90) calendar days before the liquidation, merger, or division date.

If the Eligible Investor intends to liquidate the unit-linked insurance product, a notification of that intention shall be provided to the Sub-fund without undue delay.

- (2) Without prejudice to paragraph (1) above, where any of the above changes cannot be determined in advance, the Sub-fund shall inform the Eligible Investor of the following material changes as soon as practicable. Examples of such

material changes include the following:

- (a) any suspension of the issue, redemption and conversion of units with accompanying reasons for the suspension, if and as long as circumstances exist which necessitate such a suspension. Unitholders will then be notified immediately once the suspension is repealed;
- (b) any change which may materially affect, within the meaning of applicable laws and regulation, the risk and reward profile of the Sub-fund;
- (c) any change the Management Company becomes aware of which may materially affect the ability of any key counterparty to an over-the-counter financial derivative to fulfil its obligations to the Sub-fund;
- (d) where the Sub-fund or the Management Company becomes aware of a material error in the calculation of the Sub-fund's Net Asset Value per unit, the Management Company will apply CSSF circular 02/77 concerning the protection of investors.
- (e) if the Management Company or Investment Manager is unable to perform its obligations as manager of the Sub-fund for whatever reason, including without limitation, under the following circumstances:
 - where the Management Company or the Investment Manager of the Sub-fund is being wound up or otherwise dissolved, whether in Luxembourg or elsewhere; and
 - the Management Company or the Investment Manager of the Sub-fund is no longer authorised or licensed to act as a manager of the Sub-fund.

The Sub-fund - An Overview

Fund name	MEAG FlexConcept – BEST10USD
International Securities Identification Number	LEI: 5299000FQBEN1J5FBK92 Unit class USD: ISIN: LU2001391353; Unit class SGD: ISIN LU2514450019 Unit class USD: WKN: A2PLCL; Unit class SGD: WKN A3DTQ6
Reference Currency	USD
Type of units	Registered units, no bearer certificates
Eligible Investors	Exclusively institutional and professional investors in accordance with Luxembourg laws and regulations, who are investing seed capital or life insurance premiums in the Sub-fund as part of their unit-linked insurance product and enter into a reinsurance contract with Munich Re group.
Initial Subscription Day	Unit class USD: 21 January 2020; Unit class SGD: 4 October 2022
Initial Issue Date	Unit class USD: 22 January 2020; Unit class SGD: 5 October 2022
Initial Issue Price	Unit class USD: USD 100.- per unit; Unit class SGD: 100.- per unit
Initial Minimum Subscription Amount	Unit class USD: USD 20,000,000.- ; Unit class SGD: 25,000,000.-
Minimum Holding Amount	Unit class USD: USD 20,000,000.- ; Unit class SGD: 25,000,000.-
Sales charge	No sales charge is currently charged for the Sub-fund.
Redemption fee	No redemption fee is currently charged for the Sub-fund.
Use of dividends	Earnings reinvested, currently only accumulating units are issued for the Sub-fund. However, the Management Company reserves a right to decide on extraordinary distributions and to pay dividends.
Business Day	each day, on which banks are open for business in Luxembourg, Munich, Frankfurt am Main and Singapore, with the exception of 24 and 31 December each year, and the settlement of transactions in Luxembourg.
Valuation Day	each day, on which all of the following conditions are fulfilled: (i) a day on which banks are open for business in Luxembourg, Munich, Frankfurt am Main, Singapore, Tokyo and Zurich, excluding 24 December and 31 December, and (ii) a day on which the US Federal Reserve Bank is open for business on the previous business date and (iii) a day on which all of the following exchanges are full-time open for business in respect of Systematix BEST Index components traded at the Eurex Exchange, ICE Europe, TMX Canada and Hong Kong Futures Exchange (HKFE) for the previous business date.
Subscription and Redemption Days	each Valuation Day of the Sub-fund.
Cut-off-Time	Applications for the subscription, redemption and conversion of Sub-fund units which are received by 12:00 hours CET on a Valuation Day will be dealt with on the next following Valuation Day at the issue, redemption and conversion prices of that valuation date. Applications for the subscription, redemption and conversion of units which are received after 12:00 hours CET on a Valuation Day will be processed on the Valuation Day following the next valuation date.
Management Fee (including the remuneration of the Central Administrative Agent Fee)	Up to 0.05% p.a. of the net Sub-fund assets In addition, the Management Company receives a fixed remuneration of up to EUR 1,500 per month for the unit classes SGD.
The Investment Manager Fee	Up to 0.30% p.a. of the net Sub-fund assets
Remuneration of the Depositary	Up to 0.015% p.a. of the net Sub-fund assets
Total expense ratio ("TER")	The TER will be disclosed to Investors in the annual accounts.
Countries where marketed	Grand Duchy of Luxembourg, Republic of Singapore registration as a restricted scheme constituted outside of Singapore offered to institutional investors

II

Annex II: Additional information for investors

Additional information for investors

The Sales Prospectus including the Management Regulations, the Key Information Document, and the latest annual and semi-annual reports for the Fund as well as the current issue and redemption prices and further information about the Fund are published online at www.hal-privatbank.com, and printed versions of these can be obtained free of charge in paper form at the registered office of the Management Company

Hauck & Aufhäuser Fund Services S.A.
1c, rue Gabriel Lippmann
L-5365 Munsbach

Additional information for investors in the Federal Republic of Germany

The Management Company has not submitted a notification on marketing of units of the Sub-funds MEAG FlexConcept – EuroGrowth, MEAG FlexConcept – EuroBond and MEAG FlexConcept – BEST10USD to the Federal Financial Supervisory Authority in Germany pursuant to § 310 KAGB, therefore, these Sub-funds may not be publicly marketed in the Federal Republic of Germany.

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has assumed the role of facilities agent in the Federal Republic of Germany (the "**facilities agent**").

The Sales Prospectus including the Fund's Management Regulations, the Key Information Document, and the annual and semi-annual reports as well as other Fund documents can be obtained free of charge in paper form from the facilities agent.

The issue and redemption prices can also be requested from the facilities agent free of charge. In addition, the contracts specified in Chapter 21 "Publications" can be inspected and/or obtained free of charge at the facilities agent.

The Sales Prospectus including the Management Regulations, the Key Information Document and the latest reports, issue and redemption prices and further information about the Fund are published online at www.hal-privatbank.com, and a printed version of these can be obtained free of charge at the registered office of the Management Company in Luxembourg.

Applications for the issue, redemption or conversion of units which are permitted to be marketed in Germany must be submitted to the unitholder's respective depository bank. Redemption proceeds, any distributions and other payments to the investors are forwarded by the Depository to the unitholder's respective depository bank.

Preamble

These Management Regulations set out the general principles and conditions for the **MEAG FlexConcept** fund (the "**Fund**"), an investment fund (*fonds commun de placement*) which is subject to Part I of the Luxembourg Law of 17 December 2010 on undertakings for collective investment in its latest version ("**Law of 17 December 2010**") and is managed by Hauck & Aufhäuser Fund Services S.A. (., a limited liability company under Luxembourg law (the "**Management Company**").

Depending on the context, the term "**Fund**" should also be read and understood as referring to the Fund's sub-funds (the "**Sub-funds**").

Article 1 – The Fund

The **MEAG FlexConcept** is an investment fund without legal personality which is set up as an "umbrella fund" with several Sub-funds, and it comprises securities and other assets ("**Fund Assets**") which are managed in accordance with the principle of risk diversification. The Fund Assets minus the liabilities attributable to the Fund must reach the equivalent of at least EUR 1,250,000 within six months following the approval of the Fund. The Fund is managed by the Management Company. The Fund Assets shall be held in custody by the Depositary.

The contractual rights and duties of the investors, the Management Company and the Depositary are set out in these Management Regulations.

The investor's acquisition of units entails its acceptance of the Fund's contractual conditions which are contained in these Management Regulations and the Sales Prospectus.

Article 2 – The Management Company

The Management Company is Hauck & Aufhäuser Fund Services S.A. The Management Company manages the Fund in its own name yet exclusively in the interest of and for the collective account of the unitholders. Management authorisation extends to the exercising of all rights that relate, either directly or indirectly, to the assets of the Fund.

The Management Company specifies the investment policy of the particular Sub-Fund, observing the legal and contractual investment restrictions. The Management Company's board of directors may entrust one or several members of the board with the execution of the day-to-day investment policy. It may also outsource the execution of the day-to-day investment policy to a third party under its own responsibility and control and at the expense of the particular Sub-Fund, insofar as such a third party is licensed or registered for the

purpose of asset management and subject to a supervisory authority. If the execution of the day-to-day investment policy is outsourced to a third party, this shall be mentioned in the Sales Prospectus of the Fund. Moreover, the Management Company will confirm that the third parties have taken all the necessary measures to ensure compliance with all organisational requirements and the avoidance of conflicts of interest as specified in the applicable Luxembourg laws and regulations and that the third parties monitor the compliance with these requirements.

The Management Company may consult investment consultants or fund managers and, in particular, an investment committee under its own responsibility. The relevant costs may be charged to the Fund in accordance with the provisions of the Management Regulations and will be mentioned in the Sales Prospectus.

The Management Company prepares a Sales Prospectus for the Fund and compiles the Key Information Document (Key Information Document).

Article 3 – The Depositary and Paying Agent

Hauck Aufhäuser Lampe Privatbank AG, Niederlassung Luxemburg, based in 1c, rue Gabriel Lippmann, L-5365 Munsbach, the Grand Duchy of Luxembourg, registered in the commercial and companies register of Luxembourg under the number B 175937, has been appointed as Depositary of the Fund in a written agreement. The Depositary is a branch of Hauck Aufhäuser Lampe Privatbank AG, Kaiserstr. 24, 60311 Frankfurt am Main, Germany, a fully licensed German credit institution as defined in the German Banking Act (KWG) and as defined in the Luxembourg Law of 5 April 1993 on the financial sector (in its current version). It is registered in the commercial register of Frankfurt am Main District Court under HRB 108617. Both Hauck Aufhäuser Lampe Privatbank AG and its Luxembourg branch are supervised by the German Federal Financial Supervisory Authority (BaFin). Additionally, the Luxembourg branch of Hauck Aufhäuser Lampe Privatbank AG is subject to the Luxembourg commission for the supervision of the finance sector (CSSF) regarding liquidity, money laundering and market transparency.

All duties and responsibilities of the Depositary are performed by the branch. Its role is defined in particular by the Law of 17 December 2010, the CSSF circular 16/644, the Depositary Agreement and the Sales Prospectus. As a paying agent, it is obliged to pay out any distributions and the redemption price of redeemed units and other payments.

In the performance of its duties, the Depositary acts honestly, reputably, professionally and independently, exclusively in the interest of the Fund and its unit-holders.

The Depositary ensures that the Fund's cash flows are monitored effectively and properly. The Depositary shall ensure that all payments made by or on behalf of unit-holders upon subscription to the specific Sub-Fund's units have been received and that all the Fund's cash is posted to bank accounts in the name of the Fund. These accounts must be held with the Depositary or another financial

institution.

The Depositary safeguards/monitors all the Fund's assets. In this regard, the Law of 17 December 2010 differentiates between the financial instruments to be safeguarded and the other assets, although the classification can be ambiguous in some individual cases.

The Depositary is subjected in some cases to different duties and stricter liability for the safeguarding of financial instruments (such as securities, money market instruments, units in Undertakings for Collective Investment) than for the safeguarding of other assets. Financial instruments to be safeguarded are kept in safe custody by the Depositary in segregated Depositary accounts. Aside from a few exceptional cases, the Depositary shall be held liable for the loss of these financial instruments, including where the loss was caused by a third party rather than the Depositary itself. In contrast, other (non-depositable) assets will not be held in securities accounts. Once the investment Fund's title to these assets has been ascertained, the Depositary shall maintain records of these assets. The Depositary shall be liable to the Management Company for gross negligence or wilful misconduct with respect to the fulfilment of these duties.

For the safeguarding of the assets, regardless of their type, the Depositary can appoint Sub-Custodians to comply with the conditions of the Law of 17 December 2010. The Depositary's liability vis-à-vis the Management Company remains unaffected by the commissioning of a Sub-Custodian. The names of the Sub-Custodians are available from the Depositary's website (<https://www.hal-privatbank.com/impresum>). As a general rule, third parties are not commissioned with the safeguarding or monitoring of the other assets, unless otherwise expressly stipulated.

When a Sub-Custodian is commissioned for financial instruments that are to be safeguarded, the Custodian is, in particular, obliged to check that the Sub-Custodian is subject to effective supervision (including minimum capital requirements) and regular external auditing that guarantees that the assets are in its possession ("Depositary due diligence"). These duties of care must also be complied with vis-à-vis any legal entity that is in the chain of custody after the Sub-Custodian or third-party Custodian, respectively (the so-called "Correspondent").

The Depositary must also ensure that each Sub-Custodian separates the assets of the Depositary's customers that are subject to joint administration from its own assets and the Depositary's other assets (in particular, its own assets and the assets of the Depositary's customers that are not subject to joint administration).

For financial instruments that are to be safeguarded, it is also the case that if the law in a state that is not a member of the EU prescribes that certain financial instruments must be kept in safe custody by a local authority that does not fulfil the above-mentioned supervision requirement (a "Local Depositary"), the Depositary can only commission this local Depositary if the following legal requirements are met.

First, there must be no Local Depositary that does fulfil the above-mentioned supervision requirement.

Second, the safeguarding of financial instruments can only be transferred to a Local Depositary upon express instruction from the Management Company..

Article 4 – Central Administrative Agent and registrar and transfer agent

In its role as the Fund's Central Administrative Agent and Registrar and Transfer Agent (collectively the "**Central Administrative Agent**"), Hauck & Aufhäuser Fund Services S.A. will in particular

undertake the bookkeeping, including the calculation of the Net Asset Value and the drawing up of the annual and semi-annual reports for the Fund and/or the Sub-funds, and it will keep and update any unit registers and undertake the transfer of units in connection with the issue and redemption of units.

In connection with its duties, the Central Administrative Agent may use the services of a third party, subject to it retaining responsibility and oversight, and with the approval of the Board of Managers of the Management Company. Remuneration for third party services which are connected with the transfer of tasks is paid exclusively by the Central Administrative Agent.

Article 5 – Investment objective, investment policy, principles and restrictions

The Management Company sets the investment objective, policy, principles and restrictions for the Sub-funds.

5.1 Investment objective

The aim of the Sub-funds' investment policy is to achieve continual, long-term growth in value. This entails the fund assets being invested, in accordance with the principle of risk diversification and the investment principles and restrictions, in securities and/or other liquid financial investments within the meaning of the Law of 17 December 2010.

5.2 Investment policy

The Sub-funds' investment policies are set by the Management Company and laid down in the Sales Prospectus.

5.3 Investment principles and limits

5.3.1 The following definitions apply:

"Non-EU member state": A non-EU member state is any state which is not an EU member state.

"First Class Financial Institution": Financial institutions deemed to be first-class are financial counterparties selected by the Management Company which have at least a single A rating, are subject to continuous supervision by a public body, and have experience in transactions of this type. In addition, these counterparties must be financially sound and have the organisational structure and resources that they need in order to provide the services that are to be provided for the Sub-fund. Insurance and reinsurance companies are likewise included in this definition.

"Money market instruments": Instruments usually traded on the money market which are liquid, and have a value which can be precisely determined at any time.

"Regulated market": A market within the meaning of Directive 2004/39/EC of the European Parliament and the Council of 21 April 2004 on markets in financial instruments.

"Member state": A member state of the European Union; States which are party to the Agreement on the European Economic Area but are not members of the European Union are treated within the limits of this agreement and associated contracts as being equivalent to the member states of the European Union.

"UCI": Undertaking for collective investment.

"UCITS": Undertaking for collective investment in transferable

securities which is subject to Directive 2009/65/EC.

"Directive 2009/65/EC": Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of legal and administrative regulations and relating to certain undertakings for collective investment in transferable securities (UCITS) (including the following amendments and supplements).

"Transferable securities":

- shares and other securities that are equivalent to shares ("**shares**");
- debenture bonds and other certified debt securities ("**debt securities**");
- any other marketable securities which provide an entitlement to purchase securities through subscription or conversion, with the exception of the following techniques and instruments.

For clarification purposes it is pointed out that in this section too, depending on the context, the term "Fund" may also have to be read and understood as also referring to the Sub-funds.

5.3.2 The Fund's investments may only consist of the following types of assets:

- (a) transferable securities and money market instruments which are admitted to or traded on a regulated market;
- (b) transferable securities and money market instruments traded on another market of a member state which is regulated, operates regularly and is recognised and open to the public;
- (c) transferable securities and money market instruments admitted to official listing on a stock exchange of a state in Europe, Asia or Oceania (including Australia), the American continents or Africa or traded on another market of a state in Europe, Asia or Oceania (including Australia), the American continents or Africa which is regulated, operates regularly and is recognised and open to the public;
- (d) newly issued transferable securities and money market instruments, provided that:
 - the terms of the issue include an undertaking, that application will be made for admission to official listing on a stock exchange or on another regulated market referred to in paragraphs (a) to (c) of this section which operates regularly, is recognised and open to the public; and
 - admission is secured within one year of the issue;
- (e) units of UCITS that are authorised according to Directive 2009/65/EC, and/or of other UCIs within the meaning of Article 1 (2) (a) and (b) of Directive 2009/65/EC, whether or not established in a member state, provided that:
 - such other UCIs are authorised under laws which provide that they are subject to supervision considered by the CSSF to be equivalent to that laid down under European Union law (currently the United States of America, Canada, Switzerland, Norway, Hong Kong and Japan), and that cooperation between authorities is sufficiently ensured;
 - the level of protection for unitholders in other UCIs is equivalent to that provided for unitholders in a UCITS and, in particular, the rules asset segregation, borrowing, lending and uncovered sales of transferable securities and money market instruments are equivalent to the requirements of Directive 2009/65 EC;
 - the business of the other UCIs is reported in semi-annual- and annual reports to enable assessment of the assets and liabilities, income and operations over the reporting period;
- no more than 10% of the assets of the UCITS or of other UCIs whose acquisition is contemplated, can, according to their respective management regulations or constitutive documents, be invested in aggregate in units of other UCITS or other UCIs;
- (f) deposits with a credit institution which are repayable on demand or have the right to be withdrawn, and maturing in no more than 12 months, provided that the credit institution has its registered office in a member state of the EU or – if the registered office of the credit institution is in a non-EU member state, provided that it is subject to prudential rules considered by the CSSF to be equivalent to those laid down in European Union law;
- (g) financial derivative instruments ("**derivatives**"), including equivalent cash-settled instruments, traded on regulated markets referred to in the aforementioned items (a), (b) and (c), and/or financial derivative instruments which are not traded on a stock exchange ("**OTC derivatives**"), in accordance with the investment policies and investment objectives of the Sub-fund as stated in Annex I, provided that:
 - the underlying assets consist of instruments within the meaning of items (a) to (h), or financial indices, interest rates, foreign exchange rates or currencies;
 - the counterparties to OTC derivative transactions are institutions subject to prudential supervision, and belonging to the categories approved by the CSSF ;
 - the OTC derivatives are subject to reliable and verifiable valuation on a daily basis, and can, at any time and at the initiative of the Fund, be sold or liquidated, or closed by an offsetting transaction at any time at their fair value, and
 - Unless otherwise set forth in the Special Section for each Sub-fund, the counterparty to a financial derivative instrument is a financial institution that has to fulfil the following conditions:
 - being authorised by and subject to ongoing supervision by a public financial authority;
 - either being located in the European Economic Area or in a country belonging to the group of ten leading industrial nations (G10);
 - having at least an investment grade rating; and
 - being experienced in such transactions.
- (h) money market instruments that are not traded on a regulated market and do not fall within the above definition, provided that the issuer or the issuer of such instruments is itself regulated for the purpose of protecting investors and savings, and provided they:
 - are issued or guaranteed by a central, regional or local authority or the central bank of a member state, the European Central Bank, the EU or the European Investment Bank, a non-EU countries or, in the case of a federal state, by one of the members making up the federation, or by an international body with public character to which at least one member state belongs, or
 - are issued by an undertaking, the securities of which are traded on regulated markets as defined in (a), (b) or (c) above, or
 - are issued or guaranteed by an establishment subject to official supervision in accordance with the criteria laid down in EU law, or by an establishment that is subject to and complies with prudential rules which, in the view of the CSSF, are at least as stringent as those laid down by European Union law, or

- are issued by other bodies belonging to a category approved by the CSSF, provided that investor protection rules apply to investments in such instruments which are equivalent to those of the first, second and third indents and provided that the issuer is either a company whose capital and reserves amount to at least ten million euros (EUR 10,000,000) and which compiles and publishes its annual accounts in compliance with the provisions of Directive 2013/34/EU, or is an entity within a group of companies which includes one or more listed companies and responsible for the financing of this group or is an entity which is dedicated to the financing of securitization vehicles that benefit from a banking liquidity line.

5.3.3 The Fund may also:

- invest up to 10% of its net assets in transferable securities and money market instruments other than those stated in clause 5.3.2. above;
- hold up to 20% of its net assets in liquid funds;
- take out short-term loans up to the equivalent of 10% of its net assets. Hedging transactions in connection with the sale of options or the purchase or sale of futures contracts and futures are not deemed to be borrowings within the meaning of this investment restriction;
- acquire foreign currency through a "back-to-back" transaction (i.e. a sale that is immediately covered by a purchase).

5.3.4 In addition, the Fund shall abide by the following investment restrictions when investing its assets:

- The Fund may invest a maximum of 10% of its net assets in transferable securities or money market instruments issued by the same body. It may invest a maximum of 20% of its net assets in deposits made with one and the same body.

The risk exposure to a counterparty's default risk in the case of transactions by the Fund in OTC derivatives with the same counterparty may not exceed 10% of its net assets when the counterparty is a credit institution within the meaning of paragraph 2 (f). In other cases, the maximum limit is 5% of the Fund's net assets.

- The total value of the transferable securities and money market instruments of issuers with each of which the Fund invests more than 5% of its net assets shall not exceed 40% of the value of its net assets. This restriction does not apply to deposits and OTC derivative transactions made with financial institutions subject to prudential supervision.

Notwithstanding the individual limits stated in (a), the Fund shall not combine the following if this leads to an investment of more than 20% of its net assets with the same institution:

- Investment in transferable securities or money market instruments issued by that body, and/or
- deposits with that body, and/or
- exposure arising from OTC derivatives transactions undertaken with that institution.

- The upper limit stated in clause 5.3.4 (a) sentence 1 is a maximum of 35% if the transferable securities or money market instruments are issued or guaranteed by a member state or its regional/local authorities, by a non-EU member state, or by public international bodies to which one or more member states belong.

- The upper limit stated in the first sentence of clause 5.3.4 (a) equals a maximum of 25% for certain bonds if they are issued by

a credit institution with its registered office in a member state of the European Union and which, on the basis of legal provisions for the protection of holders of such bonds, is subject to specific public supervision designed to protect bondholders. In particular, sums deriving from the issue of those bonds must be invested in accordance with the law in assets which, during the whole period of validity of the bonds, are capable of covering claims attaching to the bonds and which, in the event of bankruptcy of the issuer would be used on a priority basis, for the reimbursement of the principal and payment of the accrued interest.

Where the Fund invests more than 5% of its net assets in bonds within the meaning of the first sub-paragraph which are issued by a single issuer, the total value of such investments may not exceed 80% of the value of the net assets of the UCITS.

- The transferable securities and money market instruments referred to in clause 5.3.4 (c) and (d) shall not be taken into account when applying the investment limit of 40% stipulated in clause (b) above.

The limits specified in clause 5.3.4 (a) to (d) shall not be combined; thus investments in transferable securities or money market instruments of one and the same issuer that are made according to clause 5.3.4 (a), (b), (c) to (d) or in deposits with such issuer or in derivative instruments made with such issuer or issued by it, shall not exceed in total 35% of the net assets of the respective Fund.

Companies that belong to the same group of companies for the purposes of consolidated accounts as defined in accordance with Directive 2013/34/EU or according to recognised international accounting rules, shall be regarded as a single body for the purpose of calculating of the investment limits set out in clause (a) to (e).

The Fund may cumulatively invest up to a limit of 20% of its net assets in transferable securities and money market instruments within the same group.

- Notwithstanding the investment limits set out in clause 5.3.4 (k), (l) and (m) below, the upper limits for investments in equities and/or debt securities of a single issuer as specified in clause 5.3.4 (a) to (e) are raised to a maximum of 20% for investments in shares and/or debt securities issued by the same body when the aim of the Fund's investment policy is to replicate the composition of a certain stock or debt-security index that is recognised by the CSSF on the following basis:

- the composition of the index is sufficiently diversified;
- the index represents an adequate benchmark for the market to which it refers;
- the index is published in an appropriate manner.

- The limit laid down in clause 5.3.4 (f) is raised to 35% if this is justified based on exceptional market conditions and, in particular, in regulated markets where certain transferable securities or money market instruments are highly dominant. An investment up to this limit is only permitted for a single issuer.

By way of derogation from the provisions of clause 5.3.4 (a) to (e), the Fund may, in accordance with the principle of risk-spreading, invest up to 100% of its net Sub-Fund assets in securities and money-market instruments of various issues issued or guaranteed by a Member State or its local authorities, or by an OECD country or public international bodies to which one or more Member States belong, provided that (i) such securities have been issued within the framework of at least six different issues; and (ii) not more than 30% of the net

assets of the Company are invested in securities of a single issue.

- The Fund may acquire units of other UCITS and/or other UCIs within the meaning of paragraph 5.3.2 (e) provided that it does not invest more than 20% of its net assets in a single UCITS or other UCI. When applying this investment limit, each Sub-fund of an umbrella fund is to be considered as a separate issuer, provided that the principle of segregation of the obligations of the various Sub-funds vis-à-vis third parties is ensured.
- (h) Investments in units of UCIs other than UCITS may not exceed in aggregate exceed 30% of the Fund's net assets. If the Fund acquires units of a UCITS and/or other UCI, the assets of the respective UCITS and/or other UCIs do not have to be combined for the purpose of the limits laid down in clause 5.3.4 (a) to (e) above.

If the Fund acquires units of other UCITS and/or other UCIs which are managed directly or indirectly by delegation, by the same management company or another company with which the management company is linked by common management or control or by a substantial direct or indirect holding, then that management company or other company may not charge subscription or redemption fees on account of the Fund investment in units of such other UCITS and/or other UCIs.

If the Fund invests a substantial proportion of its net assets in units of other UCITS and/or other UCIs, the maximum level of the management fees that may be borne by the Fund itself and by the other UCITS and/or other UCIs in which the Management Company intends to invest the Fund Assets, the maximum proportion of management fees charged to both the Fund itself and to the UCITS and/or other UCI in which it invests must not exceed a maximum amount which is stated in the Sales Prospectus.

The maximum share of the management fees that may be charged to the Fund Assets and to the UCITS or and/or other UCIs in which the Fund Assets may be invested, is mentioned in the Fund's annual report as applicable.

- (i) The Fund may not acquire any shares carrying voting rights which would enable it to exercise significant influence over the management of the issuer.
- (j) Furthermore, the Fund may acquire no more than:
- 10% of the non-voting shares of the same issuer;
 - 10% of the debt securities of the same issuer;
 - 25% of the units of a single UCITS and/or other UCI;
 - 10% of the money market instruments of any single issuer.

The investment limits stated in the second, third and fourth indents may be disregarded at the time of acquisition if the gross amount of debt securities or money market instruments or the net amount of units issued cannot be calculated.

- (k) The provisions in 5.3.4 (k) and (l) above are waived in relation to:
- transferable securities and money market instruments issued or guaranteed by a member state or its local authorities;
 - transferable securities and money market instruments issued or guaranteed by a non-EU member state;
 - securities and money market instruments issued by public international bodies of which one or more member states of the European Union belong(s);
 - shares held by the Fund in the capital of a company incorporated in a non-EU member state, provided that (1) such company invests its assets mainly in securities of issuers having their registered office in that state, (2) where under the legislation of that state, such a holding represents the only way in which the Fund can invest in the securities

of issuing bodies of that state, and (3) in making its investments this company observes the investment restrictions set out in clause 5.3.4 (a) to (e) and (i) to (l) above.

- (l) The Fund must not acquire any precious metals or certificates relating to them.
- (m) The Fund must not invest in real estate, but investments in securities secured by real estate, and the related interest, and investments in securities issued by companies that invest in real estate, and related interest, are permitted.
- (n) neither loans nor guarantees for third parties may be issued which are to be borne by the Fund, but this investment restriction does not prevent the Fund from investing its net assets in transferable securities, money market instruments or other financial instruments within the meaning of clause 5.3.2 (e), (g) and (h) which are not fully paid-up.
- (o) No short sales of transferable securities, money market instruments or other financial instruments listed in clause 5.3.2 (e), (g) and (h) above may be carried out.

5.3.5 Irrespective of contrary provisions contained herein:

- (a) the Fund does not need to adhere to the investment limits specified in clauses 5.3.3 to 5.3.4 above when exercising subscription rights that are linked to transferable securities or money market instruments;
- (b) and notwithstanding its obligation to adhere to the principle of risk diversification, the Fund may, during a period of six months following its approval by the CSSF, deviate from the provisions set out in clause 5.3.4 (a) to (j) above;
- (c) the Fund must, if these provisions are exceeded due to reasons outside the control of the Management Company or due to subscription rights, primarily strive to rectify the situation through its sale transactions, taking account of the interests of its investors;
- (d) if an issuer forms a legal entity incorporating several Sub-funds in which the Fund's assets only bear a liability in respect of claims made by investors in this Sub-fund and in respect of creditors whose claim has arisen as the result of the foundation, term or liquidation of the Sub-fund, each Sub-fund is to be regarded as an independent issuer for the purposes of applying the risk diversification rules contained in clause 5.3.4 (a) to (g) and clause 5.3.4 (i) and (j).

The Management Company is entitled to apply additional investment restrictions if it is necessary to do so in order to comply with the legal and administrative provisions in countries where Fund units are offered for sale or sold.

5.3.6 Investments in Sub-funds

The Sub-funds may subscribe for, acquire and/or hold units which are to be issued or have been issued by one or more other Sub-funds if:

- the target Sub-fund is not itself invested in the Sub-fund which invests in that target Sub-fund, and
- the total share of the assets which the target Sub-funds that it is intended to purchase may, according to their Management Regulations, invest in units of other UCIs does not exceed 10%, and
- the voting right that may be associated with the units in question is suspended for as long as they are held by the Sub-fund concerned, irrespective of any appropriate consideration in

the end of year accounts and periodic reports; and

- the value of these units is not taken into account in the calculation of the net asset value of the Sub-fund which must be undertaken according to the Law of 17 December 2010 for the purpose of determining the minimum net asset value according to the Law of 17 December 2010 if these units are held by the respective Sub-fund; and
- there is no multiple charging of the fees for administration/ subscription or redemption, either at the level of the Sub-fund which has invested in the target Sub-fund, or at the level of the target Sub-fund.

5.3.7 Derivatives, techniques and instruments for efficient portfolio management

(a) General provisions

Unless otherwise provided for in the specific information for the individual Sub-fund, the Management Company may, for the account of the Fund, for the purpose of efficient portfolio management or maturity or risk management of the portfolio, use derivatives that are approved for trading on a stock exchange or another organised market and for over-the-counter (OTC) transactions in accordance with the applicable laws and regulations and the framework specified in this chapter, and in accordance with the investment objective and investment policy of the Sub-fund, including the provisions of the amended CSSF circular 08/356, and the ESMA Guidelines on ETFs and other UCITS issues (ESMA/2014/937) (the "ESMA guidelines").

Total return swaps are agreements in which one party (total return payer) transfers the total financial performance of a reference obligation to the other party (total return receiver). Total financial performance includes income from interest and fees, gains or losses from market movements, and credit losses. In general, total return swaps are unfunded derivatives, i.e. no upfront payment is made by the total return receiver at inception. However, a total return swap can be traded in a funded fashion, where the total return receiver pays an upfront amount in return for the total return of the reference asset. An unfunded total return swap allows both parties to gain exposure to a specific asset in cost-effective manner (the asset can be held without having to pay additional costs). In contrast, a funded total return swap is relatively costlier due to the upfront payment requirement. The total return swap transactions which may currently be entered into by each Sub-fund are unfunded OTC-total return swap transactions. By entering into the total return swap transactions, the Sub-funds participate in the performance of an index in return for payment of a variable monthly interest as further set out in the Special Section for each Sub-fund. The total return swap transaction does not imply the assets of the relevant Sub-fund's portfolio (i.e. bonds or other assets) as underlying of such transactions and the Sub-fund does not receive any assets from the swap counterparty, but participates in the index performance by the monthly payment of the return arising from the index performance, if any. As a consequence, there are no assets held in custody by the depositary, the counterparty or any third parties linked to the swap transactions.

Each Sub-fund may incur costs and fees in connection with total return swaps. In particular, a Sub-fund may pay fees to agents and other intermediaries, which may be affiliated with the Management Company, Depositary or Investment Manager in consideration for the functions and risks they assume. The amount of these fees may be fixed or variable. Information on direct and indirect operational costs and fees incurred by each Sub-fund in this respect, as well as the identity of the entities to

which such costs and fees are paid and any affiliation they may have with the Management Company, Depositary or Investment Manager, if applicable, may be available in the annual report of the Fund and, to the extent relevant and practicable, in the Special Section.

All revenues arising from total return swaps, net of direct and indirect operational costs and fees, will be returned to the relevant Sub-fund. Further information, to the extent relevant and practicable, may be disclosed in the Special Section for the respective Sub-fund.

If these transactions relate to the use of derivatives or financial instruments with derivative components within the meaning of Article 10 (1) of Directive 2007/16/EC, the conditions and limits must comply with the provisions of the preceding paragraphs and be derived from assets that may be purchased for the Fund or from financial indices within the meaning of Article 9 (1) of Directive 2007/16/EC or from interest rates, exchange rates or currencies.

Furthermore, the provisions concerning risk management procedures in relation to derivatives must be taken into account. All the income from the use of techniques and instruments for efficient portfolio management, less direct and indirect operational costs, accrues to the Fund in order to be reinvested in accordance with the Fund's investment policy.

The counterparties under the contracts for using techniques and instruments for efficient portfolio management are selected according to the principles for carrying out orders relating to the company's financial instruments (the "Best Execution Policy") based on the following criteria:

- price of the financial instrument,
- costs associated with order processing,
- speed of order processing,
- probability of order being carried out,
- quality of order handling,
- order size / scope of the order,
- type of order,
- generation of ideas,
- service and
- research.

Orders can be executed regularly using various methods at various performance locations and with various counterparties (banks, brokers) in Germany or abroad. These counterparties will mainly be recipients of the direct and indirect costs and the fees that are incurred in this context. The costs and fees to be paid to the respective counterparty or other third parties are negotiated according to market conditions.

The counterparties are generally not associated companies of the Management Company.

Under no circumstances may the use of derivatives or other techniques and instruments for efficient portfolio management which are intended to restrict the counterparty risk as previously described lead to the Fund deviating from its investment policy as described in this Sales Prospectus, or expose the Fund to significant additional risks which are not outlined in this Sales Prospectus. The Fund may, in accordance with the provisions of the applicable laws and regulations, including CSSF circular 08/356 as amended by CSSF circular 11/512 and the ESMA guidelines, reinvest cash which it receives as security in connection with the use of techniques and instruments for the efficient management of the portfolio, so as to limit the previously described counterparty risks..

Furthermore, the reinvestment of cash which the Fund receives as

security in connection with the use of techniques and instruments for efficient portfolio management is subject to the provisions of the following section (b) "Administration of collateral".

Every Sub-fund may incur costs and fees in connection with the use of techniques and instruments for the efficient management of the portfolio. This may specifically lead to a Sub-fund having to pay fees to representatives or other agents which may be in a relationship with the Depository, the Investment Manager or the Management Company – in recognition of the role carried out by them and the risk which they bear. These fees may either be of a fixed amount or be variable. Information relating to direct or indirect operational fees and costs incurred by each Sub-fund in this context as well as the identity of the parties to which they have been allocated and any relationship they may have to the Depository, the Investment Manager and/or the Management Company, can be seen in the semi-annual and annual report.

(b) Administration of collateral

For the purposes of this section, all the assets which the Fund receives in connection with the use of techniques and instruments for the efficient management of the portfolio are deemed to be "collateral". The Fund may accept any asset as a collateral which is listed in Section 2. (b) of CSSF circular 08/356, provided that these assets meet the requirements that are set out under the following points 1. to 10.

When concluding transactions involving OTC derivatives and using techniques and instruments for the efficient management of the portfolio, the Fund ensures that all the collateral used to reduce the counterparty risk fulfils the following conditions at all times:

1. Liquidity – any non-cash collateral is highly liquid and traded on a regulated market or in a multilateral trading system with transparent setting of prices, so that they can be sold promptly and at a price which virtually corresponds to the pre-sale valuation. Collateral must also fulfil the provisions of Article 48 of the Law of 17 December 2010. The Sub-funds may receive and post collateral in the form of cash and non-cash collateral.
2. Valuation – collateral is valued daily on each Business Day of the respective Sub-fund, and assets which are exposed to considerable price fluctuations are not accepted as collateral unless appropriate conservative valuation haircuts apply.
3. Credit rating of the issuer – securities have a high credit rating.
4. Independence – the collateral are provided by companies that are independent of the counterparty and do not display a high correlation with the performance of the counterparty.
5. Collateral spread (concentration of assets) – It must be ensured that the collateral is appropriately diversified in terms of countries, markets and issuers. The criterion of appropriate diversification in relation to the concentration of issuers is considered to be met if in the case of efficient portfolio management or of transactions involving OTC derivatives the Fund receives a collateral basket from a counterparty which limits the maximum exposure to a specific issuer to 20% of the net asset value. If the Fund has various counterparties, the various collateral baskets have to be aggregated in order to calculate the 20% threshold for the exposure to a single issuer. Notwithstanding this indent, the Fund may be fully collateralised by various securities and money market instruments belonging to or issued or guaranteed by a member state of the European Union of the European Union, one or more of its regional authorities, by a member State of the OECD or the Group of Twenty (G20) such as the United States of America, by the Republic of Singapore, by the Hong Kong Special Administrative Region of the People's Republic of China, or by an international public-law organisation to

which at least one member state of the European Union belongs. In such cases the Fund will hold securities as collateral which have been issued in at least six different issues, and the value of securities forming part of a single issue must not exceed 30% of the net assets of the Fund. If the Fund seeks full collateralisation provided by securities that are issued or guaranteed by a member state, this fact will be stated in the Sales Prospectus. Furthermore, the Sales Prospectus will specifically state which member state, or which regional authorities or public international bodies, issue(s) or guarantee(s) the securities which the Fund accepts as collateral for more than 20% of its net asset value.

6. Risks in connection with the management of collateral, e.g. operational and legal risks, are identified and managed within the Fund's risk management process, and measures are taken to reduce these risks.
7. If ownership of the collateral is transferred, the collateral concerned is held by the Depository or one of the sub-custodians to which the Depository has delegated the holding of the collateral. For other types of collateral, the relevant collateral (e.g. pledge) may also be held by a third party depository which is subject to proper supervision and independent of the party providing the collateral.
8. The Fund may realise collateral at any time without the counterparty's consent being required.
9. Collateral not provided in the form of cash is neither sold, reinvested nor pledged.
10. Collateral in the form of cash is only:
 - a. deposited with the companies listed in Article 41 (f) of the Law of 17 December 2010;
 - b. invested in high-quality government bonds;
 - c. used for buy/sell-back transactions if such transactions are carried out with credit institutions subject to proper supervision and if the Fund is at all times able to demand repayment of the full cash amount on an accrual basis;
 - d. invested in short-term money market funds.

Collateral posted by the Fund in relation to these transactions may be reinvested by the counterparty. The case being, further details will be provided in the Special Section.

Reinvested collateral in the form of cash is spread according to the diversification rules for non-cash collateral, and it can only be invested in the financial instruments listed in Section 3 of CSSF circular 08/356, and only as set out in the provisions of point 10 above. The reinvestment of collateral may produce a leverage effect which should be taken into account when determining the market risk exposure of the Fund.

In addition, the Fund may enter into OTC derivative transactions which are cleared by a central clearing house that acts as the central counterparty. In general, centrally processed OTC derivative transactions can be carried out using the agency model or the *principal-to-principal* model. The *principal-to-principal* model is normally understood to be a transaction between the Fund and its clearing broker, and a back-to-back transaction between the clearing broker and the central counterparty. The agency model is understood to be a transaction between the Fund and the central counterparty. For these transactions the Fund issues/receives collateral on behalf of the Sub-fund in the form of a margin payment in accordance with the clearing broker's regulations and the rules for this type of collateral, including the rules relating to the amount of the collateral, its value, and any haircut that applies. In this context, the Fund ensures that the clearing broker's margin payment is in accordance with the

relevant Fund rules. Central processing is intended to lower the counterparty default risk and increase liquidity compared to bilaterally cleared OTC derivatives. However, centrally cleared OTC derivatives cannot totally eliminate the risks that are specified in section 9.25. of the Sales Prospectus.

(c) Scope of the collateralisation

Level of collateral

The level of collateral required for financial derivatives transactions will be determined as per the agreements in place with the individual counterparties, taking into account factors including the nature and characteristics of transactions, the creditworthiness and identity of counterparties and prevailing market conditions. In general, the counterparty exposure not covered by collateral will remain below 5% of the Net Asset Value of the Fund. In case the counterparty is a First Class Financial Institution either located in an EU-member state, a member state of the European Economic Area or country belonging to the G10 subject equivalent regulatory provisions or having at least a rating not lower than single A selected by the Management Company, the counterparty exposure not covered by collateral will remain below 10%. The actual level of collateral will be set out in the semi-annual and annual report of the Fund.

Collateral will be valued on each Business Day of the respective Sub-fund, using available market prices and taking into account appropriate discounts which will be determined for each asset class based on the haircut policy adopted by the Management Company. The policy takes into account a variety of factors, depending on the nature of the collateral received, such as the issuer's credit standing, the maturity, currency, price volatility of the assets and, where applicable, the outcome of liquidity stress tests carried out under normal and exceptional liquidity conditions.

5.3.8 Special provisions for UCITS set up in a master-feeder structure

- (a) A feeder UCITS is a UCITS which, notwithstanding Article 2 (2) hyphen 1 of the Law of 17 December 2010 and clauses 5.3.2, 5.3.3, and 5.3.4, invests at least 85% of its assets in units of another UCITS or of a Sub-fund forming part of another UCITS ("**master UCITS**").
- (b) A feeder UCITS can hold up to 15% of its assets in one or more of the following assets:
 - ancillary liquid assets held as specified in clause 5.3.3 (b);
 - financial derivative instruments, as per paragraph 5.3.2 (g) and Article 42 (2) and (3) of the Law of 17 December 2010, which may exclusively be used for hedging purposes.
- (c) For the purposes of complying with Article 42 (3) of the Law of 17 December 2010, the feeder UCITS calculates its global exposure relating to derivative financial instruments by using a combination of its own direct risk and own risk determined according to clause 5.3.8 (b), and:
 - the actual master UCITS risk in terms of derivative financial instruments in proportion to the amount invested by the feeder UCITS in the master UCITS, or
 - the master UCITS potential maximum global exposure to financial derivative instruments provided for in the master UCITS management regulations or constitutive documents in proportion to the feeder UCITS investment into the master UCITS.
- (d) A master UCITS is a UCITS which
 - has at least one feeder UCITS among its unitholders,

- is not itself a feeder UCITS, and
- does not hold any units in a feeder UCITS.

If a master Sub-fund has at least two feeder UCITS as unitholders, Article 2 (2) first indent and Article 3 second indent of the Law of 17 December 2010 do not apply.

Article 6 – Units, unit classes

Each Sub-fund will issue fully paid-up units in registered form only. Such units may be of different classes and fractions of units of up to three decimal places will be issued.

Each unit being linked to one of the Sub-funds and registered in the register of units and unitholders by the Management Company or by a person empowered to do so by the Management Company. The register of units is administered by the Central Administrative Agent.

The right of ownership of registered units is effected through registration of the investor's name in the register of units. The register of units contains the names of each owner of registered shares, their home and/or company address or usual place of residence, and the number of units held by them. In addition, owners of registered units may receive, upon request, written confirmation of the registration of the units held by them from the Management Company or the Registrar and Transfer Agent through the issuance of certificates or letters of confirmation of the unitholders' holding of units. The register of units is conclusive evidence of ownership of the units and the Management Company will treat the registered owner of units as the owner thereof. Such certificates will not have any value other than constituting a simple confirmation of such unitholder's holding of units at the date of its issue. Every transfer and return of registered units must be registered in the register of units. The transfer of registered units is effected by means of registration in the register of units.

Units of each Sub-fund are issued to Eligible Investors only, as more fully described in the Special Section for the respective Sub-fund.

The Management Company will make sure that Investors qualify as Eligible Investors.

The Management Company may restrict or prevent the ownership of units in the Fund by any Prohibited Person.

"Prohibited Person" means any person, firm, corporation, limited liability company, trust, partnership, estate or other corporate body, if in the sole opinion of the Management Company, the holding of units of the Sub-fund by that person, firm, corporation, limited liability company, trust, partnership, estate or other corporate body may be detrimental to the interests of the existing unitholders or of the Sub-fund, if it may result in a breach of any law or regulation, whether Luxembourg or otherwise, or if as a result thereof the Sub-fund may become exposed to tax or other regulatory disadvantages, fines or penalties that it would not have otherwise incurred. The term "Prohibited Person" includes any person, firm, corporation, limited liability company, trust, partnership, estate or other corporate body, which does not meet the definition of Eligible Investors (including, but not limited to natural persons and entities in which one or several natural person(s) hold an interest, unless such entity qualifies as a corporation) and any US person and any FATCA Prohibited Investor.

Units may only be transferred to Eligible Investors, provided that units may not be transferred to a Prohibited Person.

Units may not be transferred without the prior written consent of the Management Company (given in the form of a Management Company consent letter), which consent may not be unreasonably

withheld.

The Management Company reserves the right to offer only one or more classes for subscription to a certain group of potential Investors, for instance Investors in any particular jurisdiction in order to conform to local law, customs or business practice or for fiscal or any other reason.

Every owner of registered units must provide an address to the Management Company. All notifications and announcements to the owners of registered units may be sent to the address entered in the register of units. If there are joint owners of units, only the address of the first subscriber is entered in the register of units.

The Management Company is authorised to issue an unlimited number of fully paid up units without granting the existing investors a preferential right to subscribe to units that are to be newly issued. The Management Company is authorised to empower third parties to accept the subscription of units, to accept the price for these units, and to issue new units.

The Management Company may issue two or more different classes of units within each Sub-fund, the assets of which are jointly invested within any Sub-fund. The different classes of units within each Sub-fund may carry different rights and obligations, for example with regard to the fee structure, their minimum investment and holding amounts, the distribution policy, the conditions to be met by the investors, the currency of the unit class, their target Investors as more fully described in the Special Section or other special characteristics which are determined by the Management Company in each case. The net asset value per unit is individually calculated for each class of unit that is issued.

From their date of issue, all units in the Fund are equally entitled to the returns, price gains and liquidation proceeds of the Sub-fund or the particular unit class.

Unitholders of the same class in a Sub-fund will be treated pro-rata to the number of units held by them in the relevant class. The amounts invested in the different classes in each Sub-fund are themselves invested in a common underlying portfolio of investments.

Article 7 – Dividend policy

The Management Company determines for the respective Sub-fund or class of units whether accumulating or distributing units are issued.

In the case of accumulating units, the income is continually reinvested and will be capitalised in the relevant Sub-fund for the benefit of the respective units and/or unit classes.

For the respective units and/or unit classes entitled to distributions, the Management Company determines the timing and size of distributions. The Management Company will in its discretion decide whether and to what extent special and interim distributions are to be paid out of the Sub-fund's assets. Ordinary earnings minus costs ("ordinary net earnings") and net realised price gains can be distributed. Unrealised price gains and other assets can also be distributed, provided that the net Fund's net assets do not, as a result of the distribution, fall below the minimum level specified in the Law of 17 December 2010, which is 1,250,000 euros at the time of completion of these Management Regulations.

Article 8 – Net Asset Value

The Fund's accounting currency will be the EUR and the total Net Asset Value of the Fund is equal to the sum of the net assets of the various Sub-Funds converted into EUR.

The Net Asset Value per unit of each class and/or Sub-fund will be denominated in the Reference Currency of the respective Sub-fund ("**Reference Currency**"). or if applicable, in the corresponding currency of the respective Sub-fund or the respective class of units.

The Net Asset Value per unit of the respective Sub-fund/unit class is calculated in the respective Reference Currency or the corresponding currency of the respective Sub-fund within the respective unit class in accordance with the provisions of Article 10 of these Management Regulations and in accordance with Luxembourg generally accepted accounting principles ("**Lux GAAP**").

Unless otherwise set forth in the Special Section, the Net Asset Value per unit of each class and/or Sub-fund shall be calculated by the Central Administrative Agent under the supervision of the Depositary and the Management Company on each Valuation Day. "**Valuation Day**" means each day, on which the Net Asset Value of a Sub-fund is calculated and is defined in the corresponding Annex for each Sub-fund ("**valuation date**" or "**Valuation Day**").

The Management Company may decide to determine the Net Asset Value on 24 and 31 December of any year or any other Business Day without these calculations constituting calculations of the Net Asset Value on a Valuation Day within the meaning of the preceding sentence. Consequently, the investors cannot demand the issue and/or redemption of units based on a Net Asset Value determined on 24 or 31 December of any year or any other Business Day which is not a Subscription and Redemption Day.

The Management Company is also allowed to temporarily suspend the calculation of the Net Asset Value. A detailed description of the circumstances which may lead to a temporary suspension is contained in Chapter 17 of these Management Regulations.

Article 9 – Determination of the Net Asset Value

- 1) The value of a unit ("unit value") is denominated in the currency for the unit class ("unit class currency") specified in the overview of the relevant Sub-Fund provided in the Sales Prospectus. It is calculated by the Management Company or by a third-party commissioned by the Management Company under the supervision of the Custodian on each Valuation Day. The calculation of the Sub-Fund and its unit classes is performed by dividing the net Sub-Fund assets of the particular unit class by the number of units of this unit class that are in circulation on the Valuation Day. Insofar as annual and semi-annual reports and other financial statistics have to provide information on the situation of the Fund assets as a whole, on the basis of legal regulations or the stipulations of the Management Regulations, such details are provided in Euro, and the assets of each Sub-Fund are converted into the Accounting Currency.
- 2) The net Sub-Fund assets shall be calculated in accordance with the following principles:
 - (a) The target fund units contained in the respective Sub-Fund will be valued using the latest calculated and available unit price or redemption price.
 - (b) The value of cash balances or bank deposits, certificates of deposit and outstanding claims, prepaid expenses, cash dividends and declared or accrued interest not yet received corresponds to the full amount, unless it is likely that this

cannot be paid or received in full, in which case the value is determined with inclusion of an appropriate reduction to achieve the actual value.

- (c) The value of assets that are listed or traded on a stock exchange or another regulated market is defined on the basis of the most recently available price, unless stipulated otherwise below.
- (d) If an asset is not listed or traded on a stock exchange or on another regulated market or if the prices corresponding to the rulings in c) do not adequately reflect the actual market value of the assets that are listed or traded on a stock exchange or on another market as mentioned above, then the value of such assets is defined on the basis of the reasonably foreseeable selling price according to a cautious estimate.
- (e) The liquidation value of futures, forwards or options that are not traded on stock exchanges or other organised markets will be equal to the respective net liquidation value, as determined on a consistent basis for all different types of contracts in accordance with the Board of Managers guidelines. The liquidation value of futures, forwards or options that are traded on stock exchanges or other organised markets is calculated on the basis of the most recently available conclusion prices of such agreements on the stock exchanges or organised markets on which these futures, forwards or options are traded by the Fund; if a future, a forward or an option cannot be liquidated on a day for which the net asset value is defined, then the basis of valuation for such an agreement is defined by the Board of Managers in an appropriate and reasonable manner.
- (f) Interest swaps are valued at their market value, which is determined with reference to the respective applicable interest rate curves. Swaps which relate to indices and financial securities are valued at their market value which is determined according to the respective index or financial security. The valuation of a swap agreement relating to an index or financial security is based on the market value of this swap transaction, which is determined according to the procedure specified by the Board of Managers based on the principle of good faith.
- (g) Money market instruments may be rated at their respective market value as defined by the Management Company in good faith and according to generally recognised valuation rules that can be verified by auditors.
- (h) All other securities or other assets are valued at their reasonable market price, as defined in good faith in accordance with the procedure that is to be issued by the Management Company.
- (i) The accrued pro rata interest on transferable securities will be taken into account unless considered in the price (dirty pricing).

The value of all assets and liabilities not stated in the Sub-Fund's currency will be converted into this currency at the most recently available exchange rate. If such exchange rates are not available, the exchange rate is determined in all good faith and in accordance with the procedure to be published by the Management Company.

The Management Company may approve other measurement principles at its discretion if it deems such other measurement principles to be in the interest of a more adequate measurement of an asset of the Sub-Fund.

If the Management Company believes that the unit value defined on a certain Valuation Day does not reflect the actual value of the Sub-

Fund's units or if considerable movements have occurred in the relevant stock exchanges and/or markets since the Unit Value was defined, the Management Company can decide to update the unit value on the same day. Under the circumstances, all applications for subscriptions and redemptions received for that Valuation Day are fulfilled on the basis of the unit value that has been updated according to the principle of good faith.

- 3) Where two or more unit classes have been set up for the respective Sub-Fund in accordance with Article 6 of the Management Regulations, the following specific provisions shall apply in relation to the unit price calculation:
 - (a) The unit price will be calculated separately for each unit class in accordance with the criteria listed under paragraph 2 of this Article.
 - (b) The influx of cash on the basis of the issue of units increases the particular unit class's percentage share in the total value of the net Sub-Fund assets. The outflow of cash on the basis of the redemption of units decreases the particular unit class's percentage share in the total value of the net Sub-Fund assets.
 - (c) In the event of a distribution, the unit value of unit class entitled to distribution drops by the amount of the distribution. The percentage share that this unit class holds in the value of the net Sub-Fund assets thus also drops simultaneously, while the percentage share of one or more unit classes not entitled to distribution holds in the net Sub-Fund assets increases.
- 4) An income settlement process can be performed for the particular Sub-Fund.
- 5) The Management Company may define the unit price for extensive redemption requests that cannot be fulfilled from cash and cash equivalents and permitted loans of the relevant Sub-Fund based on the prices on the Valuation Day on which it performs the necessary security sales for the Fund; this also applies to subscription requests received simultaneously for the Sub-Fund.

Article 10 – Issue of units

The Management Company is at all times fully authorised to issue units forming part of the respective Sub-fund. The Management Company is authorised to issue two or more categories of units within a Sub-fund.

The Initial Issue Date and, if applicable, the Initial Subscription Period for the Sub-funds or any new unit classes that are set up, is determined by the Management Company, and the characteristics are mentioned in the corresponding Special Section of each Sub-fund in the Sales Prospectus.

The Management Company may decide, at its own discretion before the set-up date, to withdraw the offer in respect of the respective Sub-fund. The Management Company may likewise decide to withdraw the offer to subscribe for a new unit class. Furthermore, the Management Company reserves the right to suspend the issue and sale of units at any time. In this case, investors that have already submitted a subscription order will be duly notified, and any subscription amounts already paid will be refunded. In this context, it is pointed out that interest is not applied to these amounts up until the time when they are refunded.

The Management Company may furthermore specify that after the initial subscription no more units of a Sub-fund or a specific unit class will be issued.

An Eligible Investor's first subscription for units must be made in writing directly to the Management Company, the Registrar and Transfer Agent or other duly appointed agent of the Management Company by completion of the Application Form and submission of other relevant documents (provided that the original Application Form is received by the Management Company, the Registrar and Transfer Agent or other duly appointed agent of the Management Company). Processing of the applications for subscriptions will only start once the duly completed Application Form has been received by the Management Company, the Registrar and Transfer Agent or other duly appointed agent of the Management Company together with all other information and documents reasonably required by the Management Company, the Registrar and Transfer Agent or other duly appointed agent of the Management Company.

On the Initial Issue Date or during the Initial Subscription Period, units of any Sub-fund will be offered at the Initial Issue Price as specified for each Sub-fund in the Special Section. The Initial Issue Price may be increased by a sales charge. Such sales charge is detailed for each Sub-fund in the Special Section.

Calculation example:

Net Asset Value per unit	€ 100.00
Sales charge (e.g.: 2%)	€ 2.00
Issue price	€ 102.00

A Minimum Investment, Minimum Subsequent Investment and the Minimum Holding Amount for each class may be specified in the Special Section for each Sub-fund. The Management Company may however, at its discretion, waive or modify such minimum limits.

Application for subsequent subscription may be made otherwise in writing (including facsimile), provided that all information and documents required is given to the satisfaction of the Management Company, the Registrar and Transfer Agent or other duly appointed agent of the Management Company.

Payments by Eligible Investors can be made via electronic bank transfer net of bank charges to the bank account of the Fund with the Depository, as indicated in the Application Form.

Subsequent subscriptions are issued at a price which is based on the Net Asset Value per unit of the respective Sub-fund and/or the respective unit class and is determined on each specified Valuation Day. The subscription price may be increased by any applicable sales charge, as stated in the corresponding Annex of the Sales Prospectus for each Sub-fund.

The sales charge is levied for the benefit of the sales agents. The sales charge may be increased by fees or other charges that may be payable in the particular countries where the Sub-fund/unit class is on sale. If the laws of a country specify lower sales charges, the acting sales agents in that country can sell the units with the highest sales charge that is permitted there.

The Minimum Investment, Minimum Subsequent Investment and the Minimum Holding Amounts for initial and subsequent subscriptions may differ depending on the unit class. At its discretion and with due regard for the principle of equal treatment of investors, the Management Company reserves the right to waive regulations relating to minimum investment and holding amounts for initial and subsequent subscriptions.

The issue price is payable to the Depository in the currency of the corresponding class of units, within 2 Business Days (as defined for each Sub-fund in the corresponding Annex) following the applicable Valuation Day.

Immediately after the receipt of the full issue price by the Depository, the units will be allocated on behalf of the Management Company and the appropriate number of units will be transferred to the investor on behalf of the Management Company.

Subscription orders must be submitted according to the provisions listed in Article 16.

Article 11 – Restrictions on the issue of units

Units in the Sub-funds may only be offered as part of a public sale in those countries where there is licence for public sale.

The Management Company may restrict or prevent the ownership of units by specific persons if in the Management Company's opinion such ownership could damage the Fund and/or the Sub-funds or could constitute a breach of Luxembourg or foreign laws or legal provisions, or if the Fund and/or Sub-funds could thereby be made subject to the laws of a state other than Luxembourg (for instance tax laws).

In particular, the units are not intended to be sold or marketed in the United States of America or to US citizens. Natural persons who are considered subject to US taxation include those who, for instance,

- were born in the USA or one of its territories or dependencies,
- are naturalised citizens (e.g. Green Card holders),
- were born abroad as the child of a citizen of the USA,
- reside mainly in the USA although they are not a citizen of the USA, or
- are married to a US citizen.

Legal entities considered to be subject to taxation in the USA include:

- companies and corporations which were founded under the laws of one of the 50 US federal states or the District of Columbia,
- companies or partnerships founded through an "Act of Congress", or

- (c) pension funds founded as US trusts if:
 - (i) a court within the USA is able to exert primary oversight over the administration of the trust; and
 - (ii) one or more US citizen(s) is/are authorised to make all the main decisions regarding the trust

If the issue takes place as part of saving plans, no more than one third of each of the payments agreed for the first year is used to cover costs, and the remaining costs are evenly distributed over all the subsequent payments.

The issuing of the units may be restricted, suspended, or temporarily or permanently stopped, for the reasons and subject to the conditions set out in these Management Regulations. A subscription order may be rejected subject to the conditions set out in these Management Regulations.

Furthermore, as part of their legal obligation to combat money laundering, the Management Company and the Depositary and/or Central Administrative Agent reserve the right to demand information about and proof of investors' identity. If the investors do not accede to this request in a timely manner, the subscription order may be rejected.

The Management Company may at any time and at its own discretion reject a subscription order. Furthermore, in return for payment of the redemption price, the Management Company may at any time redeem units held by any Prohibited Person.

Article 12 – Prevention of money laundering and terrorist financing

Pursuant to international rules and Luxembourg laws and regulations, obligations have been imposed on all professionals of the financial sector to prevent the use of undertakings for collective investment for money laundering purposes.

Measures aimed towards the prevention of money laundering, as provided by (but not limited to) the 2004 Law and the circulars and regulations of the CSSF, may require a detailed due diligence process.

In accordance with these provisions, this due diligence will be performed by the Registrar and Transfer Agent, under the ultimate supervision and responsibility of the Management Company. Investors must prove their identity and the Management Company or the Registrar and Transfer Agent must demand the following identity papers: for individuals, a certified copy of an identity document; for legal entities, a certified copy of the deed of incorporation and of the extract from the commercial register, a copy of the last published annual accounts and the names of the beneficial owners.

The Management Company and the Registrar and Transfer Agent reserve the right to request such additional information as they see fit to carry out the anti-money laundering due diligence. In the event of delay or failure by the applicant to produce any information required for verification purposes, the Management Company shall refuse to accept the application and will not be liable for any interest, costs or compensation.

A subscription order may only be accepted upon a complete and proper full identification of the subscribing investors and the ultimate beneficial owner in accordance with the applicable anti-money laundering laws and regulations. If the Management Company rejects an application for any reason, in whole or in part, the application monies or any balance thereof will be returned

without unnecessary delay to the applicant by transfer to the applicant's designated account or, if such account is not known to the Management Company, by post at the applicant's risk, provided the identity of the applicant can be properly verified pursuant to Luxembourg anti-money laundering regulations. In such event, the Management Company will not be liable for any interest, costs or compensation.

Pursuant to Article 3 (2) (d) of the 2004 Law, the Management Company and the Registrar and Transfer Agent are obliged to conduct an ongoing monitoring of the business relationship with its unitholders. Ongoing monitoring includes, inter alia, the obligation to verify and, where appropriate, to update, within an appropriate timeframe, the documents, data or information gathered while fulfilling the unitholder's due diligence obligations. The Management Company and the Registrar and Transfer Agent may only be in a position to fulfil its legal obligation to conduct an ongoing monitoring of the business relationship with its unitholders if the unitholders will provide the Management Company or the Registrar and Transfer Agent with the relevant information and documents in order to verify and, where appropriate, update collected data. In case of any lack of cooperation of a unitholder, the Management Company would be obliged to block such unitholder's account until the receipt of the information and documents required by the Management Company or the Registrar and Transfer Agent (i.e. when units are issued, they cannot be redeemed or converted until full details of registration and anti-money laundering documents have been completed, and failure to provide proper documentation may result in the withholding of redemption proceeds by the relevant Sub-fund). Any costs, including in particular account maintenance costs, which are related to non-cooperation of such unitholder will be borne by the respective unitholder.

Until the potential investors or the beneficiaries of a transfer have been definitively identified by the Registrar and Transfer Agent, it reserves the right to refuse to issue units or to refuse to accept units via securities transfers. This applies equally to pay-outs in connection with the redemption of units. Such payments are made only once the duty to provide identification has been complied with in full. In all such cases the Registrar and Transfer Agent cannot be held liable for potential late payment interest, costs that are incurred, or for other compensation.

In the event of delay or of inadequate proof of identity being provided, the Registrar and Transfer Agent may initiate appropriate measures as it sees fit and proper.

Depending on the nature of the specific subscription or transfer order, detailed identification of the originating client may not necessarily be required if the order is carried out by a financial institution or an authorised provider of financial services and that party is also established in a country which requires equivalent regulations to those contained in the Luxembourg Anti-Money Laundering Act and complies with the requirements specified in the "Financial Action Task Force (FATF)". The list of countries which recognise the FATF requirements can be obtained from the registrar and transfer agent, or online at "<http://www1.oecd.org/fatf>".

Information transferred in this context is recorded only in order to comply with the provisions for the prevention of money laundering.

Article 13 – Late Trading and Market Timing

In accordance with the Luxembourg laws and regulations and the CSSF circular 04/146 on the protection of undertakings for collective investment and their investors against late trading and market timing

practices, the following shall apply:

Late Trading

The Fund determines the price of its units on a forward basis. This means that it is not possible to know in advance the Net Asset Value per unit at which units will be bought or sold (exclusive of any subscription fees). Subscription applications have to be received and will be accepted only in accordance with the provisions of the Special Section and the Cut-Off-Time rules as laid down in this Sales Prospectus.

Market Timing

The Management Company does not allow any market timing practices for the Fund and the Sub-funds. Market timing is understood to mean the arbitrage technique through which an investor systematically subscribes for and sells units in the Sub-fund over a short period of time, exploiting time lags and/or imperfections/weaknesses in the system for calculating the Net Asset Value of the respective Sub-fund. This can harm the interests of the other investors. If it suspects the use of market timing practices, the Management Company will take appropriate measures to protect the other investors in the Fund and/or the respective Sub-fund.

The Sub-funds are not designed for Investors with short term investment horizons. Activities which may adversely affect the interests of the Fund's unitholders (for example activities that disrupt investment strategies or impact expenses) such as market timing or the use of the Fund as an excessive or short term trading vehicle are not permitted.

Whilst recognising that unitholders may have legitimate needs to adjust their investments from time to time, the Management Company may, if it reasonably deems that such activities adversely affect the interests of the Fund's unitholders, take action as appropriate to deter such activities.

Accordingly if the Management Company determines or suspects that a unitholder has engaged in such activities, it may suspend, cancel, reject or otherwise deal with that unitholder's subscription or conversion applications, if any, and take any action or measures as necessary to protect the Fund and its unitholders.

The Depositary shall pay back, without adding interest, payments made for subscription orders which are not executed.

Article 14 – Redemption of units

Investors may at any time demand the redemption of all or part of their units of any Sub-fund on the specified valuation dates specified in the corresponding Annex for each Sub-fund.

Investors are entitled to demand the redemption of their units at any time from the Management Company, the Registrar and Transfer Agent or other duly appointed agent authorised by the Management Company.

Written redemption requests will only be processed once the original requests are received by the Management Company, the Registrar and Transfer Agent or any other duly appointed agent of the Management Company in Luxembourg.

The redemption request must state the total amount or the number of units the Unitholder wishes to redeem and the class, Category and Sub-funds from which such units are to be redeemed as well as all necessary references enabling the payment of the redemption proceeds.

From the investor's viewpoint, the redemption orders are, without exception, deemed to be legally binding and irrevocable. All the documents required for redemption, as well as any unit certificates issued, must be enclosed with the application. It can only be revoked if the calculation of Net Asset Value, or the issue, conversion or redemption of units is suspended.

For all the Sub-Funds, redemption requests received by the Management Company, the Registrar and Transfer Agent or any other duly appointed agent of the Management Company on a Redemption Day before the relevant Cut-Off-Time (as defined in the Special Section) will be dealt with on the next following Valuation Day at the redemption price of the relevant class of each Sub-Fund prevailing on that Valuation Day. Any redemption requests received after the relevant Cut-Off-Time will be processed on the Valuation Day following the next valuation date.

The redemption price per unit of any class in a Sub-fund will be the Net Asset Value per unit of the relevant Sub-fund and/or the respective class of units concerned on the relevant Valuation Day. The redemption price may be reduced by a redemption fee charged in relation to their sale, as stated in the corresponding Annex of the Sales Prospectus for each Sub-fund.

Calculation example:

Net Asset Value per unit	€ 100.00
Redemption fee (e.g.: 2%)	€ 2.00
Redemption price	€ 98.00

If a Minimum Investment, Minimum Subsequent Investment and/or the Minimum Holding Amount is specified in the relevant Annex for individual Sub-funds or unit classes, and if it is not reached due to redemption orders, the Management Company has the right to regard them as redemption orders for all the units held by the respective investors, and consequently to initiate the redemption of all that investor's units at the relevant redemption price.

The redemption price is paid within 2 Business Days of the relevant Valuation Day or after the date on which all the necessary documents have been received by the Central Administrative Agent, whichever occurs last. The Depositary is obliged to make a payment only insofar as no legal provisions prevent it from transferring the redemption price to the applicant's country or restrict such a transfer, e.g. exchange control regulations or other circumstances beyond the control of the Depositary.

The redemption price is payable in the currency of the respective class of units. The redemption price may be less or more than the price paid at the time of subscription or purchase.

Compulsory redemption

If the Minimum Holding Amount of the Sub-fund is not maintained due to a redemption or conversion of units, the Management Company acting on behalf of the Sub-fund may compulsorily redeem any issued or remaining units at their current Net Asset Value per unit and make payment of the redemption proceeds to the respective unitholder.

If the Management Company discovers at any time that units are owned by a Prohibited Person, either alone or in conjunction with any other person, whether directly or indirectly, the Management Company acting on behalf of the Fund may at its discretion and without liability, compulsorily redeem the units pursuant to the procedure set forth in the Management Regulations after giving notice, and upon redemption, the Prohibited Person will cease to be the owner of those units.

The Management Company may require any unitholder to provide it with any information that it may consider necessary for the purpose

of determining whether or not such owner of units is or will be a Prohibited Person.

The Management Company may redeem units at any time, as it sees fit and in particular subject to the conditions set out in the provisions of Article 11. In this case, the investor is obliged to return the units. In particular, the Fund's Management Company reserves the right to be able to redeem units from investors at the redemption price if an investor does not meet the authorisation requirements of a Sub-fund, for example if it is not deemed to be an institutional investor according to Article 174 of the Law of 17 December 2010 if the Sub-fund concerned is restricted to institutional investors.

The Management Company shall ensure that the respective Sub-Fund Assets have sufficient liquid funds available to enable the redemption of units at the request of investors to take place without delay under normal circumstances.

Significant redemption

However, if on a single Valuation Day redemption orders are received, the value of which individually or together with other orders received exceeds 10% of the net Sub-fund Assets ("**Significant Redemption**"), the Management Company is entitled to temporarily suspend the redemption in order to safeguard the investors' interests, i.e. only to undertake the Significant Redemptions in relation to the Sub-fund concerned once corresponding assets forming part of the Sub-fund concerned have been sold without delay in a way which safeguards the investors' interests. In this case, the redemption takes place at the redemption price applicable at this time. Corresponding provisions apply to applications for the exchanging of units. The processing of such applications is given precedence over later applications that are received for subsequent valuation dates.

The redemption of units may be temporarily suspended for the reasons specified in Article 17.

During the temporary suspension of the redemption of units, no units are issued. The issuing of units resumes only once all the unit redemption orders have been carried out.

Article 15 – Conversion of units

Subject to meeting the respective eligibility criteria for the respective Sub-fund (e.g. the restriction to institutional investors), investors may request the conversion of some or all of their units from one Sub-fund into another Sub-fund or another class of units (if available) via the Management Company. They are converted on the basis of the Net Asset Value of the respective class of units, which is calculated on the next Valuation Day following receipt of the conversion application before Cut-Off-Time. However, a conversion commission may be charged in this context.

The conversion of units may be temporarily suspended for the reasons specified in Article 17.

Article 16 – Subscription, conversion and redemption orders

Subscription, conversion and redemption orders are received both by the Management Company, Central Administrative Agent and by the Depositary, the sales agents and the paying agents.

Units may be purchase, converted or redeemed at each Subscription and Redemption Day. Unless otherwise set forth in the Special

Section for each Sub-fund, "**Subscription and Redemption Day**" means, in relation to any Sub-Fund, each Valuation Day of the Sub-fund on which applications for subscriptions, conversion or redemption of units of any class may be received.

Subscription, conversion and redemption orders which are received by the Management Company, the Registrar and Transfer Agent, Central Administrative Agent or any other duly appointed agent of the Management Company in Luxembourg on a Subscription and Redemption Day before the relevant order Cut-Off-Time (the "**Cut-Off-Time**") will be dealt with on the next valuation date at the issue, redemption and conversion prices of the relevant class of each Sub-fund of that Valuation Day (plus any applicable sales, conversion or redemption charge).

Subscription, conversion and redemption orders received by the Management Company, the Registrar and Transfer Agent, Central Administrative Agent or any other duly appointed agent of the Management Company in Luxembourg on a Subscription and Redemption Day after the relevant Cut-Off-Time will be processed on the valuation date following the next valuation date on the basis of the issue, redemption and conversion prices per unit determined on such Valuation Day (plus any applicable sales, conversion or redemption charge).

If subscription, conversion or redemption orders are processed by the Depositary or sales or paying agents, other procedures and time limits may apply; however, the aforementioned time limits remain unchanged in the case of the Central Administrative Agent. The complete subscription, conversion and redemption conditions can be obtained from the Central Administrative Agent or the sales agents or any other duly appointed agent of the Management Company.

It is ensured that subscription, conversion and redemption orders can be surrendered only based on an as yet unknown Net Asset Value.

Article 17 – Suspension of the issue, conversion and redemption of units, and suspension of the calculation of Net Asset Value

The Management Company is authorised to temporarily suspend calculation of the net asset value and the issue, redemption and conversion of units if and as long as circumstances exist that necessitate such a suspension. This is the case in particular:

- (a) during the period for which a stock exchange or another regulated, recognised market open to the public, which operates properly and on which a significant portion of the assets of the Sub-fund are listed or traded, is closed (except on usual weekends or holidays), or the period in which trading on that stock exchange or that market has been suspended or restricted;
- (b) in emergencies, if the Management Company cannot access the Sub-fund's assets or is unable to freely transfer the equivalent value of the asset purchases or sales, or to properly calculate the net asset value;
- (c) to the extent to which such a suspension is justified for the protection of the investors following the publication of the convening of an extraordinary general meeting with the aim of merging the Fund or a Sub-fund, or of notifying investors of a decision taken by the Management Company concerning the merging of the Fund or a Sub-fund; or
- (d) during the period in which the usual means of communication or the aids used for calculating the net asset value of the Fund or a Sub-fund, or for calculating prices on the stock exchanges or the

markets on which a significant portion of the Fund's or a Sub-fund's assets are listed/traded, are disrupted.

In addition, a feeder UCITS and/or a feeder Sub-fund is entitled to suspend the redemption, pay-out, subscription or conversion of its units irrespective of the preceding conditions during the same period as its master UCITS.

No units will be redeemed by any Sub-fund during any period in which the determination of the Net Asset Value per unit of such Sub-fund is suspended pursuant to the powers contained in the Management Regulations and as indicated under "Suspension of the determination of the Net Asset Value" below.

Notice of suspension will be given to the redeeming unitholders, and redemption requests made or pending during a suspension period may be withdrawn by notice in writing received by the Management Company prior to the end of the suspension period. Redemption requests not withdrawn will be processed by the Management Company, the Registrar and Transfer Agent or other duly appointed agent of the Management Company on the first Valuation Day following the end of the suspension period, on the basis of the Net Asset Value per unit of the relevant Sub-fund and class determined on such Valuation Day.

Article 18 – Fund fees and costs

The below mentioned fees, expenses and indemnifications may be charged as between the various Sub-funds and classes, on the basis of their respective net assets, within such a period, on such terms and in such a manner as the Management Company thinks fair and reasonable provided that each class of a Sub-fund and/or each Sub-fund will bear its own fees, expenses and indemnifications which are directly and exclusively attributable to it.

Management Fee

The Management Company will be entitled to a management fee, the amount of which is specified for each class of each Sub-fund in the Special Section.

In return for its management of the Fund, the Management Company receives remuneration of up to 0.05% p.a. of the net Sub-fund Assets in respect of each Sub-fund, which is calculated on each Business Day and paid out in arrears on a monthly basis. The Management Fee is including the Central Administrative Agent Fee.

Investment Management Fee

The Investment Manager and the investment adviser, if any, will be paid an investment management fee, the amount of which is specified for each class of each Sub-fund in the Special Section.

Organisational Expenses

The Fund shall bear all Organisational Expenses and/or reimburse the Management Company, its Affiliates and/or other intermediaries having borne all or part thereof for all Organisational Expenses incurred by them in relation to the setting up of the Fund.

The Organisational Expenses may in accordance with and to the extent provided for under the generally accepted Luxembourg accounting standards be written off by the Fund over a period not exceeding five years.

Operation and Administration Expenses

The Fund shall bear all Operation and Administration Expenses.

Certain administrative costs incurred by the Management Company or the Investment Manager in the name of the Fund and other disbursements will be refunded by the Fund and treated as disbursements of the Fund. The Fund pays all expenses, liabilities and costs incurred by the Fund, the Management Company or the Investment Manager, provided that these are incurred directly in connection with the transactions or the management of the Fund.

Investment-Related Expenses

The Fund shall bear all Investment-Related Expenses and the Management Company, as the case may be, shall be reimbursed by the Fund for all Investment-Related Expenses incurred by it.

Administration Fees

The Registrar and Transfer Agent shall be entitled to be paid out of the Fund's assets, such fees as shall be disclosed to the unitholders in the annual reports.

Depositary Fee

The Depositary shall be entitled to be paid out of the Fund's assets, such fees as shall be determined from time to time by agreement with the Management Company and disclosed to the unitholders in the annual reports. The remuneration of the Depositary is up to 0.015% p.a. of the proportionate net Sub-fund Assets. This service fee may however be higher or lower than the aforementioned value, depending on the net Sub-fund Assets concerned.

In addition, the expenses and expenditure incurred by the Fund and/or the Sub-funds may be charged.

Value Added Tax

All fees and expenses pursuant to the above are exclusive of value added taxes or other chargeables thereon, which shall be paid by the Fund as required.

Indemnification

The Fund will indemnify the Management Company, its officers, directors, managers, employees and associates and all persons serving on the Management Company Board (each an "Indemnitee") against all claims, liabilities, reasonable cost and expenses incurred in connection with their role as such, other than arising directly or indirectly from negligence, fraud, bad faith or wilful misconduct of an Indemnitee. Any obligation of the unitholders with respect to such indemnification will be limited to their investments in the Fund.

Within the limits of Luxembourg law, the Indemnitees shall have no liability for any loss incurred by the Fund or any unitholder howsoever arising in connection with the service provided by them in accordance with the Fund Documents, and each Indemnitee shall be indemnified and held harmless out of the assets of the Fund against all actions, proceedings, reasonable costs, charges, expenses, losses, damages or liabilities incurred or sustained by an Indemnitee in or about the conduct of the Fund's business affairs or in the execution or discharge of their duties, powers, authorities or discretions in accordance with the terms of the appointment of the Indemnitee, including without prejudice to the generality of the foregoing, any reasonable costs and expenses, losses or liabilities incurred by them in defending (whether successfully or otherwise) any civil proceedings concerning the Fund or its affairs in any court whether in Luxembourg or elsewhere, unless such actions, proceedings, costs, charges, expenses, losses, damages or liabilities arise directly or indirectly from negligence, bad faith, wilful misconduct or fraud of an Indemnitee.

The Management Company may charge the following costs to the Fund and/or the Sub-funds:

- costs incurred in connection with the purchase, holding or sale of assets, in particular customary bank charges for transactions relating to securities and other assets and rights of the Fund and/or Sub-fund and for their custody as well as customary bank charges for the custody of foreign investment units abroad; in this context, the Management Company and/or Investment Manager will in particular place purchase and sale orders for securities and financial instruments on behalf of the Fund and/or the Sub-funds directly with brokers and dealers. The trading parties are selected according to market conditions and at the discretion of the Management Company/Investment Manager in the best interests of the Fund, the Sub-funds and the investors. However the selection process takes account not only of the stock prices offered and the commissions payable and other fees, but also relevant factors affecting the transaction price, such as implementation possibilities, analysis service, statistical services, and other broker and dealer services. The analysis service may in addition include the analysis of companies, technical analysis, company information, market news, and economic and market research. All these services that are provided are regularly reviewed. They provide useful investment management support for the Management Company.
 - all the third party management and custody fees (in particular deposit fees) charged by other correspondent banks and/or clearing houses (e.g. *Clearstream Banking S.A.*) for the assets of the Fund and/or Sub-funds in their custody, and all the third party processing, shipping and insurance expenses incurred in connection with the Fund's and/or Sub-funds' transactions in fund units;
 - all the taxes levied on the assets, income and expenses of the Fund and/or the Sub-funds;
 - the own expenses and other costs incurred by the Depositary, the Central Administrative Agent and the Registrar and Transfer Agent in connection with the Fund Assets, and the costs and other expenses arising from the necessary use of third party services. In addition, the Depositary receives customary banking expenses;
 - the costs, fees and expenses arising from the necessary use of third party services for regulatory reporting and clearing;
 - usual brokerage and bank charges, in particular stock commissions, which are incurred for transactions involving securities and other assets of the Fund and/or the Sub-funds, and for currency and securities hedging transactions;
 - accounting and bookkeeping costs and the costs of calculating the net asset value and its publication;
 - advice costs incurred by the Management Company or the Depositary when they act in the interests of the investors in the Sub-funds;
 - the costs and expenses in connection with the founding of the Fund and/or the Sub-funds, set-up costs, fees payable to index licence holders or index calculation agents, the costs of any stock exchange listing or registration in Germany or abroad, and insurance premiums, interest and brokerage costs;
 - All the printing costs of any unit certificates (certificates and coupon sheets);
 - the fees of the Fund's auditor;
 - the costs of drawing up, filing and publishing the Management Regulations and other documents concerning the Fund and/or the Sub-funds, including registration notifications and the provision of brochures or written explanations to any regulatory and supervisory authorities and stock exchanges (including local securities dealer associations) which have to be undertaken in connection with the Fund and/or the Sub-funds or the offering of the units;
 - the printing and distribution costs of the annual report and semi-annual reports, the costs of any reports produced for investors in all the necessary languages and the printing and distribution costs of all further reports and documents required according to the applicable laws or the regulations of the stated authorities;
 - the costs of the publications intended for the investors;
 - insurance costs;
 - the fees of the representatives of the Fund and/or the Sub-funds abroad;
 - a reasonable share of the costs of advertising and of those costs which are directly connected with offering and selling of units as well as sales agent remuneration;
 - remuneration, expenses and other costs of the paying agents, the sales agents, and of other bodies that have to be set up abroad, which are incurred in connection with the Fund Assets;
 - interest incurred in connection with loans that may be taken out in accordance with the investment policy and investment restrictions;
 - expenses of any investment committee;
 - costs for any credit rating of the Fund and/or the Sub-funds by nationally and internationally recognised rating agencies;
 - costs of establishing the Fund and/or the Sub-funds and for the initial issue of units. These costs may be written off over a period of five years.
 - All costs and charges shall first be charged to the current income, then to net capital gains, and lastly to the Fund and/or the Sub-fund Assets.
- The costs, remuneration, levies and extraordinary expenses incurred in connection with a specific Sub-fund or class of units are allocated to the corresponding Sub-fund and/or the corresponding class of units. These include in particular any currency exchange rate hedging transactions which are concluded exclusively for the benefit of a single Sub-fund or class of units.
- The costs, remuneration, levies and extraordinary expenses that cannot be allocated to a specific Sub-fund or to a specific class of units within the Fund are allocated to the Sub-fund and/or classes of units within the Fund in proportion to the net assets of the corresponding Sub-fund and/or classes of units.

Article 19 – Financial year

The Fund's financial year begins on 1 October and ends on 30 September each year. The first financial year began when the Fund was established on 3 April 2013 and ended on 30 September 2014.

Article 20 – Fund term

The Fund is set up for an indefinite period. The term of the Sub-fund is stated in the Sales Prospectus.

Article 21 – Liquidation and merger of the Fund and/or Sub-funds

21.1 Liquidation

Neither investors nor their heirs or legal successors can request the dissolution and/or division of the Fund or a Sub-fund.

The Fund and the Sub-funds may at any time be wound up by the Management Company acting as the liquidator in such cases. Liquidation must take place in the legally prescribed cases, and if the Management Company is wound up. The liquidation of the Fund is published in accordance with the statutory provisions by the Management Company in RESA and in at least two daily newspapers. One of these daily newspapers must be published in Luxembourg. If a situation occurs which leads to the dissolution of the Fund or a Sub-fund, the issue of units shall be discontinued. The redemption of the units of a Sub-fund remains possible if the equal treatment of the investors is ensured. In the event of the liquidation of Sub-funds, the investors will be informed.

The liquidation of the Fund and/or of Sub-funds may be decided upon in the following cases:

- (a) if, on a valuation date, the net Sub-fund Assets fall below an amount determined by the Management Company in its judgement to be the minimum level for the Fund and/or the Sub-fund to be operated in an economically efficient manner; or
- (b) if, due to a significant change or substantial modification in political, economic or monetary environment relating to the Fund that would have material adverse consequences on the investments of the Fund or due to reasons of commercial viability, continuing to manage the Fund and/or the Sub-fund no longer seems to make commercial sense.

The Depositary shall distribute the liquidation proceeds, minus the liquidation costs and fees, among the investors according to their respective shares as instructed by the Management Company or, if applicable, by the receivers appointed by it or by the Depositary with the agreement of the supervisory authority. Any net liquidation proceeds the payment of which is not demanded by unitholders upon the completion of liquidation proceedings shall, if required by law, be converted into euros, and following the completion of liquidation proceedings they shall be deposited by the Depositary on behalf of the entitled unitholders at the Caisse des Consignations in Luxembourg. These amounts shall then be forfeited if they are not claimed there within the statutory time limit.

21.2 Provisions relating to master UCITS and feeder UCITS

If a master UCITS is wound up, split into two or more UCITS, or merged with another UCITS, the feeder UCITS is also wound up unless the CSSF approves:

- (a) the investment of at least 85% of the assets of the feeder UCITS in units of another master UCITS, or
- (b) the amending of the Management Regulations in order to convert the feeder UCITS into a non-feeder UCITS.

Irrespective of specific national provisions relating to compulsory liquidations, the liquidation of a master UCITS takes place at the earliest three months after the time when the master UCITS has informed all its unitholders or unitholders and the CSSF of the binding liquidation decision.

21.3 Merger

"Mergers" are transactions in which

- (a) one or more UCITS or Sub-funds thereof, "the transferring UCITS", transfer(s) all its/their assets and liabilities to another existing UCITS or a Sub-fund of that UCITS, "the absorbing

UCITS", when it is wound up without being liquidated, and in return its unitholders receive units in the absorbing UCITS and, if applicable, a cash payment amounting to a maximum of 10% of the Net Asset Value of these units;

- (b) two or more UCITS or Sub-funds thereof, "the transferring UCITS", transfer all their assets and liabilities to a UCITS formed by them or a Sub-fund of that UCITS, "the absorbing UCITS", when they are wound up without being liquidated, and in return their unitholders receive units in the absorbing UCITS and, if applicable, a cash payment amounting to a maximum of 10% of the net asset value of these units;
- (c) one or more UCITS or Sub-funds of thereof, "the transferring UCITS", which continue(s) to exist until the liabilities are paid off, transfer(s) its/their net assets to another Sub-fund within the same UCITS, to a UCITS formed by it/them, or to another existing UCITS or a Sub-fund of that UCITS, "the absorbing UCITS".

Such mergers may be carried out in the forms specified in the Law of 17 December 2010 and in accordance with the methods and information duties specified therein; the legal consequences of a merger are specified by the Law of 17 December 2010.

If the Fund or a Sub-fund exists as a master UCITS, a merger can only take effect if the Fund or Sub-fund concerned provides the legally specified information to its investors and the responsible authorities in the member state where its feeder UCITS originates up to 60 days before the proposed date on which it is to take effect. In this case, the Fund or Sub-fund in question also gives the feeder UCITS the possibility of taking back or alternatively paying out all the units before the merger and/or split takes effect, unless the responsible authorities in the country of origin of the feeder UCITS approve an investment in units of the master UCITS which is produced through the split or merger.

In accordance with the following conditions, the Management Company may decide by a decision of the Board of Managers to incorporate or merge the Fund and/or a Sub-fund into another Sub-fund, or into a another fund or its Sub-fund managed by either the same or a different Management Company, or to incorporate or merge it into an investment company. The merger may be decided on in the following cases:

- (a) if, on a valuation date, the net Sub-fund Assets fall below an amount determined by the Management Company in its judgement to be the minimum level for the Fund and/or the Sub-fund to be operated in an economically efficient manner; or
- (b) if, due to a significant change or substantial modification in political, economic or monetary environment relating to the Fund that would have material adverse consequences on the investments of the Fund or due to reasons of commercial viability, continuing to manage the Fund and/or the Sub-fund no longer seems to make commercial sense.

The decision by the Management Company to merge the Fund and/or Sub-fund is published in a newspaper specified by the Management Company in those countries where the units of the Fund or Sub-fund to be incorporated are marketed. A merger that has taken effect according to the provisions of the Law of 17 December 2010 may no longer be declared void.

The investors in the Fund and/or Sub-fund to be incorporated have the right during a period of 30 days to demand the redemption without charge of all or some of their units at the relevant net asset value. The units of the investors who have not demanded the redemption of their units are replaced by units in the accepting Fund and/or Sub-fund on the basis of the net asset value on the date when

the merger takes effect. If necessary, the investors receive a settlement of the balance.

This right shall be effective from the date on which the unitholders of the transferring UCITS and the unitholders of the absorbing UCITS have been informed of the planned merger, and it expires five working days before the date of calculation of the exchange ratio.

Furthermore, the Management Company may decide to temporarily suspend the issue, redemption or pay-out of units in the Sub-fund if such a suspension appears to be justified in order to protect the investors.

The Board of Managers of the Management Company may decide to convene an extraordinary general meeting and to propose to it the incorporation of the Fund and/or a Sub-fund into a foreign fund or the merger of a foreign fund with the Fund and/or a Sub-fund.

The investors are responsible for making the decision to merge the Fund and/or a Sub-fund with a foreign fund. The invitation to the investors' meeting is published by the Management Company at least 8 days before the meeting in a daily newspaper that is specified by the Management Company in those countries where the Sub-fund's units are marketed. The decision to merge the Fund and/or a Sub-fund with a foreign fund is subject to a quorum of 50% of the units in circulation, and is taken by a 2/3 majority of those present or of the units represented by proxy, and only those investors who have voted in favour of the merger are bound by the resolution. In the case of investors who have not attended the meeting and any investors who did not vote for the merger, it is assumed that they have offered their units for redemption.

21.4 Conversion of existing funds into feeder UCITS and changing of existing master UCITS funds

In the case of the conversion of existing funds and/or Sub-funds into feeder UCITS and the changing of existing master funds and/or Sub-funds, the unitholders must be provided with the legally prescribed information within the statutory periods. Within a period of 30 days thereafter, the investors have the right to demand that their units be redeemed or paid out without charge, except for the costs of covering the sales.

Article 22 – Audits

The accounts of the Fund and/or Sub-Fund Assets are monitored by an independent auditor licensed in Luxembourg and appointed by

the Management Company.

Article 23 – Coming into force of and changes to the Management Regulations

These Management Regulations, which comply with the provisions of the Law of 17 December 2010, came into force on 3 April 2013.

The Management Regulations were last amended on 1 October 2022 with effect from 1 October 2022, and the amended version was filed in the Trade and Companies Register of the Luxembourg District Court. Notice of this filing will be published in RESA.

The Management Company may, at any time, wholly or partially amend the Management Regulations of the Fund. Unless otherwise stated, the changes to the Fund's Management Regulations shall come into force on the date of signing. The Management Regulations and changes to the Management Regulations are filed with the Trade and Companies Register in Luxembourg. In addition, reference to the respective filing is published in RESA.

Article 24 – Applicable law, jurisdiction and language of the agreement

These Management Regulations are subject to Luxembourg law. Any legal dispute between investors, the Management Company and the Depositary is subject to the jurisdiction of the responsible court in the city of Luxembourg.

The Management Company and the Depositary are entitled to subject themselves and the Fund to the jurisdiction and law of any country where Fund units are publicly marketed in relation to claims by investors who are resident in the country concerned, and in relation to matters relating to the subscription and redemption of units.

Only the English version of the Management Regulations and the Sales Prospectus is definitive, and in the event of any inconsistency with a translation it is decisive.

In relation to units which have been sold to investors in the respective country, the Management Company and the Depositary are entitled to declare translations into the languages of such countries where Fund units are publicly marketed to be binding on themselves and the Fund.

IV

Annex IV: Data Protection Notice for investors (version dated June 2022)

1. INTRODUCTION

1.1 Scope of Notice

1.1.1 Hauck &Aufhäuser Fund Services S.A., a a joint-stock company (société anonyme) acting on behalf of the Fund (the "**Management Company**"), is committed to protecting the privacy of the Fund's Investors and of the other individuals whose personal information comes into its possession in the context of the Investors' investments in the Fund, including in particular, but not limited to, the personal information provided by the Investors to the Fund, the Management Company and its respective service providers at the time of investing in the Fund and on an ongoing basis/completing their Application Form and interacting with the Management Company and its service providers.

1.1.2 Personal data provided to the Management Company will always be processed in accordance with the requirements of the EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("**GDPR**") and with any applicable implementing legislation, and processing systems will be designed to ensure the highest level of protection for the personal data.

1.1.3 This data protection notice ("**Notice**") sets out how the Management Company will use (which terms include processing operations like recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing, aligning, combining, restricting, erasing, destroying) ("**process**") the Investors' personal data.

1.1.4 For the avoidance of doubt, personal data processed and covered by this Notice will include personal data of the Investors in the Fund as well as personal data of other individuals (including, but not limited to, directors, managers, agents and other representatives or employees of the Investors), which personal data are provided by the Investors to the Management Company in the course of the Investors' relationship with the Management Company and which the Management Company will deal with in the course of operating the Fund and handling the Investors' investments within it.

1.1.5 Please read the information below carefully - it explains how and why personal data is processed by the Management Company, with whom it will be shared, and contains information about the Investor's rights in relation to his/her personal data.

1.2 Definitions and Interpretation

1.2.1 Unless otherwise stated in this Notice or if the context requires otherwise, capitalised terms used in this Notice shall have the meaning given to these terms in the Application Form and the Sales Prospectus.

1.2.2 For the purpose of this Notice:

the terms "controller", "personal data", "data subject" and any other term expressly defined in article 4 of the GDPR shall have the

meaning given to these terms in article 4 of the GDPR;

any reference to "you" and "your" shall be construed to include the Fund's Investors and any and all of the other individuals whose personal data comes into the possession of the Management Company in the context of the Investors' investments in the Fund, as further specified in Section 1.1.4 above;

any reference to "we" and "us" shall refer to the Management Company.

1.2.3 In relation with this Notice, unless the context otherwise requires, all reference to the Fund shall include a reference to each of its sub-funds, including the sub-funds to be created in the future.

2. IDENTITY OF THE CONTROLLER OF YOUR PERSONAL DATA

2.1 The Management Company is the controller for the personal data collected and processed in the context of your investment in the Fund.

2.2 In accordance with article 26 of the GDPR, you are hereby informed that you should contact the Management Company for all queries you would have in relation to this Notice and/or to exercise any of your rights as described in section 11 below "Your rights in respect of your personal data". The contact details of the Management Company can be found in Section 14 below "How to contact us".

2.3 The purposes for which the Management Company processes your personal data are further described in Section 7 below "Why we process personal data".

2.4 In certain circumstances, third-party service providers to the Management Company, such as the Central Administrative Agent, Registrar and Transfer Agent and the Depositary may also act in a capacity as data controller if and when processing your personal data for the purposes of complying with their own legal and regulatory obligations or for their own legitimate interest (in particular in the context of AML (anti-money laundering) and KYC (know your client) related processes). Information about processing activities of these third-party service providers is available on their respective websites.

3. WHAT PERSONAL DATA DO WE COLLECT

The personal data that we collect and process in relation to your investment in the Fund and/or in the course of operating the Fund includes in particular, but is not limited to:

your first name, last name, residential address, e-mail address, telephone number and other contact details;

your date and place of birth, your citizenship and profession;

your identity card/passport number or other national identifier and the case being copies of your identity card/passport/other identity

documents, which may include a photography of yourself;

your tax details (i.e. tax identifier, tax residence, status under dividends and Interests withholding tax rules, FATCA rules, CRS rules and any other tax rules);

your financial details and situation (i.e. bank account number, data on transactions, financial information including origin of wealth, etc.);

your knowledge, investment experience and investments objectives;

your publicly available information;

the functions and powers of your representative(s) (where applicable);

the name, address and such other information or details as detailed above in relation to your representative(s) and ultimate beneficial owner(s) (where applicable);

4. WHERE WE OBTAIN PERSONAL DATA FROM

We will collect information about you from a number of sources, including from you directly, as further detailed below.

4.1 Information that you give us:

We process the personal data that you provide to us directly, and that we obtain from our dealings with you during the course of our relationship, including:

when you provide it to us in the Application Form, and any other forms and any associated documentation that you complete when opening an investor account with the Fund and subscribing for an investment in Units of the Fund;

when you provide it to us in correspondence and conversations;

when you make transactions with respect to the Fund, including in particular - but not limited to - the cases where you subscribe, redeem and convert Units in the Fund and/or tell us where to transfer money to, among others, payments of dividends and redemption proceeds;

4.2 Information that we obtain from others, and who those others are:

We also collect and process your personal data that we may receive from, among others, the main following sources:

publicly available and accessible registries and sources;

bankruptcy registers;

tax authorities, including those that are based in and outside the EEA;

governmental and competent regulatory authorities to which we have regulatory reporting obligations;

credit agencies; and

data bases used for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution of any unlawful act.

5. DO YOU HAVE TO PROVIDE US WITH PERSONAL DATA?

5.1 Where we collect personal data from you:

You should assume that the provision of your personal data is necessary for our compliance with a legal, regulatory or contractual obligation, or for the proper operations of the Fund, the Management Company or its service providers; and

if the provision of your personal data is purely voluntary, we will inform you accordingly and in this case there will be no implications for you if you do not wish to provide us with it.

5.2 Some of the personal data we request is necessary for us to perform our contract with you and/or to comply with our legal or regulatory obligations and if you do not wish to provide us with this personal data, it will affect our ability to provide our services to you and we may reject an application for the subscription of Units of the Fund.

6. DO YOU HAVE TO INFORM YOUR REPRESENTATIVE(S) AND/OR BENEFICIAL OWNER(S)?

6.1 In the event that you are not a natural person, you shall indeed inform your representative(s) (as well as your ultimate beneficial owner(s) and all individuals whose information you provide to us in connection with our relationship with you) about the processing of their personal data for the purposes described below in Section 7 "Why we process personal data" (as well as on their related rights, see Section 11 below "Your rights in respect of your personal data") and you shall, where necessary and appropriate, obtain in advance any consent that may be required for the processing of their personal data. You shall provide these individuals with a copy of this Notice.

6.2 We may assume that you have complied with the undertakings contained herein and that your representatives and ultimate beneficial owner(s) have, where necessary given such consent and have been informed of the processing of their personal data for the purposes described in this Notice.

7. WHY WE PROCESS PERSONAL DATA

We may process your personal data for the purposes listed under Sections 7.1 to 7.3 below.

7.1 Where necessary to perform our contract (and/or pre-contractual steps) with you.

In the context of our contract (and/or pre-contractual steps) with you, we are collecting and processing your personal data, among other things, in order to:

administer and manage the setting-up of your investor account(s) to allow you to subscribe/purchase your Units in the Fund;

administer and manage your holding (of Units) in the Fund and any related accounts on an on-going basis, including without limitation through (i) the issuance of payment instructions to allow you to meet your subscription for Units in the Fund and pay other fees or amounts due as Investors in the Units, (ii) the processing of your redemption, conversion, transfer of Units in the Fund, (iii) the instruction of payments of dividends, redemption proceeds, and other distribution of Units to you, and (iv) the performance of any corporate actions in relation to your holding (of Units) in the Fund;

maintain the register of Unitholders of the Fund;

provide you with the relevant financial information and reports in relation to the Fund and your investment in the Fund;

otherwise communicate with you and provide you with appropriate notifications;

handle and follow-up your complaints as Investors in the Fund (where applicable);

meet in general all the resulting contractual obligations we have to you;

7.2 Where necessary for compliance with an EEA or EEA Member state legal obligation to which we are subject.

We are required by law to collect and process your personal data, among other things, in order to:

comply with our legal and regulatory obligations under the Luxembourg law of 12 July 2013 (as amended) relating to alternative investment fund managers and all other laws, regulations, circulars and other binding rules and guidelines applicable to us as may be issued from time to time by the European and Luxembourg relevant competent authorities, including the ESMA and the CSSF;

comply with our legal obligations under the Luxembourg law of 10 August 1915 (as amended) on commercial companies and other legislations applicable to commercial companies generally to the extent as applicable;

comply with our legal and regulatory obligations under anti-money laundering and counter-terrorism financing legislation by carrying out verification, know your client (KYC) and anti-money laundering and counter-terrorism financing checks to verify your identity, addresses, source of wealth and, if applicable your ultimate beneficial owner(s);

comply with the CRS and FATCA legislations, and any applicable tax requirements;

maintain the register of Unitholders of the Fund;

provide you with the relevant financial information and reports in relation to the Fund and your investment in the Fund;

ensure the calculation of the net asset value, valuation and pricing, including tax returns;

handle and follow-up your complaints as Investors in the Fund (where applicable);

comply with accounting legal obligations;

comply with an order of the court;

provide relevant information and reporting to the CSSF and the Luxembourg authorities responsible for combating money laundering and terrorist financing where we are under a legal obligation to do so.

7.3 Where necessary for our legitimate interests or those of a third party to which we are transferring personal data.

7.3.1 We are collecting and processing your personal data for the purpose of our legitimate interests or those of a third party to which we are transferring your personal data, provided that our legitimate interests (or those of the relevant third party) are not overridden by your legitimate interest, fundamental rights or freedoms.

7.3.2 Our legitimate interests are:

to disclose information to other data recipients such as our service providers and service providers of our affiliates, auditors, regulatory authorities and technology providers;

ensure the calculation of the net asset value, valuation and pricing, including tax returns;

to comply with our legal and regulatory obligations or internal policy requirements;

to inform you about our investment products and services;

to monitor and improve our relationships with you and other investors;

to keep our internal records;

to protect our business against fraud, breach of confidence, theft of proprietary materials, and other financial or business crimes;

to monitor communications to/from you using our systems; and

to protect the security and integrity of our IT systems.

7.3.3 Given the specific purposes for which the Management Company envisages processing your personal data, the Management Company does not anticipate obtaining your consent to do so. If we were to rely on consent to process your personal data, we will contact you to obtain this consent. In case consent is relied upon to legitimate a data processing, you will have the right to withdraw this consent at any time.

8. WHO WE SHARE PERSONAL DATA WITH AND WHY

8.1 In addition to the Management Company, your personal data may be shared with the following entities for the purpose of providing the services required by you and/or for complying with these entities' legal and regulatory obligations (including under company law and anti-money laundering and counter-terrorism legislation or foreign regulatory requirements):

the Depositary and Paying Agent of the Fund;

the Investment Manager(s) of the Fund (where applicable); the other service providers to the Fund and the Management Company, including but not limited to legal and tax counsels, accountants, auditors, independent appraiser, notaries, banks, other financial institutions and payment services providers, technology service providers, etc.;

the CSSF and the Luxembourg authorities responsible for combating money laundering and terrorism financing;

8.2 The Management Company, as well as the above recipients may further disclose your personal data to their affiliates and other third party service providers in order to process these data for the purposes mentioned in section 7 above "Why we process personal data" and for internal investigations and reporting.

In particular, the Management Company has appointed Hauck Aufhäuser Lampe Privatbank AG, Niederlassung Luxemburg ("HAL"), a credit institution authorised in Luxembourg, as Depositary and Paying Agent of the Fund. In order to provide those services, HAL may enter into outsourcing arrangements with third party service providers in- or outside HAL group (the "Sub-contractors"). As part of those outsourcing arrangements, HAL may be required to disclose and transfer personal and confidential information and documents about you, the investor and individuals related to you and the investor (the "Related Individuals") (the "Data transfer") (such as identification data - including the investor and/or the Related Individual's name, address, national identifiers,

date and country of birth, etc. – and account information, contractual and other documentation and transaction information) (the "Confidential Information") to the Sub-contractors.

In accordance with Luxembourg law, HAL is due to provide a certain level of information about those outsourcing arrangements to the Fund, which, in turn, must be provided by the Fund to you and the investors.

A description of the purposes of the said outsourcing arrangements, the Confidential Information that may be transferred to Sub-contractors thereunder, as well as the country where those Sub-contractors are located is available for viewing at HAL's registered office during normal business hours.

8.3 In addition, your personal data will be shared, in exceptional circumstances, with the courts and/or legal, regulatory, tax and government authorities in various jurisdictions as required by applicable law or regulation (e.g. for the purposes of anti-money laundering, sanctions, terrorism financing, the prevention and detection of crime as amended and the CRS and FATCA legislations).

8.4 The Management Company will take all reasonable steps, as required by the GDPR, to ensure the safety, privacy and integrity of your personal data and will, as required by the GDPR enter into contracts with such recipients to protect the privacy and integrity of your personal data supplied.

9. TRANSFERS OF PERSONAL DATA OUTSIDE THE EEA

The Management Company and the third party providers listed above in Section 8 above "Who we share personal data with and why" might share and transfer your personal data to other entities of their group, and to third party service providers, which can both be located inside the EEA (in particular Luxembourg, Germany, the Netherlands, Austria, Ireland, Finland, Belgium, France, Italy and outside of the EEA, in particular to: Canada, India, Malaysia, Australia, Hong Kong, Guernsey, Jersey, Poland, Singapore, Switzerland, the United Kingdom and the United States).

9.1 In case personal data is transferred by the Management Company and the third-party providers listed above in Section 8 above "Who we share personal data with and why" outside the EEA, they will ensure that your personal data is protected by either:

an adequacy decision of the European Commission,

appropriate safeguards such as EU model contracts, binding corporate rules, approved code of conduct, approved certification mechanisms.

9.2 In particular, HAL may transfer Confidential Information to its Sub-contractors established in countries where professional secrecy or confidentiality obligations are not equivalent to the Luxembourg professional secrecy obligations. In any event, HAL is legally bound to, and has committed to the Fund that it will enter into outsourcing arrangements with Sub-contractors which are either subject to professional secrecy obligations by application of law or which will be contractually bound to comply with strict confidentiality rules. HAL further committed to the Fund that it will take reasonable technical and organisational measures to ensure the confidentiality of the Confidential Information subject to the data transfer and to protect Confidential Information against unauthorised processing. Confidential Information will therefore only be accessible to a limited number of persons within the relevant Sub-contractor, on "a need to know" basis and following the principle of the "least privilege". Unless otherwise authorised/required by law, or in order to comply with requests from national or foreign regulatory authorities or law enforcement authorities, the relevant

Confidential Information will not be transferred to entities other than the Sub-contractors.

By subscribing in the Fund, the Eligible Investor has consented and agreed to the communication of the Confidential Information by HAL to the Sub-contractors.

9.3 Please contact the Management Company at the address or email detailed in Section 14 below "How to contact us" if you would like to know more about the safeguards in place or to receive a copy of them.

10. HOW LONG WE KEEP PERSONAL DATA

10.1 In accordance with the GDPR principles and in particular article 5 of the GDPR (which lists the core principles relating to the processing of personal data), we do not keep your personal data for longer than is necessary for the purposes for which they are processed by us.

10.2 When we no longer require your personal data for our business use, we consider whether it is appropriate to delete them, for example where:

the relevant contract has been performed and our business relationship has ceased; or

you have withdrawn your consent to the processing of your personal data (if we were to rely on consent as the legal basis for that processing).

10.3 In principle, we will retain your personal data for a period of 10 years following the termination of your relationship with the Fund and the Management Company.

10.4 Frequently, however, there are legal and/or regulatory obligations, which require us to retain our business information and records (including personal data comprised within those) for a specified period. These could include:

tax laws;

audit obligations;

anti-financial crime law (money laundering, terrorism financing, bribery and corruption, the facilitation of tax evasion);

other regulatory requirements relating to our investment business.

10.5 Also, we may need to retain information and records for a certain period of time to protect our business, and defend ourselves against potential legal claims, or allegations of wrongdoing.

10.6 For each processing activity (including personal data processed as a result of that activity) we have considered carefully:

how long the relevant business unit will need to process the relevant personal data for the intended processing activity; and

whether any legal and/or regulatory requirements stipulate a mandatory minimum retention period for the relevant information, documentation and records (including personal data) to be retained.

11. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL DATA

11.1 You have certain rights under the GDPR, including:

11.1.1 The right to access your personal data, including the right to ask for a copy of your personal data where it does not adversely affect the rights and freedoms of others (please note that if you request any further hard copies later on, we may charge you a reasonable fee based on administrative costs).

11.1.2 The right to have incomplete or inaccurate personal data corrected (including by means of providing a supplementary statement).

11.1.3 In some limited circumstances:

the right to object to the use of your personal data (where processing is based on the legitimate interest of the Management Company);

the right to restrict the use of your personal data;

the right to require us to erase/delete your personal data; however, please note that if we process your personal data in particular to comply with a legal obligation (see Section 7.2 above), we will not be able to respond positively to your request to erase/delete your personal data.

the right to receive personal data which you have provided to us in a structured, commonly used and machine-readable format and the right to transmit those data to another data controller; however, please note that this right to data portability only arises where: (a) the processing is based on consent or on a contract; and (b) the processing is carried out by automated means, and (c) it does not adversely affect the rights and freedoms of others. This data portability right also only applies to the data that you have provided to us.

11.2 Such rights can be exercised by contacting the Management Company at the address and email detailed in section 14 below "How to contact us". We will respond to you as swiftly as possible.

12. YOUR MARKETING PREFERENCES

You have the right to object to our use of your personal data for direct marketing purposes at any time by contacting us at the address and email detailed in Section 14 below "How to contact us". If you no longer wish to be contacted for marketing purposes, please contact at the address and email detailed in Section 14 below "How to contact us".

13. COMPLAINTS AND QUESTIONS TO DATA PROTECTION AUTHORITY

13.1 You have the right to ask questions or lodge a complaint about our processing of your personal data with the relevant data protection authority. You can complain in the EEA Member State where you live or work, or in the place where the alleged breach of the GDPR has taken place.

13.2 In Luxembourg, the relevant data protection authority is the *Commission Nationale pour la Protection des Données*.

14. HOW TO CONTACT US

If you want more details on the processing of your personal data, if you have any specific queries or concerns regarding the processing of your personal data, if you want to exercise your rights towards us or if you would like to make a complaint, do not hesitate to contact the Management Company at the following address:

Hauck & Aufhäuser Fund Services S.A.

fao. the Data Protection Officer

1c, rue Gabriel Lippmann

L-5365 Munsbach

15. AMENDMENTS TO THIS NOTICE

15.1 This Notice is kept under regular review and may be updated from time to time and you will be notified in writing in case of any changes.