

# onemarkets Fund

## Prospectus

Société d'Investissement à Capital Variable

July 2024

## TABLE OF CONTENTS

<b>PART 1</b> .....	<b>6</b>
<b>1. General</b> .....	<b>6</b>
1.1 Glossary	6
1.2 Preface	10
1.3 General Data Protection	11
1.4 Organisation of the Fund	12
1.5 Other fund structure related information	13
1.6 Financial Year	14
1.7 Accounting Standards	14
1.8 Fund Currency	14
<b>2. Management and Administration of the Fund</b> .....	<b>14</b>
2.1 Management Company	14
2.1.1 Other funds managed by Management Company .....	14
2.1.2 Remuneration Policy .....	15
2.2 Investment Managers	15
2.3 Depositary and Sub-Depositaries	15
2.4 UCI Administrator	17
2.5 Distributors, Sub-Distributors	17
2.6 Statutory Auditors	18
<b>3. Investment Objectives, Policies and Restrictions</b> .....	<b>18</b>
3.1 Investment objective and policy	18
3.2 Authorised investments	18
3.3 Unauthorised investments	20
3.4 Investment restrictions	20
3.4.1 Diversification requirements.....	20
3.4.2 Limits to prevent concentration of ownership .....	22
3.5 Master / Feeder structure	23
3.6 ESG and Sustainability Considerations	23
3.7 Investments in financial derivative instruments and use of efficient portfolio management techniques	25
3.7.1 Financial Derivative Instruments .....	25
3.7.2 Use of Securities Financing Transactions and Total Return Swaps .....	25
3.7.3 Management of collateral and collateral policy.....	28
<b>4. Risk Management Systems and Risk Factors</b> .....	<b>30</b>
4.1 Permanent risk management function	30
4.2 Concept of Risk Profile	30

4.3	Risk Management Policy	31
4.4	Global Exposure Approach	31
4.5	Concept of Leverage	32
4.6	Risk Factors	33
	4.6.1 General Risk Factors .....	33
	4.6.2 Specific Risk Factors .....	37
<b>5.</b>	<b>Shares .....</b>	<b>48</b>
5.1	General Provisions	48
5.2	Subscription and issuance of Shares	49
5.3	Redemption of Shares	51
5.4	Conversion of Shares	52
5.5	Distribution of income, reinvestment of income	53
<b>6.</b>	<b>Prevention of Market Timing and Late Trading Risks .....</b>	<b>53</b>
<b>7.</b>	<b>Calculation and Publication of the Net Asset Value of shares issued .....</b>	<b>54</b>
7.1	Calculation of the NAV	54
7.2	Publication of the NAV	54
7.3	Determination of the issue price and the redemption price of shares	54
7.4	Modalities concerning the valuation of assets in the portfolio	54
<b>8.</b>	<b>Fees and Charges .....</b>	<b>55</b>
8.1	One-off charges taken before or after investing	55
	8.1.1 Subscription fee/Entry charge .....	55
	8.1.2 Redemption fee/Exit charge .....	56
	8.1.3 Conversion fee/Switch charges .....	56
8.2	Fees and expenses taken from the Share Class over a year (annual fees)	56
	8.2.1 Management Fee .....	56
	8.2.2 Depository Fee and UCI Administrator Fee .....	56
	8.2.3 Administrative fee .....	56
	8.2.4 Other Operating and Administrative Expenses .....	56
	8.2.5 Other fees and expenses .....	58
<b>9.</b>	<b>Tax Considerations .....</b>	<b>58</b>
9.1	Tax treatment of the Fund	59
9.2	Tax treatment of Shareholders	59
9.3	FATCA	59
9.4	OECD Common Reporting Standards (CRS) Reporting	59
9.5	Country specific tax considerations	60
9.6	« Taxe d'abonnement » (subscription tax)	60
<b>10.</b>	<b>Conflicts of interest .....</b>	<b>60</b>
10.1	Members of the UniCredit Group	60
10.2	The Management Company	62
10.3	The Depository	62

10.4	The Investment Managers	63
<b>11.</b>	<b>Liquidity Management Tools of the Fund to manage temporary constrained market liquidity</b>	<b>64</b>
11.1	Swing Pricing	64
11.2	Dilution Levy	65
11.3	Gating/Deferral	65
11.4	Others	65
<b>12.</b>	<b>Temporary suspension of the calculation of the Net Asset Value of shares and dealing activity</b>	<b>66</b>
<b>13.</b>	<b>General Meetings of Shareholders and financial year</b>	<b>66</b>
13.1	Information when the annual general shareholders meeting will be convened (modalities of announcement and venue)	66
13.2	Rights and obligations of shareholders	67
<b>14.</b>	<b>Merger of Fund or Sub-Funds</b>	<b>67</b>
14.1	Mergers decided by the Board of Directors	67
	14.1.1 Merger of the Fund:	67
	14.1.2 Merger of Sub-Funds:	68
14.2	Mergers decided by the Shareholders	68
	14.2.1 Merger of the Fund	68
	14.2.2 Merger of Sub-Funds:	68
14.3	Rights of the Shareholders and imputation of costs	68
<b>15.</b>	<b>Liquidation of Fund or Sub-Funds</b>	<b>68</b>
15.1	Liquidation of the Fund	68
15.2	Liquidation of a Sub-Fund	69
<b>16.</b>	<b>Benchmarks</b>	<b>69</b>
16.1	Definition of use of Benchmarks and Purpose	69
	16.1.1 Use of benchmarks	70
	16.1.2 Plans setting out actions in the event that a benchmark materially changes	70
	16.1.3 Benchmark Regulation & ESMA register	70
<b>17.</b>	<b>Prevention of money laundering and financing of terrorism</b>	<b>70</b>
<b>18.</b>	<b>Further information, notices and documents available for investors</b>	<b>71</b>
18.1	Packaged Retail and Insurance-based Investment Product - Key Information Document (PRIIP KID), semi-annual and annual financial reports	71
18.2	Complaints handling and queries	72
	<b>Appendix 1: Information and documents available to investors</b>	<b>73</b>
	<b>Appendix 2: Specific information and documents available to investors in certain countries</b>	<b>74</b>
	<b>Appendix 3: Overview of Share Classes</b>	<b>89</b>
	<b>Appendix 4: Collateral and Haircut Policy</b>	<b>98</b>
	<b>Appendix 5: Sub-Funds Specific Risk Factors</b>	<b>101</b>
	<b>Appendix 6: SFDR classification</b>	<b>108</b>
	<b>PART 2: Sub-Fund Specific Information</b>	<b>109</b>
<b>1.</b>	<b>onemarkets Amundi Income Opportunities Fund</b>	<b>110</b>

2.	onemarkets Amundi Flexible Income Fund .....	116
3.	onemarkets Amundi Climate Focus Equity Fund .....	134
4.	onemarkets Fidelity World Equity Income Fund .....	151
5.	onemarkets BlackRock Global Equity Dynamic Opportunities Fund .....	170
6.	onemarkets PIMCO Global Balanced Allocation Fund .....	189
7.	onemarkets PIMCO Global Strategic Bond Fund .....	205
8.	onemarkets PIMCO Global Short Term Bond Fund .....	211
9.	onemarkets J.P. Morgan Emerging Countries Fund .....	217
10.	onemarkets J.P. Morgan US Equities Fund .....	233
11.	onemarkets Allianz Global Equity Future Champions Fund .....	250
12.	onemarkets Allianz Conservative Multi-Asset Fund .....	268
13.	onemarkets Pictet Global Opportunities Allocation Fund .....	287
13a.	onemarkets Pictet Global Opportunities Allocation Fund .....	293
14.	onemarkets VP Global Flexible Bond Fund .....	303
14a.	onemarkets VP Global Flexible Bond Fund .....	309
15.	onemarkets VP Flexible Allocation Fund .....	319
16.	onemarkets Global Multibrand Selection Fund .....	324
17.	onemarkets Balanced Eastern Europe Fund .....	329
18.	onemarkets Multi-Asset Value Fund .....	334
19.	onemarkets Short Term Bond HUF Fund .....	340
20.	onemarkets Short Term Bond CZK Fund .....	346
21.	onemarkets Bond HUF Fund .....	352
22.	onemarkets Bond Target 2029 Fund .....	358
23.	onemarkets Bond Target 2029 II Fund .....	364
24.	onemarkets Libra Fund .....	370
24a.	onemarkets Libra Fund .....	377
25.	onemarkets BlackRock Low Duration Bond Fund .....	392
26.	onemarkets BlackRock Global Diversified Balanced Fund .....	397
26a.	onemarkets BlackRock Global Diversified Balanced Fund .....	404
27.	onemarkets J.P. Morgan Emerging Markets Short Term Bond Fund .....	415
28.	onemarkets Fidelity European Heritage Equity Fund .....	420
28a.	onemarkets Fidelity European Heritage Equity Fund .....	426
29.	onemarkets Rockefeller Global Innovation Equity Fund .....	437
29a.	onemarkets Rockefeller Global Innovation Equity Fund .....	442
30.	onemarkets Capital Group US Balanced Fund .....	452

## PART 1

### 1. General

#### 1.1 Glossary

<b>Alternative Investments</b>	Means investments in financial instruments providing an indirect exposure to underlying assets which are illiquid and/or real assets (e.g., real estate, infrastructure, commodities).
<b>Articles of Incorporation</b>	Means the articles of incorporation of the Fund, as amended from time to time.
<b>Benchmark Regulation</b>	Means 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.
<b>Board of Directors</b>	Means the board of directors of the Fund, members further identified in the section Organisation of Fund.
<b>Business Day</b>	Means any day on which banks in Luxembourg are open for business except for 24 and 31 December, unless defined otherwise in the Sub-Fund Specific Information.
<b>Catastrophe Bond</b>	Means a type of bond debt security where the return of the principal and payment of interest is dependent on the non-occurrence of a specific trigger event such as a hurricane, earthquake or other physical or weather-related phenomenon.
<b>Class</b>	Means a class of share of a Sub-Fund created by the Fund having a specific distribution policy, sales and redemption mechanism, fee structure, holding requirements, currency and hedging policy or other specific characteristics.
<b>Clearing Agents</b>	Means the clearing institutions selected in the countries where the Shares may be subscribed for and through which Global Share Certificates are transferred by book entry to the securities accounts of the Shareholders' financial intermediaries opened with such Clearing Agents as described in further detail under "Subscription and Issuance of Shares".
<b>Commitment Approach</b>	Means a method of calculation of global exposure approach as detailed in applicable laws and regulations including but not limited to CSSF Circular 11/512 and as further described in section Global exposure approach.
<b>CSSF</b>	Means Commission de Surveillance du Secteur Financier, the Luxembourg supervisory authority of the financial sector.
<b>Cut-Off</b>	Means the day and time by which subscription, redemption or conversion orders must be received, as defined in the relevant Sub-Fund Specific Information.
<b>Dealing Day</b>	Means a Business Day on which subscriptions for, conversions from and redemptions of Shares can be made, it being understood that subscriptions can be restricted as the case may be to a subscription period which is limited in time in the light of the investment objective, strategy and policy of the relevant Sub-Fund.
<b>Depository</b>	Means the depository bank appointed by the Fund in accordance with the provisions of the 2010 Law and the Depository Agreement, as identified in the section Organisation of Fund.
<b>Depository Agreement</b>	Means the agreement entered into between the Fund, the Management Company and the Depository governing the appointment of the Depository, as may be amended or supplemented from time to time.
<b>Distributor</b>	Means a regulated financial intermediary appointed by the Management Company to distribute the shares of the Fund.
<b>ESMA</b>	Means the European Securities and Markets Authority.
<b>EU Law</b>	Means the law of 21 December 2012 transposing Directive 2010/78 / EU of the European Parliament and of the Council of 24 November 2010 amending Directives 98/26 / EC, 2002/87 / EC, 2003/6 / EC, 2003/41 / CE, 2003/71 / CE, 2004/39 / CE, 2004/109 / CE, 2005/60 / CE, 2006/48 / CE, 2006/49 / CE and 2009/65 / CE with regard to the skills of the European Supervisory

	Authority (European Banking Authority), the European Supervisory Authority (European Insurance and Occupational Pensions Authority) and the European Supervisory Authority (European Securities and Markets Authority).
<b>EUR</b>	Means the currency of the Member States of the European Union that use the single currency.
<b>FATCA</b>	Means the provisions of the United States Hiring Incentives to Restore Employment (HIRE) Act of 18 March 2010, commonly referred to as the Foreign Account Tax Compliance Act (FATCA).
<b>Global Share Certificates</b>	The issuance of non-certificated shares into a Centralised Securities Depository (CSD) will be subject to the issue of one or more Global Share Certificates, where required by the CSDs in which the Shares are held.
<b>Green Bonds</b>	Means fixed-income financial instruments that finance environmentally sustainable projects or activities (i.e., the proceeds from a green bond are used to fund projects with positive environmental or climate benefits, such as renewable energy, energy efficiency, etc.).
<b>Hybrid Securities</b>	means securities that combine both debt and equity characteristics. Hybrid Securities may be issued by corporate entities (referred to as corporate hybrids) or by financial institutions (commonly referred as contingent convertible bonds or "CoCos").
<b>Institutional Investors</b>	Means institutional investors as defined for the purposes of the 2010 Law and by the administrative practice of the CSSF.
<b>Investment Grade</b>	Means securities with a rating of at least BBB- from Standard & Poor's or Fitch Ratings or at least Baa3 from Moody's Investor Services, or which are judged to be of equivalent quality based on similar credit criteria at the time of acquisition. In the event of a split rating, the better rating can be used.
<b>Investment Manager(s)</b>	Means the investment manager(s) appointed by the Management Company in relation to the Sub-Funds with the consent of the Fund in accordance with the provisions of the 2010 Law.
<b>Investment Management Agreement</b>	Means the agreement entered into between the Fund, the Management Company and the Investment Manager governing the appointment of the Investment Manager, as may be amended or supplemented from time to time.
<b>Launch Date</b>	Means the date on which the Fund issues Shares relating to a Sub-Fund in exchange for the subscription proceeds.
<b>Management Company</b>	Means the management company appointed by the Fund in accordance with the provisions of the 2010 Law and the Management Company Agreement, as identified in the section Organisation of Fund.
<b>Management Company Services Agreement</b>	Means the agreement entered into between the Fund and the Management Company defining the scope and responsibilities of appointed Management Company, as may be amended or supplemented from time to time.
<b>Market Timing</b>	Means any market timing practice within the meaning of Circular 04/146 or as that term may be amended or revised by the CSSF in any subsequent circular, i.e., an arbitrage method through which an investor systematically subscribes and redeems or converts units or shares of the same Luxembourg UCI within a short time period, by taking advantage of time differences and/or imperfections or deficiencies in the methods of determination of the Net Asset Value of the UCI.
<b>Member State</b>	Means a state that is a contracting party to the Treaty creating the European Union. The states that are contracting parties to the Treaty creating the European Union, other than the Member States of the European Union, within the limits set forth by such Agreement and related acts, are considered as equivalent to Member States of the European Union.
<b>Mémorial</b>	Means the Mémorial C, Recueil des Sociétés et Associations of the official gazette of the Grand Duchy of Luxembourg.
<b>MIFID</b>	Means (i) the MiFID Directive, (ii) Regulation (EU) No 600/2014 of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and (iii) all European and Luxembourg rules and regulations implementing those texts.
<b>MIFID Directive</b>	Means the Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments.
<b>Money Market Instruments</b>	Means instruments normally dealt in on the money market which are liquid and have a value which can be accurately determined at any time.

<b>Multi-asset</b>	Means Sub-Funds which invest in multiple asset classes (including cash and cash equivalents) and can generally vary their exposure to each of them.
<b>Net Asset Value or NAV</b>	Means in relation to any Class of Shares in a Sub-Fund, the value of the net assets of that Sub-Fund attributable to that Class and calculated in accordance with the provisions described in section Calculation and Publication of the Net Asset Value of shares issued.
<b>OECD</b>	Means Organisation for Economic Co-operation and Development.
<b>OTC</b>	Means Over-The-Counter, refers to the process of how securities are traded via a broker-dealer network as opposed to on a centralised exchange.
<b>PRIIPs KIDs</b>	Means Packaged Retail and Insurance-based Investment Products (PRIIPs) - Key Information Documents (KIDs) containing information on each Class of Shares of the Fund / Sub-Fund.
<b>Prospectus</b>	Means this prospectus including all appendices and supplements, as may be amended from time to time.
<b>Reference Currency</b>	Means the currency in which a Sub-Fund or Class is denominated.
<b>Registrar and Transfer Agent</b>	Means the registrar and transfer agent appointed by the Management Company with the consent of the Fund in accordance with the provisions of the 2010 Law and the Registrar and Transfer Agency Agreement, as identified in the section Organisation of Fund and further described in section UCI Administrator.
<b>Registered Shares</b>	Means Shares that are documented by inscription of a Shareholder's name by the Registrar and Transfer Agent in the share register kept on behalf of the Fund.
<b>Regulated Market</b>	Means regulated market as defined in Directive 2014/65/EU of 15 May 2014 on markets in financial instruments (Directive 2014/65/EU), i.e. a market on the list of regulated markets prepared by each Member State, that functions regularly characterised by the fact that the regulations issued or approved by the competent authorities set out the conditions of operation and access to the market, as well as the conditions that a given financial instrument must meet in order to be traded on the market, compliance with all information and transparency obligations prescribed in Directive 2014/65/EU, as well as any other regulated, recognised market open to the public in an eligible state that operates regularly.
<b>REITs</b>	Means a Real Estate Investment Trust or REIT is an entity that is dedicated to owning, and in most cases, managing real estate. This may include, but is not limited to, real estate in the residential (apartments), commercial (shopping centers, offices) and industrial (factories, warehouses) sectors. Certain REITs may also engage in real estate financing transactions and other real estate development activities. The legal structure of a REIT, its investment restrictions and the regulatory and taxation regimes to which it is subject will differ depending on the jurisdiction in which it is established. Investment in REITs will be allowed if they qualify as (i) UCITS or other UCIs or (ii) transferable securities. A closed-ended REIT, the units of which are listed on a Regulated Market is classified as a transferable security listed on a Regulated Market thereby qualifying as an eligible investment for a UCITS under the Luxembourg Law.
<b>RESA</b>	Means the "Recueil Electronique des Sociétés et Associations", the Electronic Compendium of Companies and Associations.
<b>Rule 144A Securities</b>	Rule 144A (formally 17 CFR § 230.144A) is a Securities Exchange Commission (SEC) regulation that enables, notwithstanding from Rule 506 of Regulation D, purchasers of securities in a private placement to resell their securities to qualified institutional buyers, or sellers, that takes affirmative steps to ensure that the buyer is aware that the seller relies on Rule 144A to sell their security, or the securities are not of the same class as securities traded on a national securities exchange and the purchaser has the right to request information from the original issuer of the security.
<b>SFDR</b>	Means Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector.
<b>SFTR</b>	Means Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012.
<b>Share(s)</b>	Means the shares in the Fund, or such category of shares, relating to such Sub-Fund as may be issued by the Fund from time to time.
<b>Shareholder(s)</b>	Means a person who is the registered holder of Shares in the Fund.



<b>SICAV</b>	Means société d'investissement à capital variable, the legal corporate form of a société anonyme governed by Luxembourg law the Fund adopted.
<b>Sub-Fund</b>	Means one of the sub-funds of the Fund.
<b>Sub-Distributor</b>	Means such entity appointed as sub-distributor of a particular Sub-Fund as disclosed in the section Organisation of Fund, sub-section Distributors, Sub-Distributors and further described in the relevant Sub-Fund Specific Information.
<b>Sub-Investment Manager(s)</b>	Means such entity from time to time appointed as sub-investment manager of a particular Sub-Fund as disclosed in section Organisation of Fund and further described in as disclosed in the relevant Sub-Fund Specific Information.
<b>Sub-Investment Management Agreement</b>	Means the sub-investment management agreement, as amended, supplemented or otherwise modified from time to time, entered into between the Investment Manager of a Sub-Fund with a particular Sub-Investment Manager of a Sub-Fund as further set out in the Sub-Fund Specific Information.
<b>Sub-Fund Specific Information</b>	Means the supplement(s) to this Prospectus with Sub-Fund specific information on each Sub-Fund, which form part of this Prospectus.
<b>Taxonomy Regulation</b>	Means the Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.
<b>Transferable Securities</b>	Means shares in companies and other securities equivalent to shares in companies, bonds and other forms of securitised debt, and any other negotiable securities which carry the right to acquire any such Transferable Securities by subscription or exchange, as defined in the 2010 Law.
<b>Total Return Swaps or TRS</b>	Means a derivative contract in which the Fund transfers the total economic performance, including income from interest and fees, gains and losses from price movements, and credit losses, of a reference obligation to another counterparty against payment to the Fund of a set rate over the life of the swap.
<b>UCI</b>	Means Undertaking for Collective Investment within the meaning of Article 1(2)(a) and (b) of the UCITS Directive, being an open-ended undertaking with the sole object of collective investment of capital raised from the public, in accordance with the principle of risk-spreading, in Transferable Securities and other liquid financial assets.
<b>UCI Administrator</b>	Means the entity, as identified in section Organisation of Fund, appointed by the Management Company with the consent of the Fund in accordance with the provisions of the 2010 Law and entrusted with the UCI Administration as further described in the section UCI Administration.
<b>UCI Administrator Agreement</b>	Means the agreement entered into between the Fund, the Management Company and the UCI Administrator governing the appointment of the UCI Administrator, as may be amended or supplemented from time to time.
<b>UCITS</b>	Means Undertaking for Collective Investment in Transferable Securities authorised in accordance with the Law of 17 December 2010 relating to collective investment.
<b>UCITS Directive</b>	Means Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to UCITS, as amended by the Directive 2014/91/EU on the coordination of laws, regulations and administrative provisions relating to UCITS as regards depositary functions remunerations policies and sanctions.
<b>UniCredit Group</b>	Means UniCredit S.p.A. and any affiliates thereof.
<b>Valuation Day</b>	Means the Business Day as of which the Fund's assets and liabilities will be valued in accordance with the articles of incorporation and as further specified in the Sub-Fund Specific Information.
<b>VaR</b>	Means Value-at-Risk, a method of calculation of global exposure approach as detailed in applicable laws and regulations including but not limited to CSSF Circular 11/512 and further described in section Global exposure approach.
<b>1915 Law</b>	Means Luxembourg law of 10 August 1915 on commercial companies as amended.
<b>2010 Law</b>	Means Law of 17 December 2010 relating to undertakings for collective investment, as amended.

## 1.2 Preface

onemarkets Fund (the "Fund") is authorised in Luxembourg as an undertaking for collective investment in Transferable Securities under Part I of the law of 17 December 2010 on undertakings for collective investments, as amended (the "2010 Law") and qualifies as an undertaking for collective investment in Transferable Securities ("UCITS") for the purpose of Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in Transferable Securities, as amended (the "UCITS Directive").

The Fund is structured as an umbrella investment fund with a view to provide investors with a variety of Sub-Funds (the "Sub-Funds") of specific assets, as further detailed below.

The Fund has appointed Structured Invest S.A. as management company (the "Management Company"), as further detailed below.

### Prospectus and other Fund Documents

This prospectus ("Prospectus") is valid only if accompanied by the latest packaged retail and insurance-based investment products - key information documents ("Packaged Retail and Insurance-based Investment Products - Key Information Documents" or "PRIIPs KIDs"), the latest articles of incorporation ("Articles of Incorporation"), the latest annual report, and also the latest semi-annual report if this was published after the latest annual report. These documents shall be deemed to form part of this Prospectus. Prospective investors shall be provided with the latest version of the Key Investor Information Document in good time before their proposed subscription for shares (the "Shares"). Depending on applicable legal and regulatory requirements (including but not limited to MIFID) in the countries of distribution, additional information on the Fund, the Sub-Funds and the Shares may be made available to investors under the responsibility of local intermediaries/distributors.

Information, which is not contained in this Prospectus, or in the documents mentioned herein which are available for inspection by the public, shall be deemed unauthorised and cannot be relied upon.

This Prospectus has been prepared solely for, and is being made available to investors for the purposes of evaluating an investment in Shares in the Fund. Investors should only consider investing in the Fund if they understand the risks involved including the risk of losing all capital invested. Potential investors should thus read and consider the risk factors in Chapter 4 "Risk Factors", before investing in the Fund, and also inform themselves as to the possible tax consequences, the legal requirements and any foreign exchange restrictions or exchange control requirements which they might encounter under the laws of the countries of their citizenship, residence or domicile and which might be relevant to the subscription, holding, conversion, redemption or disposal of Shares in the Fund. Further tax considerations are set out in Chapter 8 "Tax Considerations".

This Prospectus does not constitute an offer or solicitation to subscribe for Shares in the Fund by anyone in any jurisdiction in which such offer or solicitation is not lawful or in which the person making such offer or solicitation is not qualified to do so or to anyone to whom it is unlawful to make such offer or solicitation. It is thus the responsibility of any persons in possession of this Prospectus and any persons wishing to apply for subscription for Shares pursuant to this Prospectus to inform themselves of and to observe all applicable laws and regulations of any relevant jurisdiction. Further selling restrictions considerations are set out below.

All the statements made in this Prospectus are based on the law and regulatory practice currently in force in the Grand Duchy of Luxembourg and are subject to changes in such law and regulatory practice. For the avoidance of doubt, the authorisation and qualification of the Fund as UCITS do not imply any positive appraisal by any Luxembourg authority of the contents of this Prospectus or the portfolio of assets held by the Fund. Any representation to the contrary is unauthorised and unlawful.

Prospective investors who are in any doubt about the contents of this Prospectus should consult their bank, broker, legal adviser, accountant or other professional financial adviser.

### United States of America

The Shares in the Fund have not been, and will not be, registered under the United States Securities Act of

1933 (the "1933 Act"), any of the securities laws of any of the states of the United States. The Fund has not been and will not be registered under the United States Investment Company Act of 1940, as amended, nor under any other US federal laws. Therefore, the Shares in the Fund described in this Prospectus may not be offered or sold directly or indirectly in the United States of America, except pursuant to an exemption from the registration requirements of the 1933 Act. Further, the Shares in the Fund shall not be offered or sold, directly or indirectly, to any ultimate beneficial owner that constitutes a U.S. Person. As such, the Shares may not be directly or indirectly offered or sold to or for the benefit of a "U.S. Person", which shall be defined as and include (i) a "United States person" as described in section 7701(a)(30) of the U.S. Internal Revenue Code of 1986, as amended (the "Code"), (ii) a "U.S. person" as such term is defined in Regulation S of the 1933 Act, as amended, (iii) a person that is "in the United States" as defined in Rule 202(a)(30)-1 under the U.S. Investment Advisers Act of 1940, as amended, or (iv) a person that does not qualify as a "Non-United States Person" as such term is defined in U.S. Commodities Futures Trading Commission Rule 4.7.

#### *Investors Rights*

The Fund draws the investors' attention to the fact that any investor will only be able to fully exercise his investor rights directly against the Fund, notably the right to participate in general meetings of shareholders if the investor is registered himself and in his own name in the register of shareholders of the Fund. In cases where an investor invests in the Fund through an intermediary investing into the Fund in its own name but on behalf of the investor, it may not always be possible for the investor to exercise certain shareholder rights directly against the Fund. Investors are advised to take advice on their rights.

### **1.3 General Data Protection**

The Fund and the Management Company, as well as their service providers will hold and process personal data of investors in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "GDPR") along with any implementing legislation and available guidance from competent data protection authorities, including the Luxembourg law of 1 August 2018 on the organisation of the National Commission for Data Protection and implementation of GDPR.

Further information is available in the data protection information on Website: <https://www.structuredinvest.lu/de/en/legal/privacy-statement.html> (the "Data Protection Information"). The Data Protection Information provides individuals whose personal data are processed by the Fund, the Management Company as well as its/their service providers with all legally required information regarding the personal data processed about them, the reasons for which their personal data are processed, the identity of service providers with country of residence of such entities and their rights in relation to such processing.

## 1.4 Organisation of the Fund

### REGISTERED OFFICE:

8-10 rue Jean Monnet  
L-2180 Luxembourg

### BOARD OF DIRECTORS OF THE FUND

Chairperson	Christian Moritz Voit
Member	Flavio Bonomo
Member	Manuela D'Onofrio
Member	Thomas Friedrich

### MANAGEMENT COMPANY

Structured Invest S.A., a member of the UniCredit Group

Board of Directors of the Management Company	Dr. Joachim Beckert Claudia Vacanti Christian Moritz Voit (Chairperson) Alexander Walter Tumminelli
Conducting Officers of the Management Company	Rüdiger Herres Stefan Martin Lieser
Auditor of the Management Company	KPMG Luxembourg, Société anonyme 39, Avenue John F. Kennedy L-1855 Luxembourg Grand Duchy of Luxembourg

### ADMINISTRATION, SERVICE PROVIDERS AND OTHER MAIN PARTIES

#### Depositary Bank

CACEIS Bank, Luxembourg Branch  
5, Allée Scheffer  
L-2520 Luxembourg

#### UCI Administrator

CACEIS Bank, Luxembourg Branch  
5, Allée Scheffer  
L-2520 Luxembourg

#### Statutory Auditor of the Fund

Deloitte Audit Société à responsabilité limitée  
20, Boulevard de Kockelscheuer  
Grand Duchy of Luxembourg

#### Legal Adviser

Clifford Chance, Luxembourg  
10, Boulevard G.D. Charlotte  
B.P. 1147  
L-1011 Luxembourg  
Grand Duchy of Luxembourg

## 1.5 Other fund structure related information

### The Fund

The Fund is an open-ended UCI in Transferable Securities in the legal form of an investment company with variable capital ("société d'investissement à capital variable" or "SICAV"), subject to Part I of the 2010 Law transposing the UCITS Directive.

The Fund has been incorporated as a public limited liability company ("société anonyme") on 15 September 2022 for an unlimited time. The Fund's Articles of Incorporation have been deposited with the Register of Commerce and Companies of Luxembourg ("RCS") and a mention of their deposit with the RCS has been published in the RESA on 21 September 2022. The Fund is registered with the RCS under number B271238.

The Fund's Articles of Incorporation have been amended on 20 September 2022 by a rectification deed and a mention of deposit of the amendments to the Articles of Incorporation has been published in the RESA on 21 September 2022. The legally binding version of the Articles of Incorporation is deposited with the RCS where they are available for inspection and where copies thereof may be obtained. A copy of the Fund's Articles of Incorporation and of its most recent financial reports and statements may also be obtained free of charge upon request at the registered office of the Fund during normal business hours.

The share capital of the Fund corresponds to the total Net Asset Value of the Fund and must at any time exceed one million two hundred and fifty thousand euro (EUR 1,250,000).

### The Board of Directors

The Board of Directors is responsible, while observing the principle of risk diversification, for laying down the investment policy of the Fund/Sub-Funds and for monitoring the business activity of the Fund.

### The Management Company

The Fund has appointed the Management Company as from 15 September 2022. In this capacity, the Management Company is vested with the investment management, administration and marketing functions in relation to the Fund in accordance with the 2010 Law.

Further details on the Management Company and the manner according to which it performs and/or has delegated the above-mentioned functions in relation to the Fund are specified in Chapter 2 "Management and Administration of the Fund".

### The Sub-Funds

The Fund has an umbrella structure and therefore consists of at least one Sub-Fund. Each Sub-Fund represents a portfolio containing different assets and liabilities and is considered to be a separate entity in relation to the shareholders and third parties. The rights of shareholders and creditors concerning a Sub-Fund or which have arisen in relation to the establishment, operation or liquidation of a Sub-Fund are limited to the assets of that Sub-Fund. No Sub-Fund will be liable with its assets for the liabilities of another Sub-Fund.

The list of the existing individual Sub-Funds, their denomination and Reference Currency is provided in the Sub-Fund Specific Information.

The board of directors of the Fund ("Board of Directors") may at any time establish new Sub-Funds with Shares having similar or other characteristics to the Shares in the existing Sub-Funds. If the Board of Directors establishes a new Sub-Fund, the corresponding details shall be set out in this Prospectus.

### The Shares

The Shares in the Sub-Funds may be divided into several classes of Shares ("Classes"). Each Class may be sub-divided into (i) accumulation of income and/or different distribution of income categories and/or (ii) hedged and/or un-hedged categories and/or (iii) different investment currencies, and /or other characteristics (each a "Category").

The Board of Directors may at any time create and issue new Classes or Categories of Shares within any Sub-Fund. If the Board of Directors creates a new Class or Category of Shares, the corresponding details shall be set out in this Prospectus. A new Class or Category of Shares may have different characteristics than the currently existing Classes or Categories.

Further information about the characteristics and the rights attached to each possible Class or Category of Shares and of any offering of new Classes or Category of Shares is provided in Chapter 5 “Shares” and Chapter “Investment Policy Sub-Fund level”. Information about the performance of the Classes of Shares is contained in the Key Investor Information Document.

## 1.6 Financial Year

The financial year of the Fund starts on 1 July of each year and ends on 30 June of each year.

The audited annual reports of the Fund will be published within four (4) months after the financial year-end and the unaudited semi-annual reports of the Fund will be published within two (2) months after the end of the relevant period to which they refer. Such reports will be made available to investors on request and free of charge at the registered office of the Fund during normal business hours.

## 1.7 Accounting Standards

The Fund's financial statements will be prepared and the Net Asset Value calculated in accordance with Luxembourg GAAP.

## 1.8 Fund Currency

The consolidated Reference Currency of the Fund is the Euro. The Reference Currency in which the performance and the Net Asset Value of each Class of Shares of a given Sub-Fund is calculated and expressed is specified in Chapter “Investment Policy Sub-Fund level”.

# 2. Management and Administration of the Fund

## 2.1 Management Company

The Board of Directors of the Fund has designated Structured Invest S.A. to act as its management company under the terms of the Management Company Services Agreement entered into on 15 September 2022 for an indefinite period of time.

The Management Company was incorporated under the name Structured Invest on 16 November 2005 in the Grand Duchy of Luxembourg as a public limited company (“société anonyme”) for an indefinite period and is registered with the Luxembourg commercial and company register, Registre de Commerce et des Sociétés, under the number: B 112.174. The Management Company has its registered office at 8-10 rue Jean Monnet, L2180 Luxembourg, Grand Duchy of Luxembourg.

The articles of incorporation of the Management Company were published in the Mémorial, Recueil des Sociétés et Associations, on 5 December 2005.

The subscribed and fully paid up capital of the Management Company amounts to EUR 125,500 and is in accordance with the provisions of the 2010 Law.

The Management Company is authorised as a management company in accordance with the provisions of Chapter 15 of the 2010 Law and is supervised by the CSSF. It is registered in the official list of Luxembourg management companies governed by Chapter 15 of the 2010 Law.

The Management Company has been designated to perform the collective portfolio management functions as set forth in the 2010 Law, including investment management, administration and distribution. Therefore, under the supervision of the Board of Directors of the Fund, the Management Company is responsible on a day-to-day basis for providing investment management, administration and marketing services in respect of the Fund.

Subject to the requirements set forth by the 2010 Law, the Management Company is authorised to delegate under its responsibility and supervision part or all of its functions and duties to third parties.

### 2.1.1 Other funds managed by Management Company

As of the date of the Prospectus, the Management Company manages in addition to the Fund other undertakings for collective investment (including alternative investment funds), the list of which is available at the registered office of the Management Company and on [www.structuredinvest.lu](http://www.structuredinvest.lu).

### **2.1.2 Remuneration Policy**

The Management Company applies a remuneration policy and practice that is consistent with, and promotes, sound and effective risk management and does not encourage risk-taking, which is inconsistent with the risk profile and rules or instruments of incorporation of the UCITS managed.

Furthermore, the remuneration policy is in line with the business strategy, objectives, values and interests of the Management Company and the UCITS that it manages and of the investors in such UCITS and includes measures to avoid conflicts of interest.

The remuneration policy reflects the Management Company's objectives for good corporate governance as well as sustainable and long-term value creation for Shareholders. Fixed and variable components of total remuneration are appropriately balanced, and the fixed remuneration component represents a sufficiently high proportion of the total remuneration to allow the operation of a fully flexible policy on variable remuneration components, including the possibility to pay no variable remuneration component.

Where and to the extent applicable, the assessment of performance is set in a multi-year framework appropriate to the holding period recommended to the investors of the Fund in order to ensure that the assessment process is based on the longer-term performance of the Fund and its investment risks and that the actual payment of performance-based components of remuneration is spread over the same period.

The Management Company complies with the remuneration principles described above in a way and to the extent that is appropriate to its size, internal organisation and the nature, scope and complexity of its activities.

The principles of the remuneration policy are reviewed on a regular basis and adapted to the evolving regulatory framework.

Further information on the remuneration policy of the Management Company is available on [www.structuredinvest.lu](http://www.structuredinvest.lu), which includes in particular a description of the calculation methods of remuneration and benefits for specific employee categories as well as the identification of the persons responsible for the allocation, including if applicable the members of the remuneration committee. Upon request, the Management Company will provide such information free of charge in paper form to Shareholders of the Fund.

## **2.2 Investment Managers**

The Board of Directors has designated the Management Company to perform the investment management function.

The Management Company may, however, at its own expense and under its responsibility, control and supervision, and subject to the approval of the CSSF, appoint one or more Investment Managers to perform the investment management function and implement the investment policy of one or several Sub-Funds. In this respect, any appointed Investment Manager will perform the day-to-day management of the assets of a Sub-Fund and/or several Sub-Funds and take the related investment and divestment decisions.

The Investment Manager may at its own expense and in accordance with the provisions of the Investment Management Agreement between the Management Company and the Investment Manager, and subject to the approval of the CSSF, appoint one or more Sub-Investment Managers to perform the day-to-day management of the assets of a Sub-Fund and take the related investment and divestment decisions.

## **2.3 Depositary and Sub-Depositaries**

The Depositary of the Fund is CACEIS Bank, Luxembourg Branch, with its registered office at 5, Allée Scheffer, L-2520 Luxembourg, in accordance with the Depositary Agreement dated 13 September 2022, as amended from time to time and the relevant provisions of the 2010 Law.

CACEIS Bank acting through its Luxembourg branch (CACEIS Bank, Luxembourg Branch) is a public limited liability company (*société anonyme*) incorporated under the laws of France with a share capital of 440,000,000 Euros having its registered office located at 89-91, rue Gabriel Péri, 92120 Montrouge, France, registered with the French Register of Trade and Companies under number 692 024 722 RCS Nanterre. It is an authorised credit institution supervised by the European Central Bank ("ECB") and the *Autorité de contrôle prudentiel et de résolution* ("ACPR"). It is further authorised to exercise through its Luxembourg branch banking and central administration activities in Luxembourg.

Investors may consult upon request at the registered office of the Management Company, the Depositary Agreement to have a better understanding and knowledge of the limited duties and liabilities of the Depositary.

The Depositary has been entrusted with the custody and/or, as the case may be, recordkeeping and ownership verification of the Fund's assets, and it shall fulfil the obligations and duties provided for by Part I of the 2010 Law. In particular, the Depositary shall ensure an effective and proper monitoring of the Fund's cash flows.

In due compliance with the UCITS rules, the Depositary shall:

- (i) ensure that the sale, issue, repurchase, redemption and cancellation of Shares effected on behalf of the Fund are carried out in accordance with the 2010 Law and with the Fund's Articles of Incorporation;
- (ii) ensure that the value of Shares is calculated in accordance with the 2010 Law, the Fund's Articles of Incorporation and the procedures laid down in the UCITS Directive;
- (iii) carry out the instructions of the Fund or of the Management Company acting on behalf of the Fund, unless they conflict with the 2010 Law or the Fund's Articles of Incorporation;
- (iv) ensure that in transactions involving the Fund's assets, the consideration is remitted to the Fund within the usual time limits;
- (v) ensure that the income of the Fund is applied in accordance with the 2010 Law or the Fund's Articles of Incorporation.

The Depositary may not delegate any of the obligations and duties set out in (i) to (v) above.

In compliance with the provisions of the UCITS Directive, the Depositary will also ensure that cash flows are properly monitored in accordance with the 2010 Law and the Depositary Agreement.

Pursuant to the Articles of Incorporation, the Depositary Agreement and the applicable regulations, the Depositary may, under certain conditions, entrust part or all of the assets which are placed under its custody and/or recordkeeping to correspondents or third party custodians ("sub-depositaries") as appointed from time to time. The Depositary's liability shall not be affected by any such delegation, unless otherwise specified, but only within the limits as permitted by the 2010 Law.

A list of these sub-depositaries is available on the website of the Depositary ([www.caceis.com](http://www.caceis.com), section "veille réglementaire"). Such list may be updated from time to time. A complete list of all sub-depositaries may be obtained, free of charge and upon request, from the Depositary. Up-to-date information regarding the identity of the Depositary, the description of its duties and of conflicts of interest that may arise, the safekeeping functions delegated by the Depositary and any conflicts of interest that may arise from such a delegation are also made available to investors on the website of the Depositary, as mentioned above, and upon request. There are many situations in which a conflict of interest may arise, notably when the Depositary delegates its safekeeping functions or when the Depositary also performs other tasks on behalf of the Fund, such as administrative agency and registrar agency services. These situations and the conflicts of interest thereto related have been identified by the Depositary. In order to protect the Fund's and its Shareholders' interests and comply with applicable regulations, a policy and procedures designed to prevent situations of conflicts of interest and monitor them when they arise have been set in place within the Depositary, aiming namely at:

- a. identifying and analysing potential situations of conflicts of interest;
- b. recording, managing and monitoring the conflict of interest situations either in:
  - relying on the permanent measures in place to address conflicts of interest such as maintaining separate legal entities,



segregation of duties, separation of reporting lines, insider lists for staff members; or

- implementing a case-by-case management to (i) take the appropriate preventive measures such as drawing up a new watch list, implementing a new Chinese wall, making sure that operations are carried out at arm's length and/or informing the concerned Shareholders of the Fund, or (ii) refuse to carry out the activity giving rise to the conflict of interest.

The Depositary has established a functional, hierarchical and/or contractual separation between the performance of its UCITS depositary functions and the performance of other tasks on behalf of the Fund, notably, administrative agency and registrar agency services.

The Depositary has no decision-making discretion nor any advice duty relating to the Fund's investments. The Depositary is a service provider to the Fund and is not responsible for the preparation of this Prospectus and therefore accepts no responsibility for the accuracy of any information contained in this Prospectus or the validity of the structure and investments of the Fund.

## **2.4 UCI Administrator**

The UCI Administrator of the Fund is CACEIS Bank, Luxembourg Branch, with its registered office at 5, Allée Scheffer, L-2520 Luxembourg, in accordance with the UCI Administrator Agreement dated 29 November 2021, as amended from time to time and the relevant provisions of the 2010 Law. The UCI administration activity may be split into 3 main functions: the registrar function, the NAV calculation and accounting function, and the client communication function.

The registrar function encompasses all tasks necessary to the maintenance of the Fund register and performs the registrations, alterations or deletions necessary to ensure its regular update and maintenance.

The NAV calculation and accounting function is responsible for the correct and complete recording of transactions to adequately keep the Fund's books and records in compliance with applicable legal, regulatory and contractual requirements as well as corresponding accounting principles. It is also responsible for the calculation and production of the NAV of the Fund in accordance with the applicable regulation in force.

The client communication function is comprised of the production and delivery of the confidential documents intended for investors.

Under its own responsibility and control, the UCI Administrator may delegate various functions and tasks to other entities in accordance with applicable regulation in force. In case one or several functions are delegated, the name of the appointed entities can be found under the section Organisation of Fund.

## **2.5 Distributors, Sub-Distributors**

The Management Company entered into Distribution Agreements with several distributors, who are entitled to delegate all or part of their duties to one or several Sub-Distributors. To the extent described in the agreement(s), the Distributor(s) may enter into distribution agreements with any professional agent, particularly banks, insurance companies, fund platforms, independent managers, brokers, management companies or any other institution whose primary or secondary activity is the distribution of investment funds and customer service.

Distributors are authorised to receive subscription orders, redemption orders and conversion orders for each Sub-Fund and will send them to the Registrar and Transfer Agent.

The Distributors shall only sell Shares of the Sub-Funds in countries where these Shares are authorised for sale.

The Shares of each the Sub-Funds may not be offered or sold, directly or indirectly, to persons resident in the United States of America.

## 2.6 Statutory Auditors

The Statutory Auditor of the Fund's annual accounts appointed by the Fund is Deloitte Audit Société à responsabilité limitée, an entity under supervision of the CSSF.

## 3. Investment Objectives, Policies and Restrictions

### 3.1 Investment objective and policy

Each Sub-Fund has a specific investment objective and policy more fully described in its Sub-Fund Specific Information. The investments of each Sub-Fund must comply with the provisions of the 2010 Law as well as the ESMA requirements for risk monitoring and management. In case of any discrepancy the law itself would prevail.

The investment restrictions and policies set out in this section apply to all Sub-Funds, without prejudice to any specific rules adopted for a Sub-Fund, as described in its Sub-Fund Specific Information where applicable. The Board of Directors may impose additional investment guidelines for each Sub-Fund from time to time, for instance where it is necessary to comply with local laws and regulations in countries where Shares are distributed. In the case of any detected violation of the 2010 Law at the level of a Sub-Fund, the Investment Manager must make compliance with the relevant policies a priority in its securities trades and management decisions for the Sub-Fund, taking due account of the interests of Shareholders.

All percentages and restrictions apply to each Sub-Fund individually, and all asset percentages are measured as a percentage of total net assets of the relevant Sub-Fund.

### 3.2 Authorised investments

The investments of each Sub-Fund must comprise only of one or more of the following:

(A) Transferable Securities and Money Market Instruments admitted to or dealt in on a Regulated Market.

(B) Transferable Securities and Money Market Instruments dealt in on another Regulated Market in a Member State, 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 in a non-Member State or dealt in on another Regulated Market in a non-Member State, which operates regularly and is recognised and open to the public, located within any other country of Europe, Asia, Oceania, the American continents or Africa.

(D) Recently issued Transferable Securities and Money Market Instruments, provided that the terms of issue include an undertaking that application will be made for admission to official listing on a stock exchange or to another Regulated Market referred to in paragraphs (A) to (C) of this section, and that such admission is secured within one year of issue.

(E) Shares or units of UCITS or other UCI, whether or not established in a Member State provided that:

(1) such other UCI are authorised under laws which provide that they are subject to supervision considered by the CSSF to be equivalent to that laid down in EU Law, and that cooperation between authorities is sufficiently ensured;

(2) the level of protection for shareholders or unitholders in such other UCI is equivalent to that provided for shareholders or 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 the UCITS Directive;

(3) the business of the other UCI is reported in half-yearly and annual reports to enable an assessment of the assets and liabilities, income and operations over the reporting period;

(4) no more than 10% of the net assets of the UCITS or the other UCI whose acquisition is contemplated, can be, according to their articles of incorporation or management regulations, invested in aggregate in shares or units of other UCITS or other UCI;

(5) the Sub-Funds may not invest in units of other UCITS or other UCIs for more than 10% of their net assets, unless otherwise provided in respect of particular Sub-Funds in the Sub-Fund Specific Information;

(6) when a Sub-Fund has acquired units of UCITS and/or other UCIs, the assets of the respective UCITS or other UCIs do not have to be combined for the purposes of the limits laid down in Article 43 of the 2010 Law;

(7) where a Sub-Fund invests in the units of other UCITS and/or other UCIs that are managed, directly or by delegation, by the same management company or by any other company with which the management company is linked by common management or control, or by a substantial direct or indirect holding, that management company or other company may not charge subscription or redemption fees on account of the UCITS investment in the units of such other UCITS and/or other UCIs;

(8) a Sub-Fund that invests a substantial proportion of its assets in other UCITS and/or other UCIs shall disclose in its Sub-Fund Specific Information the maximum level of the management fees that may be charged both to the UCITS itself and to the other UCITS and/or other UCIs in which it intends to invest. In its annual report it shall indicate the maximum proportion of management fees charged both to the Sub-Fund itself and to the UCITS and/or other UCIs in which it invests.

(F) Deposits with credit institutions, which are repayable on demand or have the right to be withdrawn, and maturing in no more than twelve (12) months, provided that the credit institution has its registered office in a Member State or if the credit institution has its registered office in a non-Member State, provided that it is subject to prudential rules considered by the CSSF as equivalent to those laid down in EU Law.

(G) Financial derivative instruments, including equivalent cash settled instruments, dealt in on a Regulated Market or another Regulated Market referred to in paragraphs (A) to (C) of this section, and / or financial derivative instruments dealt in OTC provided that:

(1) the underlying consists of instruments covered by this section, financial indices, interest rates, foreign exchange rates or currencies, in which a Sub-Fund may invest according to its investment objective;

(2) the counterparties to OTC financial derivatives are institutions subject to prudential supervision, and belonging to the categories approved by the CSSF; and

(3) the OTC financial derivatives are subject to reliable and verifiable valuation on a daily basis and can be sold, liquidated or closed by an offsetting transaction at any time at their fair value at the initiative of the Fund / Sub-Fund.

(H) Money Market Instruments other than those dealt in on a Regulated Market or on another Regulated Market referred to in paragraphs (A) to (C) of this section, if the issue or the issuer of such instruments is itself regulated for the purpose of protecting investors and savings, and provided that they are:

(1) issued or guaranteed by a central, regional or local authority, a central bank of a Member State, the European Central Bank, the European Union or the European Investment Bank, a non-Member State or, in case of a federal state, by one of the members making up the federation, or by a public international body to which one or more Member States belong, or

(2) issued by an undertaking any securities of which are dealt in on a Regulated Market or another Regulated Market referred to in paragraphs (A) to (C) of this section, or

(3) issued or guaranteed by an establishment subject to prudential supervision, in accordance with criteria defined by EU Law, or by an establishment which is subject to and comply with prudential rules considered by the CSSF to be at least as stringent as those laid down by EU Law; or

(4) issued by other bodies belonging to the categories approved by the CSSF, provided that investments in such instruments are subject to investor protection equivalent to that laid down in paragraphs (H)(1) to (H)(3) of this section and provided that the issuer is a company whose capital and reserves amount to at least ten million Euro (EUR 10,000,000) and which presents and publishes its annual accounts in accordance with Directive 2013/34/EU, is an entity which, within a group of companies which includes one or several listed companies, is dedicated to the financing of the group or is an entity which is dedicated to the financing of securitisation vehicles which benefit from a banking liquidity line.

Moreover, the Fund may acquire movable and immovable property, which is essential for the direct pursuit of its business. The Fund is authorised for each of its Sub-Funds to employ techniques and instruments relating to Transferable Securities and Money Market Instruments under the conditions and within the limits laid down by the CSSF, provided that such techniques and instruments are used for the purpose of efficient portfolio management. When these operations concern the use of derivative instruments, these conditions and limits shall conform to the provisions laid down in the Articles of Incorporation as well as in this Prospectus. Under no circumstances shall these operations cause the Fund to diverge, for any Sub-Fund, from its investment objectives as laid down, the case being for the relevant Sub-Fund, in the Articles of Incorporation or in this Prospectus.

### 3.3 Unauthorised investments

The Sub-Funds may not acquire commodities or precious metals or certificates representing them or hold any right or interest therein. Investments in financial instruments linked to, or backed by the performance of, commodities or precious metals, or any right or interest therein, do not fall under this restriction.

Furthermore, the Sub-Funds may not gain direct or indirect (through use of derivatives or exchange traded products) exposures to any of the commodities comprised in the FAO Food Price Index (FFPI) (further information on <https://www.fao.org/worldfoodsituation/foodpricesindex/en/>).

The Sub-Funds may not invest in real estate or hold any right or interest in real estate. Investments in financial instruments linked to, or backed by the performance of, real estate or any right or interest therein, or shares or debt instruments issued by companies, which invest in real estate or interests therein, do not fall under this restriction.

The Sub-Funds may not grant loans or guarantees in favour of a third party. Such restriction will not prevent any Sub-Fund from investing in Transferable Securities, Money Market Instruments, shares or units of UCITS or other UCI, or financial derivative instruments referenced in the section Authorised Investments which are not fully paid-up. Furthermore, such restriction will not prevent any Sub-Fund from entering into repurchase agreements, buy-sell back transactions or securities lending transactions as described in the section Use of derivatives below.

The Sub-Funds may not enter into uncovered sales of Transferable Securities, Money Market Instruments, shares or units of UCITS or other UCI or financial derivative instruments referenced in the section Authorised Investments.

## 3.4 Investment restrictions

### 3.4.1 Diversification requirements

To ensure diversification, a Sub-Fund cannot invest more than a certain percentage of its assets in one issuer or single body. These diversification rules do not apply during the first six (6) months of a Sub-Fund's operation, but the Sub-Fund must observe the principle of risk spreading.

For purposes of this section, companies that share consolidated accounts, in accordance with Directive 2013/341/EU or with recognised international accounting rules, are considered to be a single issuer.

1. The Sub-Funds may invest no more than 10% of the net assets of any Sub-Fund in Transferable Securities and Money Market Instruments issued by the same body and cannot invest more than 20% of its net assets in deposits made with the same entity.

2. The total value of the Transferable Securities and Money Market Instruments held by a Sub-Fund in the issuing bodies in which it invests more than 5% of its net assets shall not exceed 40% of the value of its net assets. This limitation does not apply to deposits and OTC financial derivative transactions made with financial institutions subject to prudential supervision.
3. Notwithstanding the individual limits set in paragraph 1. above, a Sub-Fund shall not combine, where this would lead it to invest more than 20% of its net assets in a single body, any of the following:
  - investments in Transferable Securities or Money Market Instruments issued by the said body;
  - deposits with the said body, or;
  - risks related to transactions involving OTC financial derivative instruments with the said body.

The limit of 20% is raised to 35% where that proves to be justified by exceptional market conditions in particular in Regulated Markets where certain Transferable Securities or Money Market Instruments are highly dominant. The investment up to this limit is only permitted for a single issuer.
4. The 10% limit defined in the first sentence of paragraph 1 above may be raised to a maximum of 35% when the Transferable Securities or the Money Market Instruments are issued or guaranteed by a Member State, by its local authorities, by a third state or by international public bodies of which one or more Member States are member.
5. The 10% limit defined in the paragraph 1 above may be raised to a maximum of 25% for certain debt securities, when they are issued by a credit institution having its registered office in a Member State and which, under applicable law, is submitted to specific public supervision in order to protect the holders of such qualifying debt securities. For the purposes hereof, "qualifying debt securities", are securities the proceeds of which are invested in accordance with applicable law, in assets providing a return which will cover the debt service through to the maturity date of the securities and which will be applied on a priority basis to the payment of principal and interest in the event of a default by the issuer. When a Sub-Fund invests more than 5% of its net assets in qualifying debt securities issued by a single issuer, the total value of the investments may not exceed 80% of the value of the net assets of such Sub-Fund.
6. The Transferable Securities and Money Market Instruments mentioned in paragraph 4. and 5. above are not accounted for when applying the 40% limit mentioned in paragraph 2. above.
7. The Fund may further invest up to 100% of the net assets of any Sub-Fund, in accordance with the principle of risk-spreading, in Transferable Securities and Money Market Instruments, issued or guaranteed by a Member State, its local authorities, a non-Member State of the OECD such as the United States, or of the Group of twenty (G20), Singapore or Hong Kong, or, accepted by the CSSF and specified in this Prospectus, or public international bodies to which one or more Member State(s) belong; provided that in such event, the Sub-Fund concerned must hold securities from at least six (6) different issues, but securities from any single issuer shall not account for more than 30% of the Sub-Fund's net assets.
8. No more than 20% of the net assets of a Sub-Fund can be invested in the units of a single UCITS or other UCI. Each sub-fund of a UCI with multiple sub-funds 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.
9. Investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net assets of a UCITS.

10. The limits set out in the previous paragraphs 1,2,3,4,5,8 and 9 may not be combined and therefore, the investments in Transferable Securities or Money Market Instruments of a single issuer, in deposits or financial derivatives instruments involving this entity in conformity with these paragraphs, shall not exceed a total of 35% of the net assets of the Sub-Fund in question.
11. Each Sub-Fund may invest cumulatively up to 20% of its net assets in the Transferable Securities or Money Market Instruments within the same group.
12. A Sub-Fund (the "Investing Sub-Fund") may invest in one or more other Sub-Funds. Any acquisition of shares of another Sub-Fund (the "Target Sub-Fund") by the Investing Sub-Fund is subject to the following conditions:
- the Target Sub-Fund may not invest in the Investing Sub-Fund;
  - the Target Sub-Fund may not invest more than 10% of its net assets in UCITS (including other Sub-Funds) or other UCIs;
  - the voting rights attached to the shares of the Target Sub-Fund are suspended during the investment by the Investing Sub-Fund; and
  - the value of the share of the Target Sub-Fund held by the Investing Sub-Fund are not taken into account in the calculation of the Fund's net assets for verification of the minimum threshold of net assets imposed by the 2010 Law.
13. When a Sub-Fund's investment policy allows it to invest via Total Return Swaps in shares or units of UCITS and/or other UCIs, the 20% limit defined in paragraph 10 above also applies, such that the potential losses resulting from this kind of swap contract creating an exposure to a single UCITS or UCI, together with direct investments in this single UCITS or UCI, will not in total exceed 20% of the net assets of the Sub-Fund in question. If these UCITS are Sub-Funds of the Fund, the swap contract needs to include provisions for cash settlement.
14. The limits specified in 1 and 2 above are raised to a maximum of 20% for investments in shares and / or debt securities issued by a single body when, in accordance with the investment policy of a Sub-Fund, its objective is to replicate the composition of a specific index of equities or debt securities

that is recognised by the CSSF, on the following bases:

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

#### **3.4.2 Limits to prevent concentration of ownership**

The limits to prevent significant concentration of ownership are intended to prevent the Fund or a Sub-Fund from the risks that could arise (for itself or an issuer) if it were to own a significant percentage of a given security or issuer. A Sub-Fund does not need to comply with the investment limits described above when exercising subscription rights attaching to Transferable Securities or Money Market Instruments that form part of its assets, so long as any violations of the investment restrictions resulting from the exercise of subscription rights are remedied.

The Fund may not acquire across all the Sub-Funds together:

1. shares carrying voting rights which would enable the Fund to exercise significant influence over the management of the issuing body;
2. more than:
  - a. 10% of the non-voting shares of the same issuer;
  - b. 10% of the debt securities of the same issuer;
  - c. 10% of the Money Market Instruments of the same issuer;
  - d. 25% of the outstanding shares or units of any one UCITS and/or UCI.

The limits laid down in paragraphs 2 (b), (c) and (d) above may be disregarded at the time of acquisition if, at that time, the gross amount of bonds or of the Money Market Instruments or the net amount of the instruments in issue cannot be calculated.

The restrictions mentioned in paragraphs 1 and 2 above are not applicable to:

- Transferable Securities and Money Market Instruments issued or guaranteed by a Member State, by its local authorities, or by a non-Member State;

- Transferable Securities and Money Market Instruments issued by international public bodies of which one or more Member States are members;
- Shares held in the capital of a company, incorporated under or organised pursuant to the laws of a non-Member State, or of any state of America, Africa, Asia and Oceania, provided that such company invests its assets mainly in the securities of issuers of that state, pursuant to the laws of that state such a holding represents the only way in which the Fund can invest in the securities of issuing bodies in that state. This derogation is, however, only applicable when this state respects in its investment policy the restrictions set forth under articles 43, 46 and 48 (1) and (2) of the 2010 Law;
- Shares held by one or more investment companies in the capital of subsidiary companies, which exclusively on behalf of the Fund carry on only the business of management, advising, or marking in the country where the subsidiary is located, in regard to the redemption of shares at the request of shareholders.
- the master UCITS' actual exposure to financial derivative instruments in proportion to the feeder sub-fund's investment into the master UCITS or
- the master UCITS' potential maximum global exposure to financial derivative instruments provided for in the master UCITS' management regulations or articles of incorporation in proportion to the feeder UCITS' investment into the master UCITS.

In case the Fund decides to put in place a feeder structure, the set up shall be subject to the prior approval of the CSSF and details are specifically disclosed in the Sub-Fund Specific Information.

The master UCITS and the feeder Sub-Fund must have the same Business Days, share Valuation Days and the Cut-Off times for order processing must be coordinated so that orders for shares of the feeder Sub-Fund can be processed and the resulting orders for shares of the master UCITS can be placed before the master UCITS's Cut-Off time of the same day.

### **3.6 ESG and Sustainability Considerations**

Sustainable investing refers to the process of considering environmental, social and governance information ("ESG Factors") when taking investment decisions. Sub-Funds following a sustainable investing strategy integrate ESG Factors into the investment decision process to create a more sustainable portfolio and to increase the expected risk-adjusted returns or to target specific sustainable investment objectives typically expressed as one or more of the United Nations Sustainable Development Goals. Depending on the overall investment strategy and investment universe of the Sub-Fund, the importance of and focus on individual ESG Factors varies.

As part of the UniCredit Group, the Management Company will ensure that every Sub-Fund complies with an exclusion policy aiming to exclude from the Sub-Fund's portfolio (subject to a Sub-Fund's portfolio not exceeding 10% of the relevant Sub-Fund's net assets not complying with such exclusion policy):

- Companies that are involved in very severe violations of the UN Global Compact;

### **3.5 Master / Feeder structure**

Under the conditions and within the limits laid down by the 2010 Law, the Fund can to the widest extent permitted by Luxembourg laws and regulations, create one or more Sub-Funds that qualify as a master fund or a feeder fund, or can designate any existing Sub-Fund a master fund or a feeder fund in which case further details in this respect are provided in the Sub-Fund Specific Information.

A feeder Sub-Fund is a Sub-Fund, which has been approved to invest at least 85% of its assets in units of another Fund set up as a UCITS or in a sub-fund thereof. A feeder Sub-Fund may hold up to 15% of its assets in ancillary liquid assets in accordance with the provisions of the section Authorised Investments, or financial derivative instruments, which must only be used for hedging purposes. In measuring its global exposure relating to financial derivative instruments, and in order to be compliant with article 42 (3) of the 2010 Law, the feeder Sub-Fund must combine its own direct exposure with either:

- Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations. For nuclear weapons, the exclusion is applicable to all those companies which derive from nuclear weapons a significant portion of their consolidated revenues;
- Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses a material portion of their consolidated revenues;
- Bonds issued by countries that are not compliant with FATF Recommendations (Black and Grey lists) or those which are not signatories of the Paris 2015 Agreement on climate change.

The Investment Managers appointed by the Management Company apply their own respective sustainable investing policy while being bound to comply with the UniCredit Group exclusion policy mentioned above. Further information on the sustainable investing policy applied by the Investment Manager of the relevant Sub-Fund can be found in the relevant Sub-Fund Specific Information along with the disclosures required under SFDR and the Taxonomy Regulation.

Information on the consideration of principal adverse impacts (PAI) by each Sub-Fund can be found in the relevant Sub-Fund Specific Information along with the disclosures required under SFDR and the Taxonomy Regulation. As far as the Sub-Funds qualifying as a financial product under Art. 6 of SFDR are concerned, neither the Management Company nor their respective Investment Manager take into account the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in SFDR as this is not part of the strategy or investment restrictions of those Sub-Funds.

The management of every Sub-Fund integrates risks stemming from sustainability and in particular ESG Factors into their investment decisions. Besides common financial metrics and other portfolio specific risks, the management of every Sub-Fund considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes.

Investment decisions of every Sub-Fund are made taking into account sustainability risks. Sustainability risks can arise from environmental and social impacts on a potential investment object as well as from the corporate governance of a company associated with an investment object. Sustainability risk can either represent a risk of its own or have an impact on other portfolio risks and contribute significantly to the overall risk, such as market risks, liquidity risks, credit risks or operational risks. Upon occurrence of those, they can have a significant impact on the value and/or return of the investment object, up to a total loss. Negative effects on an investment object can also negatively impact the return of the relevant Sub-Fund.

The aim of including sustainability risks in the investment decision is to identify the occurrence of these risks as early as possible and to take appropriate measures to minimise the impact on the investments or the overall portfolio of the relevant Sub-Fund. The events or conditions that may be responsible for a negative impact on the return of the relevant Sub-Fund are split into environmental, social and corporate governance aspects. While environmental aspects include climate mitigation, for example, social aspects include the consideration of internationally recognised labour law requirements or the abolition of a gender pay gap. Corporate governance aspects include, for example, the consideration of employee's rights and data protection. The Fund also considers the aspects of climate change, including physical climate events or conditions such as heat waves, storms, rising sea levels and global warming.

'Risk indicators' (key risk indicators) are used to assess sustainability risks. The risk indicators can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.



### **3.7 Investments in financial derivative instruments and use of efficient portfolio management techniques**

A Sub-Fund may, subject to the conditions and within the limits laid down in the 2010 Law, any present or future related Luxembourg laws or implementing regulations, circulars and CSSF positions applicable to UCITS (the "Regulations") and the provisions of this Prospectus:

(i) invest in financial derivative instruments for investment purposes, for efficient portfolio management or to provide protection against risks (market, securities, interest rate, credit and other risks) and/or

(ii) enter into securities financing transactions (i.e. repurchase transactions, securities lending, buy-sell back transactions, sell-buy back transactions or any other efficient portfolio management transactions as covered by the SFTR,

as further described for each Sub-Fund in the Sub-Fund Specific Information.

#### **3.7.1 Financial Derivative Instruments**

A Sub-Fund may use financial derivative instruments for the purposes and to the extent further disclosed in the Sub-Fund Specific Information.

Financial derivative instruments may include, but are not limited to, futures, forwards, options, swaps (including, but not limited to, Total Return Swaps, credit and credit-default swaps, interest rate and inflation swaps), swaptions and forward foreign currency contracts. New financial derivative instruments may be developed if those are suitable for use by the Sub-Fund and the Sub-Fund may employ such financial derivative instruments in accordance with the Regulations and collateral received will be in accordance with the Fund's collateral policy.

The conditions of use and the limits applicable shall in all circumstances, comply with the provisions laid down in the 2010 Law, in the Regulations and the Prospectus.

Under no circumstances shall these operations cause the Fund and its Sub-Funds to diverge from its investment policies and restrictions.

#### **3.7.2 Use of Securities Financing Transactions and Total Return Swaps**

In order to reduce risks or costs or to procure capital gains or revenues, a Sub-Fund to the extent further disclosed for a Sub-Fund in the Sub-Fund Specific Information, may use techniques and instruments (including, but not limited to, securities lending, repurchase agreements and reverse repurchase transactions) relating to Transferable Securities and Money Market Instruments for the purpose of efficient portfolio management and where this is in the best interest of the Sub-Fund and in line with its investment objective.

Under no circumstances shall these operations cause a Sub-Fund to diverge from its investment objectives as laid down in this Prospectus or result in additional risk higher than its risk profile as described in the Sub-Fund Specific Information.

Such techniques and instruments will be conducted in compliance with the rules specified in:

- (i) Article 11 of the Grand-Ducal regulation of 8 February 2008 relating to certain definitions of the Law of 20 December 2002 on undertakings for collective investment;
- (ii) CSSF Circular 08/356 relating to the rules applicable to undertakings for collective investments when they use certain techniques and instruments relating to Transferable Securities and Money Market Instruments;
- (iii) CSSF Circular 14/592; and
- (iv) any other applicable laws and regulations.

Risks linked to such techniques and instruments will be adequately covered by the Management Company's risk management process. For further information on risks linked to such techniques and instruments and the effect on investors returns are described in the section Risk Factors. There can be no guarantee that the objective of the use of such techniques and instruments will be achieved.

The risk exposure to a counterparty generated through efficient portfolio management techniques and OTC financial derivative instruments must be combined when calculating counterparty risk limits.

Fees and costs may be paid to agents of the Fund and other intermediaries providing services in connection with efficient portfolio management techniques as normal compensation of their services. The fees of any relevant counterparty and other intermediaries involved in efficient portfolio management techniques may not exceed the percentages of the total income generated by these efficient portfolio management techniques as further specified in the relevant Sub-Fund Specific Information. Such fees may be calculated as a percentage of gross revenues earned by the Sub-Fund through the use of such techniques. The remaining income will accrue to the relevant Sub-Fund. Information on direct and indirect operational costs and fees incurred in this respect, as well as the identity of the entities to which such costs and fees are paid – as well as any relationship they may have with the Management Company and the relevant Investment Manager or the Depositary (if any), will be available in the annual report of the Fund.

The counterparties to such transactions will be subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed for by EU Law.

Details of the selection criteria and a list of approved counterparties are available upon request at the registered office of the Management Company or Fund.

(i) Securities lending transactions

To the extent disclosed for a Sub-Fund in the relevant Sub-Fund Specific Information, the Fund may more specifically enter into securities lending transactions in relation to a Sub-Fund, provided that the following rules are complied with in addition to the above-mentioned conditions:

- a) the borrower in a securities lending transaction must be subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by European Union law;
- b) the Fund may only lend securities to a borrower either directly or through a standardised system organised by a recognised clearing institution or through a lending system organised by a financial institution subject to prudential supervision rules considered by the CSSF as equivalent to those provided by European Union law and specialised in this type of transaction;

- c) the Fund may only enter into securities lending transactions provided that it is entitled at any time under the terms of the agreement to request the return of the securities lent or to terminate the agreement.

Where a Sub-Fund enters into securities lending transactions, the maximum and the expected proportion of such Sub-Fund's net assets that could be subject to securities lending transactions will be specified in the Sub-Fund Specific Information.

The collateral received shall comply with the requirements set out in sub-section Management of collateral and collateral policy. Further details regarding such transactions are disclosed in the Sub-Fund Specific Information and in the Fund's annual report. The risks related to the use of securities lending transactions and the effect on investors returns are described in the section Risk Factors.

(ii) Repurchase and reverse repurchase transactions

To the extent disclosed for a Sub-Fund in the Sub-Fund Specific Information, the Fund may enter into:

- repurchase agreements that consist of forward transactions at the maturity of which the Fund (seller) has the obligation to repurchase the assets sold and the counterparty (buyer) the obligation to return the assets purchased under the transactions; and/or;
- reverse repurchase agreements that consist of forward transactions at the maturity of which the counterparty (seller) has the obligation to repurchase the asset sold and the Fund (buyer) the obligation to return the assets purchased under the transactions.

The Fund's involvement in such transactions is, however, subject to the following rules:

- (i) the counterparty to these transactions must be subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by European Union law;
- (ii) the value of a transaction is maintained at a level that allows the Fund to meet its redemption obligations at any time; and

- (iii) the Fund may only enter into repurchase agreement and/or reverse repurchase agreement transactions provided that it is able at any time (a) to recall the full amount of cash in a reverse repurchase agreement or any securities subject to a repurchase agreement or (b) to terminate the agreement in accordance with applicable Regulations. However, fixed-term transactions that do not exceed seven days should be considered as arrangements on terms that allow the assets to be recalled at any time by the Fund.

Where a Sub-Fund may enter into repurchase and reverse repurchase transactions, the underlying assets and investment strategies to which exposure will be gained are those allowed as per the relevant Sub-Fund's investment policy and objectives specified in the Sub-Fund Specific Information.

Where a Sub-Fund enters into repurchase and reverse repurchase transactions, the maximum and the expected proportion of such Sub-Fund's net assets that could be subject to repurchase and reverse repurchase transactions will be specified in the Sub-Fund Specific Information.

The collateral received shall comply with the requirements set out in sub-section Management of collateral and collateral policy.

Further details regarding such transactions are disclosed in the Sub-Fund Specific Information and in the Fund's annual report.

The risks related to the use of repurchase and reverse repurchase transactions and the effect on investors returns are described in section 4.6.

(iii) Total Return Swaps

To the extent disclosed for a Sub-Fund in the Sub-Fund Specific Information, a Sub-Fund may use Total Return Swaps in order to achieve its investment objective.

Total Return Swaps are financial derivative instruments in which one counterparty transfers the total economic performance, including income from interest and fees, gains and losses from price movements, and credit losses, of a reference obligation to another counterparty.

The Fund will enter into Total Return Swaps on behalf of the relevant Sub-Fund by private agreement ("OTC") with counterparties as further defined below.

Where a Sub-Fund uses Total Return Swaps, the underlying assets and investment strategies to which exposure will be gained are those allowed as per the relevant Sub-Fund's investment policy and objectives set out in the Sub-Fund Specific Information.

In any case, such Total Return Swaps and other financial derivative instruments that display the same characteristics may have underlying assets such as currencies, interest rates, Transferable Securities, a basket of Transferable Securities, indexes, or UCI.

Where a Sub-Fund enters into Total Return Swaps, the maximum and the expected proportion of such Sub-Fund's net assets that could be subject to Total Return Swaps will be specified in the Sub-Fund Specific Information.

Fees and costs may be paid to the relevant counterparty and other intermediaries providing services in connection with Total Return Swaps as normal remuneration for their services. The fees of any relevant counterparty and other intermediaries involved in Total Return Swaps may not exceed the percentages of the total income generated by these Total Return Swaps as further specified in the relevant Sub-Fund Specific Information. Such fees may be calculated as a percentage of gross revenues earned by the Sub-Fund through the use of such techniques. The remaining income will accrue to the relevant Sub-Fund. Information on direct and indirect operational costs and fees incurred in this respect, the identity of the entities to which such costs and fees are paid as well as any relationship they may have with the Management Company or the relevant Investment Manager or the Depositary (if any) will be available in the annual report of the Fund.

Any variation margin in connection with the Sub-Fund entering into Total Return Swaps is valued and exchanged daily, subject to the terms of the relevant derivatives contract.

The counterparties to such transactions must be subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by European Union law and specialised in this type of transaction.

Details of the selection criteria and a list of approved counterparties is available at the registered office of the Management Company.

The counterparty to the transaction will be a counterparty approved and monitored by the Management Company or the relevant Investment Manager. At no time will a counterparty to a transaction have discretion over the composition or the management of the Sub-Fund's investment portfolio or over the underlying of the Total Return Swap.

The risk of counterparty default and the effect on investor's returns are described in the section Risk Factors

Further information with respect to investments in Total Return Swaps, can be found in the Sub-Fund Specific Information.

### **3.7.3 Management of collateral and collateral policy**

#### (i) General

In the context of OTC financial derivative instruments (in particular Total Return Swaps) and efficient portfolio management techniques, each Sub-Fund concerned may receive collateral with a view to reducing counterparty risk. All assets received by a Sub-Fund in the context of efficient portfolio management techniques shall be considered as collateral for the purposes of this section. This section sets out the general principles of the collateral policy applied by the Fund in such case. Further information can be found in Appendix 4 Collateral and Haircut Policy and in the relevant Sub-Fund Specific Information.

#### (ii) Eligible collateral

Collateral received by the relevant Sub-Fund may be used to reduce its counterparty risk exposure if it complies with the criteria set out in the Regulations notably in terms of liquidity, valuation, issuer credit quality, correlation, risks linked to the management of collateral and enforceability. In particular, collateral should comply with the following conditions:

(a) Any collateral received other than cash should be of high quality, highly liquid and traded on a Regulated Market or multilateral trading facility with transparent pricing in order that it can be sold quickly at a price that is close to pre-sale valuation;

(b) It should be valued on at least a daily basis and assets that exhibit high price volatility should not be accepted as collateral unless suitably conservative haircuts are in place;

(c) It should be issued by an entity that is independent from the counterparty and is expected not to display a high correlation with the performance of the counterparty;

(d) It should be sufficiently diversified in terms of country, markets and issuers with a maximum exposure of 20% of the concerned Sub-Fund's Net Asset Value to any single issuer on an aggregate basis, taking into account all collateral received. By way of derogation, a Sub-Fund may be fully collateralised in different Transferable Securities and Money Market Instruments issued or guaranteed by a Member State, one or more of its local authorities, or a public international body to which one or more Member States belong. In such event, the relevant Sub-Fund should receive securities from at least six different issues, but securities from any single issue should not account for more than 30% of the concerned Sub-Fund's Net Asset Value;

(e) It should be capable of being fully enforced by the relevant Sub-Fund at any time without reference to or approval from the counterparty;

(f) Where there is a title transfer, the collateral received will be held by the Depositary. For other types of collateral arrangement, the collateral will be held by a third-party depositary which is subject to prudential supervision, and which is unrelated to the provider of the collateral.

Subject to the above-mentioned conditions, collateral received by the Sub-Funds may consist of:

(a) Cash and cash equivalents, including short-term bank certificates and Money Market Instruments;

(b) Bonds issued or guaranteed by a member state of the OECD or by their local public authorities or by supranational institutions and undertakings with European Union, regional or worldwide scope;

(c) Shares or units issued by money market UCIs calculating a daily Net Asset Value and being assigned a rating of AAA or its equivalent;

(d) Shares or units issued by UCITS investing mainly in bonds/shares mentioned in (e) and (f) below;

(e) Bonds issued or guaranteed by first class issuers offering adequate liquidity;

(f) Shares admitted to or dealt in on a Regulated Market of a member state or on a stock exchange of a member state of the OECD, on the condition that these shares are included in a main index.

Cash collateral received shall only be:

(a) placed on deposit with entities prescribed in the 2010 Law;

(b) invested in high-quality government bonds;

(c) used for the purpose of reverse repurchase transactions provided the transactions are with credit institutions subject to prudential supervision and the Sub-Fund is able to recall at any time the full amount of cash on accrued basis;

(d) invested in short-term money market funds as defined in the CESR Guidelines on a Common Definition of European Money Market Funds (Ref. CESR/10-049).

(iii) Level of collateral

With respect to securities lending transactions, the relevant Sub-Fund will generally require the borrower to post collateral representing, at any time during the lifetime of the agreement, at least 100% of the total value of the securities lent. Repurchase agreement and reverse repurchase agreements will generally be collateralised, at any time during the lifetime of the agreement, at a minimum of 100% of their notional amount.

(iv) Collateral valuation and haircut policy

Collateral will be valued, on a daily basis, using available market prices and taking into account appropriate discounts which will be determined based on the haircut policy. The haircut 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 by the Fund under normal and exceptional liquidity conditions. No haircut will generally be applied to cash collateral.

The value of collateral will correspond to the market value of the relevant securities reduced by at least the applicable haircut percentage.

Further information with respect to the eligible assets that can be received by the Sub-Funds as collateral along with the applicable haircut percentages can be found in the relevant Sub-Fund Specific Information.

(v) Re-investment policy

The Investment Manager will determine for each Sub-Fund the required level of collateral for OTC financial derivative instruments and efficient portfolio management techniques by reference to the applicable counterparty risk limits set out in the section Risk Factors of this Prospectus and taking into account the nature and characteristics of transactions, the creditworthiness and identity of counterparties and prevailing market conditions.

Cash collateral received by a Sub-Fund in relation to any of these transactions may be reinvested in a manner consistent with the investment objectives of such Sub-Fund in:

(a) shares or units issued by short-term money market undertakings for collective investment as defined in the CESR Guidelines on a Common Definition of European Money Market Funds (Ref. CESR/10-049),

(b) short-term bank deposits,

(c) high-quality government bonds issued or guaranteed by a Member State, Switzerland, Canada, Japan or the United States or by their local authorities or by supranational institutions and undertakings with European Union, regional or world-wide scope, and

(d) reverse repurchase agreement transactions according to the provisions described under section XII Article 43. J) of ESMA Guidelines on ETFs and other UCITS issues released by the CSSF under CSSF Circular 14/592. Such reinvestment will be taken into account for the calculation of each concerned Sub-Fund's global exposure, in particular if it creates a leverage effect.

Re-invested cash collateral should be diversified in accordance with the diversification requirements applicable to non-cash collateral.

Following reinvestment of collateral received in cash, all risks associated with a normal investment will apply.

Non-cash collateral received by the Fund may not be sold or pledged.

D. Additional information

The following information will be disclosed in the Fund's annual report:

- (a) the exposure of each Sub-Fund obtained through techniques for efficient portfolio management and Total Return Swaps;
- (b) the identity of the counterparties for these techniques for efficient portfolio management and Total Return Swaps;
- (c) the link of these counterparties with the Management Company, the relevant Investment Manager or the Depositary;
- (d) the type and extent of guarantees received by the Sub-Funds to decrease exposure to counterparty risk;
- (e) the revenues deriving from techniques for efficient portfolio and Total Return Swaps for the whole period, with the direct and indirect operational costs and fees borne;
- (f) the identity of the entities to which such costs and fees are paid; and
- (g) any other information required by SFTR.

## 4. Risk Management Systems and Risk Factors

### 4.1 Permanent risk management function

In accordance with CSSF Regulation 10-04, the Management Company shall establish and maintain a permanent risk management function. This permanent risk management function shall be hierarchically and functionally independent from operating units.

The Management Company shall be able to demonstrate that appropriate safeguards against conflicts of interest have been adopted so as to allow an independent performance of risk management activities, and that its risk management process satisfies the requirements of Article 42 of the 2010 Law.

The permanent risk management function shall:

- Implement the risk management policy and procedures;

- Ensure compliance with the Fund's risk limit system concerning global exposure and counterparty risk in accordance with articles 46, 47 and 48 of CSSF Regulation 10-4;
- Provide advice to the Board of Directors as regards the identification of the risk profile of the Fund / Sub-Fund;
- Provide regular reports to the Board of Directors and, where it exists, the supervisory function, on:
  - o the consistency between the current levels of risk incurred by the Fund and its risk profile,
  - o the compliance of the Fund with relevant risk limit systems,
  - o the adequacy and effectiveness of the risk management process, indicating in particular whether appropriate remedial measures have been taken in the event of any deficiencies;
- Provide regular reports to the senior management outlining the current level of risk incurred by the Fund and any actual or foreseeable breaches of their limits, so as to ensure that prompt and appropriate action can be taken;
- Review and support, where appropriate, the arrangements and procedures for the valuation of OTC financial derivatives as referred to in Article 49 of CSSF Regulation 10-4.

The permanent risk management function shall have the necessary authority and access to all relevant information necessary to fulfil the tasks set out above.

### 4.2 Concept of Risk Profile

Article 13(3)(c) of CSSF Regulation 10-4 requires the permanent risk management function of Management Companies to provide advice to the board of directors as regards the definition of the risk profile of each managed UCITS. Circular CSSF 11/512 specifies that the Management Company must define, for each managed UCITS, a risk profile resulting from a process of risk identification, which considers all risks that may be material for the managed UCITS. This risk profile must then be approved by the board of directors of the Management Company before launching the UCITS.

In accordance with Article 45(2)(d) of CSSF Regulation N° 10-4, the Management Company must also establish, implement and maintain a documented system of internal limits concerning the measures used to manage and control the relevant risks to which the Fund is exposed, considering all risks which may be material to the Fund as referred to in Article 43 of said regulation and ensuring consistency with the Fund risk profile.

The risk profile must be updated in the context of a decision of the Board of Directors, whenever it is impacted by a material modification.

### 4.3 Risk Management Policy

In accordance with the 2010 Law and CSSF Regulation 10-4 transposing Commission Directive 2010/43/EU of 1 July 2010 implementing Directive 2009/65/EC as regards risk management, the Management Company must employ a risk management policy, which enables it to monitor and measure at any time the risk of the positions in the Funds' portfolios and their contribution to the overall risk profile of these portfolios.

The Management Company has accordingly implemented a risk management policy, which will be followed in relation to the Fund. The risk management policy enables the Management Company to assess the exposure of the Funds to market, liquidity and counterparty risks, and to all other risks, including operational risks and sustainability risks, which are material for each Fund. The directors of the Management Company will review such risk management policy at least annually.

The Fund deploys a risk management policy, which enables it to monitor and measure at any time the risk of the positions and their contribution to the overall risk profile of each individual Sub-Fund. Furthermore, the Fund deploys a process for accurate and independent assessment of the value of OTC financial derivative instruments, which is communicated to the CSSF on a regular basis in accordance with Luxembourg Law.

Upon request of investors, the Management Company can provide supplementary information relating to the risk management policy.

### 4.4 Global Exposure Approach

The Management Company will deploy a risk-management policy, which enables them to monitor and measure at any time the risk of the positions and their contribution to the overall risk profile of each Sub-Fund. The Management Company will deploy if applicable, a process for accurate and independent assessment of the value of any OTC financial derivative instruments.

There are three possible risk measurement approaches, as described below. The Management Company chooses which approach each Sub-Fund will use as specified in the relevant Sub-Fund Specific Information, based on the Sub-Fund's investment strategy. Where a Sub-Fund's use of derivatives is mostly for hedging and efficient portfolio management purposes, the commitment method is usually used. Where a Sub-Fund may use derivatives extensively, absolute VaR is usually used, unless the Sub-Fund is managed with respect to a benchmark, in which case relative VaR is usually used.

The Board of Directors can require a Sub-Fund to use an additional approach (for reference only, however, not for purposes of determining compliance), and can change the approach if it believes the current method no longer adequately expresses the Sub-Fund's overall market exposure.

Approach	Description
Absolute Value-at-Risk (Absolute VaR)	The Sub-Fund seeks to estimate the maximum loss it could experience in a month (meaning 20 trading days), and requires that 99% of the time, the Sub-Fund's worst outcome is not worse than a 20% decline in Net Asset Value.

Relative Value-at-Risk (Relative VaR)	The Sub-Fund seeks to estimate the maximum loss it could experience beyond the estimated maximum loss of a benchmark (typically an appropriate market index or combination of indices). The Sub-Fund calculates the amount that, with 99% certainty, is the limit for how much the Sub-Fund could underperform the benchmark over a month (20 trading days). The VaR of the Sub-Fund may not exceed twice that of the benchmark.	Commitment	The Sub-Fund calculates all derivatives exposures as if they were direct investments in the underlying positions. This allows the Sub-Fund to include the effects of any hedging or offsetting positions as well as positions taken for efficient portfolio management. A Sub-Fund using this approach must ensure that its overall market exposure does not exceed 210% of total assets (100% from direct investment, 100% from derivatives and 10% from borrowings).
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#### 4.5 Concept of Leverage

The expected level of leverage per Sub-Fund for which a VaR risk measurement approach is used and which is calculated by using the "Sum of Notionals" of the derivatives used as well as the commitment approach calculation used for the Sub-Fund's global risk exposure is set out in Sub-Fund Specific Information. The "Sum of Notionals" calculation shows the total sum of the principal values of all derivatives used by the Sub-Fund not taking into account any netting of derivative positions, whereas the commitment calculation converts each financial derivative instrument position into the market value of an equivalent position in the underlying asset of that financial derivative instrument.

Investors should note that the expected level of leverage is an estimate only and there is possibility of higher leverage levels in certain circumstances, e.g. where a Sub-Fund's Investment Manager may make more extensive use of financial derivative instruments for investment purposes (within the limits of each Sub-Fund's investment objective) as opposed to a more limited use for hedging purposes.

An expected level of leverage does not necessarily represent an increase of risk in the Sub-Fund as some of the derivative instruments used may even reduce the risk. Shareholders should note that the "Sum of Notionals" calculation method of the expected level of leverage does not make a distinction as to the intended use of a derivative e.g. being either hedging or investment purposes.

The "Sum of Notionals" calculation typically results in a higher leverage figure than for the commitment approach calculation predominantly due to the exclusion of any netting and/or hedging arrangements.

This may be varied within applicable limits if considered to be in the best interests of the Sub-Fund.

Where the Fund or a Sub-Fund is authorised by the Securities and Futures Commission (SFC) in Hong Kong, it will be required to disclose its maximum expected net derivative exposure (NDE) as calculated in accordance with the requirements under the SFC's Code on Unit Trusts and Mutual Funds and the requirements and guidance issued by the SFC from time to time.



Investors' attention is drawn to the fact that such methodology is different to the risk measurement approaches described herein and that as a consequence, in some instances, this could result in a Sub-Fund having a more restrictive use of financial derivative instruments than what it is allowed on the basis on the limits outlined above. However, the maximum expected exposure is not expected to impact the achievement of the investment objectives of the relevant Sub-Funds.

Upon request, the Management Company can provide further information about each Sub-Fund's risk measurement approach, including how this approach was chosen, the related quantitative limits and the recent state and behaviour of the risks and returns of the main categories of instruments.

## 4.6 Risk Factors

All investments involve risks and the risks involved when investing in a Sub-Fund may vary depending on the investment policy and strategies of the Sub-Fund.

Every Sub-Fund is facing general risk factors along with specific risk factors. The general risk factors applying to all the Sub-Funds are described below whilst the specific risk factors which are relevant to each Sub-Fund are specified in the synoptical table in Appendix 5 Sub-Funds Specific Risk Factors and in the Sub-Fund Specific Information. All the specific risk factors listed in the synoptical table in Appendix 5 Sub-Funds Specific Risk Factors are described below.

The risk information in this Prospectus is intended to give an overview of the main and material risks associated with each Sub-Fund.

Any of these risks could cause a Sub-Fund to lose money, to perform less well than similar investments, to experience high volatility (ups and downs in NAV), or to fail to meet its objective over any period of time.

Investors should also carefully consider all of the information set out in this section as well as the information provided in Appendix 5 Sub-Funds Specific Risk Factors and in the relevant Sub-Fund Specific Information before making an investment decision in any Sub-Fund. This section does not purport to be a complete explanation of all risks involved in an investment in any Sub-Fund or Class and other risks may also be or become relevant from time to time.

### 4.6.1 General Risk Factors

- **Management risk**

The Sub-Fund's management team may be wrong in its analysis, assumptions, or projections. This includes projections concerning industry, market, economic, demographic, or other trends.

- **Market risk**

Market risk is understood as the risk of loss for a Sub-Fund resulting from fluctuation in the market value of positions in its portfolio attributable to changes in market variables, such as general economic conditions, interest rates, foreign exchange rates, or the creditworthiness of the issuer of a financial instrument.

This is a general risk that applies to all investments, meaning that the value of a particular investment may go down as well as up in response to changes in market variables. Although it is intended that each Sub-Fund will be diversified with a view to reducing market risk, the investments of a Sub-Fund will remain subject to fluctuations in market variables and the risks inherent in investing in financial markets.

- **Concentration risk**

To the extent that the Sub-Fund invests a large portion of its assets in a limited number of industries, sectors, or issuers, or within a limited geographical area, it can be more risky than a fund that invests more broadly. When a Sub-Fund invests a large portion of its assets in a particular issuer, industry, type of bond, country or region, or in a series of closely interconnected economies, its performance will be more strongly affected by any business, economic, financial, market or political conditions affecting the area of concentration. This can mean both higher volatility and a greater risk of loss.

- **Volatility risk**

The risk of uncertainty of price changes. Usually, the higher the volatility of an asset or instrument, the higher its risk. The prices for Transferable Securities in which the Sub-Funds invest may change significantly in short-term periods.

- **Liquidity risk**

Liquidity risk exists when a particular instrument is difficult to purchase or sell. On the asset side, liquidity risk refers to the inability of a Sub-Fund to dispose of investments at a price equal or close to their estimated value within a reasonable period of time. On the liability side, liquidity risk refers to the inability of a Sub-Fund to raise sufficient cash to meet a redemption request due to its inability to dispose of investments.

In principle, each Sub-Fund will only make investments for which a liquid market exists or which can otherwise be sold, liquidated or closed at any time within a reasonable period of time. However, in certain circumstances, investments may become less liquid or illiquid due to a variety of factors including adverse conditions affecting a particular issuer, counterparty, or the market generally, and legal, regulatory or contractual restrictions on the sale of certain instruments.

In the case of financial derivative transactions, if a financial derivative transaction is particularly large or if the relevant market is illiquid, it may not be possible to initiate a transaction or liquidate a position at an advantageous price (however, a Sub-Fund will only enter into OTC financial derivative instruments if it is allowed to liquidate such transactions at any time at fair value). Difficulties in disposing of investments may result in a loss for a Sub-Fund and/or compromise the ability of the Sub-Fund to meet a redemption request.

- **Currency risk**

The risk, which arises from potential movements of currency exchange rates. It is the risk which arises from the holding of assets denominated in currencies different from the Sub-Fund's base currency. It may be affected by changes in currency exchange rates between the base currency and these other currencies or by changes in regulations controlling these currency exchange rates. It must therefore be expected that currency exchange risks cannot always be hedged and the volatility of currency exchange rates to which the Sub-Fund is exposed may affect the NAV of the Sub-Fund.

- **Settlement risk**

The risk of loss resulting from a counterparty's failure to deliver the terms of a contract at the time of settlement. The acquisition and transfer of holdings in certain investments may involve considerable delays and transactions may need to be carried out at unfavourable prices as clearing, settlement and registration systems may not be well organised in some markets.

- **Interest rate risk**

The risk, which arises from potential movements in the level and volatility of yields. The value of investments in bonds and other debt securities or derivative instruments may rise or fall sharply as interest rates fluctuate. As a general rule, the value of fixed-rate instruments will increase when interest rates fall and vice-versa. In some instances, prepayments (i.e. early unscheduled return of principal) can introduce reinvestment risk as proceeds may be reinvested at lower rates of return and impact the performance of the Sub-Funds.

- **Negative credit interest risk**

The Investment Managers place liquid assets of the Sub-Funds with the Depositary or other credit institutions for the account of the Sub-Funds. An interest rate is often agreed for these deposits, which correspond to the customary market interest rate such as the European Interbank Offered Rate ("Euribor"), less a certain margin. If the market interest rate falls below the agreed margin, this leads to negative interest rates on the corresponding account.

Depending on the development of the interest rate policy of the European Central Bank or another central bank, short, medium and long-term bank credit may generate a negative interest rate. Investments of liquid assets based on an interest rate other than the market interest rate and investments of liquid assets in a foreign currency taking into account the key rates of foreign central banks may therefore also lead to a negative return.

- **Hedging risk**

Any attempts to hedge (reduce or eliminate certain risks) may not work as intended, and to the extent that they do work, they will generally eliminate potentials for gain along with risks of loss. Any measures that the Sub-Funds take that are designed to offset specific risks may work imperfectly, may not be feasible at times, or may fail completely.

To the extent that no hedge exists, the Sub-Funds or Share Classes will be exposed to all risks that the hedge would have protected against. The Sub-Funds may use hedging within their portfolios. With respect to any designated Share Classes, the Sub-Funds may hedge the currency exposure of the Class (relative to the Sub-Fund's base currency or relative to the currency exposure(s) of the relevant Sub-Fund portfolio) which, being imperfect, not only might not eliminate all currency exposure but might even create new additional currency exposure. Hedging involves costs, which reduce investment performance.

- **Custody risk**

The assets of the Fund and its Sub-Funds shall be held in custody by the Depositary and its sub-depositary(ies) and/or any other depositaries and/or broker-dealers appointed by the Fund.

Investors are hereby informed, that cash and fiduciary deposits may not be treated as segregated assets and might therefore not be segregated from the relevant Depositary, sub-depositary(ies), other depositary/third-party bank and/or broker dealer's own assets in the event of the insolvency, or the opening of bankruptcy, moratorium, liquidation or reorganisation proceedings of the Depositary, sub-depositary(ies), other depositary / third-party bank or the broker dealer as the case may be.

Subject to specific depositor's preferential rights in bankruptcy proceedings set forth by regulation in the jurisdiction of the relevant Depositary, sub-depositary(ies), other depositary / third-party bank, or the broker dealer, the Fund's claim might not be privileged and may only rank *pari passu* with all other unsecured creditors' claims. The Fund and/or its Sub-Funds might not be able to recover all of their assets in full.

- **Country and transfer risk**

Should economic or political instability affect countries in which the respective Sub-Funds invest, this could mean, that the Sub-Funds will not receive all or some of the money owed to them despite the issuer of the respective security being able to pay. Key factors in this regard include limits being imposed on foreign currencies or transfers, or other legal changes.

- **Operational risk**

The operations of the Fund (including investment management) are carried out by the service providers mentioned in this Prospectus. In the event of bankruptcy or insolvency of a service provider, investors may experience delays (for example, delays in the processing of subscriptions, conversions and redemption of shares) or other disruptions.

- **Legal risk**

The Fund may be subject to a number of legal and regulatory risks, including contradictory interpretations or applications of laws, incomplete, unclear and changing laws, restrictions on general public access to regulations, practices and customs, ignorance or breaches of laws on the part of counterparties and other market participants, lack of established or effective avenues for legal redress, inadequate investor protection, or lack of enforcement of existing laws. Difficulties in asserting, protecting and enforcing rights may have a material adverse effect on the Sub-Funds and their operations.

In case of financial derivative transactions, there is also a risk that financial derivative transactions may be terminated, for example because of bankruptcy, irregularity or changes in tax or accounting laws. In such circumstances, the Fund may be required to cover all losses incurred.

In addition, certain transactions are concluded on the basis of complex legal documents. These documents may be difficult to enforce or may be subject to dispute as to their interpretation in certain circumstances. Although the rights and obligations of the parties to a legal document may, for example, be governed by Luxembourg law, in certain circumstances (such as insolvency proceedings), other legal systems may apply as a priority, and this can affect the enforceability of existing transactions.

- **Valuation/price risks**

Valuation risk is that risk originating from the incorrect valuation of assets. The assessment procedures described under Section Determination of Net Asset Value include the risk of price discrepancies. For unlisted or infrequently traded securities, there is also a risk that arises from the frequency of valuation. It is possible that an outdated price no longer reflects the latest market information ("Stale Price").

A risk management strategy or a determination of fair value is based on the assumptions of a particular model. It is uncertain whether the underlying model reliably reflects reality – if not, risks would not be detected, or would only be incompletely detected, or the fair value calculation would not yield the correct value.

- **Leverage risk**

Leverage resulting from an extensive use of financial derivatives instruments may increase the volatility of the Sub-Fund's Net Asset Value and may amplify losses, which could become significant and potentially cause a total loss of the Net Asset Value in extreme market conditions. The Sub-Fund's net exposure above the Sub-Fund net asset value makes its share price more volatile.

- **Default risk**

The issuers of certain bonds could become unable to make payments on their bonds.

- **Counterparty risk**

Counterparty risk refers to the risk of loss for a Sub-Fund resulting from the fact that the counterparty to a transaction entered into by the Sub-Fund may default on its contractual obligations. There can be no assurance that an issuer or counterparty will not be subject to credit or other difficulties leading to a default on its contractual obligations and the loss of all or part of the amounts due to the Sub-Fund.

This risk may arise at any time the assets of a Sub-Fund are deposited, extended, committed, invested or otherwise exposed through actual or implied contractual agreements. For instance, counterparty risk may arise, when a Sub-Fund has deposited cash with a financial institution, or invests into debt securities and other fixed income instruments.

The Fund on behalf of a Sub-Fund may enter into transactions in OTC markets, which will expose the Sub-Fund to counterparty risk.

For example, the Fund on behalf of the Sub-Fund may enter into repurchase agreements, forward contracts, options and swap arrangements or other derivative techniques, each of which expose the Sub-Fund to counterparty risk. In the event of a bankruptcy or insolvency of a counterparty, the concerned Sub-Fund could experience delays in liquidating the position and significant losses, including declines in the value of its investment during the period in which the Fund seeks to enforce its rights, inability to realise any gains on its investment during such period and fees and expenses incurred in enforcing its rights.

There is also a possibility that the above agreements and derivative techniques are terminated due, for instance, to bankruptcy, supervening illegality or change in the tax or accounting laws relative to those at the time the agreement was originated. In such circumstances, investors may be unable to cover any losses incurred. Financial derivative transactions such as swap contracts entered into by the Fund on behalf of a Sub-Fund involve credit risk that could result in a loss of the Sub-Fund's entire investment as the Sub-Fund may be fully exposed to the creditworthiness of a single approved counterparty where such an exposure will be collateralised.

- **Collateral risk**

Despite collateral can be taken to mitigate the risk of counterparty default, there is a risk that collateral taken, particularly in the case of securities, when realised, may not generate sufficient liquidity to settle the debts of the counterparty. This may be due to factors such as improper pricing of collateral, weaknesses in the valuation of collateral on a regular basis, adverse market movements in the collateral value, deterioration of the credit rating of the collateral issuer or the illiquidity of the market in which the collateral is negotiated.

Where a Sub-Fund is in turn required to post collateral with a counterparty, there is a risk that the value of the collateral that the Sub-Fund places with the counterparty is higher than the cash or investments received by the Sub-Fund.

In both cases, where there are delays or difficulties in recovering assets or liquid assets, collateral provided to counterparties or received from counterparties, the Sub-Fund may encounter difficulties in responding to purchase or redemption applications or in meeting delivery or purchase obligations under other contracts.

A Sub-Fund may reinvest the cash collateral it receives, it is possible that the value of the return of the reinvested cash collateral will not be sufficient to cover the amount to be repaid to the counterparty. In this circumstance, the Sub-Fund would be required to cover the loss of profit.

As collateral will take the form of cash or certain financial instruments, market risk is also relevant.

Collateral received by a Sub-Fund may be held either by the Depository or by a third-party depository. In either case there, there is a risk of loss as a result of events such as the insolvency or negligence of the Depository or the sub-depository.

- **Credit risk**

The risk of loss resulting from a borrower's failure to meet financial contractual obligations, for instance timely payment of interest or principal. Depending on contractual agreements, various credit events may qualify as default, which include but are not limited to bankruptcy, insolvency, court-ordered reorganisation/liquidation, rescheduling of debts or non-payment of debts payable. The value of assets or derivative contracts may be highly sensitive to the perceived credit quality of the issuer or reference entity. Credit events may adversely affect the value of investments, as the amount, nature and timing of recovery may be uncertain.

- **Credit rating risk**

The risk that a credit rating agency may downgrade an issuer's credit rating. Investment restrictions may rely on credit rating thresholds and thus have an impact on securities selection and asset allocation. The Investment Managers may be forced to sell securities at an unfavourable time or price. Credit rating agencies may fail to correctly assess the creditworthiness of issuers.

- **Epidemics and Pandemics risks**

Certain countries have been susceptible to epidemics, which may be designated as pandemics by world health authorities (e.g. "COVID-19").

The outbreak of such epidemics, together with any resulting restrictions on travel or quarantines imposed, has had and will continue to have a negative impact on the economy and business activity globally (including in the countries in which the Sub-Funds invest), and therefore can be expected to adversely affect the performance of the Sub-Funds' investments and the ability of the Sub-Funds to achieve their respective investment objective.

Furthermore, the rapid development of epidemics or pandemics could preclude prediction as to the ultimate adverse impact on economic and market conditions, and, as a result, presents material uncertainty and risk with respect to the Sub-Funds and the performance of their respective investments or operations.

#### 4.6.2 Specific Risk Factors

- **High yield risk**

The high yield debt securities involve special considerations and risks, including the risks associated with international investing generally, such as currency fluctuations, the risks of investing in countries with smaller capital markets, limited liquidity, price volatility and restrictions on foreign investment. Investment in high yield debt securities is subject to risks of interest rate,

- **Prepayment and extension risk**

Any unexpected behaviour in interest rates could hurt the performance of callable debt securities (securities whose issuers have the right to pay off the security principal before the maturity date). When interest rates fall, issuers tend to pay off these securities and re-issue new ones at lower interest rates. When this happens, the Sub-Fund may have no alternative but to reinvest the money from these prepaid securities at a lower rate of interest ("prepayment risk"). At the same time, when interest rates rise, borrowers tend not to prepay their low-interest mortgages. This may lead the Sub-Fund to receiving below-market yields until interest rates fall or the securities mature ("extension risk"). It can also mean that the Sub-Fund must either sell the securities at a loss or forgo the opportunity to make other investments that may turn out to have performed better.

The prices and yields of callable securities typically reflect the assumption that they will be paid off at a certain point before maturity. If this prepayment happens when expected, the Sub-Fund generally will not suffer any adverse effects. However, if it happens substantially earlier or later than expected, it can mean that the Sub-Fund effectively overpaid for the securities. Other factors as well can affect when or if an individual security is prepaid, including the presence or absence of any optional redemption and mandatory prepayment features, the default rate of the underlying assets and the nature of any turnover in the underlying assets.

Prepayment and extension considerations can also affect the Sub-Fund's duration, increasing or decreasing sensitivity to interest rates in undesired ways. In some circumstances, the failure of rates to rise or fall when anticipated could cause prepayment or extension risks as well.

- **Distressed and defaulted debt securities risk**

Bonds from issuers in distress are often defined as those (i) that have been given a very speculative long-term rating by credit rating agencies or those (ii) that have filed for bankruptcy or expected to file for bankruptcy.

In some cases, the recovery of investments in distressed or defaulted debt securities is subject to uncertainty related to court orderings and corporate reorganisations among other things. Companies, which issued the debt that has defaulted may also be liquidated. In that context, the fund may receive, over a period of time, proceeds of the liquidation. The received amounts may be subject to a case-by-case specific tax treatment. The tax may be reclaimed by the authority independently from the proceed paid to the Fund. The valuation of distressed and defaulted securities may be more difficult than other higher rated securities because of lack of liquidity. The Sub-Fund may incur legal expenses when trying to recover principal or interest payments. Investment in this kind of securities may lead to unrealised capital losses and/or losses that can negatively affect the Net Asset Value of the Sub-Fund.

- **Risk in relation to Equity**

Equities can lose value rapidly and can remain at low prices indefinitely and typically involve higher risks than bonds or Money Market Instruments. Equities of rapidly grown companies can be highly sensitive to bad news, because much of their value is based on high expectations for the future. Equities of companies that appear to be priced below their value may continue to be undervalued. If a company goes through bankruptcy or a similar financial restructuring, its equities may lose most or all of their value.

- **Commodity-Related Investments**

Commodity values can be highly volatile, in part because they can be affected by many factors, such as changes in interest rates, changes in supply and demand, extreme weather, agricultural diseases, trade policies and political and regulatory developments.

- **Real estate investments risk**

Real estate and related investments can be hurt by any factor that makes an area or individual property less valuable. Specifically, investments in real estate holdings or related businesses or securities (including interests in mortgages) can be hurt by natural disasters, economic declines, overbuilding, zoning changes, tax increases, population or lifestyle trends, environmental contamination, defaults on mortgages, failures of management, and other factors that may affect the market value or cash flow of the investment.

- **Multi-Asset**

Multi-asset Sub-Funds invest in multiple asset classes (including cash and cash equivalents) and can generally vary their exposure to each of them. As well as being subject to the risks inherent in those individual asset classes to a degree that depends on the exposure over time, the overall risk also depends on the correlation of returns between each asset class and hence could be adversely affected by a change in those correlations which could result in higher volatility and/or lower diversification.

Where provided for in the relevant investment objective of a Sub-Fund, for investments within multi asset funds, the risk assessment process takes into account both the environmental, social and governance credentials of the provider and, where possible, by performing analysis on the underlying fund holdings which provide an understanding of the Sustainability Risk exposures.

A wide range of Sustainability Risks applies to companies within equity markets and corporate bond issuers which multi asset funds invest in. Failure to effectively manage these risks can lead to a deterioration in financial outcomes as well as a negative impact on society and the environment.

Environmental risks include, but are not limited to; the ability of companies to mitigate and adapt to climate change and the potential for higher carbon prices, exposure to increasing water scarcity and potential for higher water prices, waste management challenges, and impact on global and local ecosystems.

Social risks include, but are not limited to; product safety, supply chain management and labour standards, health and safety and human rights, employee welfare, data & privacy concerns and increasing technological regulation.

Governance risks include board composition and effectiveness, management incentives, management quality and alignment of management with shareholders.

Multi asset Sub-Funds can invest across a broad range of geographies and asset classes. Where a Sub-Fund has exposure to emerging markets governance risks can be more pronounced. The equity exposure can include exposure to smaller companies where lower levels of disclosure can entail governance risks. Sovereign fixed income exposure can be affected by governance factors such as the political climate, the regulatory regime and rule of law. Multi Asset Sub-Funds can invest in third-party strategies which exposes them to governance risks as the underlying investment decisions are delegated to third-party managers.

Alternative asset classes such as infrastructure can expose investors to liquidity and transparency risks. Infrastructure shares similar risk characteristics to real estate assets. Infrastructure exposure through public private partnerships can expose these assets to political risk and regulatory changes.

- **Risks in relation to Emerging Markets**

Emerging markets are less established than developed markets and therefore involve higher risks, particularly market, liquidity, currency risks and interest rate risks, and the risk of higher volatility.

Reasons for this higher risk include:

- political, economic, or social instability;

- fiscal mismanagement or inflationary policies;
- unfavourable changes in regulations and laws and uncertainty about their interpretation;
- failure to enforce laws or regulations, or to recognise the rights of investors as understood in developed markets;
- excessive fees, trading costs or taxation, or outright seizure of assets;
- rules or practices that place outside investors at a disadvantage;
- incomplete, misleading, or inaccurate information about securities issuers;
- lack of uniform accounting, auditing and financial reporting standards;
- manipulation of market prices by large investors;
- arbitrary delays and market closures;
- fraud, corruption and error.

Emerging markets countries may restrict securities ownership by outsiders or may have less regulated custody practices, leaving the Sub-Fund more vulnerable to losses and less able to pursue recourse.

In countries where, either because of regulations or for efficiency, the Sub-Fund uses depository receipts (tradable certificates issued by the actual owner of the underlying securities), P-notes or similar instruments to gain investment exposure, the Sub-Fund takes on risks that are not present with direct investment. These instruments involve counterparty risk (since they depend on the creditworthiness of the issuer) and liquidity risk, may trade at prices that are below the value of their underlying securities, and may fail to pass along to the Sub-Fund some of the rights (such as voting rights) it would have if it owned the underlying securities directly.

To the extent that emerging markets are in different time zones from Luxembourg, the Sub-Fund might not be able to react in a timely fashion to price movements that occur during hours when the Sub-Fund is not open for business.

For purposes of risk, the category of emerging markets includes markets that are less developed, such as most countries in Asia, Africa, South America and Eastern Europe, as well as countries that have successful economies but may not offer the same level of investor protection as exists in, for example, Western Europe, the US and Japan.

- **Eurozone Risk**

The performance of certain Sub-Funds will be closely tied to the economic, political, regulatory, geopolitical, market, currency or other conditions in the Eurozone and could be more volatile than the performance of more geographically diversified funds. In light of the ongoing concerns on the sovereign debt risk of certain countries within the Eurozone, the relevant Sub-Funds' investments in the region may be subject to higher volatility, liquidity, currency and default risks. Any adverse events, such as the credit downgrade of a sovereign or the exit of Eurozone members from the Eurozone, may have a negative impact on the value of the relevant Sub-Funds.

- **Small and mid-cap equity risk**

Equities of small and mid-size companies can be more volatile than equities of larger companies. Small and mid-size companies often have fewer financial resources, shorter operating histories, and less diverse business lines, and as a result can be at greater risk of bankruptcy or other long-term or permanent business setbacks. Initial public offerings (IPOs) can be highly volatile and can be hard to evaluate because of a lack of trading history and relative lack of public information.

- **Distressed Securities**

Some of the Sub-Funds may hold securities, which are Distressed Securities or, may, in accordance with their respective investment policies, invest in Distressed Securities. Distressed Securities involve significant risk. Such investments are highly volatile and are made, when the investment manager believes, the investment will yield an attractive return based on the level of discount on price compared to perceived fair value of the security, or where there is a prospect of the issuer making a favourable exchange offer or plan of reorganisation.

There can be no assurances that an exchange offer or reorganisation will occur or that any securities or other assets received will not have a lower value or income potential than anticipated at the time of investment. In addition, a significant period may pass between the time at which the investment in Distressed Securities is made and the time that any such exchange, offer or plan of reorganisation is completed.

Distressed Securities may frequently not produce income while they are outstanding and there will be significant uncertainty as to whether fair value will be achieved or whether any exchange offer or plan of reorganisation will be completed.

There may be a requirement for a Sub-Fund bear certain expenses which are incurred to protect and recover its investment in Distressed Securities, or which arise in the course of negotiations surrounding any potential exchange or plan of reorganisation. Furthermore, constraints on investment decisions and actions with respect to Distressed Securities due to tax considerations may affect the return realised on Distressed Securities.

A Sub-Fund's investments in Distressed Securities may include issuers with substantial capital needs or negative net worth or issuers that are, have been or may become, involved in bankruptcy or reorganisation proceedings. A Sub-Fund may be required to sell its investment at a loss or hold its investment pending bankruptcy proceedings.

- **Risks in relation to Investment Funds**

As with any investment fund, investing in the Sub-Funds involves certain risks an investor would not face if investing in markets directly:

- the actions of other investors, in particular sudden large outflows of cash, could interfere with orderly management of the Sub-Fund and cause its NAV to fall;
- the investor cannot direct or influence how money is invested while it is in the Sub-Fund;
- the Sub-Fund's buying and selling of investments may not be optimal for the tax efficiency of any given investor;
- the Sub-Fund is subject to various investment laws and regulations that limit the use of certain securities and investment techniques that might improve performance; to the extent that the Sub-Fund decides to register in jurisdictions that impose narrower limits, this decision could further limit its investment activities;
- because the Sub-Fund is based in Luxembourg, any protections that would have been provided by other regulators (including, for investors outside Luxembourg, those of their home regulator) may not apply;



- to the extent that the Sub-Fund invests in other UCITS / UCIs, it may incur a second layer of investment fees, which will further erode any investment gains;
- to the extent that the Sub-Fund uses efficient portfolio management techniques, such as securities lending, securities borrowing, repurchase transactions and reverse repurchase transactions as well as TRS, and in particular if it reinvests collateral associated with these techniques, the Sub-Fund takes on counterparty, liquidity, legal, custody (e.g. absence of the assets' segregation) and operational risks, which can have an impact on the performance of the Sub-Fund concerned. To the extent that related parties (companies of the same group as the Management Company or as the Investment Manager or as the Sub-Investment Manager) may intervene as either counterparty or agent (or in any other role) in efficient portfolio management operations, and in particular in securities' lending operations, a potential conflict of interest risk may arise. The Management Company is responsible for managing any conflict that might arise and avoid that such conflicts negatively impact shareholders. All the revenues arising from repurchase transactions and securities lending transactions shall be returned to the relevant Sub-Fund following the deduction of any direct and indirect operational costs and fees. Such direct and indirect operational costs and fees, which shall not include hidden revenue, shall include fees and expenses payable to agents or counterparties at normal commercial rates;
- the Investment Manager or its designees may at times find their obligations to the Sub-Fund to be in conflict with their obligations to other investment portfolios they manage (although in such cases, all portfolios will be dealt with equitably).

- **Risks in relation to REITs**

REITs are exchange-traded entities where the underlying investments are primarily investments in real estate, which are generally less liquid than certain other asset classes such as equities, which may then be reflected in wider bid-offer spreads. Limited liquidity may affect the ability of a REIT to vary its investment portfolio or liquidate part of its assets in response to changes in economic conditions, international securities markets, foreign exchange rates, interest rates, real estate market or other conditions. Heavy cash flow dependency, borrowers' default risk, declines in the credit rating of the REIT and interest rate rises will potentially lead to a decline in the value of the investments.

A wide range of Sustainability Risks apply to listed property companies. Environmental risks include but are not limited to; potential physical damage to property resulting from extreme weather events and climate change, such as droughts, wildfires, flooding and heavy precipitations, heat/cold waves, landslides or storms, and the ability of the company to respond to regulatory and public pressure to reduce the energy and water consumption of buildings. Social risks include but are not limited to; health and safety of tenants and employees, labour standards, employee welfare, and data & privacy concerns. Governance risks include board composition and effectiveness, management quality and alignment of management with shareholders.

Failure to effectively manage these risks can lead to a deterioration in financial outcomes such as a fall in the value of real estate assets as well as negative impacts on society and the environment.

- **Securities with loss absorption features (Corporate Hybrids and Cocos) risks**

A convertible security is generally a debt obligation, preferred equity or other security that pays interest or dividends and may be converted by the holder within a specified period of time into common equity at a specified conversion price.

The value of convertible securities may rise and fall with the market value of the underlying equity or, like a debt security, vary with changes in interest rates and the credit quality of the issuer. A convertible security tends to perform more like an equity when the underlying equity price is high relative to the conversion price (because more of the security's value resides in the option to convert) and more like a debt security when the underlying equity price is low relative to the conversion price (because the option to convert is less valuable). Because its value can be influenced by many different factors, a convertible security is not as sensitive to interest rate changes as a similar non-convertible debt security, and generally has less potential for gain or loss than the underlying equity.

Hybrid Securities are those that, like convertible securities described above, combine both debt and equity characteristics. Hybrids may be issued by corporate entities (referred to as corporate hybrids) or by financial institutions (commonly referred as contingent convertible bonds or "CoCos").

Hybrid Securities are subordinated instruments that generally fall in the capital structure between equity and other subordinated debt, i.e. such securities will be the most junior securities above equity. Such securities will generally have a long maturity and may even be perpetual in nature. Coupon payments may be discretionary and as such may be cancelled by the issuer at any point, for any reason, and for any length of time. The cancellation of coupon payments may not amount to an event of default. Hybrid Securities are callable at pre-determined levels. It cannot be assumed that Hybrid Securities, including perpetual securities, will be called on the call date. The investor may not receive return of principal on a given call date or on any date.

Contingent convertible securities issued by financial institutions ("CoCos"), which became popular following the 2008-2009 financial crisis as a way of mitigating the impact of stressed market conditions, have certain additional characteristics not typical of corporate hybrids. For CoCos, conversion is tied to a pre-specified trigger event based on the capital structure of the financial institution and/or to when the regulator deems the bank to be no longer viable. The contingent convertible bond may convert to equity or, alternatively, may be purely loss absorbing and convert to nothing.

Trigger levels may differ from one issue to the next and the risk of conversion will depend on the distance of the capital ratio to the trigger level and/or the point at which the regulator deems the issuer no longer viable (i.e. the bonds are "bail-in-able" at the "point of non-viability" or PONV), making it difficult for the Investment Manager of the relevant Sub-Fund to anticipate the triggering events that would require the debt to convert into equity or be simply loss absorbing. It may also be difficult for the Investment Manager to assess how the securities will behave upon conversion.

Because conversion occurs after a specified event, conversion may occur when the share price of the underlying equity is less than when the bond was issued or purchased. Whereas traditional convertible securities are convertible at the option of the holder and the holder of such bonds will generally convert when the share price is higher than the strike price (i.e. when the issuer is doing well), CoCos tend to convert when the issuer is in crisis and needs additional equity or loss absorption in order to survive. As a result, there is greater potential for capital loss with CoCos compared to conventional convertible securities. The trigger could be activated through a material loss in capital as represented in the numerator or an increase in risk weighted assets (due to a shift to riskier assets) as measured in the denominator. Unlike for corporate hybrids, cancelled coupon payments do not generally accumulate and are instead written off. Holders of CoCos may see their coupons cancelled while the issuer continues to pay dividends on common equity, unlike the case of corporate hybrids which typically have so-called "dividend pusher/stopper clauses" which link the payment of hybrid coupons to equity dividends.

CoCos may suffer from capital structure inversion risk, since investors in such securities may suffer loss of capital when equity holders do not in the event the pre-defined trigger is breached before the regulator deems the issuer nonviable (if the regulator declares non-viability before such a breach, the normal creditor hierarchy should apply). The value of CoCos may be subject to a sudden drop in value should the trigger level be reached. A Sub-Fund may be required to accept cash or securities with a value less than its original investment or, in the event of instances where the contingent convertible bond is intended to be only loss absorbing, the Sub-Fund may lose its entire investment.

- **Catastrophe Bonds risks**

If a trigger event occurs (such as a natural disaster or financial or economic failure), the bonds may lose part or all of their value. The loss amount is defined in the terms of the bond and may be based on losses to a company or industry, modelled losses to a notional portfolio, industry indices, readings of scientific instruments or certain other parameters associated with a catastrophe rather than actual losses. The modelling used to calculate the probability of a trigger event may not be accurate or may underestimate the likelihood of the trigger event occurring which may increase the risk of loss. Catastrophe Bonds may provide for extensions of maturity which may increase volatility. Catastrophe Bonds may be rated by credit ratings agencies on the basis of how likely it is that the trigger event will occur and are typically rated below investment grade (or considered equivalent if unrated).

- **Benchmark and Sub-Fund performance risk**

Investors should note that any Sub-Fund whose objective is to outperform a given reference benchmark in adopting an active management process will, at certain points in time, achieve a return close and very similar to the relevant benchmark due to a variety of circumstances that may among others include a narrow investment universe which offers more limited opportunities in terms of securities acquisition compared to those represented in the benchmark, the chosen degree of risk exposure depending on market circumstances or environment, a wide spread portfolio investing in a large number of securities or the current liquidity conditions.

- **Hedged Share Classes risks**

The currency hedging used to minimise the effect of exchange rate fluctuations will not be perfect. Shareholders may have exposure to currencies other than the Share Class Currency and are also exposed to the risks associated with the instruments used in the hedging process. Over-hedged or under-hedged positions may arise unintentionally due to factors outside the control of the Management Company, however, over-hedged positions will not exceed 105% of the NAV of the currency hedged Share Class and under-hedged positions will not fall below 95% of the NAV of the currency hedged Share Class. The hedged positions will be kept under review to ensure that under-hedged positions do not fall below the level set out above and are not carried forward from month to month and that over-hedged positions materially in excess of 100% will not be carried forward from month to month.

As there is no legal segregation of assets and liabilities between different Share Classes in the same Sub-Fund, there is a risk that, under certain circumstances, hedging transactions relating to hedged Share Classes could have an adverse impact on other Share Classes in the same Sub-Fund. Although spill-over risk will be mitigated, it cannot be fully eliminated, as there may be circumstances where it is not possible or practical to do so. For example, where the Sub-Fund needs to sell securities to fulfil financial obligations specifically related to a currency hedged Share Classes which may adversely affect the NAV of the other Share Classes in the Sub-Fund.

- **Risks in relation to derivatives**

Within the framework of the investment limits, the Sub-Funds may use derivatives for hedging purposes, for efficient portfolio management, to achieve additional returns, and as part of their respective investment strategy. Both derivative transactions that are authorised for trading on a stock exchange or included on another organised market, as well as Over-The-Counter (OTC) transactions may be entered into.

Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories (European Market Infrastructure Regulation, EMIR) has been in force since August 2012.

(OTC) transactions, which are entered into from 1 March 2017 (new transactions) are subject to the new EMIR collateral requirements. Only certain OTC derivatives that a) are concluded after the collateral obligation has entered into force, b) that are not processed by a central counterparty and c) are concluded between the two counterparties concerned are affected by the new EMIR collateral requirements. If an (OTC) transaction is not subject to the new EMIR collateral requirements, the parties are obligated to reach an agreement on the exchange of collateral (mutual collateralisation).

The International Swap and Derivatives Association ("ISDA") and the leading associations of German lenders organised in the Central Credit Committee (ZKA) have each written standardised documentation for this type of transaction under the umbrella of framework agreements, the ISDA Master Agreement and the German Framework Agreement for Futures Transactions ("DRV").

To reduce the risk incurred through transactions with (credit default) swaps, the Sub-Funds only enter into (credit default) swaps with top-rated financial institutions specialised in this type of transaction and that adhere to the standard conditions set forth in the ISDA or DRV.

The derivatives and financial instruments with derivative components may contain, among other things, options transactions, futures transactions on financial instruments (including interest rates, exchange rates and currencies), swaps including credit default swaps and equity swaps, or combinations of these.

In this connection, the following risks in particular may be associated with the use of derivatives:

*Risk of loss:*

- Derivatives contain special risks arising from the so-called leverage effect. This leverage is generated by the low expenditure of capital required to acquire a derivative in comparison to a direct purchase of the underlying assets. For a given change in the price of the underlying asset, the greater the leverage, the greater the change in the value of the derivative. As the leverage increases, the risk of loss tends to increase accordingly.
- The risk of loss cannot be pre-determined and may exceed any security provided.

- It may be impossible to undertake transactions that limit or eliminate risks, or such transactions may only be possible at a market price constituting a loss.
- The risk of loss may increase if the liabilities arising from such transactions or the consideration receivable from them are denominated in a foreign currency.

*Counterparty risk:*

The Sub-Funds may engage in derivative transactions that are not quoted on a stock exchange or included in another organised market only with suitable financial institutions or financial services institutions with which standardised master agreements have been concluded. Transactions on OTC markets may expose a given Sub-Fund to risks with regard to the credit status of its counterparties and their capacity to meet the conditions of such agreements. If the counterparty should default, then the relevant Sub-Fund may incur losses. The default risk exposure to a counterparty of a Sub-Fund in transactions on OTC markets may not exceed 10% of the Sub-Fund's net assets when the counterparty is a credit institution. In other cases the limit is 5 % of the net assets of the relevant Sub-Fund. Should the counterparty of the OTC derivatives occur as a portfolio manager in this sense, this will be considered as an outsourcing agreement in respect of the portfolio management and will therefore comply with the UCITS requirements in relation to outsourcing.

The respective Sub-Fund may, for example, enter into securities lending, futures, options and swap transactions or make use of other derivative techniques, whereby in each case the Sub-Fund is subject to the risk that the Counterparty might not fulfil its obligations under the agreement concerned. The Sub-Fund in question may, if possible, reduce the default risk by requesting security ("collateral"), which shall be furnished in the form of equities belonging to major indices, investment-grade government bonds, (mortgage bonds (Pfandbriefe)), investment-grade Money Market Instruments or cash.

The Investment Manager reduces counterparty risk in derivative transactions concluded with counterparty by requiring the counterparty to provide liquid security, particularly in the form of cash and top-rated government bonds.

The market value of this collateral is determined daily. The amount of collateral that a counterparty has to provide must at least equal a value exceeding the market-value of the limits stated in the Management Regulations for the implemented investment principles and restrictions and, where applicable, multiplied by a weighting factor. In event of default, the Investment Manager may liquidate the collateral. The amount of security shall be calculated on a daily basis to ensure that sufficient collateral has been provided.

Of the collateral, which basically amounts to 100% of the legal claims, reductions in value (haircuts) can be deducted that vary depending on the nature of the securities, the creditworthiness of the issuer and the residual maturity, if necessary. After deducting the Haircuts, securities must at all times have a sufficient amount to meet the legal requirements.

*Valuation risk:*

Other risks associated with the use of derivatives include the risk of different valuations for derivatives resulting from different permissible valuation methods and the fact that there is no absolute correlation between derivatives and the underlying securities, interest rates, exchange rates and indices.

Many derivatives, in particular OTC derivatives, are complex and often subjectively valued. In many cases, only a few market participants are able to perform the valuation, and they often appear as counterparties in transactions involving the derivative transactions to be valued. Imprecise valuations may result in higher cash-payment obligations for the counterparty or a loss of value for the respective Sub-Fund. Derivatives do not always reproduce fully or only to a large extent the performance of the securities, interest rates, exchange rates or indices which they are intended to mirror. For this reason, the use of derivatives techniques by a Sub-Fund is, under certain circumstances, not always an effective tool for achieving the investment objective, and may sometimes even prove to be counterproductive.

- **Total Return Swap risk**

For Total Return Swaps that do not involve physical holding of securities, synthetic replication through fully funded (or unfunded) Total Return Swaps may provide a means of obtaining exposure to strategies that are difficult to implement and which would otherwise be very expensive and difficult to access with physical replication. However, synthetic replication involves a counterparty risk. If a Sub-Fund engages in OTC financial derivative transactions, there is a risk - over and above the general counterparty risk - that the counterparty may default or be unable to fully fulfil its commitments. When the Fund and any of its Sub-Funds enter into Total Return Swaps on a net basis, the two cash flows are offset and the Fund or the Sub-Fund will receive or pay, as the case may be, only the net amount of the two payments.

Total Return Swaps concluded on a net basis do not imply physical delivery of investments, other underlying assets or principal. As a result, it is anticipated that the risk of loss on Total Return Swaps will be limited to the net amount of the difference between the total return rate of a reference investment, an index or a basket of investments and fixed or variable payments. If the other party to a Total Return Swaps is in default, under normal circumstances, the risk of loss of the Fund or the concerned Sub-Fund is the net amount of the total return of payments that the Fund or the Sub-Fund is contractually entitled to receive.

A broker/dealer may, taking into account the price, at which he could sell the Sub-Fund shares (the ask) or the price at which he could purchase Sub-Fund shares (the bid) on the secondary market, endeavour to take advantage of opportunities to enter into arbitrage transactions that, because of anomalies and discrepancies in the pricing on the secondary market, offer opportunities compared to the relative Net Asset Value. Brokers/dealers, who seek to take advantage of these anomalies and discrepancies for arbitrage transactions will take into account the notional price at which they (i) could buy the components (when prices on the secondary market are higher than the Net Asset Value per Share) that could provide the (combined) income of the underlying (and of the assets, if any); or (ii) sell the components (when prices on the secondary market are lower than the Net Asset Value) that provide the (combined) income of the underlying (and of the assets, if any); and in each case including related transaction costs and taxes.

- **Sustainability risks**

Sustainability risks can arise from environmental and social impacts on a potential investment as well as from the corporate governance of a company associated with an investment. Sustainability risk can either represent a risk of its own or have an impact on other portfolio risks and contribute significantly to the overall risk, such as market risks, liquidity risks, credit risks or operational risks. Upon occurrence of those, they can have a significant impact on the value and/or return of the investment, up to a total loss. Negative effects on an investment can also negatively impact the returns of a Sub-Fund.

The aim of including sustainability risks in the investment decision is to identify the occurrence of these risks as early as possible and to take appropriate measures to minimise the impact on the investments or the overall portfolio of a Sub-Fund. The events or conditions that may be responsible for a negative impact on the return of a Sub-Fund are split into environmental, social and corporate governance aspects. While environmental aspects include climate mitigation, for example, social aspects include the consideration of internationally recognised labour law requirements or the abolition of a gender pay gap. Corporate governance aspects include, for example, the consideration of employee's rights and data protection. The Management Company also considers the aspects of climate change, including physical climate events or conditions such as heat waves, storms, rising sea levels and global warming.

### **Country risk – China**

#### *Stock Connect*

Certain Sub-Funds may invest and have direct access to certain eligible China A Shares via the Stock Connect, a securities trading and clearing linked programme which aims to achieve mutual stock market access between the PRC and Hong Kong.

Under the Stock Connect, overseas investors (including the funds) may be allowed, subject to rules and regulations issued / amended from time to time, to trade China A Shares listed on the Shanghai Stock Exchange ("SSE") and the Shenzhen Stock Exchange ("SZSE") through the Northbound Trading Link.

Investments through the Stock Connect are subject to risks, such as quota limitations, suspension risk, operational risk, restrictions on selling imposed by front-end monitoring, recalling of eligible equities, clearing and settlement risks, nominee arrangements in holding China A Shares and regulatory risk. The Stock Exchange of Hong Kong Limited ("SEHK"), SSE and SZSE reserve the right to suspend trading through Stock Connect if necessary to ensure an orderly and fair market and prudently manage risks which could adversely affect the relevant funds' ability to access the PRC market. Where a suspension in the trading through the programme is effected, the relevant fund's ability to invest in China A Shares or access the PRC market through the programme will be adversely affected. PRC regulations require that before an investor sells any share, there should be sufficient shares in the account (front-end monitoring); otherwise SSE or SZSE, as relevant, will reject the sell order concerned. SEHK will carry out pre-trade checking on China A Shares sell orders of its participants (i.e., the stockbrokers) to ensure there is no over-selling. Furthermore, the Stock Connect only operates on days when both the PRC and Hong Kong markets are open for trading and when banks in both markets are open on the corresponding settlement days so it is possible that there are occasions when it is a normal trading day for the PRC market but Hong Kong investors (such as the funds) cannot carry out any China A Shares trading. The relevant funds may be subject to a risk of price fluctuations in China A Shares during the time when the Stock Connect is not trading as a result.

The Stock Connect is novel in nature, and is subject to regulations promulgated by regulatory authorities and implementation rules made by the stock exchanges in the PRC and Hong Kong. Furthermore, new regulations may be promulgated from time to time by the regulators in connection with operations and cross-border legal enforcement in connection with cross-border trades under the Stock Connect.

The regulations are untested so far and there is no certainty as to how they will be applied. Moreover, the current regulations are subject to change which may have potential retrospective effect. There can be no assurance that the Stock Connect will not be abolished. The relevant funds which may invest in the PRC markets through Stock Connect may be adversely affected as a result of such changes.

#### *Bond Connect*

Bond Connect is a new initiative launched in July 2017 for mutual bond market access between Hong Kong and Mainland China ("Bond Connect") established by China Foreign Exchange Trade System & National Interbank Funding Centre ("CFETS"), China Central Depository & Clearing Co., Ltd, Shanghai Clearing House, and Hong Kong Exchanges and Clearing Limited and Central Moneymarkets Unit.

Bond Connect is governed by rules and regulations as promulgated by the Mainland Chinese authorities. Such rules and regulations may be amended from time to time.

Under the prevailing regulations in Mainland China, eligible foreign investors will be allowed to invest in the bonds circulated in the China Interbank Bond Market through the northbound trading of Bond Connect ("Northbound Trading Link"). There will be no investment quota for Northbound Trading Link.

Under the Northbound Trading Link, eligible foreign investors are required to appoint the CFETS or other institutions recognised by the PBOC as registration agents to apply for registration with the PBOC.

Pursuant to the prevailing regulations in Mainland China, an offshore custody agent recognised by the Hong Kong Monetary Authority (currently, the Central Moneymarkets Unit) shall open omnibus nominee accounts with the onshore custody agent recognised by the PBOC (currently, the China Central Depository & Clearing Co., Ltd and Shanghai Clearing House). All bonds traded by eligible foreign investors will be registered in the name of Central Moneymarkets Unit, which will hold such bonds as a nominee owner.

Market volatility and potential lack of liquidity due to low trading volume of certain debt securities in the China interbank bond market may result in prices of certain debt securities traded on such market fluctuating significantly. The Sub-Fund investing in such market is therefore subject to liquidity and volatility risks. The bid and offer spreads of the prices of such securities may be large, and the relevant Sub-Fund may therefore incur significant trading and realisation costs and may even suffer losses when selling such investments.

To the extent that the relevant Sub-Fund transacts in the CIBM, the Sub-Fund may also be exposed to risks associated with settlement procedures and default of counterparties. The counterparty which has entered into a transaction with the relevant Sub-Fund may default in its obligation to settle the transaction by delivery of the relevant security or by payment for value.

For investments via the Foreign Access Regime and/or Bond Connect, the relevant filings, registration with PBOC and account opening have to be carried out via an onshore settlement agent, offshore custody agent, registration agent or other third parties (as the case may be). As such, the Fund is subject to the risks of default or errors on the part of such third parties.

Investing in the CIBM via Foreign Access Regime and/or Bond Connect is also subject to regulatory risks. The relevant rules and regulations on these regimes are subject to change which may have potential retrospective effect. In the event that the relevant Mainland Chinese authorities suspend account opening or trading on the CIBM, the relevant Sub-Fund's ability to invest in the CIBM will be adversely affected. In such event, the relevant Sub-Fund's ability to achieve its investment objective will be negatively affected.

In China, it is uncertain whether a court would protect the relevant Sub-Fund's right to securities it may purchase via the Shanghai-Hong Kong Stock/Bond Connect or other programs, whose regulations are untested and subject to change. The structure of these schemes does not require full accountability of some of its component entities and leaves investors such as the Sub-Funds with relatively little standing to take legal action in China. In addition, the Security exchanges in China may tax or limit short-swing profits, recall eligible equities, set maximum trading volumes (at the investor level or at the market level) or may otherwise limit or delay trading.

- **Liquidity risk, Rule 144A securities**

SEC Rule 144A provides a safe harbour exemption from the registration requirements of the Securities Act of 1933 for resale of restricted securities to qualified institutional buyers, as defined in the rule. The advantage for investors may be higher returns due to lower administration charges. However, dissemination of secondary market transactions in rule 144A securities is restricted and only available to qualified institutional buyers. This might increase the

volatility of the security prices and, in extreme conditions, decrease the liquidity of a particular rule 144A security.

- **Asset-backed securities and mortgage-backed securities risks**

Mortgage-backed and asset-backed securities (MBSs and ABSs) typically carry prepayment and extension risk and can carry above-average liquidity, credit and interest rate risks. MBSs (a category that includes collateralised mortgage obligations, or

CMOs) and ABSs represent an interest in a pool of debt, such as credit card receivables, auto loans, student loans, equipment leases, home mortgages and home equity loans.

When interest rates fall, these securities are often paid off early, as the mortgage-holders and other borrowers refinance the debt underlying the security. When interest rates rise, the borrowers of the underlying debt tend not to refinance their low-interest debt.

MBSs and ABSs also tend to be of lower credit quality than many other types of debt securities. To the extent that the debts underlying an MBS.

or ABS go into default or become uncollectable, the securities based on those debts will lose some or all of their value.

## 5. Shares

### 5.1 General Provisions

The Board may decide at any time to create within each Sub-Fund different Classes of Shares, whose assets will be commonly invested pursuant to the specific investment policy of the relevant Sub-Fund, but where a specific fee structure, or other specific features may apply according to the characteristics of each Class of Shares. Additionally, Classes of Shares may be created in different Reference Currencies than the Reference Currency of the Sub-Fund and some of those Classes of Shares in other Reference Currencies may be hedged Share Classes. Each Class of Shares is represented by a code composed by one indicator (the "Class Indicator") and one or several sub-indicators defined in Appendix 3 Overview of Share Classes (the "Class Sub-Indicators"). Each Class Sub-Indicator represents a specific characteristic and several Class Sub-Indicators may be combined in order to determine the features of a Class of Shares. In particular, the Class Indicator "H" refers to hedged Share Classes. With Class H Shares, the risk generated by the exposure to the respective Reference Currency of each of those Share Classes is hedged against the Reference Currency of the relevant Sub-Fund. Costs associated with operating the hedged Share Classes will be borne by the relevant Share Class. Because of the hedging at the level of the hedged Share Classes against the Reference Currency of the relevant Sub-Fund, the Net Asset Value of the Class H Shares does develop in the same direction as that of the Share Classes issued in the Sub-Fund's Reference Currency. Investors are however made aware that currency hedging at the level of the hedged Share Classes against the Reference Currency of the relevant Sub-Fund is never perfect – it aims to reduce significantly the effects of currency movements at the Share Class level, but it cannot eliminate them entirely. A more detailed description of risks affecting hedged Share Classes can be found in section 4.6 Risk Factors.

A detailed list of the Classes of Shares available as at the time of the Prospectus can be found in Appendix 3 Overview of Share Classes of the Prospectus. Such list may be updated from time to time. A complete list of all available Share classes may be obtained, free of charge and upon request, at the registered office of the Management Company in Luxembourg.



The Management Company may, at any time, offer existing Classes of Shares through different distribution channels in different countries.

The Board of Directors retains the right to offer only one or several Classes of Shares for subscription in any particular jurisdiction in order to conform to local law, custom, business practice or the Fund's commercial objectives.

The Shareholders are co-owners of the respective Sub-Fund's assets in proportion to their number of Shares. The Shares are of no par value and carry no preferential or pre-emptive rights.

Registered Shares are documented by inscription of a Shareholder's name by the Registrar and Transfer Agent in the share register kept on behalf of the Fund. Fractions of Registered Shares may be issued to three (3) decimals of a Share. Written confirmation detailing the purchase of Shares will be sent to Shareholders. Confirmation of entry into the share register shall be sent to the Shareholders at the address specified in the share register. Shareholders are not entitled to the delivery of physical certificates.

The possibility cannot be ruled out that Shares of a Sub-Fund may be listed or traded on an official stock exchange or on other markets, in which case Sub-Fund Specific Information will provide details.

## **5.2 Subscription and issuance of Shares**

Shares are issued on each Valuation Day at the issue price. The issue price is the Net Asset Value of a Share pursuant to chapter Calculation and Publication of the Net Asset Value of shares issued, eventually plus a subscription fee, the maximum amount of which for each Sub-Fund is stipulated in the Sub-Fund Specific Information. The issue price may be increased by fees or other charges payable in the countries where the Fund is distributed.

Shares can be issued either in the form of Registered Shares or Shares represented by a Global Share Certificate. Fractions of Shares can be issued and rounded up to 3 decimal places. Any rounding may result in a benefit for the relevant Shareholder or Sub-Fund. Subscription orders (investment amount or number of relevant shares) for the acquisition of Registered Shares may be submitted to the Management Company, the Distributors, or Sub-Distributors. These receiving entities must immediately forward all subscription orders to the Registrar and Transfer Agent. Receipt by the relevant entity in charge is decisive.

Subscription orders for the acquisition of Shares certified in the form of Global Share Certificates are forwarded by the entity at which the subscriber holds his custody account to the Registrar and Transfer Agent. Receipt by the Registrar and Transfer Agent entity is decisive.

Global Share Certificates will be issued in the name of the Company and deposited with the Clearing Agents. Investors will receive the Shares represented by a Global Share Certificate by way of book entry form to the securities accounts of their financial intermediaries held, directly or indirectly, with the Clearing Agents. Such Shares represented by a Global Share Certificate are freely transferable subject to and in accordance with the rules set out in this Prospectus and/or the rules of the relevant Clearing Agent. Shareholders who are not participants in such systems will only be able to transfer such Shares represented by a Global Share Certificate through a financial intermediary who is a participant in the settlement system of the relevant Clearing Agent.

Complete subscription orders received by the relevant entity in charge no later than the Cut-Off time further specified in Sub-Fund Specific Information on a Valuation Day shall be settled at the issue price of the next following Valuation Day applicable. In any case, the Management Company ensures that Shares are issued on the basis of a previously unknown Net Asset Value per share. If, however, an investor is suspected of engaging in Market Timing, the Management Company may reject the subscription order until the applicant has cleared up any doubts with regard to his order. Complete subscription orders received by the Registrar and Transfer Agent after Cut-Off time on a Valuation Day shall be settled at the issue price of the next following Valuation Day applicable.

If the subscription order is incorrect or incomplete, the subscription order shall be regarded as having been received by the Registrar and Transfer Agent on the date on which the subscription order is submitted properly.

The Global Shares Certificates are transferred by the Registrar and Transfer Agent after accounting through payment/delivery transactions, i.e. against payment of the agreed investment amount, to the entity with which the subscriber holds his custody account.

The issue price is payable at the Depositary in Luxembourg in the respective Sub-Fund Reference Currency or, if there are several Classes, in the respective Class Reference Currency, within the payment period after the corresponding Valuation Day further specified in the Sub-Fund Specific Information.

Subscriptions of the Shares may be performed either by means of single payments ("Single Payment subscriptions") or, if available in the country of subscription, through a pluri-annual investment plan ("Pluri-annual Investment Plan").

Subscriptions performed by way of a Pluri-annual Investment Plan may be subject to other conditions (i.e. number, frequency and amounts of payments, details of commissions) than Single Payment subscriptions provided these conditions are not less favourable or more restrictive for the Fund.

The Board of Directors may notably decide that the amount of subscription may be inferior to the minimum amount of subscription applicable to Single Payment subscriptions.

Terms and conditions of a Pluri-annual Investment Plan offered to the subscribers are fully described in separate leaflets offered to subscribers in countries, if any, where a Pluri-annual Investment Plan is available. The last version of the Prospectus, the semi-annual and annual reports are attached to such leaflets, or such leaflets describe how the Prospectus, the semi-annual and annual reports might be obtained.

Without limitation, the Management Company may refuse an application for subscription where it determines that the Shares would or might be held by, on behalf or for the account or benefit of any person not qualifying as an eligible investor. In such event, subscription proceeds received by the Depositary will be returned to the applicant as soon as practicable, at the risks and costs of the applicant, without interest or penalty.

The Management Company reserves the right to reject any subscription in whole or part at its absolute discretion, whether for an initial or additional investment, in which event the amount paid on the subscription or the balance thereof (as the case may be) will be returned (without interest) as soon as practicable in the currency of subscription and at the risk and cost of the applicant.

If the Fund determines that it would be detrimental to the existing Shareholders to accept a subscription application that exceeds a certain level determined by the Fund, the Fund may postpone the acceptance of such subscription application and, in consultation with the incoming Shareholder, may require such incoming Shareholder to stagger their proposed subscription over an agreed period of time. The Management Company can reject any subscription where all documents required to open an account is not provided, in which event paid in investment money will be returned without interest.

The circumstances under which the issue of Shares may be suspended are specified under section Temporary suspension of the calculation of the Net Asset Value of shares and dealing activity.

In case a subscription in kind option is made available for investors, the paragraph below shall be added.

The Management Company may agree to issue Shares as consideration for a "contribution in kind" of assets with an aggregate value equal to the Net Asset Value (plus any subscription fee), provided that such assets comply with the investment objective and policy of the Sub-Fund and any restrictions and conditions imposed by applicable laws and regulations. In accepting or rejecting such a contribution at any given time, the Management Company shall take into consideration the interest of other Shareholders of the Sub-Fund and the principle of fair treatment. Any contribution in kind will be valued independently in a special report issued by the Auditor or any other independent auditor (*réviseur d'entreprises agréé*) appointed by the Board of Directors. The Management Company and the contributing Shareholder will agree on specific settlement procedures. Any costs incurred in connection with a contribution in kind, including the costs of issuing a valuation report, shall be borne by the contributing shareholder or by such other third party as agreed by the Management Company or in any other way, which is considered to be fair to all Shareholders of the Sub-Fund.

### 5.3 Redemption of Shares

Shareholders are entitled to request the redemption of their Shares at any time at the Net Asset Value per share in accordance with chapter Calculation and Publication of the Net Asset Value of shares issued, less any redemption fee if applicable ("redemption price"). This redemption will only be carried out on a Valuation Day. If a redemption fee is payable, the maximum amount of which for each Sub-Fund is stipulated in the Sub-Fund Specific Information.

The corresponding Share is cancelled upon payment of the redemption price. Payment of the redemption price, as well as any other payments to the Shareholders, shall be made via the Depositary and the paying agents (if any). The Depositary is only obliged to make payment insofar as there are no legal provisions, such as exchange control regulations or other circumstances beyond the Depositary's control, prohibiting the transfer of the redemption price to the country of the applicant.

The Management Company reserves the right to redeem Shares unilaterally against payment of the redemption price if this is deemed necessary in the interests of the Shareholders or for the protection of the Shareholders or a Sub-Fund.

The Management Company can proceed unilaterally to a redemption of a Share Class of an investor or switch the holding to another Class if the investor no longer meets the qualifying criteria to maintain the Class he holds.

If the Management Company believes that a Shareholder is no longer an eligible owner, the owner may be requested to proof the eligibility, but the Management Company can at its option proceed to a redemption without consent of the owner.

The Fund cannot be held liable for any gain and losses resulting from such unilateral redemptions.

Complete orders for the redemption of Registered Shares can be submitted to the Management Company, the Distributors, Sub-Distributors or paying agents (if any). The receiving agents are obliged to immediately forward the redemption orders to the Registrar and Transfer Agent.

An order for the redemption of Registered Shares shall only be deemed complete if it contains the name and address of the Shareholder, the number and/or transaction value of the Shares to be redeemed, the name of the Sub-Fund and the signature of the Shareholder.

Complete redemption orders for the redemption of Global Shares Certificates will be forwarded to the Registrar and Transfer Agent by the agent with whom the Shareholder holds his custody account.

Failure to provide any of the above information may result in delays for the application for redemption being dealt with.

Complete orders for the redemption of Shares received no later than the Cut-Off time further specified in the Sub-Fund Specific Information on a Valuation Day shall be settled at the share Net Asset Value of that Valuation Day, less any applicable redemption fees. The Management Company shall in any event ensure that Shares are redeemed on the basis of a previously unknown Net Asset Value per share. Complete redemption orders received after Cut-Off time on a Valuation Day shall be settled at the share Net Asset Value of the next following Valuation Day. Any applicable redemption fees shall be deducted.

The time of receipt of the redemption order by the Registrar and Transfer Agent shall be decisive.

The redemption price is payable in the relevant Sub-Fund Reference Currency or, if there are several Classes, in the relevant Class Reference Currency, within the payment period further specified in the Sub-Fund Specific Information after the relevant Valuation Day (with the exception that: (i) the Fund reserves the right to delay payment for a further five (5) Business Days, provided such delay is in the interest of the remaining Shareholders and (ii) in the event that a redemption application relates to all remaining Shares of the relevant Sub-Fund or Class of Shares, the UCI Administrator will issue instructions for payment or settlement made in the Sub-Fund or relevant Class currency to be affected no later than 10 Business Days after the relevant Valuation Day). In the case of Registered Shares, payment is made to the account specified by the Shareholder.

The Management Company is obliged to temporarily suspend the redemption of Shares due to a suspension of the calculation of the Net Asset Value.

Subject to prior approval from the Depositary and while preserving the interests of the Shareholders, the Management Company shall only be entitled to process significant volumes of redemptions after selling corresponding assets of the respective Sub-Fund without delay. In this case, the redemption shall be carried out at the redemption price valid at that time. The Management Company shall, however, ensure that the respective Sub-Fund has sufficient liquid funds at its disposal such that, under normal circumstances, the redemption of Shares may take place immediately upon application from Shareholders.

Payment of redemption proceeds may be further delayed, if there are any specific provisions such as foreign exchange restrictions, or any circumstances beyond the Fund's control, which make it impossible to transfer the redemption proceeds to the country where the redemption was requested.

The Management Company may, in order to facilitate the settlement of substantial redemption applications or in other exceptional circumstances, accept from a Shareholder a redemption in kind whereby the Shareholder receives a portfolio of assets of the Sub-Fund of equivalent value to the Net Asset Value (less any redemption fee). In the circumstance where a redemption in kind may be proposed to one or all Shareholder(s), the Management Company must specifically receive a consent from the Shareholder(s) to the redemption in kind and the Shareholder(s) always can request a cash redemption payment instead. In proposing or accepting a request for redemption in kind at any given time, the Management Company shall consider the interest of other Shareholders of the Sub-Fund, the principle of fair treatment and in case retail Shareholder(s) will be redeemed in kind, the Management Company should assess whether the assets to be redeemed in kind are adequate for an average retail investor. Where the Shareholder accepts a redemption in kind, he will receive a set of assets of the Sub-Fund selected by taking into account principle of fair treatment. Any redemption in kind will be valued independently in a special report issued by the Auditor or any other independent auditor (*réviseur d'entreprises agréé*) appointed by the Board of Directors. The Management Company and the redeeming Shareholder will agree on specific settlement procedures. Any costs incurred in connection with a redemption in kind, including the costs of issuing a valuation report, shall be borne by the redeeming Shareholder or by such other third party as agreed by the Management Company or in any other way which the Board of Directors considers fair to all Shareholder of the Sub-Fund.

#### **5.4 Conversion of Shares**

The conversion of all or some Shares for Shares in another Sub-Fund will take place on the basis of the applicable share Net Asset Value of the relevant Sub-Funds taking into account the applicable conversion fee as further specified in the Sub-Fund Specific Information.

In the event that different Classes are offered within a single Sub-Fund, it is also possible to convert Shares of one Class for those of another within the same Sub-Fund, unless otherwise stipulated in the Sub-Fund Specific Information and subject to the class specific eligibility and fee conditions applicable.

The Management Company may reject an order for the conversion of Shares, if this is deemed in the interests of the Fund or the Sub-Fund or in the interests of the Shareholders.

Complete orders for the conversion of Registered Shares can be submitted to the Management Company, the Distributors, Sub-Distributors or the paying agents (if any). The receiving agents are obliged to immediately forward the conversion orders to the Registrar and Transfer Agent.

An order for the conversion of Registered Shares shall only be deemed complete if it contains the name and address of the Shareholder, the number and/or transaction value of the Shares to be converted, the name of the Sub-Fund and the signature of the Shareholder.

Failure to provide any of the above information may result in delay of the application for conversion while verification is being sought from the Shareholder.

Complete orders for the conversion of Shares received no later than the Cut-Off time further specified in Sub-Fund Specific Information on a Valuation Day shall be settled at the share Net Asset Value of the next Valuation Day, less any applicable conversion fees. The Management Company ensures that Shares are converted on the basis of a previously unknown Net Asset Value per share. Any applicable conversion fee shall be taken into consideration.

The time of receipt of the conversion order by the Registrar and Transfer Agent shall be decisive.

The Management Company is obliged to temporarily suspend the conversion of Shares due to a suspension of the calculation of the Net Asset Value.

Subject to prior approval from the Depositary and while preserving the interests of the Shareholders, the Management Company shall only be entitled to process significant volumes of conversion orders after selling corresponding assets of the respective Sub-Fund without delay. In this case, the conversion shall be carried out at the price valid at that time. The Management Company shall, however, ensure that the respective Sub-Fund has sufficient liquid funds at its disposal such that, under normal circumstances, the conversion of shares may take place immediately upon application from Shareholders.

## **5.5 Distribution of income, reinvestment of income**

Each Sub-Fund may offer distributing shares and non-distributing shares. Distributing Shares and non-distributing Shares issued within the same Sub-Fund will be represented by different Classes. Such Classes may confer the right to dividend distributions or not.

Unless otherwise specified, Shares will reinvest their income. Distributing Shares may include Shares of Classes making distributions, which are higher than the income generated by the investments allocated to such Classes as further specified in Appendix 3 Overview of Share Classes.

Distributions, if any, shall be made at intervals as determined from time to time by the Board of Directors in accordance with the Articles of Incorporation. The holders of Registered Shares will be credited by an amount of distribution in proportion to the number of Shares indicated in the share register. The holders of Shares represented by a Global Share Certificate will be credited by an amount of distribution in proportion to the number of Shares held at the date of the distributions. Upon request, distributions will be paid directly to an account indicated by the Shareholder. If the issuing fee was originally paid by direct debit, distributions will be paid to the same account.

Detailed information regarding the use of income will be published on the Management Company's website.

## **6. Prevention of Market Timing and Late Trading Risks**

Investing in the Sub-Funds should be regarded as a long-term commitment.

Market timing is understood to mean the technique of arbitrage whereby a shareholder systematically subscribes, converts and redeems shares in a Sub-Fund within a short period by exploiting time differences and/or the imperfections or weaknesses in the valuation system for calculating the Sub-Fund's Net Asset Value. The Management Company takes the appropriate protection and/or control measures to avoid such practices. It also reserves the right to reject, cancel or suspend an order from a shareholder for the subscription or conversion of shares if the investor is suspected of engaging in Market Timing.

The Management Company strictly opposes the purchase or sale of shares after the close of trading at already established or foreseeable closing prices ("late trading"). In any case, the Management Company ensures that shares are issued and redeemed on the basis of a share value previously unknown to the shareholder. If, however, a shareholder is suspected of engaging in Market Timing, the Management Company may reject the redemption or subscription order until the applicant has cleared up any doubts with regard to his order.

## **7. Calculation and Publication of the Net Asset Value of shares issued**

### **7.1 Calculation of the NAV**

The Net Asset Value per share of the Sub-Fund and each Class is calculated on each Valuation Day as further specified for each Sub-Fund in the Sub-Fund Specific Information, and is expressed in the Reference Currency of the Sub-Fund. The NAV of a Class is calculated in the Reference Currency of the Sub-Fund. If Classes are issued with other Reference Currencies, such NAV will be published in the currency in which that Class is denominated.

The NAV must in principle be calculated at least twice a month and applicable calculation frequency of each Sub-Fund is further specified in Sub-Fund Specific Information.

The NAV is calculated by dividing the value of the assets less the value of the liabilities of the Sub-Fund by the total number of outstanding shares of the Sub-Fund on the Valuation Day. The NAV of a Class is determined by the proportional share of the assets of the Fund attributable to such a Class less the proportional share of the liabilities of the Sub-Fund attributable to that Class on the Valuation Day. In case of distributing Classes, the value of the net assets attributable to the distributing shares is reduced by the amount of such distributions.

The NAV is rounded to two decimal places, unless otherwise foreseen for a Sub-Fund in the Sub-Fund Specific Information.

### **7.2 Publication of the NAV**

The NAV of each Class as well as the issue, redemption and conversion price of each Class is published on each Valuation Day on the website of the Management Company and is also available at the registered office of the Fund, the Management Company, the Paying and Information Agents (if any) or the Distributors during normal business hours.

### **7.3 Determination of the issue price and the redemption price of shares**

The issue price per share of each Class is calculated based on the NAV of the Class by adding the sales charge, if any, and any taxes, commissions or other applicable fees and expenses. The entry charge is expressed as a percentage of the NAV.

The redemption price per share of each Class is calculated based on the NAV of the Class by subtracting the exit charge, if any, and any taxes, commissions or other applicable fees and expenses. The exit charge is expressed as a percentage of the NAV.

### **7.4 Modalities concerning the valuation of assets in the portfolio**

The value of the assets of any Sub-Fund is determined according to the following principles:

- a. Assets that are officially listed on a stock exchange are valued at the latest available price. If an asset is listed on several stock exchanges, the most recently available price on the stock exchange that is the main market for such asset is applied.
- b. Assets which are not listed on a stock exchange but which are traded on another regulated market which operates regularly and is recognised and open to the public are valued at a price which may not be lower than the bid price and not higher than the offering price at the time of valuation, and which the Management Company considers to the best possible price at which the assets can be sold.

- c. If an asset is not listed or traded on a stock exchange or on another regulated market or if, with regard to assets which are listed or traded on a stock exchange or other market as mentioned above, the prices in accordance with the provisions contained in (a) or (b) above do not reasonably reflect the actual market value of the assets in question, such assets shall be valued at the realisable value as determined in good faith by the Management Company in application of generally recognised valuation regulations that are verifiable by auditors.
- d. The pro rata interest on assets will be included in so far as it is not expressed in the price.
- e. The settlement value of forwards or options which are not traded on stock exchanges or other organised markets will be determined in accordance with the directives of the Management Company on a basis which shall be applied consistently with regard to all different types of contracts. The liquidation value of futures, forwards or options traded on stock exchanges or other organised markets is calculated on the basis of the latest available settlement prices for such contracts on the stock exchanges or organised markets on which such futures, forwards or options are traded by the Sub-Fund. If a future, forward or option cannot be settled on a day for which the Net Asset Value is determined, the valuation basis for such a contract is determined by the management in an appropriate and reasonable manner.
- f. Swaps are valued at present value.
- g. Cash is valued at nominal value plus pro rata accrued interest. Fixed-term deposits may be valued at the respective yield price, provided that a corresponding contract between the financial institution holding the deposits in safekeeping and the Management Company stipulates that such deposits may be called at any time and that, in the event of calling, the liquidation value shall correspond to such yield price.
- h. Shares or units of UCITS or other UCIs are valued at the latest Net Asset Value determined and obtainable. If redemption has been suspended for investment units or if no redemption prices are set, these units and any other assets are valued at the realisable value which the Management Company determines in good faith on the basis of the probable realisable value.
- i. All assets not denominated in the currency of the relevant Sub-Fund are converted at the most recently available exchange rate into the relevant currency of the Sub-Fund. Gains or losses on foreign exchange transactions are shown net.
- j. All other securities or other assets are valued at their appropriate realisable value as determined in good faith by the Management Company and according to a procedure specified by the Management Company.

The net Sub-Fund's assets are reduced by any distributions paid to the Shareholders of the relevant Sub-Fund.

If Share Classes are created, the resulting calculation of the Net Asset Value will be made separately according to the criteria set out above. However, the composition and allocation of assets is always undertaken separately for the Sub-Fund as a whole.

In the event that the valuation of an asset in accordance with the above principles is rendered impossible, incorrect or not representative, the Board of Directors is entitled to use other generally recognised and auditable valuation principles in order to reach a fair valuation of that asset.

## 8. Fees and Charges

This section provides information on the fees and charges that may be deducted before or after investing or from the Sub-Fund's assets over a year. Details on level of fees and charges and related calculation and payment conditions are provided further in Sub-Fund Specific Information.

### 8.1 One-off charges taken before or after investing

One-off charges are charges of various kind deducted upfront from a Shareholder's investment amount, switch amount or redemption proceeds, including any rounding adjustments.

#### 8.1.1 Subscription fee/Entry charge

Entry charge is deducted from the subscription amount of Shares before investment; calculated as a percentage of the subscription amount; may be waived in whole or in part at the discretion of the beneficiary of this charge.

### 8.1.2 Redemption fee/Exit charge

Exit charge is deducted from the redemption amount of Shares before payment out of the redemption proceeds; calculated as a percentage of the redemption amount; may be waived in whole or in part at the discretion of the beneficiary of this charge.

### 8.1.3 Conversion fee/Switch charges

Charged on conversion amount from one Class to another Class deducted from subscription amount of new Class before investment; calculated as a percentage of the subscription amount in the new Class; may be waived in whole or in part at the discretion of the beneficiary of this charge.

## 8.2 Fees and expenses taken from the Share Class over a year (annual fees)

These fees and expenses are deducted from the Class NAV, and are the same for all Shareholders of a given Class. With the exception of the direct and indirect fund expenses described below, the fees and expenses are paid to the Management Company. The amount charged varies depending on the value of the NAV and does not include portfolio transaction costs. Fees and expenses borne by the Fund may be subject to VAT and other applicable taxes.

Most of the ongoing business expenses of the Fund are covered by these fees and expenses. Details of the fees and expenses paid can be found in the Shareholder reports. These fees and expenses are calculated for each Class of each Sub-Fund, as a percentage of average daily net assets being accrued daily and paid monthly in arrears. Each Sub-Fund and each Class pays all costs it directly incurs and also pays its pro rata share of costs not attributable to a specific Sub-Fund or Class based on its total net assets.

### 8.2.1 Management Fee

The annual management fee (the "Management Fee") covers the Investment Manager fee (and, as the case may be, a Sub-Investment Manager fee in case of sub-delegation and/or an investment advisor fee which is/are paid out of the Investment Manager fee) as well as a potential fee to the Distributors (the "Distribution Fee"). A Distributor may re-allocate an amount of the Distribution Fee to Sub-Distributors (as applicable).

The Management Fee is specified in Appendix 3 Overview of Share Classes in relation to every Sub-Fund and their respective Share Classes.

### 8.2.2 Depository Fee and UCI Administrator Fee

Unless otherwise provided in the Sub-Fund Specific Information, the Depository is entitled to receive fees (the "Depository Fee") out of the assets of the Fund, pursuant to the relevant agreement between the Depository and the Fund and in accordance with usual market practice. The fees payable to the Depository (excluding sub-depository fees, if any and transaction fees) will not exceed 0.065% p.a. of the respective Sub-Fund's average net assets. The fees are calculated and accrued on each Valuation Day and are payable quarterly in arrears.

Unless otherwise provided in the Sub-Fund Specific Information, the UCI Administrator is entitled to receive fees (the "UCI Administrator Fee") out of the assets of the Fund, pursuant to the relevant agreement between the UCI Administrator and the Management Company and in accordance with usual market practice. The fees are calculated and accrued on each Valuation Day and are payable quarterly in arrears. More detailed information concerning the Depository Fee and UCI Administrator Fee can be found in Appendix 3 Overview of Share Classes in relation to every Sub-Fund and their Share Classes.

### 8.2.3 Administrative fee

The annual administrative fee (the "Administrative Fee") remunerates the Management Company for its services relating to the management of the Sub-Funds' assets, the amount of which is specified in Appendix 3 Overview of Share Classes in relation to every Sub-Fund.

### 8.2.4 Other Operating and Administrative Expenses

The other operating and administrative expenses not covered by the Management Fee, the Depository Fee and Administrative Fee include (but are not limited to):

**Direct expenses** directly paid by the Fund or its relevant Sub-Fund includes, but are not limited to:

- a. all taxes charged to the Sub-Fund's assets, income and expenditures;



- b. the processing charges for such matters as preparing tax reports;
- c. usual customary brokerage and banking charges, in particular fees and expenses for credit transfers and their entry in bookkeeping systems, securities commissions arising in respect of transactions in securities and other assets of the Sub-Fund as well as currency and securities hedging transactions;
- d. revenues arising from the use of securities financing transactions (Total Return Swaps, securities lending and repurchase transactions etc.) should in principle – net of direct respectively indirect costs – flow to the Sub-Fund’s assets whilst the Management Company shall have the right to charge a fee for the initiation, preparation and execution of such transactions. The gross income generated within the scope of securities lending transactions and repurchase transactions accrue respectively to the relevant Sub-Fund's assets and the Management Company in accordance with the following breakdown: at least 75% to the relevant Sub-Fund in relation to securities lending transactions and 100% to the relevant Sub-Fund in relation to repurchase transactions. Expenses incurred in connection with the preparation and execution of such transactions, including fees payable to third parties (for example transaction costs paid to the Depositary) are borne by the Management Company. The identity of the counterparty to the transactions to which the direct and indirect costs and fees are paid and the costs will be published in the annual report. The costs and fees do not include hidden revenues;
- e. the costs of accounting, bookkeeping and calculation of Net Asset Value as well as publication thereof;
- f. costs of advice (including legal consulting) incurred by the Management Company or the Depositary if they are acting in the interests of the investors of the Sub-Fund;
- g. the costs and expenses in connection with the creation of a Sub-Fund, establishment costs, fees payable to index licensors or index calculation agents (if not borne by the relevant Investment Manager), the costs of any domestic or foreign stock exchange listings or registration, as well as insurance premiums, interest and broker costs;
- h. all printing costs for any Share certificates (certificates and coupon sheets);
- i. costs for the redemption of coupons;
- j. the fees of the Fund's auditor;
- k. the costs of preparing, depositing and publishing the Articles of Incorporation along with their amendments/restatements as well as other documents relating to the Fund, including applications for registration, prospectuses or written declarations to all registration authorities and stock exchanges (including local dealer associations) which must be effected in respect of the Fund respectively Sub-Fund or the offering for sale of Shares;
- l. the costs of preparing, depositing and publishing the documents relating to the Sub-Funds, such as prospectuses and Key Investor Information Documents, and other documents necessary to permit the Shares to be offered for sale in certain countries according to their regulations, including the costs of applications for registration or written declarations to all registration authorities and stock exchanges (including local dealer associations) which must be effected in respect of the Sub-Fund or the offering for sale of Shares, including possible amendment procedures;
- m. the costs of the publications intended for investors;
- n. the fees of the Fund's representatives and paying agents abroad (if not already included in other fees);
- o. a reasonable proportion of the costs for advertising and such costs as are incurred directly in connection with the offering for sale and sale of Shares, and Distributors fees;
- p. costs and charges in connection with pre-hedging arrangements;
- q. costs of implementing a risk management procedure in accordance with the legal requirements;
- r. costs for a possible creditworthiness evaluation of the Fund or Sub-Fund by nationally and internationally recognised rating agencies, as well as for the Fund's possible membership of associations;
- s. ESG reporting costs (e.g., SFDR periodic reportings and European ESG Template -EET- reports)
- t. and all other operating and administrative fees and expenses in relation to services supporting the proper operations of the Fund (except the following any administrative costs associated with the preparation and execution of a merger).

All charges and fees will be charged first against current income, then against net capital gains and then against the net assets of the relevant Sub-Fund.

The Management Company reserves the right, however, to refrain from charging some of the above costs to the respective Sub-Fund and to bear such costs directly from the assets of the Management Company.

The costs, fees, levies and extraordinary expenses incurred in relation to a particular Share Class shall be allocated to such Share Class.

The costs, fees, levies and extraordinary expenses that cannot be allocated to a particular Share Class within an individual Sub-Fund shall be charged to the Share Classes within the Sub-Fund in proportion to the net assets of the corresponding Share Classes.

Costs incurred in connection with the formation of the Fund or Sub-Fund and the initial offering of Shares may be amortised over a period of no more than five (5) years.

The costs (excluding transactions costs) incurred with respect to the management of each Sub-Fund during the financial year and charged to each Sub-Fund as applicable shall be disclosed in the annual report and reported as a proportion of the average Sub-fund Assets (the total expense ratio or TER). In addition to the management fees, fees due to the Depositary and the Taxe d'Abonnement, all other costs shall also be taken into account with the exception of transactions costs incurred in the Sub-Fund. Any performance-related fees shall be reported separately.

#### **Indirect fund expenses:**

These are expenses directly contracted by the Management Company on behalf of the Fund and include, but are not limited to:

- a. legal fees and expenses;
- b. formation expenses, such as organisation and registration costs;
- c. transfer agency expenses covering registrar and transfer agency services;
- d. Fund accounting and administrative service expenses;
- e. administrative services and domiciliary agent services;
- f. ongoing registration, listing and quotation fees, including translation expenses;

- g. documentation costs and expenses, such as preparing, printing and distributing the Prospectus, PRIIPs KIDs or any other offering document, as well as Shareholder Reports and any other documents made available to Shareholders;
- h. the fees and reasonable out-of-pocket expenses of the paying agents and representatives;
- i. the cost of publication of the Share prices, and costs of postage, telephone, facsimile transmission and other electronic means of communication;
- j. any other fees and expenses in relation to services supporting the proper operations of the Fund.

#### **8.2.5 Other fees and expenses**

Most operating fees and expenses are included in the fees and expenses described above. However, in addition, each Sub-Fund bears transaction fees and extraordinary expenses such as:

##### **Transaction fees:**

- brokerage fees and commissions;
- transaction costs associated with buying and selling Sub-Fund assets, including interest, taxes, governmental duties, charges and levies;
- expenses for operating hedged Share Classes;
- other transaction related costs and expenses.

##### **Extraordinary expenses:**

- interest and full amount of any duty, levy and tax or similar charge imposed on a Sub-Fund and/or the Fund;
- cost associated to special reporting or tax requirements as required by Shareholders;
- litigation expenses;
- any extraordinary expenses or other unforeseen charges.

All of these expenses are paid directly from the relevant Sub-Fund assets and are reflected in NAV calculations.

## **9. Tax Considerations**

The information below is based on the current Luxembourg law, regulations and administrative practice and may accordingly change in the future.

## 9.1 Tax treatment of the Fund

The Fund is not subject to any taxation on its income and profits in the Grand Duchy of Luxembourg.

Income received by the Fund (especially interest and dividends) may be subject to withholding tax or assessed tax in the countries in which the Fund's assets are invested. The Fund may also be taxed on realised or unrealised capital gains of its investments in the source country.

Distributions by the Fund as well as liquidation and disposal gains are not subject to withholding tax in the Grand Duchy of Luxembourg.

For subscription tax, refer to section sub-section 9.6 below.

## 9.2 Tax treatment of Shareholders

Tax treatment varies depending on whether the Shareholder is an individual or a corporate structure.

Shareholders who are not or have not been tax resident in the Grand Duchy of Luxembourg and who do not maintain a permanent establishment or have a permanent representative there are not subject to any Luxembourg taxation of income in respect of income from or the capital gains on their Shares in the Fund.

Interested parties and investors are recommended to find out about the laws and regulations that apply to the taxation of the Fund assets and to the subscription, purchase, ownership, redemption or transfer of Shares in their country of residence, and to seek the advice of external third parties, especially a tax adviser.

## 9.3 FATCA

FATCA ("Foreign Account Tax Compliance Act") was passed as part of the Hiring Incentives to Restore Employment Act of March 2010 in the United States. FATCA requires financial institutions outside the United States of America ("foreign financial institutions" or "FFIs") to send information on financial accounts that are held directly or indirectly by "specified US persons" or non-US entities with Controlling Person(s) who are specified US Person(s) on an annual basis to the US tax authorities (Internal Revenue Service or IRS). A withholding tax of 30% might be deducted from certain types of U.S. income from FFIs in case the reporting obligation is not met.

On 28 March 2014, the Grand Duchy of Luxembourg entered into an Intergovernmental Agreement ("IGA"), in accordance with model 1, and a related memorandum of understanding with the United States of America. The IGA was transposed into Luxembourg law via the law of 24 July 2015, as modified.

The Management Company and the Fund both comply with the FATCA regulations.

In any case, shareholders and investors should take note and acknowledge that the Fund or the Management Company may be required to disclose to the Luxembourg tax authority certain confidential information in relation to the investor and the Luxembourg tax authority may be required to automatically exchange such information with the Internal Revenue Service.

For any questions concerning FATCA and the FATCA status of the Fund, investors and potential investors are advised to contact their financial, tax and/or legal advisers.

## 9.4 OECD Common Reporting Standards (CRS) Reporting

The importance of the automatic exchange of information to combat cross-border tax fraud and tax evasion has increased significantly at the international level in recent years. For this purpose, the OECD has published, among other things, a global standard for the automatic exchange of information on financial accounts in tax matters (Common Reporting Standard, hereinafter "CRS"). The CRS was integrated into Directive 2011/16/EU at the end of 2014 with Council Directive 2014/107/EU of 9 December 2014 regarding the obligation to automatically exchange information in the area of taxation. The participating states (all EU member states and several third countries) apply the CRS. Luxembourg implemented the CRS into national law with the Law of 18 December 2015 as modified transposing the automatic exchange of financial account information in tax matters.

With the CRS, reporting financial institutions are obliged to obtain certain information about their clients and/or investors and potentially their controlling persons. If the clients/investors (natural persons or legal entities) are persons subject to reporting requirements and tax resident in other participating states, their financial accounts will be classified as reportable accounts. The reporting

financial institutions will then annually transmit certain information for each reportable account to their home tax authority. The latter will then transmit the information to the tax authority of the reportable clients and/or investors and potentially of their controlling person(s).

The information to be transmitted is essentially the following:

- Family name, first name, address, tax identification number, countries of residence as well as the date and place of birth of each reportable person,
- register number,
- register balance or value,
- credited capital gains, including sales proceeds.

## 9.5 Country specific tax considerations

Interested parties and Shareholders are recommended to find out about the laws and regulations that apply to the taxation of the Fund assets and to the subscription, purchase, ownership, redemption or transfer of Shares in the country of their residence, and to seek the advice of external third parties, especially a tax adviser.

## 9.6 « Taxe d'abonnement » (subscription tax)

In the Grand Duchy of Luxembourg, the Fund's assets are only subject to the *taxe d'abonnement*, which is currently 0.05% p.a.. A reduced *taxe d'abonnement* of 0.01% p.a. of its net assets calculated and payable at the end of each quarter is applicable to (i) Sub-Funds or Classes whose Shares are only issued to Institutional Investors within the meaning of Article 174 of the 2010 Law, (ii) Sub-Funds whose sole purpose is to invest in Money Market Instruments, time deposits with credit institutions or both, (iii) Sub-Funds whose purpose is to invest in micro finance.

A reduced rate from 0,01% to 0,04% p.a. is applicable for the portion of net assets that is invested into sustainable investments as defined by EU Taxonomy Regulation (2020/852).

The *taxe d'abonnement* is payable quarterly, based on the Fund's net assets reported at the end of each quarter. The applicable rate of the *taxe d'abonnement* is specified for each Class in the Prospectus. An

exemption from the *taxe d'abonnement* applies, inter alia, to the extent that the Fund's assets are invested in other Luxembourg investment funds which in turn are subject to *taxe d'abonnement*.

## 10. Conflicts of interest

### 10.1 Members of the UniCredit Group

The following discussion enumerates certain potential divergences and conflicts of interest that may exist or arise in relation to the Directors, Shareholders, Management Company, and any other service provider (including their affiliates and respective potential investors, partners, members, directors, officers, employees, consultants, agents and representatives) (each a "Service Provider"), with respect to all or part of the Sub-Funds (collectively the "Connected Persons" and each a "Connected Person").

This section does not purport to be an exhaustive list or a complete explanation of all the potential divergences and conflicts of interest.

Each Connected Person may be deemed to have a fiduciary relationship with a Sub-Fund in certain circumstances and consequently the responsibility for dealing fairly with the Fund and the relevant Sub-Fund(s). However, the Connected Persons may engage in activities that may diverge from or conflict with the interests of the Fund, one or several Sub-Funds or potential investors. They may for instance:

- contract or enter into any financial, banking or other transactions or arrangements with one another or with the Fund including, without limitation, investment by the Fund in securities or investment by any Connected Persons in any company or body any of whose investments form part of the assets of the Fund or be interested in any such contracts or transactions;
- invest in and deal with Shares, securities, assets or any property of the kind included in the property of the Fund for their respective individual accounts or for the account of a third party; and

- deal as agent or principal in the sale or purchase of securities and other investments to or from the Fund through or with the Investment Manager or the Depositary or any subsidiary, affiliate, associate, agent or delegate thereof.

Any assets of the Fund in the form of cash or securities may be deposited with any Connected Person. Any assets of the Fund in the form of cash may be invested in certificates of deposit or banking investments issued by any Connected Person. Banking or similar transactions may also be undertaken with or through a Connected Person.

Members of the UniCredit Group may act as Service Providers and may for instance act as counterparties to the derivatives transactions or contracts entered into by the Fund (for the purposes hereof, the "Counterparty" or "Counterparties"). In this respect, members of the UniCredit Group can act as Director, distributor, underlying asset sponsor, underlying asset allocator, market maker, investment adviser and provide sub-custodian services to the Fund, all in accordance with the relevant agreements which are in place. In addition, in many cases the Counterparty may be required to provide valuations of such derivative transactions or contracts. These valuations may form the basis upon which the value of certain assets of the Fund is calculated.

The Board of Directors acknowledges that, by virtue of the functions which members of the UniCredit Group will perform in connection with the Fund, potential conflicts of interest are likely to arise. In such circumstances, each Member of the UniCredit Group has undertaken to use its or his reasonable endeavours to resolve any such conflicts of interest fairly (having regard to its or his respective obligations and duties) and to ensure that the interests of the Fund and the Shareholders are not unfairly prejudiced.

Prospective investors should note that, subject always to their legal and regulatory obligations in performing each or any of the above roles:

- members of the UniCredit Group will pursue actions and take steps that it deems appropriate to protect their interests;
- members of the UniCredit Group may act in their own interests in such capacities and need not have regard to the interests of any Shareholder;

- members of the UniCredit Group may have economic interests adverse to those of the Shareholders. Members of the UniCredit Group shall not be required to disclose any such interests to any Shareholder or to account for or disclose any profit, charge, commission or other remuneration arising in respect of such interests and may continue to pursue its business interests and activities without specific prior disclosure to any Shareholder;
- members of the UniCredit Group do not act on behalf of, or accept any duty of care or any fiduciary duty to any investors or any other person;
- members of the UniCredit Group shall be entitled to receive fees or other payments and to exercise all rights, including rights of termination or resignation, which they may have, even though so doing may have a detrimental effect on investors; and
- members of the UniCredit Group may be in possession of information which may not be available to investors. There is no obligation on any member of the UniCredit Group to disclose to any investor any such information.

Notwithstanding the above, the Board of Directors believes that these divergences or conflicts can be adequately managed, and expect that the members of the UniCredit Group will be suitable and competent to provide such services and will do so at no further cost to the Fund which would be the case if the services of a third party were engaged to provide such services.

## 10.2 The Management Company

The Management Company and/or its respective affiliates or any person connected with it (together the "Relevant Parties") may from time to time act as directors, management company, investment manager, distributor, trustee, custodian, depositary, registrar, broker, administrator, investment adviser or dealer in relation to, or be otherwise involved in, other investment funds which have similar or different objectives to those of the Fund or which may invest in the Fund. It is, therefore, possible that any of them may, in the course of business, have potential conflicts of interest with the Fund. The Relevant Parties have adopted policies and procedures reasonably designed to prevent, limit or mitigate conflicts of interest. In addition, these policies and procedures are designed to comply with applicable law where the activities that give rise to conflicts of interest are limited or prohibited by law, unless an exception is available. The Board of Directors and each of the Relevant Parties will, at all times, have regard in such event to its obligations to the Fund and will endeavour to ensure that such conflicts are resolved fairly.

In addition, subject to applicable law, any Relevant Party may deal, as principal or agent, with the Fund, provided that such dealings are carried out as if effected on normal commercial terms negotiated on an arm's length basis. Any Relevant Party may deal with the Company as principal or as agent, provided that it complies with applicable law and regulation and the provisions of the Investment Management Agreement, the Management Agreement, the Administration Agreement, the Depositary Agreement and the Registrar and Transfer Agency Agreement, to the extent applicable.

The Investment Manager or any of its affiliates or any person connected with the Investment Manager may invest in, directly or indirectly, or manage or advise other investment funds or accounts, which invest in assets which may also be purchased or sold by the Fund. Neither the Investment Manager nor any of its affiliates nor any person connected with the Investment Manager is under any obligation to offer investment opportunities of which any of them becomes aware to the Company or to account to the Company in respect of (or share with the Funds or inform the Company of) any such transaction or any benefit received by any of them from any such transaction, but will allocate such opportunities on an

equitable basis between the Company and other clients.

The Depositary may from time to time, act as the depositary of other open-ended investment companies. Further information regarding the Depositary's conflict of interest arrangements is summarised in this Prospectus under the section The Depositary. The Depositary will provide, from time to time, a description of the conflicts of interest that may arise in respect of its duties. Moreover, if the Depositary delegates the whole or part of its safekeeping functions to a sub-depositary, it will provide, from time to time, a list of any conflicts of interest that may arise from such a delegation.

In calculating a Fund's Net Asset Value, the UCI Administrator may consult with the Investment Manager with respect to the valuation of certain investments. There is an inherent conflict of interest between the involvement of the Investment Manager or any Sub-Investment Manager in determining the Net Asset Value of a Fund and the entitlement of the Investment Manager or any Sub-Investment Manager to a management fee, which is calculated on the basis of the Net Asset Value of the Fund.

The foregoing does not purport to be a complete list of all potential conflicts of interest involved in an investment in the Fund.

The Management Company has established, implemented and maintained an effective conflicts of interest policy which is available on its website [www.structuredinvest.lu](http://www.structuredinvest.lu).

The Board of Directors will seek to ensure that any conflict of interest of which they are aware is resolved fairly.

## 10.3 The Depositary

The Depositary maintains comprehensive and detailed corporate policies and procedures requiring the Depositary to comply with applicable laws and regulations.

The Depositary has policies and procedures governing the management of conflicts of interest. These policies and procedures address conflicts of interest that may arise through the provision of services to UCITS.

The Depositary's policies require that all material conflicts of interest involving internal or external parties are promptly disclosed, escalated to senior management, registered, mitigated and/or prevented, as appropriate. In the event a conflict of interest may not be avoided, the Depositary shall maintain and operate effective organisational and administrative arrangements in order to take all reasonable steps to properly (i) disclosing conflicts of interest to the Fund and to Shareholders and (ii) managing and monitoring such conflicts.

The Depositary ensures that employees are informed, trained and advised of conflicts of interest policies and procedures and that duties and responsibilities are segregated appropriately to prevent conflicts of interest issues.

Compliance with conflicts of interest policies and procedures is supervised and monitored by the Depositary's authorised management, as well as the Depositary's compliance, internal audit and risk management functions.

The Depositary shall take all reasonable steps to identify and mitigate potential conflicts of interest. This includes implementing its conflict of interest policies that are appropriate for the scale, complexity and nature of its business. This policy identifies the circumstances that give rise or may give rise to a conflict of interest and includes the procedures to be followed and measures to be adopted in order to manage conflicts of interest. A conflicts of interest register is maintained and monitored by the Depositary.

In case the Depositary also performs central administration services for the benefit of the Fund, the entity has implemented appropriate segregation of activities between the Depositary and the administration services rendered, including escalation processes and governance. In addition, the depositary function is hierarchically and functionally segregated from the Fund administration business unit.

A potential risk of conflicts of interest may occur in situations where the correspondents may enter into or have a separate commercial and/or business relationship with the Depositary in parallel to the safekeeping delegation relationship. In the conduct of its business, conflicts of interest may arise between the Depositary and the correspondent. Where a correspondent shall have a group link with the Depositary, the Depositary undertakes to identify potential conflicts of interests arising from that link, if any, and to take all reasonable steps to mitigate those conflicts of interest.

The Depositary does not anticipate that there would be any specific conflicts of interest arising as a result of any delegation to any correspondent. The Depositary will notify its Board of Directors and/or the board of directors of the Management Company of the Fund of any such conflict should it so arise.

To the extent that any other potential conflicts of interest exist pertaining to the Depositary, they have been identified, mitigated and addressed in accordance with the Depositary's policies and procedures.

Updated information on the Depositary's custody duties and conflicts of interest that may arise may be obtained, free of charge and upon request, from the Depositary.

#### **10.4 The Investment Managers**

Each Investment Manager that has been appointed by the Management Company in accordance with the provisions of the 2010 Law is bound to implement procedures dealing with conflicts of interest in accordance with CSSF circular 18/698 or has implemented a conflicts of interest framework in compliance with their respective jurisdictional regulations.

## 11. Liquidity Management Tools of the Fund to manage temporary constrained market liquidity

### 11.1 Swing Pricing

The actual price obtained by a Sub-Fund when purchasing or selling assets may be higher or lower than the mid-price used in calculating the Net Asset Value of the Sub-Fund. Where subscriptions, redemptions, and/or conversions in a Sub-Fund cause the Sub-Fund to buy and/or sell underlying investments, the value of these investments may be affected by bid/offer spreads, trading costs and related expenses including transaction charges, brokerage fees, and taxes. As a result, the Net Asset Value per share of a Sub-Fund may be diluted as a result of subscriptions for, redemptions or conversion of Shares in the Sub-Fund at a price that does not reflect the actual price obtained in the underlying asset transactions undertaken on behalf of the Sub-Fund to accommodate the resulting inflows or outflows.

This investment activity may have a negative impact on the Net Asset Value per share called "dilution". In order to protect existing or remaining investors from the potential effect of dilution, the Fund may apply a "swing pricing" methodology as further explained below.

By applying the "swing pricing" methodology the Net Asset Value per Share is adjusted to account for the aggregate costs of buying and/or selling underlying investments. The pricing adjustment is applied to the capital activity at the level of a Sub-Fund and does therefore not address the specific circumstances of each individual investor transaction.

The Net Asset Value per Share will be adjusted by a certain percentage set by the Fund from time to time for each Sub-Fund called the "Swing Factor". The Swing Factor represents the estimated bid-offer spread of the assets in which the Sub-Fund invests and estimated tax, trading costs, and related expenses that may be incurred by the Sub-Fund as a result of buying and/or selling underlying investments. As certain equity markets and jurisdictions may have different charging structures on the buy and sell sides, the Swing Factor may be different for net subscriptions

and net redemptions in a Sub-Fund. Generally, the Swing Factor will not exceed two percent (2%) of the Net Asset Value per Share unless otherwise set out for each Sub-Fund in its supplement. In exceptional market conditions resulting in a higher volatility, this maximum level may be increased up to five percent (5%) to protect the interests of Shareholders. A periodical review will be undertaken in order to verify the appropriateness of the Swing Factor in view of market conditions.

Until the threshold rate is triggered, no pricing adjustment is applied and the transaction costs will be borne by the Sub-Fund. This will result in a dilution (reduction in the Net Asset Value per share) to existing shareholders.

As a partial swing methodology is adopted, the Net Asset Value per Share will be adjusted upwards or downwards if net subscriptions or redemptions in a Sub-Fund exceed a certain threshold set by the Fund from time to time for each Sub-Fund (the Swing Threshold).

The Swing Factor will have the following effect on subscriptions or redemptions:

- on a Sub-Fund experiencing levels of net subscriptions with respect to a Valuation Day (i.e., subscriptions are greater in value than redemptions) (in excess of the Swing Threshold) the Net Asset Value per share will be adjusted upwards by the Swing Factor; and
- on a Sub-Fund experiencing levels of net redemptions with respect to a Valuation Day (i.e., redemptions are greater in value than subscriptions) (in excess of the Swing Threshold) the Net Asset Value per share will be adjusted downwards by the Swing Factor.

The volatility of the Net Asset Value of the Sub-Fund might not reflect the true portfolio performance (and therefore might deviate from the Sub-Fund's benchmark, where applicable) as a consequence of the application of swing pricing.

Note that the Management Company can decide not to apply swing pricing to purchases when it is trying to attract assets so that a Sub-Fund can reach a certain size. In this case, the Management Company will pay the dealing costs and other costs from its own assets in order to prevent dilution of Shareholder value.



## 11.2 Dilution Levy

In certain circumstances, the value of the property of a Sub-Fund may be reduced as a result of charges incurred in dealings in the Sub-Fund's investments and of any spread between the buying and selling prices of these investments. In order to offset this effect, known as "dilution", and the consequent potential adverse effect on the existing or remaining Shareholders, the Board of Directors has the power to charge a "dilution levy" when Shares are bought or sold. If charged, the dilution levy will be shown in addition to (and not part of) the subscription price or redemption price of the Shares, as the case may be, in the relevant documentation. If charged, the dilution levy would be paid to the Fund and would become part of the property of the relevant Sub-Fund thus protecting the value of the remaining Shareholders' interests. It is not, however, possible to predict accurately whether dilution will occur at any future point in time.

Any dilution levy charged must be fair to all Shareholders and potential Shareholders. In particular, the dilution levy may be charged in the following circumstances:

- a) on a Sub-Fund experiencing large levels of net purchases (i.e. purchases less redemptions) relative to its size;
- b) on a Sub-Fund experiencing large levels of net redemptions (i.e. redemptions less purchases) relative to its size;
- c) in any other case where the Board of Directors is of the opinion that the interests of existing/continuing Shareholders and potential Shareholders require the imposition of a dilution levy.

The dilution levy for the Sub-Fund may be applied for transactions representing 5% of its net assets on any Valuation Day and will be calculated by reference to the costs of dealing in the underlying investments of the Sub-Fund, including any dealing spreads, commission and transfer taxes.

In any cases the dilution levy shall not exceed 2% of the Net Asset Value per Share.

In order to reduce inconsistency in the application of any dilution levy, the Board of Directors may take account of the trend of the Sub-Fund in question to expand or to contract in size and the transactions in Shares as of a particular Dealing Day.

## 11.3 Gating/Deferral

The Fund reserves the right not to accept instructions to redeem or convert on any one Valuation Day more than ten (10)% of the net assets of a Sub-Fund. In these circumstances, the Fund may declare that any such redemption or conversion requests will be deferred until the next Valuation Day and will be valued at the NAV per share prevailing on that Valuation Day. On such Valuation Day, deferred requests will be dealt with in priority to later requests and in the order that requests were initially received by the Registrar and Transfer Agent.

## 11.4 Others

The Fund reserves the right to extend the period of payment of redemption proceeds to such period, not exceeding ten (10) Business Days, as shall be necessary to repatriate proceeds of the sale of investments in the event of impediments due to exchange control regulations or similar constraints in the markets in which a substantial part of the assets of the Sub-Fund are invested or in exceptional circumstances where the liquidity of the Sub-Fund is temporary not sufficient to meet the redemption requests.

As an additional supplementary liquidity management tool, the Fund may decide to meet a redemption request by transferring securities, instead of cash, to the redeeming investors, rather Institutional Investors. Redemption-in-kind may protect investors remaining in the investment fund against the high liquidation costs which might otherwise arise.

Finally, the Fund may decide to extend temporarily stipulated ordinary period of advance notice that investors must give to the Fund when redeeming their investments in order to give fund managers more time to meet redemption requests during exceptionally deteriorated market conditions.

## 12. Temporary suspension of the calculation of the Net Asset Value of shares and dealing activity

This section provides useful information on possible cases that may trigger a suspension, restrictions to subscribe and redeem, duration of such suspensions and how investors are informed.

The Board of Directors of the Fund is authorised to temporarily suspend the calculation of the NAV of Shares of any Sub-Fund or any Class as well as the issue, redemption and conversion of Shares of any Sub-Fund or any Class, in the following circumstances:

- a) during any period (other than ordinary holidays or customary weekend closings) when any market or stock exchange is closed or when trading on any market or stock exchange is restricted or suspended, if that market or stock exchange is the main market or stock exchange for a significant part of Sub-Fund's investments; or
- b) during any period when an emergency exists as a result of which it is impossible to dispose of investments which constitute a substantial portion of the assets of a Sub-Fund; or it is impossible to transfer monies involved in the acquisition or disposition of investments at normal rates of exchange; or it is impossible to fairly determine the value of any asset in a Sub-Fund; or
- c) during any breakdown in the means of communication normally employed in determining the price of any of a Sub-Fund's investments or of current prices on any stock exchange; or
- d) if for any reason the prices of any investment owned by a Sub-Fund cannot be reasonably, promptly or accurately determined; or
- e) during any period when remittance of monies which will or may be involved in the purchase or sale of any of the Sub-Fund's investments cannot, in the opinion of the Board of Directors, be carried out at normal rates of exchange; or
- f) following a decision to liquidate or dissolve the Fund/a Sub-Fund or a Class; or

- g) in the case of a merger, if the Board of Directors deems this to be justified for the protection of the Shareholders; or
- h) in the event that a Sub-Fund is a feeder fund, following a suspension of the calculation of the NAV of the master fund or any other suspension or deferral of the issue, redemption and/or conversion of shares in the master fund; or
- i) in all other cases in which the Board of Directors of the Fund considers a suspension to be in the best interest of the Shareholders.

The suspension of the calculation of the NAV and of the issue, redemption and conversion of the Shares will be notified immediately to Shareholders who have made an application for subscription, redemption or conversion of shares for which the calculation of the NAV and of the issue, redemption and conversion of shares has been suspended. Such Shareholders will also be notified immediately once the calculation of the NAV per share is resumed.

During the time of suspension, any unprocessed and incoming subscription, redemption and conversion requests will be suspended, unless they are withdrawn by the Shareholders. Requests that have not been withdrawn will, in principle, be processed on the first Valuation Day after termination of the suspension period.

The suspension of the calculation of the NAV as well as the issue, redemption and conversion of a Class has no effect on the NAV calculation and dealing of other Classes or other Sub-Funds.

## 13. General Meetings of Shareholders and financial year

### 13.1 Information when the annual general shareholders meeting will be convened (modalities of announcement and venue)

The annual general meeting is generally held at the Fund's registered office at a date and time decided by the Board of Directors being no later than six (6) months after the end of the Fund's previous financial year.

To the extent required by law, notices shall, in addition, be published in the RESA and in a Luxembourg newspaper.

In exceptional circumstances, the Board of Directors may hold the annual general meeting outside of Luxembourg. Other Shareholder meetings may be held at other places and times, with appropriate approval and notification. The written notices convening annual general meetings, indicating the agenda, the date and time of the meeting and setting out the quorum and majority vote requirements, will be sent at least eight (8) days prior to the meeting to all holders of Registered Shares at their address listed in the register of Shareholders. Resolutions concerning the interests of all Shareholders generally will be taken in a general meeting, and will become effective if approved by two-thirds of the votes cast (whether in person or by proxy).

### **13.2 Rights and obligations of shareholders**

Among other matters, Shareholders will be asked to approve the dividends proposed by the Board of Directors, with the option of modifying them, within the limits of applicable law, as to the portion of annual net profits for the fiscal period to be included, as well as any portion of net assets. The Fund's financial statements must reflect the amount of net investment income and of capital in each dividend payment. Approval of a dividend requires the approval of a majority (as defined in the Articles of Incorporation) of the Shareholders of the applicable Sub-Fund or Class. Each Share gets one vote in all matters brought before a general meeting of Shareholders. Fractional Shares do not have voting rights. Nominees determine the voting policy for all Shares of which they are the owner of record. If the Shares are registered in the name of more than one holder, the unanimous approval of all account holders is required in order to enter a vote for the account, unless the account holders have notified the Fund that they have unanimously approved a representative to vote on behalf of the account. For information on admission and voting at any meeting, refer to the applicable meeting notice.

## **14. Merger of Fund or Sub-Funds**

### **14.1 Mergers decided by the Board of Directors**

The Board of Directors may from time to time elect to proceed with a merger within the meaning of the 2010 Law of the Fund or of one of its Sub-Funds, either as a receiving or a merging UCITS or Sub-Fund, subject to the conditions and procedures imposed by the 2010 Law, including the following provisions regarding notice and approval:

#### **14.1.1 Merger of the Fund:**

The Board of Directors may decide to proceed with a merger of the Fund, only on a receiving UCITS basis, with:

- another Luxembourg or foreign UCITS;

or

- a sub-fund thereof,

and, as appropriate, to redesignate the Shares of the relevant Sub-Fund thereof, as applicable.

In case the Fund is the receiving UCITS within the meaning of the 2010 Law, solely the Board of Directors will decide on the merger and effective date thereof.

Such a merger shall be subject to the conditions and procedures imposed by the 2010 Law, in particular concerning the merger project and the information to be provided to the Shareholders.

In case the Fund is the absorbed UCITS within the meaning of the 2010 Law, and hence ceases to exist, the general meeting of the Shareholders, rather than the Board of Directors, has to approve, and decide on the effective date of, such merger by a resolution adopted with no quorum requirement and at a simple majority of the votes validly cast at such meeting.

Such a merger shall be subject to the conditions and procedures imposed by the 2010 Law, in particular concerning the merger project and the information to be provided to the Shareholders.

#### **14.1.2 Merger of Sub-Funds**

The Board of Directors may decide to proceed with a merger of any Sub-Fund, either as receiving or absorbed Sub-Fund, with another existing Sub-Fund within the Fund and, as appropriate, to redesignate the Shares of the Sub-Fund concerned as Shares of either the receiving or absorbed Sub-Fund.

The Board of Directors may decide to proceed with a merger of any Sub-Fund, as receiving Sub-Fund, with:

- a Sub-Fund of another Luxembourg or foreign UCITS

or

- another Luxembourg or foreign UCITS, and, as appropriate, to redesignate the Shares of the Sub-Fund concerned as applicable.

Under the same conditions and procedure as for a merger, the Board of Directors may decide to reorganise a Sub-Fund or Class by means of a division into two or more Sub-Funds or Classes.

### **14.2 Mergers decided by the Shareholders**

#### **14.2.1 Merger of the Fund**

Notwithstanding the powers conferred to the Board of Directors by the preceding section, a merger within the meaning of the 2010 Law of the Fund, either as receiving or absorbed UCITS, with:

- another Luxembourg or foreign UCITS;

or

- a Sub-Fund thereof,

may be decided by a general meeting of the Shareholders for which there shall be no quorum requirement and which will decide on such a merger and its effective date by a resolution adopted at a simple majority of the votes validly cast at such meeting.

Such a merger shall be subject to the conditions and procedures imposed by the 2010 Law, in particular concerning the merger project and the information to be provided to the Shareholders.

#### **14.2.2 Merger of Sub-Funds**

The general meeting of the Shareholders of a Sub-Fund may also decide a merger within the meaning of the 2010 Law of the relevant Sub-Fund, either as receiving or absorbed Fund, with another Sub-Fund of a Luxembourg or foreign UCITS by a resolution adopted with no quorum requirement at a simple majority of the votes validly cast at such meeting.

Such a merger shall be subject to the conditions and procedures imposed by the 2010 Law, in particular concerning the merger project and the information to be provided to the Shareholders.

### **14.3 Rights of the Shareholders and imputation of costs**

In all the merger cases above, the Shareholders will in any case be entitled to request the redemption of their Shares, or, where possible, to convert them into units or shares of another sub-fund pursuing a similar investment policy and managed by the Management Company or by any other company with which the Management Company is linked by common management or control, or by substantial direct or indirect holding, in accordance with the provisions of the 2010 Law. Any legal, advisory or administrative costs associated with the preparation and the completion of the merger shall not be charged to the merging or the receiving Fund respectively Sub-Fund, or to any of their shareholders.

## **15. Liquidation of Fund or Sub-Funds**

### **15.1 Liquidation of the Fund**

The Fund may be dissolved and put into liquidation at any time with or without cause by a resolution of the general meeting of Shareholders as foreseen in the Articles of Incorporation. This meeting will be convened by the Board of Directors in compliance with Luxembourg law.

Should the Fund be liquidated, such liquidation shall be carried out in accordance with the provisions of the 2010 Law and of the 1915 Law and which specify the steps to be taken to enable Shareholders to participate in the liquidation distributions and in this connection provides for deposit in escrow at the Caisse de Consignation in Luxembourg of any such amounts which it has not been possible to distribute to the Shareholders at the close of liquidation. Amounts not claimed within the prescribed period are liable to be forfeited in accordance with the provisions of Luxembourg law. The net liquidation proceeds of the Fund shall be distributed to the Shareholders of each Class of the Fund in proportion to their respective holdings of such Class.

## **15.2 Liquidation of a Sub-Fund**

In the event that, for any reason, the Board of Directors determines that (i) the Net Asset Value of any Sub-Fund or Class has decreased to, or has not reached, the minimum level for that Sub-Fund or Class to be managed and/or administered in an efficient manner, or (ii) changes in the legal, economic or political environment would justify such termination, or (iii) a product rationalisation or any other reason would justify such termination, (iv) to do so would be in the interests of Shareholders, the Board of Directors may decide to compulsorily redeem all Shares of the relevant Sub-Fund or Class at the Net Asset Value per share (taking into account actual realisation prices of investments, realisation expenses and liquidation costs) for the Valuation Date in respect of which such decision shall be effective, and to terminate and liquidate such Sub-Fund or Class.

The Shareholders will be informed of the decision of the Board of Directors to terminate a Sub-Fund or Class by way of a notice and/or in any other way as required or permitted by applicable laws and regulations. The notice will indicate the reasons for and the process of the termination and liquidation.

Notwithstanding the powers conferred on the Board of Directors by the preceding paragraphs, the general meeting of Shareholders of a Sub-Fund or Class may also decide on such termination and liquidation and have the Fund compulsorily redeem all Shares of the relevant Sub-Fund or Class at the Net Asset Value per share for the Valuation Date in respect of which such decision shall be effective. Such general meeting will decide by resolution taken with no quorum

requirement and adopted by a simple majority of the votes validly cast. The liquidation of the last Sub-Fund will result in the liquidation of the entire Fund on same effective date.

Actual realisation prices of investments, realisation expenses and liquidation costs will be taken into account in calculating the Net Asset Value applicable to the liquidation. Following the decision to liquidate a Sub-Fund, the Board of Directors will determine whether dealing in Shares may continue up to the date of liquidation and will inform Shareholders in the notice of liquidation. Shareholders in the Sub-Fund or Class concerned will be authorised to continue requesting the redemption or conversion of their Shares prior to the effective date of the compulsory redemption where the Board of Directors is satisfied that this will not jeopardise the fair treatment of the Shareholders.

Liquidation proceeds which have not been claimed by the Shareholders upon closure of the liquidation process will be deposited, in accordance with applicable laws and regulations, in escrow at the Caisse de Consignation on behalf of the persons entitled thereto. Proceeds not claimed within the statutory period will be forfeited in accordance with laws and regulations.

## **16. Benchmarks**

### **16.1 Definition of use of Benchmarks and Purpose**

The Benchmark Regulation introduces a common framework to ensure the accuracy and integrity of indices used as benchmarks in the European Union, thereby contributing to the proper functioning of the internal market while achieving a high level of consumer and investor protection. To achieve this goal the Benchmark Regulation foresees, inter alia, that an EU supervised entity may use a benchmark or a combination of benchmarks in the European Union if the benchmark is provided by an administrator located in the European Union and included in the public register maintained by ESMA or is a benchmark which is included in the ESMA register. As further defined in the Benchmark Regulation, a fund uses an index or a combination of indices (further referred to as a 'benchmark') where the benchmark is used to

measure the performance of the Sub-Fund for the purpose of tracking the return of such index or combination of indices, of defining the asset allocation of a portfolio, or of computing the performance fee.

#### **16.1.1 Use of benchmarks**

The Sub-Fund Specific Information provides details on the use of benchmarks as defined under the Benchmark Regulation. A benchmark can in principle be used for the following purposes:

- Management in reference to a benchmark in order to define the asset allocation of a portfolio;
- Management in reference to a benchmark in order to track the performance of this benchmark;
- Management in reference to a benchmark in order to calculate the performance fee;

#### **16.1.2 Plans setting out actions in the event that a benchmark materially changes**

For each benchmark, the Management Company has established written plans in which it has defined measures that it would take if the benchmark was to change materially or cease to be provided ("Contingency Plan"). A copy of the Contingency Plan may be obtained, free of charge, and upon request at the registered office of the Management Company.

#### **16.1.3 Benchmark Regulation & ESMA register**

Under the Benchmarks Regulation, ESMA publishes and maintains a public register ("ESMA register") that contains the consolidated list of EU administrators and third country benchmarks, in accordance with article 36 of the Benchmarks Regulation. A Sub-Fund may use a benchmark in the European Union if the EU administrator or if the benchmark appears in the ESMA register or if it is exempted according to article 2(2) of the Benchmark Regulation, such as, for example, benchmarks provided by EU and non-EU central banks. Further, certain third country benchmarks are eligible even though they do not appear in the ESMA register as benefiting from a transitional provision under article 51.5 of the Benchmark Regulation.

## **17. Prevention of money laundering and financing of terrorism**

In accordance with international regulations and Luxembourg laws and regulations in relation to the fight against money laundering and terrorism financing (including, but not limited to, the amended Law of 12 November 2004 on the fight against money laundering and financing of terrorism (the "2004 Law"), the Grand Ducal Regulation dated 1 February 2010, CSSF Regulation 12-02 of 14 December 2012 concerning the fight against money laundering and terrorist financing as amended by CSSF Regulation 20-05 of 14 August 2020, CSSF Circular 15/609 concerning the fight against money laundering and terrorist financing, and any respective amendments or replacements) (collectively, the "AML/CFT Rules"), obligations have been imposed on all professionals of the financial sector to prevent the use of undertakings for collective investment for money laundering and terrorism financing purposes.

Measures aimed towards the prevention of money laundering, as provided by the 2004 Law and the regulations and circulars of the CSSF, may require a detailed verification of a prospective Investor's identity. For the sake of completeness, such verification also entails the mandatory and regular controls and screenings related to international sanctions and performed against targeted financial sanctions lists.

In addition, in accordance with article 3-2 of the 2004 Law and with article 2 of the CSSF Regulation N°12-02, as amended by the CSSF Regulation 20-05, enhanced customer due diligence measures will apply to intermediaries acting on behalf of Investors.

As a result of such provisions, the implementation of those identification procedures and, where applicable, the performance of the detailed verification is under the supervision and responsibility of the UCI Administrator.

The Fund, the Management Company and the UCI Administrator have the right to request any information as it is necessary to verify the identity of a prospective Investor. In the event of delay or failure by the prospective Investor to produce any information required for verification purposes, the Board of Directors (or its delegate) may refuse to accept the application and will not be liable for any

interest, costs or compensation. Similarly, when Shares are issued, they cannot be redeemed or converted until full details of registration and anti-money laundering documentation have been completed.

The Board of Directors reserves the right to reject an application, for any reason, in whole or in part in which event the application monies or any balance thereof will be returned without unnecessary delay to the applicant by transfer to the applicant's designated account, provided the identity of the applicant can be properly verified pursuant to Luxembourg anti-money laundering regulations. In such event, the Fund, the Management Company and the UCI Administrator will not be liable for any interest, costs or compensation.

Failure to provide proper documentation may result in the withholding of distribution and redemption proceeds by the relevant Sub-Fund.

#### *Fund UBO Register*

The Fund, or any delegate thereof, will further provide the Luxembourg beneficial owner register (the "RBO") created pursuant to the Law of 13 January 2019 establishing a register of beneficial owners with relevant information about any Shareholder or, as applicable, beneficial owner(s) thereof, qualifying as beneficial owner of the Fund within the meaning of the 2004 Law. Such information will be made available to the general public through access to the RBO, as required by, and under the conditions set forth in the Luxembourg anti-money laundering laws and regulations. In addition, the Investor acknowledges that failure by a Shareholder, or, as applicable, beneficial owner(s) thereof, to provide the Fund, or any delegate thereof, with any relevant information and supporting documentation necessary for the Fund to comply with its obligation to provide same information and documentation to the RBO is subject to criminal fines in Luxembourg.

## **18. Further information, notices and documents available for investors**

Besides this Prospectus, additional information is made available by the Fund at the registered office of its Management Company, upon request, in accordance with the provisions of Luxembourg law and regulation. This additional information may include

further documents made available by the Fund to inform investors on their investment in a Sub-Fund, among others on the procedures relating to complaints handling, notices to investors, remuneration policies, conflict of interest, the strategy followed for the exercise of voting rights of the Fund, the best execution policy as well as the arrangements relating to the fees, commissions or non-monetary benefits if any in relation with the investment management and administration of the Fund.

### **18.1 Packaged Retail and Insurance-based Investment Product - Key Information Document (PRIIP KID), semi-annual and annual financial reports**

This Prospectus is one of the compulsory documents required by law together and in cooperation with the obligatory Key Investor Information Document and the semi-annual and annual financial report.

Investors are advised to read these documents to get informed on the structure, activities and investment proposals of the Fund and its Sub-Fund(s) they are invested in.

A Packaged Retail and Insurance-based Investment Product - Key Information Document (PRIIP KID) exists for each Class, consistent with the relevant parts of the Prospectus. The Key Investor Information Document contains only the essential elements for making the investment decisions. The nature of the information is harmonised so as to provide standardised and consistent information in a non-technical language. A single document for each Class of limited length presenting the information in a specified sequence that should help to understand the nature, characteristics, the risks, costs and past performance of the investment product.

The financial reports include, among others, a balance sheet or a statement of assets and liabilities, a detailed income and expenditure account for the past financial (half) year, a description of how the remuneration and the benefits have been calculated, a report on the activities of the past financial (half) year as well as information which will enable investors to make an informed judgement on the development of the activities and the results of the fund. Audited annual reports are available within four months after the end of the Fund's financial year. Unaudited semi-annual reports are available within 2 months after the end of the Fund's financial year.

These documents about the Fund or a Sub-Fund can be accessed at [www.structuredinvest.lu](http://www.structuredinvest.lu) or are available as further described below in section Information and Documents available upon request.

## **18.2 Complaints handling and queries**

The details of the Fund's complaint handling procedures may be obtained free of charge during normal office hours at the registered office of the Fund in Luxembourg.



## Appendix 1: Information and documents available to investors

The following table shows places and channels where official materials are available:

	Registered Office of Management Company	Registered Office of Fund	Website address/other media Outlets	Other
Prospectus, Packaged Retail and Insurance-based Investment Product - Key Information Document (PRIIP KID)	✓	✓	<a href="http://www.structuredinvest.lu">www.structuredinvest.lu</a>	
Articles of Incorporation, Financial Reports	✓	✓		RESA
Complaints Procedure	✓	✓		RESA
Agreements between the Fund and service providers	✓	✓		
NAV per share (subscription/redemption price)	✓	✓	<a href="http://www.structuredinvest.lu">www.structuredinvest.lu</a>	
Dividend announcements	✓	✓	<a href="http://www.structuredinvest.lu">www.structuredinvest.lu</a>	
Notice of suspension of NAV, subscriptions, redemptions	✓	✓	<a href="http://www.structuredinvest.lu">www.structuredinvest.lu</a>	
Convening notices to Shareholder meetings	✓	✓		RESA
Other notices to Shareholders (mergers, liquidations, pre-notice of material changes, ...)	✓	✓	<a href="http://www.structuredinvest.lu">www.structuredinvest.lu</a>	
Management Company's remuneration policy, counterpart selection policy/list, conflict of interest policy, list of other funds managed, list of benchmarks used and related contingency plans	✓		<a href="http://www.structuredinvest.lu">www.structuredinvest.lu</a>	
Depository's duties, Conflict of Interest Policy, sub-depository network			<a href="https://www.caceis.com/who-we-are/compliance/">https://www.caceis.com/who-we-are/compliance/</a>	

## Appendix 2: Specific information and documents available to investors in certain countries

### GERMANY

#### Paying and Information Agent in Germany

The bank CACEIS Bank S.A. Germany Branch, Lilienthalallee 36, D-80939 Munich has assumed the function of Paying and Information Agent as defined in Section 309 KAGB in Germany (German Paying and Information Agent). Following the pre-conditions set out above it accepts subscription, conversion and redemption orders.

Redemption proceeds, any distributions, and payments to the investors may be made through the German Paying and Information Agent.

The following documents are available free of charge from the German Paying and Information Agent:

- The prospectus and the Key Investor Information
- The Articles of Incorporation
- The current annual report and, if published, the current semi-annual report
- All the documents listed under Appendix 1: Information and documents available to investors

Information for investors is published to the extent required by law in the Federal Republic of Germany, in the online version of the Bundesanzeiger. The issue and redemption prices are published online every trading day at [www.structuredinvest.lu](http://www.structuredinvest.lu) and can be obtained free of charge from the Paying and Information Agent in Germany.

#### Tax notice for Germany

The following information on the taxation of income from fund units is of a general nature, is limited to the investment funds listed in this Prospectus and relates to investors with unlimited tax liability in Germany who hold their fund units as private assets or business assets.

This information must not be understood as tax advice and does not replace such advice. The information is based on the current legal situation as it results from tax legislation and administrative regulations and their interpretation or supplementation by the tax authorities and court rulings. Subsequent changes to the legal situation may also be introduced retroactively and adversely affect the tax consequences described below. This summary does not claim to deal with all tax aspects that may be of significance for taxation due to the personal circumstances of the individual investor. Individual investors are therefore advised to seek advice from their tax advisor, if necessary, on the consequences of acquiring, holding or disposing of the fund units.

As special-purpose assets, the Fund is generally exempt from corporation and trade tax in Germany. However, it is partially liable to corporation tax on its domestic (i.e. German) investment income and other domestic income within the meaning of the limited income tax liability, with the exception of gains from the sale of shares in corporations. The tax rate is 15%. Insofar as the taxable income is collected by way of withholding taxes, the 15% tax rate already includes the solidarity surcharge. However, the investment income is subject to income tax for the private investor as income from capital assets, insofar as it exceeds, together with other investment income, the annual lump-sum savings amount of EUR 1,000 (for single persons or married couples assessed separately) or EUR 2,000 (for married couples assessed jointly). Income from capital assets is generally subject to a tax deduction of 25% (plus solidarity surcharge and church tax, if applicable).

Under certain conditions, investors may receive a lump-sum portion of this investment income tax-free (so-called partial exemption). A partial exemption is applicable to income from investment funds that meet the tax requirements for classification as equity funds or mixed funds. Equity funds are investment funds that, in accordance with the investment terms and conditions, continuously invest more than 50% of the value of their assets in equity investments as defined by the Investment Tax Act. Mixed funds are investment funds that, in accordance with the investment conditions, continuously invest at least 25% of the value of their assets in equity investments within the meaning of the Investment Tax Act. If the investment fund does not meet the tax requirements for either an equity fund or a mixed fund, no partial exemptions are applicable to the investment income. If the tax classification of the investment fund for the purposes of the partial exemption changes, the fund unit is deemed to have been sold and to have been acquired on the following date with a new tax classification for the purposes of the partial exemption; however, any resulting notional capital gain is not to be taken into account until the fund units are actually sold.

Income from capital assets also includes income from investment funds (investment income), i.e. the distributions of the investment fund, the advance lump sums and the gains from the sale of the fund units. In principle, if the fund units are held in a domestic, i.e. German, securities account, the tax deduction made by the German depositary institution has a settlement effect for the private investor (so-called final withholding tax), so that the income from capital assets regularly does not have to be declared in the income tax return. When the tax is withheld, the German depositary institution generally already offsets losses and credits foreign withholding taxes arising from the direct investment. However, the tax deduction has no settlement effect if, among other things, the personal tax rate is lower than the settlement rate of 25% and the so-called favourable tax assessment is applied for. In this case, the income from capital assets must be declared in the income tax return. The tax office then applies the lower personal tax rate and credits the tax deduction made against the personal tax liability. If income from capital assets has not been subject to a tax deduction (e.g. because a profit was generated from the sale of fund units in a foreign securities account), this must always be stated in the income tax return. In the context of the assessment, this income from capital assets is then also subject to the flat tax rate of 25% or, in case of the favourable tax assessment applies, the lower personal tax rate. If the fund units are held as business assets, the investment income is recognised for tax purposes as business income.

#### I. Fund units held as private assets (tax residents)

##### Distributions

Distributions by the fund are generally taxable. If the fund meets the tax requirements for a partial exemption, distributions may be partially tax-free. However, if the fund meets the tax requirements for an equity fund, 30% of the distributions are tax-free. If the fund meets the tax requirements for a mixed fund, 15% of the distributions are tax-free. The taxable distributions are generally subject to a 25% withholding tax (plus solidarity surcharge and church tax, if applicable). Tax withholding may be waived if the investor is a German tax resident and submits an exemption form, provided that the taxable income does not exceed EUR 1,000 for single taxpayers or EUR 2,000 for married couples filing jointly. The same also applies if a certificate is presented for persons who are not expected to be assessed for income tax (so-called non-assessment certificate, hereinafter "NV-certificate"). If the domestic investor holds the fund units in a domestic custody account, the depositary institution as paying agent shall refrain from deducting tax if it is presented, prior to the specified distribution date, with an exemption order issued in a sufficient amount in accordance with an official model or a NV-certificate issued by the tax office for a maximum period of three years. In this case, the investor is credited the entire distribution without deduction.

At the level of business investors, distributions by the fund are generally subject to income tax or corporate income tax and trade tax.

If the fund meets the tax requirements for an equity fund, 60% of the distributions are tax-free for income tax purposes and 30% for trade tax purposes if the fund units are held by individuals as business assets. For taxable corporations, generally 80% of the distributions are tax-exempt for corporate income tax purposes and 40% are tax-exempt for trade tax purposes. For corporations that are life or health insurance companies and for which the fund units are classified as investments, or that are credit institutions and for which the fund units are classified as part of the trading book or were acquired by them with the aim of achieving a short-term proprietary trading profit, 30% of the distributions are tax-free for corporate income tax purposes and 15% for trade tax purposes.

If the fund meets the tax requirements for a mixed fund, 30% of the distributions are tax-free for income tax purposes and 15% for trade tax purposes if the fund units are held by individuals as business assets. For taxable corporations, generally 40% of the distributions are tax-exempt for purposes of corporate income tax and 20% for purposes of trade tax. For corporations that are life or health insurance companies and for which the fund units are classified as investments, or that are credit institutions and for which the fund units are classified as part of the trading book or were acquired for the purpose of achieving a short-term proprietary trading profit, 15% of the distributions are tax-exempt for corporate income tax purposes and 7.5% for trade tax purposes.

For tax deduction purposes, if the tax requirements for an equity or mixed fund are met, the partial exemption rate applicable to private investors is applied uniformly, i.e. 30% in the case of an equity fund and 15% in the case of a mixed fund.

#### Advance lump sums

The advance lump sum is the amount by which the fund's distributions within a calendar year fall short of the base yield for that calendar year. The base yield is determined by multiplying the fund unit's redemption price at the beginning of a calendar year by 70% of the prime rate derived from the long-term attainable yield on public bonds. The base yield is limited to the additional amount that results between the first and the last redemption price set in the calendar year plus distributions within the calendar year. In the year in which the fund units are acquired, the advance lump sum shall be reduced by one-twelfth for each full month preceding the month of acquisition. The advance lump sum is deemed to have accrued on the first working day of the following calendar year. Advance lump sums are generally taxable.

If the fund meets the tax requirements for a partial exemption, advance lump sums may be partially tax-exempt. The taxable advance lump sums are generally subject to a tax deduction of 25% (plus solidarity surcharge and church tax, if applicable). The tax deduction may be waived if the investor is a tax resident and submits an exemption order, provided that the taxable income components do not exceed EUR 1,000 in the case of single tax assessment or EUR 2,000 in the case of joint tax assessment of married couples. The same also applies if a NV-certificate is presented for persons who are not expected to be assessed for income tax.

If the domestic investor holds the fund units in a domestic custody account, the depositary institution as paying agent shall refrain from deducting tax if it is presented, prior to the time of inflow, with an exemption order issued in a sufficient amount in accordance with an official model or a NV-certificate issued by the tax office for a maximum period of three years. In this case, no tax is withheld. Otherwise, the investor must provide the domestic custodian with the amount of tax to be withheld. For this purpose, the depositary institution may collect the amount of tax to be withheld from an account maintained with it and in the name of the investor without the investor's consent. Unless the investor objects prior to the inflow of the advance lump sum, the custodian may collect the amount of tax to be withheld from an account in the name of the investor to the extent that an overdraft facility agreed with the investor for this account has not been utilised. If the investor fails to fulfill his obligation to provide the amount of tax to be withheld to the domestic depositary institution, the depositary institution shall notify the tax office responsible for it. In this case, the investor must declare the advance lump sum in his income tax return.

Capital gains at investor level.

If fund units in the fund are sold after December 31, 2017, the capital gain is subject to the 25% settlement rate. This applies both to fund units acquired before January 1, 2018, which are considered disposed of as of December 31, 2017, and reacquired as of January 1, 2018, and to fund units acquired after December 31, 2017. If the fund qualifies for a partial tax exemption, capital gains may be partially tax-free. In the case of gains from the sale of fund units acquired prior to January 1, 2018, which are deemed to have been sold as of December 31, 2017 and reacquired as of January 1, 2018, it should be noted that at the time of the actual sale, tax is also payable on the gains from the deemed sale that took place as of December 31, 2017, if the fund units were actually acquired after December 31, 2008. If the fund units are held in a domestic custody account, the custodian will make the tax deduction, taking into account any partial exemptions. The 25% withholding tax (plus solidarity surcharge and, if applicable, church tax) can be avoided by submitting a sufficient exemption instruction or a NV-certificate. If such fund units are sold by a private investor at a loss, the loss can be offset against other positive income from capital assets. If the fund units are held in a domestic custody account and positive income from capital assets was generated at the same custodian in the same calendar year, the custodian will offset the loss. If fund units acquired before January 1, 2009 are sold after December 31, 2017, the gain that arises after December 31, 2017 is generally tax-free for private investors up to an amount of EUR 100,000. This tax-free amount can only be claimed if these gains are declared to the tax office responsible for the investor. When determining the capital gain, the gain must be reduced by the advance lump sums recognised during the period of ownership.

## II. Fund units held as business assets (resident for tax purposes)

### Refund of the fund's corporate income tax

If the investor is a domestic corporation, association of persons or estate which, according to its articles of association, foundation or other constitution and according to its actual management, exclusively and directly serves charitable, benevolent or ecclesiastical purposes, or a foundation under public law which exclusively and directly serves charitable or benevolent purposes, or a legal entity under public law which exclusively and directly serves ecclesiastical purposes, then, upon application, the investor shall be reimbursed by the fund for the corporation tax incurred at the fund level on a pro rata basis for its holding period; this does not apply if the fund units are held in a commercial business operation. The same applies to comparable foreign investors domiciled and managed in a foreign state providing administrative and recovery assistance. The refund requires that the investor has been the civil law and beneficial owner of the fund units for at least three months prior to the inflow of the fund's income subject to corporate income tax, without any obligation to transfer the fund units to another person. Furthermore, with regard to the corporation tax incurred at the fund level on German dividends and income from German quasi-equity profit participation rights, the refund essentially requires that German shares and German quasi-equity profit participation rights were held by the fund as the beneficial owner for an uninterrupted period of 45 days within 45 days before and after the due date of the investment income and that there was an uninterrupted minimum risk of a change in value of 70% during these 45 days. The application must be accompanied by evidence of tax exemption and a certificate of fund unit ownership issued by the custodian. The fund unit inventory certificate is a certificate issued in accordance with an official model showing the number of fund units held by the investor throughout the calendar year, as well as the time and scope of the acquisition and sale of fund units during the calendar year. Due to the high complexity of the regulation, it seems advisable to consult a tax advisor.

### Distributions

Distributions by the fund are generally subject to income or corporation tax and trade tax. If the fund meets the requirements for a partial exemption, distributions may be partially tax-exempt for income or corporation tax and trade tax purposes. Distributions are generally subject to a 25% withholding tax (plus solidarity surcharge). If the fund meets the tax requirements for a partial exemption, the partial exemption rate applicable to private investors is applied uniformly for tax deduction purposes.

### Advance lump sums

The advance lump sum is the amount by which the fund's distributions within a calendar year fall short of the base yield for that calendar year. The base yield is determined by multiplying the fund unit's redemption price at the beginning of a calendar year by 70% of the prime rate derived from the long-term attainable yield on public bonds. The base yield is limited to the additional amount that results between the first and the last redemption price set in the calendar year plus distributions within the calendar year. In the year in which the fund units are acquired, the advance lump sum shall be reduced by one-twelfth for each full month preceding the month of acquisition. The advance lump sum is deemed to have accrued on the first working day of the following calendar year. Advance lump-sum payments are generally subject to income tax or corporation tax and trade tax. If the fund meets the requirements for a partial exemption, advance lump sums may be partially tax-exempt for purposes of income or corporate income tax and trade tax. As a rule, the advance lump sums are subject to a 25% tax deduction (plus solidarity surcharge). If the fund meets the tax requirements for a partial exemption, the partial exemption rate applicable to private investors is applied uniformly for tax deduction purposes.

#### Capital gains at investor level

Gains from the disposal of the fund units are generally subject to income or corporation tax and trade tax. When determining the capital gain, the gain must be reduced by the advance lump sums recognised during the period of ownership. If the fund qualifies for a partial exemption, capital gains may be partially exempt from tax for purposes of income or corporation tax and trade tax. Gains from the sale of fund units are generally not subject to tax withholding.

#### Negative taxable income

Negative taxable income cannot be attributed directly to the investor.

#### Liquidation taxation

During the liquidation of the fund, distributions are considered income only to the extent that they include the appreciation of a calendar year.

#### Overview of the tax consequences for usual operating investor groups

Following this General Section of the Prospectus, you will find a summary overview for common operational investor groups.

### III. Non-resident taxpayers

If a non-resident taxpayer holds the fund units in a custody account with a domestic custodian, no tax will be withheld on distributions, advance lump sums, and gains from the sale of the fund units, provided that the non-resident taxpayer can prove his or her non-resident status. If the custodian is not aware of the investor's non-resident status or if proof of such status is not provided in good time, the foreign investor is obliged to apply for a refund of the tax withheld in accordance with the German Fiscal Code (*Abgabenordnung*). The competent tax office is the tax office responsible for the depository institution.

### IV. Solidarity Surcharge

A solidarity surcharge of 5.5% is levied on the tax withheld on distributions, advance lump sums and gains from the sale of fund units. The solidarity surcharge is creditable against income tax and corporation tax.

### V. Church tax

Insofar as the income tax is already levied by a domestic depository (withholding agent) by way of tax withholding, the church tax payable thereon is regularly levied as a surcharge on the tax withholding in accordance with the church tax rate of the religious community to which the church tax payer belongs. The deductibility of church tax as a special expense is already taken into account as a reduction when the tax is withheld.

### VI Foreign withholding tax

In some cases, withholding tax is withheld on the fund's foreign income in the countries of origin. This withholding tax cannot be taken into account by the investors in order to reduce tax.

## VII Consequences of the Merger of Investment Funds

In the case of a merger of a domestic investment fund into another domestic investment fund, there is no disclosure of hidden reserves either at the level of the investors or at the level of the investment funds involved, i.e. this process is tax-neutral. The same applies to the transfer of all assets of a domestic investment fund to a domestic investment stock corporation with variable capital or a sub-fund of a domestic investment stock corporation with variable capital. If the investors of the transferring investment fund receive a cash payment provided for in the merger plan, such payment shall be treated as a distribution. The same principles should apply with a view to a merger of a foreign investment fund into another investment fund both of which are subject to the same law of a foreign state providing administrative and recovery assistance (such as, e.g. Luxembourg).

### Legal and tax risk

The legal and tax treatment of funds can change in unforeseeable and uncontrollable ways. In the event of a correction that is fundamentally disadvantageous for the investor from a tax perspective, a change in the incorrectly determined tax bases of the fund for previous fiscal years may result in the investor having to bear the tax burden arising from the correction for previous fiscal years, even though he may not have been invested in the investment fund at that time. Conversely, investors may find that they no longer benefit from a correction for the current and previous fiscal years in which they held an investment in the investment fund that is fundamentally advantageous from a tax perspective due to the redemption or sale of the units prior to the implementation of the corresponding correction.

In addition, a correction of tax data may result in taxable income or tax benefits actually being assessed for tax purposes in a different assessment period than the one that is actually applicable and this may have a negative impact on the individual investor.

### Right of revocation in accordance with Section 305 KAGB

If investment units are purchased on the basis of verbal negotiations outside of the permanent business premises of the party making or brokering the sale, then the purchaser may revoke his declaration of the sale in writing to the foreign management company within a period of two weeks (right of revocation); this also holds when the party selling or brokering the sale of the units does not have any permanent business premises. For distance selling as defined by Section 312c of the German Civil Code (BGB), there is no right of revocation for the acquisition of financial services whose price is subject to fluctuations on the financial market (Section 312g(2)(8) BGB).

Timely dispatch of the revocation notice is sufficient for the purpose of observing the time limit. The revocation must be declared in writing directly to Structured Invest S.A. 8-10, rue Jean Monnet, L-2180 Luxembourg including information on the person making the declaration and his signature; no reason for the revocation is required.

The deadline for revocation does not commence until a copy of the concluded contract has been delivered to the purchaser or a contract note has been sent to him or her, including instructions regarding the right of the revocation similar to the above.

If the beginning of the period is in dispute, the burden of proof lies with the seller.

The right of revocation does not apply if the seller can prove that either the investor acquired the units as part of his commercial operations or if he called on the investor to conduct negotiations leading to the sale of the units as a result of a previous order in accordance with Section 55(1) of the Industrial Code (GewO).

If the revocation is exercised after the investor has made payment, the foreign management company is obliged to repay the investor's costs – incrementally as the purchased units are transferred back to the investment company, if necessary – in addition to an amount corresponding to the value of the purchased units the day after the revocation was received.

The right of revocation cannot be waived.

## **Austria**

Pursuant to Section 140 (1) Austrian Investment Fund Act 2011 ("InvFG 2011"), the Austrian Financial Market Authority ("Finanzmarktaufsicht") has been notified of the intention to publicly distribute Share Classes of the Fund in Austria and is authorised to do so from the end of the notification procedure.

### Paying agent

UniCredit Bank Austria AG, Schottengasse 6-8, A-1010 Vienna, has been appointed as paying agent in Austria according to § 41 Abs 1 iVm § 141 Abs 1 InvFG 2011 (see also 92 RL (EU) 2019/1160). In addition to the normal redemption and switching procedures shareholders resident in Austria may - following the pre-conditions set out above) - alternatively redeem or switch their shares through the Austrian Paying Agent. Any payments to shareholders may also be effected through the Austrian Paying Agent.

### Information agent

The sales prospectus, the PRIIPs KIDs, the most recent annual and half-yearly report, as well as the offer and redemption price may also be obtained free of charge from UniCredit Bank Austria AG at the stated address.

### Tax representative

The Fund has appointed KPMG Alpen-Treuhand Wirtschaftsprüfungs- und Steuerberatungsgesellschaft, Porzellangasse 51, 1090 Wien as tax representative according to § 186 par. 2 no. 2 in connection with § 188 Investment Fund Act 2011.

### Publication of prices

The calculated values of the Fund can be obtained from the paying agent UniCredit Bank Austria AG, Schottengasse 6-8, A-1010 Wien. The calculated values of the Sub-Funds can be seen on the Fund's homepage [www.structuredinvest.lu](http://www.structuredinvest.lu).

### Taxation in Austria

The following information is supposed to give a general overview of the principles of Austrian taxation on income derived from investment funds for investors subject to unlimited tax liability in Austria based on the legal status applicable since 1 April 2012. Particularities of individual cases are not considered. As no concrete advice on the taxation of individual investors is hereby given, it is recommended that investors seek advice from a tax advisor regarding the taxation of their respective holdings.

#### 1. General information

Investment funds are transparent according to Austrian tax law. This means that income from a fund is not taxed at fund level but at investor level (tax transparency).

The fund's income is generally taxable, when it is distributed to the investors. Income, which is not distributed, is taxable as deemed distributed income ("DDI") once a year.

The Investment Fund Act 2011 generally provides for two tax categories for foreign investment funds:

- Investment funds, which have a tax representative, who calculates the 25% withholding tax on distributions and DDI and reports the tax figures to the OeKB (reporting funds) and
- Investment funds, which do not have a tax representative and which are therefore subject to the lump-sum taxation (black funds). The lump-sum taxation is based on the higher of the following two amounts: 90% of the difference between the first and the last redemption price of the calendar year or 10% of the last redemption price of the calendar year.

#### 2. Private investors

##### 2.1. Taxation of the fund's income



The taxable fund's income consists of the net investment income (i.e. interest income, dividend income, other ordinary income minus the fund's expenses) and 60% or 100% of the realised capital gains from the sale of securities and of the income from derivative instruments.

Realised capital losses (after netting with realised capital gains) can be credited against the ordinary income (dividends, interest and other income minus expenses). If capital losses exceed the net investment income, the exceeding amount can be carried forward at Share Class level. Also a negative net investment income can be offset against realised capital gains and carried forward if the negative net investment income exceeds the realised capital gains. In the following financial years, these carry forwards have to be offset in a first step against realised capital gains and in a second step against the net investment income.

## 2.2. Taxation of the DDI

In case of foreign investment funds, the annual Austrian DDI figures have to be reported within seven months after the fund's financial year end by the Austrian tax representative. The applicable tax rate for private investors on the fund's income is generally 25% KESt. In case the fund shares are held on Austrian deposit, the 27.5% KESt on the DDI is withheld by the Austrian depository bank when the tax figures are reported to OeKB. In case the fund shares are held on foreign deposit the DDI (which is deemed to be distributed four months after the fund's financial year-end in this case) has to be included in the private investor's personal income tax return and is subject to special 27.5% tax rate.

## 2.3. Taxation of distributions

Distributed income is subject to 25% tax. In case the fund shares are held on Austrian deposit, the 25% tax on the distribution (KESt) is withheld by the Austrian depository bank. In case the fund shares are held on foreign deposit the distributed income has to be included in the private investor's personal income tax return and is subject to special 27.5% tax rate.

## 2.4. Sale of fund shares

In case private investors sell their fund shares, the difference between the sales price and the purchase price is subject to 27.5% KESt irrespective of the holding period. In order to avoid a double taxation of the DDI (i.e. annual taxation and taxation as part of the gain derived from the sale of the fund shares) the fund share's purchase price is increased annually by the taxed DDI. It has to be considered that the sales (preliminary) charge must generally not be considered as incidental acquisition cost. If the fund shares are held on Austrian deposit, the 27.5% tax on the capital gain shall be withheld by the Austrian depository bank. In case the fund shares are held on foreign deposit, the capital gain has to be included in the private investor's personal income tax return.

## 3. Individuals holding the fund shares as business property

If fund shares are held by individuals as business property (sole proprietors or partnerships), the tax rules as described above for private investors are generally applicable with the following exemptions:

- Individuals holding the fund shares as business property have to include the realised capital gains into the income tax return. The capital gains are subject to 27.5% tax. Any tax withheld on capital gains by the Austrian depository bank will be credited on the individual's income tax.
- 100% of the accumulated realised capital gains are taxable.
- The sales (preliminary) charge can be considered as incidental acquisition cost and have to be included in the individual's income tax.

## 4. Corporate Investors

The net investment income as well as all realised capital gains are subject to 25% Corporate Income Tax and must be included in the corporate income tax return of the corporation. If the corporate investor sells fund shares, the difference between the purchase price and the sales price less already taxed DDI is subject to 25% Corporate Income Tax (irrespective of the holding period) and must be included in the corporate income tax return. The DDI is deemed to be received by corporate investors at the financial year-end of the fund.

Corporate investors can avoid the withholding tax deduction by way of providing the Austrian bank with a certificate of exemption. If no certificate of exemption is provided, the deducted withholding tax can be credited against the Corporate Income Tax.

#### 5. Disclaimer

Please note that the information on the tax consequences according to the above is based on the current tax rules. The correctness of this tax information can be affected by subsequent changes in the law or changes in the application of the law.

### **BULGARIA**

In accordance with the Bulgarian Collective Investment Schemes and Other Undertakings for Collective Investment Act as further amended ("**CISOU CIA**"), the Bulgarian Financial Supervision Commission ("**FSC**") has been notified of the intention to publicly distribute Share Classes of the Fund in Bulgaria.

UniCredit Bulbank AD having its registered office at Sofia, Sveta Nedelya square 7, Bulgaria, acts as the Sub-Distributor for Bulgarian investors, and is authorised to receive subscription, redemption orders. Redemption proceeds, any distributions and payments to Bulgarian investors are made through UniCredit Bulbank AD. Pursuant to article 128 and the following from Bulgarian Law on collective investment schemes and other undertakings for collective investments a collective investment scheme established in another Member State may propose its shares in Bulgaria after the competent authority of such Member State notifies Bulgarian Financial supervision commission.

The notification shall be made by forwarding of the notification letter prepared by the collective investment scheme, accompanied by an attestation issued by the competent authority of the collective investment scheme's home Member State, certifying compliance of the scheme with the requirements set out in Directive 2009/65/EC.

The notification letter shall contain information about the measures taken for marketing of the units of the collective investment scheme on the territory of the Republic of Bulgaria, the measures for marketing the respective classes of shares and also information that the units will be marketed by the scheme's management company, enclosing the following thereto:

1. the constituent instruments of the collective investment scheme, the prospectus, the last annual and half-yearly reports in Bulgarian or English;
2. the document with the key investor information in Bulgarian.

The notification letter shall contain the address, as well as the other information necessary for the issuance of an invoice or for the communication of the applicable Commission's fees for supervision, as well as information about the about measures. The notification letter and the attestation shall be submitted in English.

A collective investment scheme established in another Member State shall provide to investors in the Republic of Bulgaria access to all the information and documents available to the investors in its home Member State. The document with the key investor information shall be provided to the investors in the Republic of Bulgaria in Bulgarian and any other information may be provided at the choice of the collective investment scheme in Bulgarian or in English. The translation of the document with the key investor information and of any other information shall reflect accurately and completely the content of the original. The requirements for provision of information and documents shall also apply to any subsequent change and update.

The issue and redemption prices are available at [www.structuredinvest.lu](http://www.structuredinvest.lu) and can be obtained free of charge from the UniCredit Bulbank AD.

The following documents are available at UniCredit Bulbank AD free of charge or can be downloaded from [www.structuredinvest.lu](http://www.structuredinvest.lu):

- Prospectus
- PRIIPS KID
- The Articles of Incorporation

- The current annual report and, if published, the current semi-annual report
- All the documents listed under Appendix 1: Information and documents available to investors

## Taxation in Bulgaria

The below overview is based on the Bulgarian tax legislation as of the date of this Prospectus and may be subject to changes in case of amendments to the Bulgarian tax law. The following information is a general overview of the principles of the taxation on income from investment funds according to the Bulgarian tax law and it does not represent a tax advice to investors.

The below overview is based on the Bulgarian Personal Income Tax Act (PITA) and the Bulgarian Corporate Income Tax Act (CITA).

### I. General overview

Capital gains tax standard rate in Bulgaria is 10%. However, exempted from taxation is the trading:

- in units and shares of collective investment schemes and national investment funds concluded on a regulated market according to Art. 152, para. 1 and 2 of the Bulgarian Financial Instruments Markets Act;
- in shares and rights that can be exercised to participate in capital increases concluded on a regulated market;
- in government securities concluded on a regulated market according to Art. 152, para. 1 and 2 of the Bulgarian Financial Instruments Markets Act;
- executed under the terms and according to the procedures for repurchase or redemption by collective investment schemes and national investment funds, which have been admitted to trading on a regulated market in Bulgaria or in another European Union (EU) / European Economic Area (EEA) country;
- executed under the terms and in accordance with the procedures for tender offers as outlined in the Public Offering of Securities Act or similar provisions in other EU/EEA countries.

### II. Bulgarian Tax Residents

#### 1. Private Individual Investors

Bulgarian tax residents are taxed on capital gains and investment income realised from all sources during their period of residence. Capital gains are taxed on an annual basis with a 10% flat tax rate through the submission of the personal annual tax return. The taxable income shall be equal to the aggregate of the profit realized during the respective calendar year under each specific transaction decreased by the amount of the losses realized during the year under each specific transaction. This means that each transaction shall be listed separately on the tax return. The taxable income is the positive difference between the sale price and the purchase price and is taxed with 10% tax rate. The above mentioned exemptions in respect of capital gains are applicable and should be taken into consideration.

Individuals are required to report and tax their foreign dividend/interest income on an annual basis through the submission of the annual tax return. The dividend income is taxed with 5% tax rate and interests with 10%. Taxable persons are entitled to a tax credit in case a tax has already been paid abroad. However, the tax credit shall be limited to the amount of the Bulgarian tax on these incomes.

#### 2. Corporate Investors

The realised capital gains by legal entities are included in their corporate income and are taxed at the full corporate income tax rate of 10%. Similar to individuals, the exemptions above apply, i.e. capital gains from trade in listed securities (shares, units of collective investment funds and others) on regulated markets in the EU/EEA are not subject to taxation.

Dividend income deriving from local or EU/EEA based companies are tax exempt. Nonexempt dividends are taxed as part of overall taxable profits.

Interest income is included in the financial results of the legal entities and is subject to 10% corporate income tax.

### III. Non-Bulgarian Tax Residents

#### 1. Private Individual Investors

Foreign tax residents are taxed only on the capital gains and investment income derived from sources in Bulgaria. Hence, the foreign capital gains (as well as the foreign dividend income and interests derived from the collective investment units) of non-Bulgarian tax residents are not subject to taxation in Bulgaria with respect to the discussed in this Prospectus collective investment units as far as the latter are from source outside Bulgaria.

#### 2. Corporate Investors

Legal entities which are non-Bulgarian tax residents are not subject to tax in Bulgaria with respect to any income resulting from the acquisition, holding, redemption or sale of the collective investment units (incl. any dividend and interest income) provided that they do not have a permanent establishment in Bulgaria to which a transaction with the collective investment units can be related.

### IV. Impact of a Double Tax Treaty between Bulgaria and the Jurisdiction of the Fund

Where applicable, the provisions of the respective double tax treaty in force between Bulgaria and the jurisdiction of the Fund should be taken into consideration with respect to the taxation of the capital gains realised from the disposal of the collective investment units. Such provisions may decrease the amount of the tax due or lead to tax exemption in Bulgaria or the respective other country.

### V. Withholding tax

As far as the issuer of the collective investment units (the Fund) is a non-Bulgarian tax resident, the possession and/or the transactions with/redemption of the collective investment units shall not be subject to withholding tax in Bulgaria according to the Bulgarian tax legislation.

Capital gains from transactions with financial assets admitted to trading on a regulated market and to public offer in Bulgaria, in another EU member state or state of the EEA are also exempt from withholding tax at the source.

### **CZECH REPUBLIC**

Only investments in a foreign standard fund that has duly notified public marketing to the Czech National Bank pursuant to Article 93 of the UCITS Directive and also has ensured the fulfilment of the certain tasks pursuant to Section 306 of Act No 240/2013 Coll. on management companies and investment funds (the "AMCIF") can be marketed publicly in the Czech Republic.

The performance of tasks under Section 306 of the AMCIF are as follows and those tasks can be arranged electronically or in another manner enabling remote access:

- the performance of instructions concerning the issuing, subscription and purchasing of securities or registered securities issued by this fund in the Czech Republic and the performance of the related payments, in accordance with the conditions contained in documents pursuant to Section 307 of the AMCIF;
- the provision of information to investors about how the instructions pursuant to the previous paragraph can be performed and on the division and payment of shares in the profit and other yields from the assets of this fund in the Czech Republic;
- the establishment of suitable procedures and measures to ensure the proper discussion of investor complaints and the removal of all restrictions for investors when claiming their rights;
- making information and documents available to investors for inspection and obtaining copies under similar conditions to those in Section 307 of the ACMIF;
- the provision of information to investors concerning the tasks that people perform, on a permanent data carrier; and

- the operation of the contact point for communication with the relevant bodies.

The public marketing of investments in a foreign standard fund in the Czech Republic is governed by Sections 305 to 307 of the AMCIF.

In case of publicly marketed investments to a foreign standard fund, the following up-to-date documents (as well as amendments thereof) in relation to this foreign standard fund must be made available to investors with their registered office or residence in the Czech Republic and be published on the internet pages of the foreign standard fund:

- a PRIIPS KID;
- a statute of this foreign standard fund;
- an annual report of this foreign standard fund;
- a semi-annual report of this foreign standard fund; and
- information on the amounts at which securities issued by this foreign standard fund are issued and redeemed.

All marketing communications and promotional materials must be clearly identifiable as such. They shall be fair, clear, not misleading and comply with the requirements of Sections 243 and 244 of the AMCIF. Where the net asset value of securities or registered securities issued by a foreign standard fund is likely to have a high volatility, marketing communications shall include a prominent statement drawing attention to that characteristic. Where a foreign standard fund does invest principally in transferable securities or Money Market Instruments, or where a foreign standard fund replicates an equity or debt securities index and observe other benchmark, its prospectus and, where necessary, marketing communications shall include a prominent statement drawing attention to the investment policy.

Marketing materials do not need to be sent to the Czech National Bank in advance. The Czech National Bank does not check, approve or give consent to their use before the start of marketing of a foreign standard fund in the Czech Republic.

## **HUNGARY**

### Distributor in Hungary

In accordance with Section 119 (3) of Act XVI of 2014 on Collective Investment Funds and Their Managers and on the Amendment of Financial Regulations ("**Investment Fund Act**") the Hungarian National Bank ("**HNB**"), acting as the financial supervisory authority in Hungary was duly notified of the intention to publicly distribute Share Classes of the Fund in Hungary. Pursuant to Section 119 (3) of the Investment Fund Act, the distribution agreement concluded with the Distributor was submitted to the HNB.

UniCredit Bank Hungary Zrt., having its registered office at 1054 Budapest, Szabadság tér 5-6, Hungary, acts as the Distributor for Hungarian investors, and is authorised to receive subscription-, redemption- and conversion orders. Redemption proceeds, any distributions and payments to Hungarian investors are made through UniCredit Bank Hungary Zrt.

The following documents are available at UniCredit Bank Hungary Zrt. free of charge or can be downloaded from [www.structuredinvest.lu](http://www.structuredinvest.lu):

- Prospectus
- PRIIPS KID – available in Hungarian as well
- Annual- and semi-annual report
- All the documents listed under Appendix 1: Information and documents available to investors

As prescribed by Section 119 (1) of the Investment Fund Act, the Key Investor Information is provided to the Hungarian investor upon such request free of charge and in a written form by UniCredit Bank Hungary Zrt. at the time of the conclusion of the contract.

The issue and redemption prices are available at [www.structuredinvest.lu](http://www.structuredinvest.lu) and can be obtained free of charge from the UniCredit Bank Hungary Zrt.

## Taxation in Hungary

### I. General overview

The following is an overview of the potentially applicable Hungarian tax liabilities with regard to the investment in the Shares which qualify as collective investment units. The overview does not address tax considerations applicable to investors of Shares that may be subject to special tax rules, including, among others, controlled foreign companies ("**CFCs**"), non-business carrying entities, income tax-exempt entities or companies, enterprises subject to special, elected or obligatory tax regimes. The overview does not cover situations where (i) individuals hold the Shares in the context of business activities, (ii) the Shares are held as current assets (i.e. allocable to the inventory or otherwise held for trading purposes) or (iii) the Shares are received and handled by the private individual or corporate investor due to or under a special arrangement or relationship between the private individual or corporate investor and the Fund or a third party.

This overview is based on the tax laws of Hungary as in effect and applied on the date of this Prospectus, and is subject to changes in Hungarian law, including changes that could have a retroactive effect. The following overview is not exhaustive and does not take into account or discuss the tax laws of any country other than Hungary.

Note that the tax treatment of certain categories of the Shares is not in all respects established and is, therefore, uncertain to some extent. In particular, there are no specific tax laws addressing the tax treatment of certificates in Hungary, nor is there any court practice specifically available in respect of certificates.

This overview is based on the Hungarian Personal Income Tax Act (Act CVXII of 1995, as amended) ("**PIT Act**") and the Hungarian Corporate Income Tax Act (Act LXXXI of 1996, as amended, as amended) ("**CIT Act**").

This overview addresses neither Hungarian inheritance nor gift tax consequences.

### II. Non-Hungarian Tax Residents

#### 1. Private Individual Investors

Private individual investors, who are not tax resident in Hungary, shall not be liable to tax on their income from the Shares provided that the Fund is not Hungarian tax resident or it is not obliged to pay the interest, qualifying as such under the PIT Act, through its Hungarian permanent establishment, branch office or commercial representative office.

#### 2. Corporate Investors

A non-Hungarian tax resident corporate investor shall not be subject to tax in Hungary with respect to any income resulting from the acquisition, holding, redemption or sale of the Shares, provided that it does not have a permanent establishment in Hungary to which such transaction with the Shares can be related.

### III. Hungarian Tax Residents

#### 1. Private Individual Investors

The income of a Hungarian tax resident private individual investor, arising from the acquisition, holding, or redemption of the Shares which qualify as collective investment units and publicly offered and traded is subject to PIT in Hungary as interest income at the rate of 15 per cent. Income from the sale of such Shares at arm's length price on a controlled market of any member state of the EEA or OECD or on the stock exchange under Act CXX of 2001 on the Capital Market is subject to PIT in Hungary as income from controlled capital market transactions at the rate of 15 per cent. The profit and loss of controlled capital market transactions during the tax year can be totalled and the PIT assessed accordingly. Losses of previous two tax years can be used to offset the taxable profit of the tax year, subject to certain conditions.

## 2. Tax allowance and exemption

Favourable tax treatment could be applied on income from long-term investments in Hungary under Section 67/B of the PIT Act. The tax allowance and tax exemption could be applied on the income under a long-term investment contract (in Hungarian, "tartós befektetési számla") ("LTIC") concluded between the private individual and an investment service provider or a credit institution. The LTIC itself is a separate agreement where the parties agree to observe the taxation rules laid down in the PIT Act in order the private individual to be eligible for the below tax allowance or exemption.

In accordance with the rules of the LTIC, the private individual shall conclude an LTIC with an investment service provider or a credit institution and place funds (at least HUF 25,000) on the LTIC account. The calendar year of opening the LTIC account is regarded as the collection year and funds can only be placed until the 31st of December of such year. The placed funds can be used, in the collection year and the subsequent years, in general, to invest in debt securities and controlled capital market transactions.

The withdrawal of funds, including the yield from the investments, from the LTIC account after the end of the third year following the collection year shall be subject to 10% PIT. The withdrawal of funds, including the yield from the investment, from the LTIC account after the end of the fifth year following the collection year shall be exempt from PIT.

An agreement concluded with a foreign investment service provider/credit institution could also be regarded as an LTIC if (i) it is in compliance with the PIT Act, (ii) the parties apply the respective rules of the PIT Act on their rights and obligation and (iii) the private individual undertakes to (a) tie-up at least cash amounting min. HUF 25 000 (approx. EUR 70) on the account and (b) not to withdraw its investment for 3 or 5 consecutive years. In such case, the private individual shall report to the Hungarian tax authority that it has concluded such agreement with a foreign entity.

## 3. Investors other than Private Individuals

The income of Hungarian tax resident corporate investors arising from the acquisition, holding, redemption or sale of the Shares is subject to corporate income tax in Hungary at the rate of 9 per cent in accordance with the provisions of the CIT Act.

## IV. Impact of a Double Tax Treaty between Hungary and the Jurisdiction of the Fund

Where the private individual or corporate investor is subject to tax in Hungary in relation to the Shares, the provisions of the double tax treaty in force between Hungary and the jurisdiction of the Fund shall be observed. Such provisions may decrease the amount of or eliminate the payable tax in Hungary or the other country. In the case of absence of such double tax treaty, the Hungarian tax laws provide for, in general, a limited deduction of the tax paid abroad from the tax payable in Hungary.

## V. Withholding tax

Under Hungarian tax law currently in force, no Hungarian withholding tax is applicable to interest paid on the Shares by the Fund to non-Hungarian tax resident corporate investors.

Hungary applies withholding tax to non-Hungarian tax resident private individuals, however according to the PIT Act, their income from the Shares should not be subject to tax in Hungary (please see above in Section 1.2(a)).

## VI. Financial transactional tax

Under Government Decree 197/2022. (VI. 4.), financial transactional tax shall be payable on the purchase of securities having an ISIN number issued by KELER Central Depository Ltd., the Hungarian central depository, to a client account or own account by an investment enterprise under Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers, and on the Regulations Governing their Activities or credit institution under Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises. The rate of tax is 0.3% of the value of the securities credited on the client account (securities account) limited to HUF 10,000. The tax is payable by the investment enterprise or credit institution.

### **ROMANIA**

In accordance with articles 173 and 174 of the Government Emergency Ordinance no. 32/2012 on undertakings for collective investment in transferable securities and investment management companies and amending and supplementing Capital Market Law No. 297/2004, as further amended ("**GEO no. 32/2012**"), the Romanian Financial Supervisory Authority ("*Autoritatea de Supraveghere Financiara*") has been notified of the intention to publicly distribute Share Classes of the Fund in Romania and such distribution is authorised to take place from the end of the notification procedure.

The Depository of the Fund is CACEIS Bank, Luxembourg Branch, with its registered office at 5, Allée Scheffer, L-2520 Luxembourg.

UniCredit Bank S.A., with its registered office at Bd. Expozitiei Nr.1F, Sect 1, Bucharest, Postal Code 012101, Romania, has been appointed as paying and information agent in Romania pursuant to GEO no. 32/2012 (the "**Romanian Paying and Information Agent**").

Requests for issuance, redemption and conversion of Shares can be submitted to the Romania Paying and Information Agent at its branch offices or, through its internet banking platform, to the extent it offers this possibility to investors. Redemption proceeds, distributions (if any) and any other payments can be made to the Shareholders via the Romanian Paying and Information Agent.

The issue and redemption prices are published online every trading day at [www.structuredinvest.lu](http://www.structuredinvest.lu) and on the website of the Romanian Paying and Information Agent at [www.unicredit.ro/](http://www.unicredit.ro/)

*Read the Prospectus and the Key Investor Information, as provided for by article 98 of GEO no. 32/2012, before investing in the Fund.*

The following documents are available in hard copy free of charge from the Romanian Paying and Information Agent and on its website at [www.unicredit.ro/](http://www.unicredit.ro/):

- The Prospectus and the Key Investor Information
- The Articles of Incorporation
- The current annual report and, if published, the current semi-annual report
- All the documents listed under Appendix 1: Information and documents available to investors

### **GREECE**

Alpha Bank S.A., with its registered office at 40, Stadiou Street, 10564 Athens, Greece has been appointed as paying agent and distributor pursuant to the Hellenic Capital Market Commission ("HCMC") Board Decision 15/966/30.9.2022.



## Appendix 3: Overview of Share Classes

### Share Class Description

Class	Description
<b>A</b>	Open for retail investors.
<b>A2</b>	Open for retail investors
<b>B</b>	Open for retail investors.
<b>C</b>	Open for retail investors.
<b>C1</b>	Open for retail investors.
<b>C2</b>	Open for retail investors
<b>M</b>	Open for retail investors.
<b>M2</b>	Open for retail investors
<b>N</b>	Open for retail investors.
<b>O</b>	Open for retail investors.
<b>T</b>	Open for retail investors.
<b>P</b>	Open for retail investors.
<b>U</b>	Open for retail investors designated by the Board of Directors of the Fund.
<b>U2</b>	Open for retail investors designated by the Board of Directors of the Fund.
<b>W</b>	Open for retail investors.
<b>D</b>	Open for financial intermediaries which do not accept and retain inducements including intermediaries providing discretionary portfolio management.
<b>E</b>	Open for investments by insurance companies.
<b>I</b>	Open for institutional investors Purchases of any of these Classes of Shares by Italian domiciled investors (including entities having an Italian parent company) are subject to receipt of confirmation to the satisfaction of the Management Company or its agents that the Shares purchased will not be the underlying investment for any product ultimately marketed to retail investors in Italy.
<b>S</b>	Open for institutional investors. Open for financial intermediaries which do not accept and retain inducements including intermediaries providing discretionary portfolio management.
<b>V</b>	Open for institutional investors designated by the Board of Directors of the Fund.

### Share Class Indicators

Indicator	Description
<b>H</b>	When included in a Class of Shares' name, indication that such Class of Shares is hedged. With respect to this Class of Shares, hedging is used to reduce exposure to currency movements between the Class of Shares' Reference Currency and the Sub-Fund's Reference Currency.
<b>HP</b>	When included in a Class of Shares' name, indication that such Class of Shares apply FX hedging on portfolio level. With respect to this Class of Shares, hedging is used to reduce exposure to currency movements between reference assets of the investment portfolio and the Class of Shares' Reference Currency.
<b>(accumulating)</b>	When no reference to distribution is appended to the name it means the Share Class is accumulating.
<b>D</b>	When included in a Share Class name, indication that such Class of Shares is an annually distributing income and capital Class of Shares.
<b>FQD</b>	When included in the denomination of Share Class, the Fund pre-announces a target dividend paid on a quarterly basis. A target dividend is an amount that the Sub-Fund aims to pay but does not guarantee. Target dividends may be stated as a specific currency amount or as a percentage of NAV. Note that in order to meet a targeted dividend amount, a Sub-Fund may end up paying out more money than it actually earned in dividends, meaning that in effect Shareholders are getting some of their capital back as a dividend.
<b>(currency)</b>	Share Class currency indicator (ISO Code). In case no Reference Currency is indicated, the Reference Currency of the Sub-Fund is applicable.

<sup>1</sup> Investors invested in Class B Shares will be automatically transferred into Class C respectively C2 for the onemarkets Amundi Income Opportunities Fund upon the third anniversary of their holding of Class B Shares. A switch from Class B into other Share Classes is not allowed before the third anniversary of an investor's holding.

## Retail Share Class Parameters

	A; A2	B	C; C1; C2	M; M2	N	O	P	T	U; U2	W
<b>Initial NAV (on launch date)<sup>2</sup></b>	EUR 100.00	EUR 100.00	EUR 100.00	EUR 100.00	EUR 100.00	EUR 100.00	EUR 100.00	EUR 100.00	EUR 100.00	EUR 100.00
<b>Subscription fee</b>	Up to 4%	None	Up to 3.5%	Up to 5%	Up to 5%	Up to 3%	Up to 3%	Up to 3%	None	Up to 3%
<b>Redemption fee<sup>3</sup></b>	None	2.55% <sup>4</sup>	None	None	None	None	None	None	None	None
<b>Minimum initial investment<sup>5</sup></b>	EUR 125,000.00	EUR 100.00	EUR 100.00	EUR 100.00	EUR 100.00	EUR 125,000.00	EUR 125,000.00	EUR 1,000,000.00	EUR 100.00	EUR 5,000,000.00
<b>Administrative Fee</b>	See separate table below									
<b>Depositary Fee</b>	Unless otherwise provided in the Sub-Fund Specific Information, the Depositary is entitled to receive fees out of the assets of the Fund, pursuant to the relevant agreement between the Depositary and the Fund and in accordance with usual market practice. The fees payable to the Depositary (excluding sub-depositary fees, if any and transaction fees) will not exceed 0.065% p.a. of the respective Sub-Fund's average net assets. The fees are calculated and accrued on each Valuation Day and are payable quarterly in arrears.									
<b>UCI Administrator Fee</b>	Unless otherwise provided in the Sub-Fund Specific Information, the UCI Administrator is entitled to receive fees out of the assets of the Fund, pursuant to the relevant agreement between the UCI Administrator and the Management Company and in accordance with usual market practice. The fees payable to the UCI Administrator will not exceed 0.04% p.a. of the respective Sub-Fund's average net assets, subject to a minimum monthly fee per Sub-Fund of EUR 1,150.00. The fees are calculated and accrued on each Valuation Day and are payable quarterly in arrears.									
<b>Taxe d'abonnement</b>	0.05 % p.a. of NAV and as reduced according to section 9.6. "Taxe d'abonnement" (subscription tax) in the general part of the Prospectus.									

## Institutional Share Class Parameters

	D	E	I	S	V
<b>Initial NAV (on launch date)</b>	EUR 100.00	EUR 100.00	EUR 100.00	EUR 100.00	EUR 100.00
<b>Subscription fee</b>	None	None	None	None	None
<b>Redemption fee<sup>3</sup></b>	None	None	None	None	None
<b>Minimum initial investment<sup>6</sup></b>	Not applicable	Not applicable	EUR 1,000,000.00	EUR 1,000,000.00	EUR 5,000,000.00
<b>Administrative Fee</b>	See separate table below				
<b>Depositary Fee</b>	Unless otherwise provided in specific Sub-funds, the Depositary is entitled to receive fees out of the assets of the Company, pursuant to the relevant agreement between the Depositary and the Company and in accordance with usual market practice. The fees payable to the Depositary (excluding sub-depositary fees, if any and transaction fees) will not exceed 0.065% p.a. of the respective Sub-fund's average net assets. The fees are calculated and accrued on each Valuation Day and are payable quarterly in arrears.				

<sup>2</sup> In case of Share Classes denominated in other Reference Currencies than Euro, the Initial NAV is the same amount (i.e., 100,00) in the other applicable Reference Currency.

<sup>3</sup> A redemption fee with an annual reduction 2.00% (1Y); 1.60% (2Y); 1.20% (3Y); 0.8% (4Y); 0.5% (5y); 0% (after 5y) applies for all Retail and Institutional Share Classes (ex Class B) for the following Sub-Funds: onemarkets Bond Target 2029 II Fund; onemarkets Bond Target 2029 Fund. For Share Classes B a redemption fee according to the fee schedule will be applied.

<sup>4</sup> The redemption fee will be reduced linearly over the 3-year holding period from 2.55% to 0% (for instance: 1.7% (2.55%-0.85%) in case of redemption after 1 year). No redemption fee will be charged as from the third anniversary of the holding of the Class B Shares because of their automatic conversion into Class C Shares. In addition to the redemption fee, a placement fee equal to 2.55% is set aside (levied on the Sub-Fund's assets) at the time of the subscription and is then paid out to the distributor and compensated through daily deductions from the prevailing Share Class NAV on the basis of a linear amortisation over a 3-year period. At the expiration of the 3-year period, holders of Class B Shares will thus have borne a fee of 2.55% on their subscription amount.

<sup>5</sup> In case of Share Classes denominated in other Reference Currencies than Euro, the minimum initial investment amount is the same amount (i.e., 125,000.00 for Class A) in the other applicable Reference Currency. The minimum initial investment amount can be reduced in some jurisdictions due to upfront distribution fees payable to distributors.

<sup>6</sup> The minimum initial investment amount can be reduced in some jurisdictions due to upfront distribution fees payable to distributors.

<b>UCI Administrator Fee</b>	Unless otherwise provided in the Sub-Fund Specific Information, the UCI Administrator is entitled to receive fees out of the assets of the Fund, pursuant to the relevant agreement between the UCI Administrator and the Management Company and in accordance with usual market practice. The fees payable to the UCI Administrator will not exceed 0.04% p.a. of the respective Sub-Fund's average net assets, subject to a minimum monthly fee per Sub-Fund of EUR 1,150.00. The fees are calculated and accrued on each Valuation Day and are payable quarterly in arrears.
<b>Taxe d'abonnement</b>	0.01 % p.a. of NAV

## Management Fee of Retail Share Classes

	A	A2	B	C	C1	C2	M	M2	N	O	P	T	U	U2	W
<b>onemarkets Amundi Income Opportunities Fund</b>		1.60 %	0.90 %		1.75 %	1.75 %		1.50 %	1.50 %	1.35 %	1.35 %			1.00 %	
<b>onemarkets Amundi Flexible Income Fund</b>	1.25 %		0.70 %	1.55 %	1.55 %		1.25 %		1.25 %	1.10 %	1.10 %		0.85 %		
<b>onemarkets Amundi Climate Focus Equity Fund</b>	1.70 %		1.15 %	2.00 %	2.00 %		1.70 %		1.70 %	1.55 %	1.55 %		1.20 %		
<b>onemarkets Fidelity World Equity Income Fund</b>	1.60 %		1.05 %	1.90 %	1.90 %		1.65 %		1.65 %	1.50 %	1.50 %		1.10 %		
<b>onemarkets Fidelity European Heritage Equity Fund</b>	1.80 %		1.15 %	2.00 %	2.00 %		1.65 %		1.65 %	1.50 %	1.50 %		1.10 %		
<b>onemarkets BlackRock Global Equity Dynamic Opportunities Fund</b>	1.60 %		1.05 %	1.90 %	1.90 %		1.65 %		1.65 %	1.50 %	1.50 %		1.10 %		
<b>onemarkets BlackRock Global Diversified Balanced Fund</b>	1.60 %		0.90 %	1.75 %	1.75 %		1.50 %		1.50 %	1.35 %	1.35 %		1.00 %		
<b>onemarkets BlackRock Low Duration Bond Fund</b>	0.80 %			0.90 %	0.90 %		0.80 %		0.80 %	0.70 %	0.70 %		0.65 %		
<b>onemarkets PIMCO Global Balanced Allocation Fund</b>	1.25 %		0.70 %	1.55 %	1.55 %		1.25 %		1.25 %	1.10 %	1.10 %		0.85 %		
<b>onemarkets PIMCO Global Strategic Bond Fund</b>	1.35 %		0.70 %	1.55 %	1.55 %		1.40 %		1.40 %	1.25 %	1.25 %		0.90 %		
<b>onemarkets PIMCO Global Short Term Bond Fund</b>	1.25 %			1.35 %	1.35 %		1.20 %		1.20 %	1.05 %	1.05 %		0.85 %		
<b>onemarkets J.P. Morgan Emerging Countries Fund</b>	1.60 %		1.05 %	1.90 %	1.90 %		1.65 %		1.65 %	1.50 %	1.50 %		1.10 %		
<b>onemarkets J.P. Morgan US Equities Fund</b>	1.80 %		1.15 %	2.00 %	2.00 %		1.65 %		1.65 %	1.50 %	1.50 %		1.10 %		
<b>onemarkets J.P. Morgan Emerging Markets Short Term Bond Fund</b>	1.55 %		0.85 %	1.70 %	1.70 %		1.45 %		1.45 %	1.20 %	1.20 %		0.85 %		
<b>onemarkets Allianz Global Equity Future Champions Fund</b>	1.90 %		1.25 %	2.10 %	2.10 %		1.70 %		1.70 %	1.55 %	1.55 %		1.20 %		

<b>onemarkets Allianz Conservative Multi-Asset Fund</b>	1.45 %		0.80 %	1.65 %	1.65 %		1.45 %		1.45 %	1.30 %	1.30 %		0.95 %		
<b>onemarkets Pictet Global Opportunities Allocation Fund</b>	1.60 %		0.90 %	1.75 %	1.75 %		1.50 %		1.50 %	1.35 %	1.35 %		1.00 %		
<b>onemarkets Capital Group US Balanced Fund</b>	1.60 %		0.90 %	1.75 %	1.75 %		1.50 %		1.50 %	1.35 %	1.35 %		1.00 %		
<b>onemarkets Rockefeller Global Innovation Equity Fund</b>	1.90 %		1.35 %	2.20 %	2.20 %		1.70 %		1.70 %	1.55 %	1.55 %		1.20 %		
<b>onemarkets VP Global Flexible Bond Fund</b>									1.45 %		1.30 %	0.65 %			0.60 %
<b>onemarkets VP Flexible Allocation Fund</b>									1.50 %		1.35 %	0.90 %			0.60 %
<b>onemarkets Global Multibrand Selection Fund</b>	1.60 %		0.90 %	1.75 %	1.75 %		1.50 %		1.50 %	1.35 %	1.35 %		1.00 %		
<b>onemarkets Balanced Eastern Europe Fund</b>	1.60 %		0.90 %	1.75 %	1.75 %		1.50 %		1.50 %	1.35 %	1.35 %		1.00 %		
<b>onemarkets Bond Target 2029 II Fund</b>				1.40 %	1.40 %		1.30 %		1.45 %	1.25 %	1.25 %		0.90 %		
<b>onemarkets Bond Target 2029 Fund</b>				1.40 %	1.40 %		1.30 %		1.45 %	1.25 %	1.25 %		0.90 %		
<b>onemarkets Bond HUF Fund</b>							1.80 %						0.85 %		
<b>onemarkets Short Term Bond HUF Fund</b>							1.50 %						0.85 %		
<b>onemarkets Short Term Bond CZK Fund</b>							1.40 %						0.85 %		
<b>onemarkets Multi-Asset Value Fund</b>	1.60 %		0.90 %	1.75 %	1.75 %		1.50 %		1.50 %	1.35 %	1.35 %		1.00 %		
<b>onemarkets Libra Fund</b>	1.60 %		0.90 %	1.75 %	1.75 %		1.50 %		1.50 %	1.35 %	1.35 %		1.00 %		

## Management Fee of Institutional Share Classes

	D	E	I	S	V
<b>onemarkets Amundi Income Opportunities Fund</b>	0.70%	0.60%	0.55%	0.55%	0.60%
<b>onemarkets Amundi Flexible Income Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%
<b>onemarkets Amundi Climate Focus Equity Fund</b>	0.70%	0.60%	0.55%	0.65%	0.60%
<b>onemarkets Fidelity World Equity Income Fund</b>	0.70%	0.60%	0.55%	0.60%	0.60%
<b>onemarkets Fidelity European Heritage Equity Fund</b>	0.70%	0.60%	0.55%	0.60%	0.60%
<b>onemarkets BlackRock Global Equity Dynamic Opportunities Fund</b>	0.70%	0.60%	0.55%	0.60%	0.60%
<b>onemarkets BlackRock Global Diversified Balanced Fund</b>	0.70%	0.60%	0.55%	0.55%	0.60%
<b>onemarkets BlackRock Low Duration Bond Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%
<b>onemarkets PIMCO Global Balanced Allocation Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%
<b>onemarkets PIMCO Global Strategic Bond Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%

<b>onemarkets PIMCO Global Short Term Bond Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%
<b>onemarkets J.P. Morgan Emerging Countries Fund</b>	0.70%	0.60%	0.55%	0.60%	0.60%
<b>onemarkets J.P. Morgan US Equities Fund</b>	0.70%	0.60%	0.55%	0.60%	0.60%
<b>onemarkets J.P. Morgan Emerging Markets Short Term Bond Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%
<b>onemarkets Allianz Global Equity Future Champions Fund</b>	0.70%	0.60%	0.55%	0.65%	0.60%
<b>onemarkets Allianz Conservative Multi-Asset Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%
<b>onemarkets Pictet Global Opportunities Allocation Fund</b>	0.70%	0.60%	0.55%	0.55%	0.60%
<b>onemarkets Capital Group US Balanced Fund</b>	0.70%	0.60%	0.55%	0.55%	0.60%
<b>onemarkets Rockefeller Global Innovation Equity Fund</b>	0.70%	0.60%	0.55%	0.65%	0.60%
<b>onemarkets VP Global Flexible Bond Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%
<b>onemarkets VP Flexible Allocation Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%
<b>onemarkets Global Multibrand Selection Fund</b>	0.70%	0.60%	0.55%	0.55%	0.60%
<b>onemarkets Balanced Eastern Europe Fund</b>	0.70%	0.60%	0.55%	0.55%	0.60%
<b>onemarkets Bond Target 2029 II Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%
<b>onemarkets Bond Target 2029 Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%
<b>onemarkets Bond HUF Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%
<b>onemarkets Short Term Bond HUF Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%
<b>onemarkets Short Term Bond CZK Fund</b>	0.70%	0.60%	0.55%	0.50%	0.60%
<b>onemarkets Multi-Asset Value Fund</b>	0.70%	0.60%	0.55%	0.55%	0.60%
<b>onemarkets Libra Fund</b>	0.70%	0.60%	0.55%	0.55%	0.60%

## Administrative Fee

		Minimum EUR 80k p.a. on Sub-Fund level plus additional transaction costs
<b>onemarkets Amundi Income Opportunities Fund</b>	Up to 0.40% on NAV	
<b>onemarkets Amundi Flexible Income Fund</b>	Up to 0.40% on NAV	
<b>onemarkets Amundi Climate Focus Equity Fund</b>	Up to 0.40% on NAV	
<b>onemarkets Fidelity World Equity Income Fund</b>	Up to 0.40% on NAV	
<b>onemarkets Fidelity European Heritage Equity Fund</b>	Up to 0.40% on NAV	
<b>onemarkets BlackRock Global Equity Dynamic Opportunities Fund</b>	Up to 0.40% on NAV	
<b>onemarkets BlackRock Global Diversified Balanced Fund</b>	Up to 0.40% on NAV	
<b>onemarkets BlackRock Low Duration Bond Fund</b>	Up to 0.40% on NAV	
<b>onemarkets PIMCO Global Balanced Allocation Fund</b>	Up to 0.40% on NAV	
<b>onemarkets PIMCO Global Strategic Bond Fund</b>	Up to 0.40% on NAV	
<b>onemarkets PIMCO Global Short Term Bond Fund</b>	Up to 0.40% on NAV	
<b>onemarkets J.P. Morgan Emerging Countries Fund</b>	Up to 0.40% on NAV	
<b>onemarkets J.P. Morgan US Equities Fund</b>	Up to 0.40% on NAV	
<b>onemarkets J.P. Morgan Emerging Markets Short Term Bond Fund</b>	Up to 0.40% on NAV	
<b>onemarkets Allianz Global Equity Future Champions Fund</b>	Up to 0.40% on NAV	
<b>onemarkets Allianz Conservative Multi-Asset Fund</b>	Up to 0.40% on NAV	

<sup>7</sup> The Board of Directors may on a discretionary basis decide to waive temporarily and totally or partially such minimum EUR 80k p.a. on Sub-Fund level plus additional transaction costs.

<b>onemarkets Pictet Global Opportunities Allocation Fund</b>	Up to 0.40% on NAV
<b>onemarkets Capital Group US Balanced Fund</b>	Up to 0.40% on NAV
<b>onemarkets Rockefeller Global Innovation Equity Fund</b>	Up to 0.40% on NAV
<b>onemarkets VP Global Flexible Bond Fund</b>	Up to 0.40% on NAV
<b>onemarkets VP Flexible Allocation Fund</b>	Up to 0.40% on NAV
<b>onemarkets Global Multibrand Selection Fund</b>	Up to 0.40% on NAV
<b>onemarkets Balanced Eastern Europe Fund</b>	Up to 0.40% on NAV
<b>onemarkets Bond Target 2029 II Fund</b>	Up to 0.40% on NAV
<b>onemarkets Bond Target 2029 Fund</b>	Up to 0.40% on NAV
<b>onemarkets Bond HUF Fund</b>	Up to 0.40% on NAV
<b>onemarkets Short Term Bond HUF Fund</b>	Up to 0.40% on NAV
<b>onemarkets Short Term Bond CZK Fund</b>	Up to 0.40% on NAV
<b>onemarkets Multi-Asset Value Fund</b>	Up to 0.40% on NAV
<b>onemarkets Libra Fund</b>	Up to 0.40% on NAV

## Available Share Classes

### Sub-Fund

<b>onemarkets Amundi Income Opportunities Fund</b>	A2 A2D	B	C2 C2D C2-USD C2D-USD	M2 M2D M2H-CZK M2DH-CZK M2-USD M2D-USD M2H-RON M2DH-RON		O OD			U2 U2D	D	E	I ID	S	
<b>onemarkets Amundi Flexible Income Fund</b>	A AD	B	C CD	M MD MH-CZK MDH-CZK MH-RON MDH-RON		O OD			U UD	D	E EFQD	I ID	S	
<b>onemarkets Amundi Climate Focus Equity Fund</b>	A	B	C	M MD MH-CZK		O OD			U UD	D	E	I	S	
<b>onemarkets Fidelity World Equity Income Fund</b>	A AD	B	C C-HUF CD	M MD MH-CZK		O OD			U UD	D	E ED	I ID	S	
<b>onemarkets Fidelity European Heritage Equity Fund</b>	A	B	C	M MH-CZK M-USD		O			U	D	E	I	S	

<b>onemarkets BlackRock Global Equity Dynamic Opportunities Fund</b>	A	B	C C-USD CD-USD	M MD MH-CZK M-USD		O OD			U UD	D	E	I	S	
<b>onemarkets BlackRock Global Diversified Balanced Fund</b>	A AD	B	C CD C-USD CD-USD C-HUF CD-HUF	M MD MH-CZK MDH-CZK M-USD MD-USD MH-RON MDH-RON		O OD			U UD	D	E	I	S	
<b>onemarkets BlackRock Low Duration Bond Fund</b>	A AD		C CD	M MD MH-CZK MDH-CZK M-HUF MD-HUF		O OD			U UD	D	E	I	S	
<b>onemarkets PIMCO Global Balanced Allocation Fund</b>	A AD	B	C CD C-HUF CD-HUF	M MD MH-CZK MDH-CZK MH-RON MDH-RON		O OD			U UD	D	E	I	S	
<b>onemarkets PIMCO Global Strategic Bond Fund</b>	A AD	B	C CD	M MD MH-CZK MDH-CZK M-HUF MD-HUF		O OD			U UD	D	E	I	S	
<b>onemarkets PIMCO Global Short Term Bond Fund</b>	A AD		C CD	M MD MH-CZK MDH-CZK M-HUF MD-HUF		O OD			U UD	D	E	I	S	
<b>onemarkets J.P. Morgan Emerging Countries Fund</b>	A	B	C C-USD CD-USD	M MD MH-CZK M-USD MD-USD		O OD			U UD	D	E	I	S	
<b>onemarkets J.P. Morgan US Equities Fund</b>	A	B	C C-HUF C-USD	M MD MH-CZK M-USD		O OD			U UD	D	E	I	S	

<b>onemarkets J.P. Morgan Emerging Markets Short Term Bond Fund</b>	A AD AHP ADHP	B	C CD C-USD CD-USD CHP CDHP	M MD MHP MDHP MH-CZK MDH-CZK M-USD MD-USD M-HUF MD-HUF		O OD OHP ODHP			U UD UHP UDHP	D	E	I	S	
<b>onemarkets Allianz Global Equity Future Champions Fund</b>	A	B	C C-USD CD-USD	M MD MH-CZK M-USD		O OD			U UD	D	E	I	S	
<b>onemarkets Allianz Conservative Multi-Asset Fund</b>	A AD	B	C CD	M MD MH-CZK MDH-CZK MH-RON MDH-RON		O OD			U UD	D	E	I	S	
<b>onemarkets Pictet Global Opportunities Allocation Fund</b>	A AD	B	C CD	M MD MH-CZK MDH-CZK MH-RON MDH-RON		O OD			U UD	D	E	I	S	
<b>onemarkets Capital Group US Balanced Fund</b>	A AD	B	C CD C-USD CD-USD	M MD MH-CZK MDH-CZK M-USD MD-USD MH-RON MDH-RON		O OD			U UD	D	E	I	S	
<b>onemarkets Rockefeller Global Innovation Equity Fund</b>	A	B	C C-USD	M MH-CZK M-USD		O			U	D	E	I	S	
<b>onemarkets VP Global Flexible Bond Fund</b>					N ND		P PD	T TD		D	E	I	S	W WD
<b>onemarkets VP Flexible Allocation Fund</b>					N ND		P PD	T TD		D	E	I	S	W WD



<b>onemarkets Global Multibrand Selection Fund</b>	A AD	B	C CD	M MD MH-CZK MDH-CZK MH-RON MDH-RON		O OD			U UD	D	E	I	S	
<b>onemarkets Balanced Eastern Europe Fund</b>	A AD	B	C CD	M MD MH-CZK MDH-CZK MH-RON MDH-RON		O OD			U UD	D	E	I	S	
<b>onemarkets Bond Target 2029 II Fund</b>			C CD	M MD MH-CZK MDH-CZK M-HUF MD-HUF		O OD			U UD	D	E	I	S	
<b>onemarkets Bond Target 2029 Fund</b>			C CD	M MD MH-CZK MDH-CZK M-HUF MD-HUF		O OD			U UD	D	E	I	S	
<b>onemarkets Bond HUF Fund</b>				M MD					U UD	D	E	I	S	
<b>onemarkets Short Term Bond HUF Fund</b>				M MD					U UD	D	E	I	S	
<b>onemarkets Short Term Bond CZK Fund</b>				M MD					U UD	D	E	I	S	
<b>onemarkets Multi-Asset Value Fund</b>	A AD	B	C CD	M MD		O OD			U UD	D	E	I	S	
<b>onemarkets Libra Fund</b>	A AD	B	C CD	M MD MH-CZK MDH-CZK MH-RON MDH-RON		O OD			U UD	D	E	I	S	

## Appendix 4: Collateral and Haircut Policy

	Use of OTC derivatives and/or SFTs	Collateral			Haircut	Reinvestment
<b>onemarkets Amundi Income Opportunities Fund</b>	Yes	Cash only			NA	Yes
<b>onemarkets Amundi Flexible Income Fund</b>	Yes	Cash only			NA	Yes
<b>onemarkets Amundi Climate Focus Equity Fund</b>	Yes	Cash only			NA	Yes
<b>onemarkets Fidelity World Equity Income Fund</b>	Yes	Cash only			NA	Yes
<b>onemarkets J.P. Morgan Emerging Countries Fund</b>	No	NA			NA	NA
<b>onemarkets J.P. Morgan US Equities Fund</b>	No	NA			NA	NA
<b>onemarkets PIMCO Global Balanced Allocation Fund</b>	Yes	Cash only			NA	Yes
<b>onemarkets PIMCO Global Strategic Bond Fund</b>	Yes	Cash only			NA	Yes
<b>onemarkets PIMCO Global Short Term Bond Fund</b>	Yes	Cash only			NA	Yes
<b>onemarkets BlackRock Global Equity Dynamic Opportunities Fund</b>	Yes	Type	Residual maturity	Rating		Yes
		Cash	NA	NA	NA	
		TBILL	0-1 year	NA	99%	
		US Treasury Incl Strips	0-1 year	BBB-, bbb-/Baa3, (P)Baa3, Baa-mf (min)	99%	
			1-5 years	BBB-, bbb-/Baa3, (P)Baa3, Baa-mf (min)	97%	
			5-10 years	A+, a+/A1, (P)A1 to BBB-, bbb-/Baa3, (P)Baa3, Baa-mf	95%	
			Greater than 10 years	BBB-, bbb-/Baa3, (P)Baa3, Baa-mf (min)	90%	
<b>onemarkets Allianz Global Equity Future Champions Fund</b>	No	NA			NA	NA
<b>onemarkets Allianz Conservative Multi-Asset Fund</b>	Yes	Cash only			NA	NA
<b>onemarkets Pictet Global Opportunities Allocation Fund</b>	Yes	Type	Country	Residual Maturity	Rating	Yes
		Collateral				
		Cash	NA	NA	NA	99%
		Euro Gov. Bonds	Germany	0-1 year	BBB-, bbb-/Baa3, (P)Baa3, Baa-mf (min)	97%
			France			
			Italy			
			Spain Belgium			

		Euro Gov. Bonds	Germany France Italy Spain Belgium	1-5 years	BBB-, bbb- /Baa3, (P)Baa3 , Baa- mf (min)		
		Euro Gov. Bonds	Germany France Italy Spain Belgium	5-10 years	BBB-, bbb- /Baa3, (P)Baa3 , Baa- mf (min)	95%	
		Euro Gov. Bonds	Germany France Italy Spain Belgium	Greater than 10 years	BBB-, bbb- /Baa3, (P)Baa3 , Baa- mf (min)	90%	
<b>onemarkets VP Global Flexible Bond Fund</b>	Yes	Cash only				NA	Yes
<b>onemarkets VP Flexible Allocation Fund</b>	yes	cash only				NA	yes
<b>onemarkets Global Multibrand Selection Fund</b>	yes	cash only				N	yes
<b>onemarkets Balanced Eastern Europe Fund</b>	Yes	Cash only				NA	Yes
<b>onemarkets Multi-Asset Value Fund</b>	Yes	Type	Residual Maturity	Rating		Yes	
		Cash	NA	NA	NA		
		Cash Equivalents	0-3m	Min (BBB)	0 to 2%		
		OECD Gov. or guaranteed by OECD Gov.	0-10 years	Min (BBB)	0 to 5%		
		Other Liquid bonds	0-10 years	Min (BBB)	5 to 20%		
<b>onemarkets Short Term Bond HUF Fund</b>	Yes	Type	Maturity	Rating		No	
		Cash	NA	NA	0%		
		Government debt securities and money market instruments	1 year	Investment grade	1-9%		
			1-5 years	Investment grade	3-12%		
			Above 5 years	Investment grade	6-14%		
<b>onemarkets Short Term Bond CZK Fund</b>	Yes	Type	Maturity	Rating		No	
		Cash	NA	NA	0%		
		Government debt securities and money market instruments	1 year	Investment grade	1-9%		
			1-5 years	Investment grade	3-12%		
			Above 5 years	Investment grade	6-14%		
<b>onemarkets Bond HUF Fund</b>	Yes	Type	Maturity	Rating		No	
		Cash	NA	NA	0%		

		Government debt securities and money market instruments	1 year	Investment grade	1-9%		
			1-5 year	Investment grade	3-12%		
			Above 5 years	Investment grade	6-14%		
<b>onemarkets Bond Target 2029 Fund</b>	Yes	Type	Maturity	Rating		No	
		Cash	NA	NA	0%		
		Government debt securities and money market instruments	1 year	Investment grade	1-9%		
			1-5 years	Investment grade	3-12%		
			Above 5 years	Investment grade	6-14%		
<b>onemarkets Bond Target 2029 II Fund</b>		Yes	Type	Maturity	Rating		
	Cash		NA	NA	0%		
	Government debt securities and money market instruments		1 year	Investment grade	1-9%		
			1-5 years	Investment grade	3-12%		
			Above 5 years	Investment grade	6-14%		
<b>onemarkets Libra Fund</b>	No		NA			NA	NA
<b>onemarkets BlackRock Low Duration Bond Fund</b>	Yes	Cash			0%	Yes	
		Government Bond Maturity: $0 < x \leq 1$			1%		
		Government Bond Maturity: $1 < x \leq 5$			3%		
		Government Bond Maturity: $5 < x \leq 10$			4%		
		Government Bond Maturity: $10 < x \leq 30$			8%		
		Government Bond Maturity: $30 < x \leq 50$			9%		
<b>onemarkets BlackRock Global Diversified Balanced Fund</b>	Yes	Cash			0%	Yes	
		Government Bond Maturity: $0 < x \leq 1$			1%		
		Government Bond Maturity: $1 < x \leq 5$			3%		
		Government Bond Maturity: $5 < x \leq 10$			4%		
		Government Bond Maturity: $10 < x \leq 30$			8%		
		Government Bond Maturity: $30 < x \leq 50$			9%		
<b>onemarkets J.P. Morgan Emerging Markets Short Term Bond Fund</b>	Yes	Cash			NA	Yes	
<b>onemarkets Fidelity European Heritage Equity Fund</b>	Yes	Cash only			NA	Yes	
<b>onemarkets Rockefeller Global Innovation Equity Fund</b>	No	NA	NA	NA			
<b>onemarkets Capital Group US Balanced Fund</b>	Yes	Cash and US Treasuries			NA	No	













Sub-Fund			onemarkets J.P. Morgan Emerging Markets Short Term Bond Fund	onemarkets Fidelity European Heritage Equity Fund	onemarkets Rockefeller Global Innovation Equity Fund	onemarkets Capital Group US Balanced Fund
Asset Class Specific Risks	Equities			x	x	x
	Bonds and other Debt Instruments		x			x
	Commodities					
	Real Estate Related		x	x	x	x
	Multi Asset					x
Investment Focus / Style-Related Risks	Stock/Issuer Concentration					
	Country Concentration			x		x
	Sector Concentration / Thematic Focus			x	x	
	Small and mid-cap equities			x		
	Below Investment Grade / Unrated Securities and High Yielding Debt Instruments		x		x	x
	Emerging Markets		x	x	x	x
	Eurozone Risk			x	x	
	Benchmark and Sub-Fund performance		x		x	
	Sustainability risks			x	x	
Specific Instrument Related Risks	China Related	General	x		x	x
		Risks in relation to Investment Funds	x	x	x	x
	Fixed Income Related	Convertibles, Hybrids, CoCos & other instruments with loss absorption features	x			

Sub-Fund			onemarkets J.P. Morgan Emerging Markets Short Term Bond Fund	onemarkets Fidelity European Heritage Equity Fund	onemarkets Rockefeller Global Innovation Equity Fund	onemarkets Capital Group US Balanced Fund
		Collateralised and/or Securitised Debt Instruments	x			x
		Equity Linked Notes/Credit Linked Notes				
		Prepayment and extension risk				
		Distressed and defaulted debt securities risk	x			
Derivatives / Counterparty Risk		General	x	x	x	x
		Short Positions				
		High Leverage				
		Active Currency			x	
		Specific Derivative Instruments	x	x	x	

## Appendix 6: SFDR classification

Sub-Fund	SFDR Classification		
	Article 6	Article 8	Article 9
onemarkets Amundi Income Opportunities Fund	x		
onemarkets Amundi Flexible Income Fund		x	
onemarkets Amundi Climate Focus Equity Fund		x	
onemarkets Fidelity World Equity Income Fund		x	
onemarkets BlackRock Global Equity Dynamic Opportunities Fund		x	
onemarkets PIMCO Global Balanced Allocation Fund		x	
onemarkets PIMCO Global Strategic Bond Fund	x		
onemarkets PIMCO Global Short Term Bond Fund	x		
onemarkets J.P. Morgan Emerging Countries Fund		x	
onemarkets J.P. Morgan US Equities Fund		x	
onemarkets Allianz Global Equity Future Champions Fund		x	
onemarkets Allianz Conservative Multi-Asset Fund		x	
onemarkets Pictet Global Opportunities Allocation Fund		x	
onemarkets VP Global Flexible Bond Fund		x	
onemarkets VP Flexible Allocation Fund	x		
onemarkets Global Multibrand Selection Fund	x		
onemarkets Balanced Eastern Europe Fund	x		
onemarkets Multi-Asset Value Fund	x		
onemarkets Short Term Bond HUF Fund	x		
onemarkets Short Term Bond CZK Fund	x		
onemarkets Bond HUF Fund	x		
onemarkets Bond Target 2029 Fund	x		
onemarkets Bond Target 2029 II Fund	x		
onemarkets Libra Fund		x	
Onemarkets BlackRock Low Duration Bond Fund	x		
onemarkets BlackRock Global Diversified Balanced Fund		x	
onemarkets J.P. Morgan Emerging Markets Short Term Bond Fund	x		
onemarkets Fidelity European Heritage Equity Fund		x	
onemarkets Rockefeller Global Innovation Equity Fund		x	
onemarkets Capital Group US Balanced Fund	x		

## **PART 2: Sub-Fund Specific Information**

All of the Sub-Funds described under this chapter are part of onemarkets Fund that functions as an umbrella structure. The Fund exists to offer investors a broad range of sub-funds with different objectives and strategies.

For each Sub-Fund, the specific investment objectives and the main securities it may invest in, along with other key characteristics, are described in this section. In addition, all Sub-Funds are subject to the general investment policies and restrictions, that are being described in section Investment Objectives, Policies and Restrictions of the general part of this Prospectus.

The Board of Directors of the Fund has overall responsibility for the Fund's business operations and its investment activities, including the investment activities of all of the Sub-Funds. The Board of Directors has delegated the day-to-day management of the Sub-Funds to its Management Company, which in turn has delegated some of its responsibilities to a number of Investment Managers and other service providers.

The Board of Directors retains supervisory approval, control and responsibility over the Management Company.

For general information on fees, charges and expenses you may have to pay in connection with your investment, consult the section Fees and Charges.

## **1. onemarkets Amundi Income Opportunities Fund**

### **1. Investment Objective:**

The Sub-Fund seeks to provide income and as a secondary objective capital appreciation over the recommended holding period (as further specified under the section "Profile of the typical investor below").

### **2. Investment Strategy:**

The Sub-Fund has the flexibility to invest in a broad range of income producing securities from around the world, including in emerging markets. This may include equities, equity linked instruments (ADRs and GDRs), government and corporate bonds, subordinated bonds and Money Market Instruments. The Sub-Fund is not bound by any country, region or industry/sector constraints.

### **3. Investment Policy:**

The Sub-Fund's bond investments may be of any quality (investment grade or below) provided that the minimum average rating of the Sub-Fund's portfolio is B. The Sub-Fund may invest up to 50% of its net assets in bonds which are below investment grade. The Sub-Fund may also invest up to 20% of its net assets in unrated bonds (i.e., bonds which neither the bonds themselves nor their issuers have a credit rating issued by a third-party rating agency). The selection process of fixed income investments is based on fundamental analysis considering both broad economic and issuer specific factors (in assessing the appropriate maturity, credit quality and sector weighting of the Sub-Fund's fixed income investments, the Investment Manager considers a variety of factors that are expected to influence economic activity and interest rates). In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals, a relative value analysis and fixed income security evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realisation of the same) in the best interest of the investors. Unrated bonds will be assigned an internal rating determined by the Investment Manager for the purposes of the determination of the average rating of the Sub-Fund's portfolio.

The Sub-Fund may gain the following exposure:

- equities and equity-linked instruments (ADRs and GDRs): up to 100% of the Sub-Fund's net assets;
- bonds: up to 100% of the Sub-Fund's net assets, including up to 20% in asset-backed and mortgage-related securities (ABS/MBS) and CLOs and CMOs and up to 20% in convertible securities (including CoCos);
- Money Market Instruments: up to 100% of its net assets.

The Sub-Fund may invest into closed-ended REITs up to 20% of its net assets. The Sub-Fund will not invest directly in real estate.

Emerging markets (including Russia, subject to the sanctions being lifted) may represent up to 30% of the total assets, including up to 5% in Chinese bonds denominated in any currency and dealt in China (directly on CIBM or indirectly via Bond Connect or in other markets for offshore Chinese investors (i.e., HK listed and potentially traded in markets such as London or via Euroclear)).

The Sub-Fund may invest in debt instruments with loss absorption features ("LAPs" which are contingent convertible bonds ("CoCos") and senior non-preferred debts).

These instruments may be subject to contingent write-down or contingent conversion to ordinary shares on the occurrence of trigger event(s). The Sub-Fund's expected total maximum investments in LAPs (including CoCos) will be less than 30% of its net assets. The Sub-Fund may invest up to 10% of its net assets in Cocos.

The Sub-Fund may invest up to 10% of its assets in UCITS and other UCIs eligible under article 41(1)e) of the 2010 Law. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund.

The Sub-Fund will not invest more than 10% of its net assets in debt securities issued and/or guaranteed by a single sovereign issuer (including its government, public or local authority) which is below investment grade or unrated.

The Sub-Fund may invest up to 5% of its net assets directly in insurance-linked securities, such as Catastrophe Bonds, pandemic bonds and quota shares, issued outside Hong Kong. For the avoidance of doubt, the Sub-Fund will not invest in ILS issued in Hong Kong and their repackaged products and derivatives.

The Sub-Fund makes use of financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) to reduce various risks (i.e., hedging), for efficient portfolio management and as a way to gain exposure (long or short) to various assets, markets or other investment opportunities (including equity index futures, currency futures, currency forwards, bond futures/Treasury futures, CDX, equity index options exchange traded, equity index options OTC, single security equity options exchange traded, single security equity options OTC, volatility futures and volatility options).). The long and short active financial derivative instruments ("FDI") positions implemented by the Sub-Fund may not be correlated with the underlying securities positions (e.g., equities, bonds, etc.) held by the Sub-Fund. For the avoidance of doubt, the use of FDI by the Sub-Fund will not result in the Sub-Fund being in a net short position on an overall basis.

The Sub-Fund's net derivative exposure may be up to 50% of its net assets.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the reference currency (EUR).

The Sub-Fund may use strategies to hedge currency risks in relation to currencies different from EUR.

The Sub-Fund may hold defaulted or distressed securities up to 10% of its net assets.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular leverage, is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

In addition to the bank deposits at sight referred to above and for liquidity management purposes and/or to deal with adverse market conditions, the Sub-Fund may invest in Money Market Instruments and/or money market funds.

**It cannot be assured that the investment policy will achieve the investment objective.**

#### 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 6 of SFDR. The investments underlying the Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

#### 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a temporary basis:

Securities financing transaction	Permitted	Used	Maximum amount	Estimated amount
Total Return Swaps	Yes	on a temporary basis	10%	0%

Total Return Swap transactions will more specifically be used with a view to achieving exposure to assets while limiting costs, reducing risks, offer combined investments and/or facilitating the access to the market in a timely manner. For example, Total Return Swaps may be used to gain exposure and benefit from the returns on a reference asset without purchasing the asset directly.



In respect to Total Return Swap revenues, the gross income generated by the transactions is credited for 100% to the Sub-Fund and for 0% to the counterparty in these transactions (subject to the funding and trading costs that will be borne by the Sub-Fund). The Sub-Fund will enter into Total Return Swaps with multiple counterparties (the top 10 counterparties will be listed in the annual report of the Fund in accordance with SFTR). As of the prospectus date, Amundi Intermediation acts as agent and is in charge of counterparty selection and best execution. Such transactions may be executed with related parties, belonging to Credit Agricole Group such as Crédit Agricole CIB, CACEIS, Credit Agricole S.A. and other entities. The proportion of the assets held by the Sub-Fund that may be subject to Total Return Swap transactions is generally expected to around 0% of the Sub-fund's Net Asset Value. That proportion will fluctuate mainly due to the level of directional investment opportunities in the market. The proportion of TRS may increase up to a maximum of 10% of the Sub-Fund's Net Asset Value compared to the expected average when directional exposure of the portfolio is low and additional TRS exposure to implement relative strategies (geographical or sectorial) is needed to increase the alpha of the strategy.

The Sub-Fund will not enter into securities lending transactions and repurchase transactions.

## **6. Investment Manager and Investment Sub-Managers:**

Amundi Asset Management US, Inc. will act as the Investment Manager.

Contact details:

Amundi Asset Management US, Inc.

60 State Street

Boston, MA 02109-1820

United States

## **7. Benchmark used:**

The Sub-Fund does not use any index under the Benchmark Regulation.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a significant volatility of the Sub-Fund and potentially high capital losses in order to achieve high potential investment performances. The Sub-Fund is intended for investors with a long-term investment horizon.

## 9. Risk Management procedure:

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Absolute VaR approach. The Management Company calculates the level of the leverage of the Sub-Fund using the sum of notional approach and expects that this level will in principle not be higher than 100% (in relation to the total net assets of the Sub-Fund).

The Sub-Fund pursues an opportunity-oriented investment strategy. The focus is on maximising the potential return to investors, rather than minimising risks. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as increased risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## 10. Specific Risk factors:

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Risk Factors in the general part of the Prospectus.

## 11. Sub-Fund Currency:

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day

NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## **2. onemarkets Amundi Flexible Income Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is primarily to generate income and, secondarily, increase the value of the investor's investment over the recommended holding period (as further specified under the section "Profile of the typical investor below").

### **2. Investment Strategy:**

The Investment Manager uses its own global economic analysis to determine the most attractive asset types and geographical regions, then uses analysis of individual issuers to identify individual securities that offer the best potential gain for the risk involved. The Investment Manager seeks investment prospects paying above average income. The Investment Manager pursues a flexible asset allocation strategy.

In addition, the sub-fund promotes environmental and/or social characteristics by complying with the ESG analysis framework and scoring methodology of the Investment Manager which includes a mix of exclusion, ESG integration and engagement approach.

The Investment Manager's ESG analysis framework has been designed to assess corporate behaviour in three fields: Environment, Social, and Governance (ESG). The Investment Manager assesses companies' exposure to ESG risks and opportunities, including sustainability factors and sustainability risks, and how corporates manage these challenges in each of their sectors. As far as issuers of listed securities are concerned, The Investment Manager scores issuers regardless of the instrument type, equity or debt.

Also, the Sub-Fund does consider Principal Adverse Impact Indicators (PAIs) on sustainability factors in accordance with article Art. 7(1) of the Sustainable Finance Disclosure Regulation (SFDR) Regulation (EU) 2019/2088.

A detailed description of the ESG characteristics promoted as well as the methodology and applied criteria is set out in appendix 2a.

### **3. Investment Policy:**

The Sub-Fund will mainly invest in a broad range of securities from around the world, including emerging markets (e.g., China H-Shares via the Shanghai-Hong Kong Stock Connect program).

This may include equities (up to 50% of its net assets), government and corporate bonds and Money Market Instruments. The Sub-Fund's bond investments may be of any quality (investment grade or below). Investments in bonds with a rating below investment grade will not exceed 60% of the Sub-Fund's net assets whilst investments in unrated bonds will only represent a very limited portion of the Sub-Fund's portfolio (not exceeding 5% of the Sub-Fund's net assets). The selection process of bonds is based on fundamental analysis. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals and bond evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio *versus* realisation of the same) in the best interest of the investors.

The Sub-Fund will not invest in defaulted or distressed securities.

The Sub-Fund may invest up to 50% of its net assets, in securities that are denominated in currencies other than the Euro.

The Sub-Fund may also hold investments, up to 30% of its net assets, whose values are linked to prices of 'real assets' such as, but not limited to, real estate, infrastructure or commodities. These investments will be done through UCITS eligible investments such as closed-ended REITs, ETC, Indices and UCITS funds exposed to commodities but also listed equities of companies active in business that are exposed to such 'real assets'.

The Sub-Fund may invest in (up to 10% of its net assets in each of these three categories):

- convertible bonds and contingent convertible bonds ("CoCos");
- depository receipts (American Depository Receipts (ADRs) eligible (including their respective underlying) under the 2010 Law; and,
- other UCITS and UCIs eligible under article 41(1)e) of the 2010 Law.

In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs) potential retrocessions will benefit to the Sub-Fund.

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) as well as use securities financing techniques (as further described below) for hedging and efficient management purposes and to achieve its investment objective. To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors or currencies from time to time. The use of financial derivative instruments (e.g. futures, options and swaps) as well as the use of securities financing techniques is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular leverage, is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

A minimum of 75% of the Sub-Fund's securities and instruments will be used to meet the promoted environmental or social characteristics, where they integrate sustainability factors through the exclusion of any issuers specified in the exclusion list of Amundi's responsible investment policy as further described in section "Sustainable Investment" of the Prospectus and on the website [www.amundi.lu](http://www.amundi.lu).

Furthermore, the sub-fund commits to have a minimum of 5% of Sustainable Investments according to article 2(17) SFDR which are part of the 75% mentioned above.

**It cannot be assured, that the investment policy will achieve the investment objective.**

## 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR.

The Sub-Fund seeks to achieve an ESG score of its portfolio greater than that of its investment universe. In determining the ESG score of the Sub-Fund and the investment universe, ESG performance is assessed by comparing the average performance of a security against the security issuer's industry, in respect of each of the three ESG characteristics of environmental, social and governance. The selection of securities through the use of Amundi's ESG rating methodology (as detailed below) takes into account principal adverse impacts of investment decisions on Sustainability Factors according to the nature of the Sub-Fund.

The Sub-Fund currently has a low exposure to sustainable investments in accordance with article 2(17) of SFDR.

The Sub-Fund's investments do not take into account the criteria for environmentally sustainable economic activities, including enabling or transitional activities, within the meaning of the Taxonomy Regulation and the Sub-Fund may only hold such investments on an incidental basis. It is expected that 0% of the Sub-Fund's portfolio will be aligned to taxonomy eligible activities and sectors within the meaning of the Taxonomy Regulation.

### Amundi ESG rating approach

Amundi has developed its own ESG rating approach. The Amundi ESG rating aims to measure the ESG performance of an issuer, i.e. its ability to anticipate and manage Sustainability Risks and opportunities inherent to its industry and individual circumstances. By using the Amundi ESG ratings, the Investment Manager is taking into account Sustainability Risks in its investment decisions.

Amundi applies targeted exclusion policies to all Amundi's active investing strategies by excluding companies in contradiction with the Responsible Investment Policy, such as those which do not respect international conventions, internationally recognised frameworks or national regulations.

Amundi has developed its own in-house ESG rating process based on the "Best-in-class" approach. Ratings adapted to each sector of activity aim to assess the dynamics in which companies operate. ESG rating and analysis is performed within the ESG analysis team of Amundi, which is also used as an independent and complementary input into the decision process as further detailed below.

The Amundi ESG rating is an ESG quantitative score translated into seven grades, ranging from A (the best scores universe) to G (the worst). In the Amundi ESG rating scale, the securities belonging to the exclusion list correspond to a G.

For corporate issuers ESG performance is assessed by comparison with the average performance of its industry, through the three ESG dimensions:

1. *Environmental dimension*: this examines issuers' ability to control their direct and indirect environmental impact, by limiting their energy consumption, reducing their greenhouse emissions, fighting resource depletion and protecting biodiversity.

2. *Social dimension*: this measures how an issuer operates on two distinct concepts: the issuer's strategy to develop its human capital and the respect of human rights in general.

3. *Governance dimension*: this assesses capability of the issuer to ensure the basis for an effective corporate governance framework and generate value over the long term.

The methodology applied by the Amundi ESG rating uses 37 criteria that are either generic (common to all companies regardless of their activity) or sector specific (weighted according to sector) and considered in terms of their impact on reputation, operational efficiency and regulations in respect of an issuer.

The Amundi ESG rating also considers potential negative impacts of the issuer's activities on Sustainability (principal adverse impact of investment decisions on sustainability factors, as determined by Amundi) including on the following indicators:

- Greenhouse gas emission and Energy Performance (Emissions and Energy Use Criteria)
- Biodiversity (Waste, recycling, biodiversity and pollution Criteria, Responsible Management Forest Criteria)
- Water (Water Criteria)
- Waste (Waste, recycling, biodiversity and pollution Criteria)
- Social and employee matters (Community involvement and human rights criteria, Employment practices Criteria, Board Structure Criteria, Labour Relations Criteria and Health and Safety Criteria)
- Human rights (Community involvement & Human Rights Criteria)
- Anti-corruption and anti-bribery (Ethics Criteria)

The way in which and the extent to which ESG analyses are integrated, for example based on ESG scores, are determined separately by the investment manager of the relevant fund.

More detailed information including Amundi's Responsible Investment Policy and rating methodology are available at [www.amundi.com](http://www.amundi.com).

## 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions under the SFTR that are used on a temporary basis and for efficient portfolio management purposes:

Securities financing transactions	Permitted	Used	Maximum amount	Estimated amount
Total Return Swaps	Yes	Yes	20%	10%

Total Return Swap transactions will more specifically be used with a view to achieving exposure to assets while limiting costs, reducing risks, offer combined investments and/or facilitating the access to the market in a timely manner. For example, Total Return Swaps may be used to gain exposure and benefit from the returns on a reference asset without purchasing the asset directly.

In respect to Total Return Swap revenues, the gross income generated by the transactions is credited for 100% to the Sub-Fund and for 0% to the counterparty in these transactions (subject to the funding and trading costs that will be borne by the Sub-Fund). The Sub-Fund will enter into Total Return Swaps with multiple counterparties (the top 10 counterparties will be listed in the annual report of the Fund in accordance with SFTR). As of the prospectus date, Amundi Intermediation acts as agent and is in charge of counterparty selection and best execution. Such transactions may be executed with related parties, belonging to Credit Agricole Group such as Crédit Agricole CIB, CACEIS, Credit Agricole S.A. and other entities. The proportion of the assets held by the Sub-Fund that may be subject to Total Return Swap transactions is generally expected to around 10% of the Sub-fund's Net Asset Value. That proportion will fluctuate mainly due to the level of directional investment opportunities in the market. The proportion of TRS may increase up to a maximum of 20% of the Sub-Fund's Net Asset Value compared to the expected average when directional exposure of the portfolio is low and additional TRS exposure to implement relative strategies (geographical or sectorial) is needed to increase the alpha of the strategy.

The Sub-Fund will not enter into securities lending transactions and repurchase transactions.

## 6. Investment Manager and Investment Sub-Manager:

Amundi Deutschland GmbH will act as the Investment Manager.

Contact details:

<b>Amundi Deutschland GmbH</b>
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Arnulfstraße 124-126 D-80636 Munich, Germany
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## 7. Benchmark used:

The Sub-Fund does not use any index under the Benchmark Regulation.

## 8. Profile of the typical investor:

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a medium volatility of the Sub-Fund and potentially capital losses in order to achieve moderate potential investment performances. The sub-fund is intended for investors with a medium-term investment horizon.

## 9. Risk Management procedure:

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.



The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes.

The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The Sub-Fund's global exposure will be measured and monitored by using the Absolute VaR approach. The Management Company calculates the level of the leverage of the Sub-Fund using the sum of notional approach and expects that this level will in principle not be higher than 500% (in relation to the total net assets of the Sub-Fund). In exceptional cases, the level of leverage may exceed this figure.

The Sub-Fund pursues a conservative investment strategy. A steady and stable investment performance is the aim in return for a moderate risk appetite. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as reduced risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## **12. Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

### 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, are generally open for business except 24 and 31 December.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 2a. onemarkets Amundi Flexible Income Fund – 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:  
onemarkets Amundi Flexible Income Fund

Legal entity identifier:  
529900ANIKKO9ZCAA439

### Environmental and/or social characteristics

#### 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, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

#### Does this financial product have a sustainable investment objective?

**Yes**

**No**

It will make a minimum of **sustainable investments with an environmental objective**: \_\_\_\_%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of **sustainable investments with a social objective**: \_\_\_\_%

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 5 % of sustainable investments.

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**



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

The Sub-Fund promotes environmental and/or social characteristics by complying with the ESG analysis framework and scoring methodology of Amundi which includes a mix of exclusion, ESG integration and engagement approach.

Amundi's ESG analysis framework (available online: <https://www.amundi.lu/retail/Local-Content/Footer/Quick-Links/Regulatory-information/Amundi>) has been designed to assess corporate behaviour in three fields: Environment, Social, and Governance (ESG). Amundi assesses companies' exposure to ESG risks and opportunities, including sustainability factors and sustainability risks, and how corporates manage these challenges in each of their sectors. As far as issuers of listed securities are concerned, Amundi scores issuers regardless of the instrument type, equity or debt.

The environmental and/or social characteristic promoted by this financial product are embedded in the criteria identified to perform the ESG analysis framework.

These criteria are different for corporates issuing listed instruments and for sovereign entities.

Regarding corporate issuers, our ESG analysis framework is comprised of 38 criteria, of which 17 are cross-sector criteria, common to all companies whatever their business sector, and 21 sector specific criteria. These criteria were designed to either assess how sustainability issues might affect the issuer as well as the quality of the management of this dimension. Impact on sustainability factors as well as quality of the mitigation undertaken are also considered. All criteria are available in the Investment Manager's front office portfolio management system.

### Sector specific criteria

#### Environment

- Clean Energy
- Green Car
- Green Chemistry
- Sustainable Construction
- Responsible Forest Management
- Paper Recycling
- Green Investing & Financing
- Green Insuring
- Green Business
- Packaging

#### Social

- Bioethics
- Responsible Marketing
- Healthy Product
- Tobacco Risk
- Vehicle Safety
- Passenger Safety
- Responsible Media
- Data Security & Privacy
- Digital Divide
- Access to Medicine
- Financial Inclusion

### Cross sector criteria

#### Environment

- Emissions & Energy
- Water Management
- Biodiversity & Pollution
- Supply Chain- Environment

#### Social

- Health & Safety
- Working Conditions
- Labour Relations
- Supply Chain - Social 2
- Product & Customer Responsibility
- Community Involvement & Human Rights

#### Governance

- Board Structure
- Audit & Control
- Remuneration
- Shareholders' Rights
- Ethics
- Tax Practices
- ESG Strategy

The extent to which these criteria affect an issuer's ESG score depends on the relative importance attributed to them in the model compared to the other factors considered. Each issuer is rated with a score measured against the average of its sector, in order to distinguish between best practices and worst practices at the sector level.

Regarding sovereign issuers, Amundi's methodology relies on a set of about 50 ESG indicators. All indicators have been grouped into 8 categories, each category falling into one of the pillars E, S or G. Similar to our corporate ESG rating scale, issuers' ESG score is translated in an ESG rating ranging from A to G:

<b>Environment</b>	<b>Social</b>	<b>Governance</b>
- Climate Change - Natural Capital	- Human Rights - Social Cohesion - Human Capital - Civil Rights	- Government Effectiveness - Economic Environment

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

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

Sustainability indicators used to measure the attainment of environmental or social characteristic are the ESG Rating assigned to each financial instruments according to a proprietary methodology, the resulting ESG Rating of the portfolio and the ESG Rating of the benchmark or investment universe.

Regarding the ESG Rating, Amundi bases its ESG analysis of corporates on a "best-in-class" approach. Each issuer is assessed with a quantitative score scaled around the average of their sector, which distinguishes best practices from worst practices at sector level. Amundi's assessment relies on a combination of non-financial data from third parties and qualitative analysis of associated sector and sustainability themes. The quantitative score is translated into a letter rating which ranges from a scale of A (for best practices) to G (for the worst ones). G-rated companies are excluded from investment of this fund. The ESG Rating of each issuer is the result of the aggregation of the environmental, social and corporate governance ratings.

The overall ESG Rating of the portfolio is the AUM-weighted average of each issuer's ESG Rating. The ESG Rating of the portfolio must be higher than the one of the benchmark or investment universe.

Moreover, Amundi applies a targeted exclusion policy with reference to issuers that do not comply with Amundi Group's Responsible Investment Policy, such as issuers exposed to the exclusionary rules and thresholds set out in our sector policy (i.e. thermal coal, tobacco) or do not comply with internationally recognised conventions and/or frameworks, and national regulations.

● ***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?***

The objectives of the sustainable investments according to article 2(17) SFDR are to invest in investee companies that seek to meet two criteria:

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

1. follow best environmental and social practices; and
2. avoid making products or providing services that harm the environment and society.

At the investee company level this means that an investee company must be a “best performer” within its sector of activity on at least one of its material environmental or social factors. The definition of “best performer” relies on Amundi’s proprietary ESG methodology which aims to measure the ESG performance of an investee company.

**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.

***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?***

To ensure sustainable investments do no significant harm (‘DNSH’), Amundi utilises two tests:

1. The first DNSH test relies on monitoring the mandatory Principal Adverse Impacts indicators where robust data is available (e.g. GHG intensity of investee companies) via a combination of indicators (e.g. carbon intensity) and specific thresholds or rules (e.g. that the investee company’s carbon intensity does not belong to the last decile of the sector). In addition to the criteria that have been developed specifically for this test, Amundi already considers specific Principal Adverse Impacts indicators within its exclusion policy as part Amundi’s Responsible Investment Policy (e.g. exposure to controversial weapons).
2. Beyond the specific Principal Adverse Impacts indicators covered in the first test, Amundi has defined a second test in order to verify that the investee company does not have an overall environmental or social performance that is amongst the worst of its sector.

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

The first DNSH filter relies on monitoring of mandatory Principal Adverse Impacts indicators in Annex 1, Table 1 of the RTS where robust data is available via the combination of following indicators and specific thresholds or rules:

- Have a CO2 intensity which does not belong to the last decile compared to other companies within its sector (only applies to high intensity sectors), and
- Have a Board of Directors’ diversity which does not belong to the last decile compared to other companies within its sector, and
- Be cleared of any controversy in relation to work conditions and human rights.
- Be cleared of any controversy in relation to biodiversity and pollution.

Amundi already considers specific Principal Adverse Impacts within its exclusion policy as part of Amundi's Responsible Investment Policy. These exclusions, which apply on the top of the tests detailed above, cover the following topics: exclusions on controversial weapons, Violations of UN Global Compact principles, coal and tobacco.

*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 OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are integrated into our ESG scoring methodology. Our proprietary ESG rating tool assesses issuers using available data from our data providers. For example the model has a dedicated criteria called "Community Involvement & Human Rights" which is applied to all sectors in addition to other human rights linked criteria including socially responsible supply chains, working conditions, and labor relations. Furthermore, we conduct controversy monitoring on a, at minimum, quarterly basis which includes companies identified for human rights violations. When controversies arise, analysts will evaluate the situation and apply a score to the controversy (using our proprietary scoring methodology) and determine the best course of action. Controversy scores are updated quarterly to track the trend and remediation efforts.

*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?**

- Yes, Amundi considers all the mandatory Principal Adverse Impacts and relies on a combination of exclusion policies (normative and sectorial), ESG rating integration into the investment process, engagement and voting approaches.

A respective PAI policy outlining the PAI is available online:

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html> Further information on principal adverse impacts will be provided in accordance with Art. 11 (2) of Regulation (EU) 2019/2088 in an annex to the Fund's annual report.

No



### What investment strategy does this financial product follow?

The investment manager first constructs a macro strategy portfolio to provide a return not correlated to any market, and then overlays this with an investment strategy to generate excess return. The macro strategy portfolio consists of any type of equities and bonds from any type of issuers worldwide and the asset allocation and long or short positioning are driven by macroeconomic, thematic and regional scenarios. The excess return strategy principally targets interest rates, equities, corporate bonds, currencies and commodities. This strategy will take advantage of price differentials between correlated financial instruments but will also be based on the direction in which a specific security is heading. A sophisticated process continually assesses risk and performance and determines the allocation among different types of asset classes.

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

● ***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?***

The Sub-Fund integrates Sustainability Factors in its investment process as outlined above. In particular, the Sub-Fund seeks to achieve an ESG score of its portfolio greater than that of its investment universe.

The Amundi ESG rating is an ESG quantitative score translated into seven grades, ranging from A (the best scores universe) to G (the worst). All the G rated securities are excluded from the eligible universe and all the securities belonging to the exclusion list, such as those not respecting international conventions, correspond to a G rating. For further details please refer to Amundi Responsible Investment Policy available on the public website.

A targeted exclusion policy is applied to the portfolio management activity by excluding companies in contradiction with both the Management Company exclusion policy (as described in the Prospectus) and the Investment Manager Responsible Investment Policy (as described below).

The Investment Manager exclusion policy includes the following rules:

1. legal exclusions on controversial weapons (anti-personnel mines, cluster bombs, chemical weapons, biological weapons and depleted uranium weapons, etc.);
2. exclusion of companies that seriously and repeatedly violate one or more of the 10 principles of the Global Compact, without credible corrective measures;
3. sectoral exclusions of Amundi group on Coal and Tobacco (details of this policy are available in Amundi's Responsible Investment Policy available on the website [www.amundi.lu](http://www.amundi.lu)).

Additionally, the Sub-Fund has defined exclusion criteria identifying Companies and/or Countries and/or underlying which should not be invested in or which should be invested in respecting predefined thresholds, subject to the Sub-fund's investments not complying with such exclusion criteria remaining below 10% of the relevant Sub-Fund's net assets.

4. Companies that are involved in severe violations of the UN Global Compact



5. Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations.
6. Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 10% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
7. Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact (a *de minimis* rule can be applied, i.e. companies with a minor involvement are not necessarily excluded, and the internal threshold limit on the Management Company's side will be set at 5%).
8. Companies involved in the tobacco production which derive from these businesses more than 5% of their consolidated revenues.
9. Companies involved in the nuclear energy production which derive from these businesses more than 15% of their consolidated revenues.
10. Companies involved in the weapons production which derive from these businesses more than 10% of their consolidated revenues.
11. Companies involved in the gambling business which derive from these businesses more than 15% of their consolidated revenues.
12. Companies involved in the adult entertainment business which derive from these businesses more than 15% of their consolidated revenues.

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

N/A. There is no minimum committed rate for the Sub-Fund.

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

The governance dimension, which is one of the three pillars of ESG rating methodology, is set to ensure that a company's management is able to organise a collaborative process between the different stakeholders that guarantees it will meet long-term objectives (therefore guaranteeing the company's value over the long term). This dimension provides an analysis of how a company integrates all of its stakeholders in its development model.

Among the criteria that contribute to the rating there are:

1. Independence of board
2. Audit and control
3. Compensation
4. Shareholders' rights
5. Ethics
6. ESG strategy
7. Tax practices

**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?

### Asset allocation

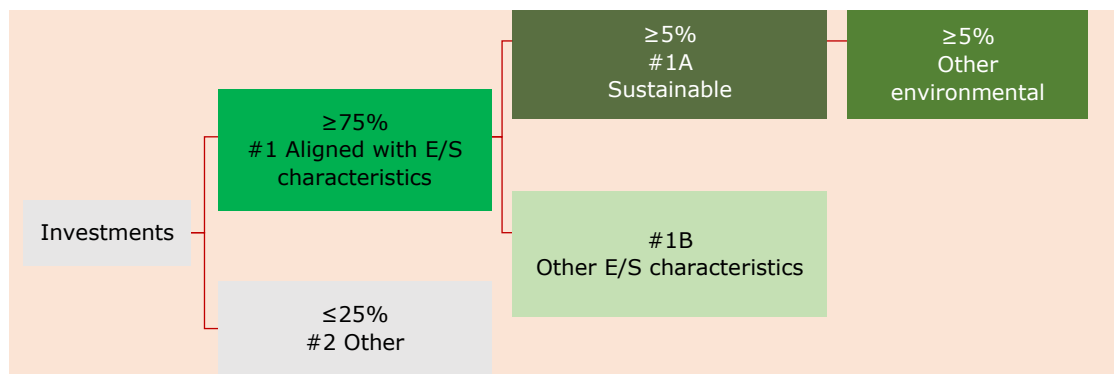
describes the share of investments in specific assets.

A minimum of 75% of the Sub-Fund's securities and instruments will be used to meet the promoted environmental or social characteristics, where they integrate sustainability factors through the exclusion of any issuers specified in the exclusion list of Amundi's responsible investment policy as further described in section "Sustainable Investment" of the Prospectus and on the website [www.amundi.lu](http://www.amundi.lu).

Furthermore, the sub-fund commits to have a minimum of 5% of Sustainable Investments according to article 2(17) SFDR

### 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.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

Derivatives are not used to attain the environmental and social characteristics promoted by the sub-fund.



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

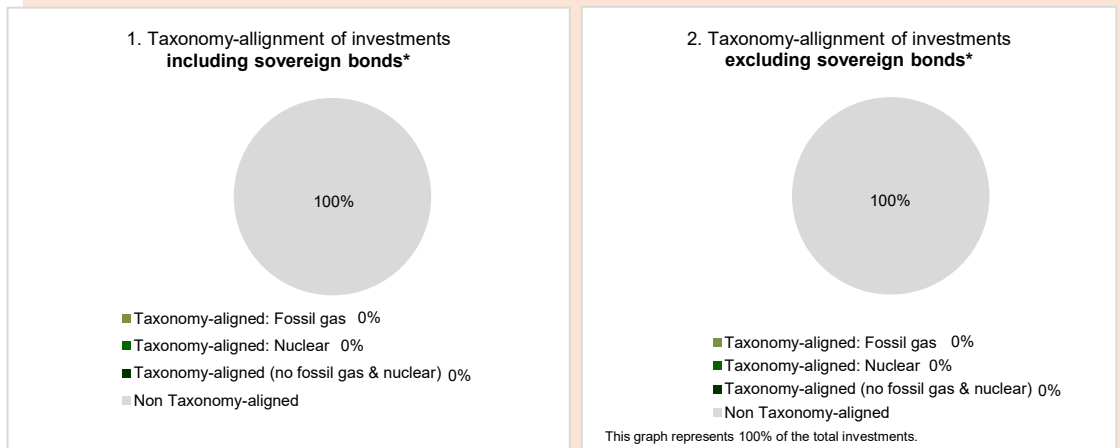
● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>8</sup>?**

Yes:

In fossil gas    In nuclear energy

No

*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

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

N/A. The Sub-Fund has no minimum proportion of investment in transitional or enabling activities.



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

The Sub-Fund invests at least 5% of assets in Sustainable Investments according to article 2(17) SFDR, typically across both environmental and social objectives. It does not

**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.

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

<sup>8</sup> 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.

commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



### **What is the minimum share of socially sustainable investments?**

The Sub-Fund invests at least 5% of assets in Sustainable Investments according to article 2(17) SFDR, typically across both environmental and social objectives. It does not commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



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

Included in “#2 Other” are cash and unrated instruments for the purpose of liquidity and portfolio risk management. Unrated instruments may also include securities for which data needed for the measurement of attainment of environmental or social characteristics is not available.



### **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

There is no specific benchmark defined to assess the alignment with the promoted characteristics.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

N/A

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

N/A

- ***How does the designated index differ from a relevant broad market index?***

N/A

- ***Where can the methodology used for the calculation of the designated index be found?***

N/A



### **Where can I find more product specific information online?**

**More product-specific information can be found on the website:**

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

### **3. onemarkets Amundi Climate Focus Equity Fund**

#### **1. Investment Objective:**

The Sub-Fund's investment objective is to increase the value of the investor's investment over the recommended holding period (as further specified under the section "Profile of the typical investor below").

#### **2. Investment Strategy:**

The Investment Manager uses fundamental analysis of individual issuers to identify equities with superior long-term prospects, as well as their ESG, in particular carbon intensity characteristics.

The Sub-Fund aims to promote environmental characteristics aligning the carbon intensity of the portfolio with the MSCI World Climate Paris Aligned Index (the "Index"). Additionally, this Sub-Fund promotes environmental and/or social characteristic through the incorporation of ESG considerations in the selection of investments (ESG analysis framework).

Amundi's ESG analysis framework has been designed to assess corporate behaviour in three fields: Environment, Social, and Governance (ESG). Amundi assesses companies' exposure to ESG risks and opportunities, including sustainability factors and sustainability risks, and how corporates manage these challenges in each of their sectors. As far as issuers of listed securities are concerned, Amundi scores issuers regardless of the instrument type, equity or debt.

Also, the Sub-Fund does consider Principal Adverse Impact Indicators (PAIs) on sustainability factors in accordance with article Art. 7(1) of the Sustainable Finance Disclosure Regulation (SFDR) Regulation (EU) 2019/2088.

A detailed description of the ESG characteristics promoted as well as the methodology and applied criteria is set out in appendix 3a.

#### **3. Investment Policy:**

The Sub-Fund mainly invests in a broad range of equities and equity-linked instruments of companies from anywhere in the world which contribute to climate change mitigation by supporting the transition of the global economy through a trajectory of reduction of their carbon emissions. The Sub-Fund will be at any time invested at least at 51% of its net assets in equities and equity-linked instruments.

The Sub-Fund may invest up to 30% of its net assets in equities and equity-linked instruments of companies, that are headquartered in or do substantial business in Emerging Markets.

The Sub-Fund will not invest in contingent convertible bonds ("CoCos").

Equity-linked instruments are securities or instruments that replicate or are based on an equity, including a share warrant, a subscription right, an acquisition or purchase right, an embedded derivative based on equities or equity indexes and whose economic effect leads to be exclusively exposed to equities or a depository receipt such as an American Depository Receipt (ADR) and Global Depository Receipt (GDR) eligible (including their respective underlying) under the 2010 Law.

The Sub-Fund may invest up to 20% of its net assets in depository receipts (ADRs and GDRs).

While complying with the above policies, the Sub-Fund may also invest, up to 20% of its net assets, in Money Market Instruments and deposits and, up to 10% of its net assets, in other UCITS and UCIs eligible under article 41(1)e) of the 2010 Law.

In case of investments in units of UCITS or UCITS Exchange Traded Funds (UCITS-ETFs) potential retrocessions will benefit to the Sub-Fund.

The Sub-Fund's benchmark is the MSCI World Climate Paris Aligned Index. The Sub-Fund is actively managed with reference to and seeks to outperform (after applicable fees) the Index over the recommended holding period. The Sub-Fund is mainly exposed to the issuers of the Index, however, the management of the Sub-Fund is discretionary, and the Sub-Fund will invest in issuers not included in the Index. The extent of deviation from the Index is expected to be significant.

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) as well as use securities financing techniques (as further described below) for hedging and efficient management purposes and to achieve its investment objective. To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors or currencies from time to time. The use of financial derivative instruments (e.g. futures, options and swaps) as well as the use of securities financing techniques is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular leverage, is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

90% of the Sub-Fund's investments (excluding derivatives) will meet the promoted environmental or social characteristics, where they integrate sustainability factors through the exclusion of any issuers specified in the exclusion list of Amundi's responsible investment policy as further described in section "Sustainable Investment" of the Prospectus and on the website [www.amundi.lu](http://www.amundi.lu).

Furthermore, the sub-fund commits to have a minimum of 10% of Sustainable Investments which are part of the 90% mentioned above.

**It cannot be assured, that the investment policy will achieve the investment objective.**

#### **4. Sustainability approach:**

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR.

The Sub-Fund seeks to achieve an ESG score of its portfolio greater than that of the Index. In determining the ESG score of the Sub-Fund and the Index, ESG performance is assessed by comparing the average performance of a security against the security issuer's industry, in respect of each of the three ESG characteristics of environmental, social and governance. The selection of securities through the use of Amundi's ESG rating methodology (as detailed below) takes into account principal adverse impacts of investment decisions on Sustainability Factors according to the nature of the Sub-Fund.

The Sub-Fund currently has a low exposure to sustainable investments in accordance with article 2(17) of SFDR.

In accordance with its objective and investment policy, the Sub-Fund promotes environmental characteristics within the meaning of article 6 of the Taxonomy Regulation and may partially invest in economic activities that qualify as environmentally sustainable under Articles 3 and 9 (a) and (b) of the Taxonomy Regulation. The Sub-Fund cannot however at this stage accurately calculate the extent to which its underlying investments qualify as environmentally sustainable as per the strict understanding of Article 3 of the Taxonomy Regulation so that it is expected that 0% of the Sub-Fund's portfolio will be aligned to taxonomy eligible activities and sectors within the meaning of the Taxonomy Regulation.

Notwithstanding the above, the "do no significant harm" principle applies only to those investments underlying the Sub-Fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities.

#### Amundi ESG rating approach

Amundi has developed its own ESG rating approach. The Amundi ESG rating aims to measure the ESG performance of an issuer, i.e. its ability to anticipate and manage Sustainability Risks and opportunities inherent to its industry and individual circumstances. By using the Amundi ESG ratings, the Investment Manager is taking into account Sustainability Risks in its investment decisions.

Amundi applies targeted exclusion policies to all Amundi's active investing strategies by excluding companies in contradiction with the Responsible Investment Policy, such as those which do not respect international conventions, internationally recognised frameworks or national regulations.

Amundi has developed its own in-house ESG rating process based on the "Best-in-class" approach. Ratings adapted to each sector of activity aim to assess the dynamics in which companies operate. ESG rating and analysis is performed within the ESG analysis team of Amundi, which is also used as an independent and complementary input into the decision process as further detailed below.

The Amundi ESG rating is a ESG quantitative score translated into seven grades, ranging from A (the best scores universe) to G (the worst). In the Amundi ESG rating scale, the securities belonging to the exclusion list correspond to a G.

For corporate issuers ESG performance is assessed by comparison with the average performance of its industry, through the three ESG dimensions:

1. *Environmental dimension*: this examines issuers' ability to control their direct and indirect environmental impact, by limiting their energy consumption, reducing their greenhouse emissions, fighting resource depletion and protecting biodiversity.
2. *Social dimension*: this measures how an issuer operates on two distinct concepts: the issuer's strategy to develop its human capital and the respect of human rights in general.



3. *Governance dimension*: this assesses capability of the issuer to ensure the basis for an effective corporate governance framework and generate value over the long term.

The methodology applied by the Amundi ESG rating uses 37 criteria that are either generic (common to all companies regardless of their activity) or sector specific (weighted according to sector) and considered in terms of their impact on reputation, operational efficiency and regulations in respect of an issuer.

The Amundi ESG rating also considers potential negative impacts of the issuer's activities on Sustainability (principal adverse impact of investment decisions on sustainability factors, as determined by Amundi) including on the following indicators:

- Greenhouse gas emission and Energy Performance (Emissions and Energy Use Criteria)
- Biodiversity (Waste, recycling, biodiversity and pollution Criteria, Responsible Management Forest Criteria)
- Water (Water Criteria)
- Waste (Waste, recycling, biodiversity and pollution Criteria)
- Social and employee matters (Community involvement and human rights criteria, Employment practices Criteria, Board Structure Criteria, Labour Relations Criteria and Health and Safety Criteria)
- Human rights (Community involvement & Human Rights Criteria)
- Anti-corruption and anti-bribery (Ethics Criteria)

The way, in which and the extent to which ESG analyses are integrated, for example based on ESG scores, are determined separately by the investment manager of the relevant fund.

More detailed information including Amundi's Responsible Investment Policy and rating methodology are available at [www.amundi.com](http://www.amundi.com).

## 5. Use of Securities Financing Transactions:

The Sub-Fund will not enter into securities lending transactions, Total Return Swap transactions and repurchase transactions.

## 6. Investment Manager:

Amundi Ireland Ltd will act as the Investment Manager.

Contact details:

<p><b>Amundi Ireland Ltd</b></p> <p>1 George's Quay Plaza George's Quay Dublin 2, Ireland</p>
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## **7. Benchmark used:**

The Index is not used by the Sub-Fund as a benchmark under the Benchmark Regulation since the Index is not used for the purpose of tracking the return of the Index or defining the asset allocation of the Sub-Fund's portfolio or computing the performance fee.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept an increased volatility of the Sub-Fund and potentially high capital losses in order to achieve above-average potential investment performances. The Sub-Fund is intended for investors with a medium to long-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes.

The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The global exposure of the Sub-Fund is determined under the Commitment approach.

The Sub-Fund pursues a growth-oriented investment strategy. In order to take advantage of opportunities for higher investment returns, a higher risk exposure is unavoidable. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## 11. Sub-Fund Currency:

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures, that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, are generally open for business except 24 and 31 December.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

### 3a. onemarkets Amundi Climate Focus Equity Fund – 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:  
onemarkets Climate Focus Equity Fund

Legal entity identifier:  
529900S3XIZ72EHQKK37

## Environmental and/or social characteristics

**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, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

#### Does this financial product have a sustainable investment objective?

**Yes**

**No**

It will make a minimum of **sustainable investments with an environmental objective**: \_\_\_%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of **sustainable investments with a social objective**: \_\_\_%

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 10 % of sustainable investments.

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**



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

The Sub-Fund aims to promote environmental characteristics aligning the carbon intensity of the portfolio with the MSCI World Climate Paris Aligned Index (the "Index"). Additionally, this Sub-Fund promotes environmental and/or social characteristic through the incorporation of ESG considerations in the selection of investments (ESG analysis framework).

Amundi's ESG analysis framework (available online: <https://www.amundi.lu/retail/Local-Content/Footer/Quick-Links/Regulatory-information/Amundi>) has been designed to assess corporate behaviour in three fields: Environment, Social, and Governance (ESG). Amundi assesses companies' exposure to ESG risks and opportunities, including sustainability factors and sustainability risks, and how corporates manage these challenges in each of their sectors. As far as issuers of listed securities are concerned, Amundi scores issuers regardless of the instrument type, equity or debt.

The environmental and/or social characteristic promoted by this financial product are embedded in the criteria identified to perform the ESG analysis framework.

These criteria are different for corporates issuing listed instruments and for sovereign entities.

Regarding corporate issuers, our ESG analysis framework is comprised of 38 criteria, of which 17 are cross-sector criteria, common to all companies whatever their business sector, and 21 sector specific criteria. These criteria were designed to either assess how sustainability issues might affect the issuer as well as the quality of the management of this dimension. Impact on sustainability factors as well as quality of the mitigation undertaken are also considered. All criteria are available in the Investment Manager's front office portfolio management system.

### Sector specific criteria

#### Environment

- Clean Energy
- Green Car
- Green Chemistry
- Sustainable Construction
- Responsible Forest Management
- Paper Recycling
- Green Investing & Financing
- Green Insuring
- Green Business
- Packaging

#### Social

- Bioethics
- Responsible Marketing
- Healthy Product
- Tobacco Risk
- Vehicle Safety
- Passenger Safety
- Responsible Media
- Data Security & Privacy
- Digital Divide
- Access to Medicine
- Financial Inclusion

### Cross sector criteria

#### Environment

- Emissions & Energy
- Water Management
- Biodiversity & Pollution
- Supply Chain-Environment

#### Social

- Health & Safety
- Working Conditions
- Labour Relations
- Supply Chain - Social 2
- Product & Customer Responsibility
- Community Involvement & Human Rights

#### Governance

- Board Structure
- Audit & Control
- Remuneration
- Shareholders' Rights
- Ethics
- Tax Practices
- ESG Strategy

The extent to which these criteria affect an issuer's ESG score depends on the relative importance attributed to them in the model compared to the other factors considered. Each issuer is rated with a score measured against the average of its sector, in order to distinguish between best practices and worst practices at the sector level.

Regarding sovereign issuers, Amundi's methodology relies on a set of about 50 ESG indicators. All indicators have been grouped into 8 categories, each category falling into one of the pillars E, S or G. Similar to our corporate ESG rating scale, issuers' ESG score is translated in an ESG rating ranging from A to G:

<b>Environment</b>	<b>Social</b>	<b>Governance</b>
- Climate Change - Natural Capital	- Human Rights - Social Cohesion - Human Capital - Civil Rights	- Government Effectiveness - Economic Environment

The Sub-Fund has designated the MSCI World Climate Paris Aligned Index which is based on the MSCI World Index, its parent index, and includes large and midcap securities across 23 Developed Markets countries, as a reference benchmark for the purpose of attaining the environmental and/or social characteristics promoted.

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

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

The Sub-Fund measures the carbon intensity of the portfolio against that of the MSCI World Climate Paris Aligned Index (the "Index"). The portfolio carbon intensity is calculated as an asset weighted portfolio average and compared to the asset weighted carbon footprint intensity of the Index.

Additionally, another sustainability indicator is represented by the ESG quantitative score ("ESG Rating") assigned to each financial instrument according to a proprietary methodology and the resulting ESG rating of the Sub-Fund and of the benchmark.

Regarding the ESG Rating, Amundi bases its ESG analysis of corporates on a "best-in-class" approach. Each issuer is assessed with a quantitative score scaled around the average of their sector, which distinguishes best practices from worst practices at sector level. Amundi's assessment relies on a combination of non-financial data from third parties and qualitative analysis of associated sector and sustainability themes. The quantitative score is translated into a letter rating which ranges from a scale of A (for best practices) to G (for the worst ones). G-rated companies are excluded from investment of the fund. The ESG Rating of each issuer is the result of the aggregation of the environmental, social and corporate governance ratings.

The overall ESG Rating of the portfolio is the AUM-weighted average of each issuer's ESG Rating. The ESG Rating of the portfolio must be higher than the one of the benchmark or investment universe.

Moreover, Amundi applies a targeted exclusion policy with reference to issuers that do not comply with Amundi Group's Responsible Investment Policy, such as issuers exposed to the exclusionary rules and thresholds set out in our sector policy (i.e. thermal coal, tobacco) or do not comply with internationally recognised conventions and/or frameworks, and national regulations.

● ***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?***

The objectives of the sustainable investments according to article 2(17) SFDR are to invest in investee companies that seek to meet two criteria:

1. follow best environmental and social practices; and
2. avoid making products or providing services that harm the environment and society.

At the investee company level this means that an investee company must be a "best performer" within its sector of activity on at least one of its material environmental or social factors. The definition of "best performer" relies on Amundi's proprietary ESG methodology which aims to measure the ESG performance of an investee company.

● ***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?***

To ensure sustainable investments do no significant harm ('DNSH'), Amundi utilises two tests:

1. The first DNSH test relies on monitoring the mandatory Principal Adverse Impacts indicators where robust data is available (e.g. GHG intensity of investee companies) via a combination of indicators (e.g. carbon intensity) and specific thresholds or rules (e.g. that the investee company's carbon intensity does not belong to the last decile of the sector). In addition to the criteria that have been developed specifically for this test, Amundi already considers specific Principal Adverse Impacts indicators within its exclusion policy as part of Amundi's Responsible Investment Policy (e.g. exposure to controversial weapons).
2. Beyond the specific Principal Adverse Impacts indicators covered in the first test, Amundi has defined a second test in order to verify that the investee company does not have an overall environmental or social performance that is amongst the worst of its sector.

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

The first DNSH filter relies on monitoring of mandatory Principal Adverse Impacts indicators in Annex 1, Table 1 of the RTS where robust data is available via the combination of following indicators and specific thresholds or rules:

**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.

- Have a CO2 intensity which does not belong to the last decile compared to other companies within its sector (only applies to high intensity sectors), and
- Have a Board of Directors' diversity which does not belong to the last decile compared to other companies within its sector, and
- Be cleared of any controversy in relation to work conditions and human rights.
- Be cleared of any controversy in relation to biodiversity and pollution.

Amundi already considers specific Principal Adverse Impacts within its exclusion policy as part of Amundi's Responsible Investment Policy. These exclusions, which apply on the top of the tests detailed above, cover the following topics: exclusions on controversial weapons, Violations of UN Global Compact principles, coal and tobacco.

*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 OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are integrated into our ESG scoring methodology. Our proprietary ESG rating tool assesses issuers using available data from our data providers. For example the model has a dedicated criteria called "Community Involvement & Human Rights" which is applied to all sectors in addition to other human rights linked criteria including socially responsible supply chains, working conditions, and labor relations. Furthermore, we conduct controversy monitoring on a, at minimum, quarterly basis which includes companies identified for human rights violations. When controversies arise, analysts will evaluate the situation and apply a score to the controversy (using our proprietary scoring methodology) and determine the best course of action. Controversy scores are updated quarterly to track the trend and remediation efforts.

*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?**



- Yes, Amundi considers all the mandatory Principal Adverse Impacts and relies on a combination of exclusion policies (normative and sectorial), ESG rating integration into the investment process, engagement and voting approaches.

A respective PAI policy outlining the PAI is available online:

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

Further information on principal adverse impacts will be provided in accordance with Art. 11 (2) of Regulation (EU) 2019/2088 in an annex to the Fund's annual report.

- No



### What investment strategy does this financial product follow?

The Sub-Fund mainly invests in a broad range of equities and equity-linked instruments of companies from anywhere in the world which contribute to climate change mitigation by supporting the transition of the global economy through a trajectory of reduction of their carbon emissions. The Investment Manager uses fundamental analysis of individual issuers to identify equities with superior long-term prospects, as well as their ESG, in particular carbon intensity characteristics.

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

- ***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?***

The Sub-Fund aims to align the carbon intensity of the portfolio with the MSCI World Climate Paris Aligned Index (the "Index"). The portfolio carbon intensity is calculated as an asset weighted portfolio average and compared to the asset weighted carbon footprint intensity of the Index. As a result, equities with relatively low carbon intensity have a higher probability of being selected in the portfolio compared to equities with relatively high carbon intensity.

In addition, the Sub-Fund integrates Sustainability Factors in its investment process as outlined above. In particular, the Sub-Fund seeks to achieve an ESG score of its portfolio greater than that of its investment universe.

The Amundi ESG rating is an ESG quantitative score translated into seven grades, ranging from A (the best scores universe) to G (the worst). All the G rated securities are excluded from the eligible universe and all the securities belonging to the exclusion list, such as those not respecting international conventions, correspond to a G rating. For further details please refer to Amundi Responsible Investment Policy available on the public website.

A targeted exclusion policy is applied to the portfolio management activity by excluding companies in contradiction with both the Management Company exclusion policy (as described in the Prospectus) and the Investment Manager Responsible Investment Policy (as described below).

The Investment Manager exclusion policy includes the following rules:

1. legal exclusions on controversial weapons (anti-personnel mines, cluster bombs, chemical weapons, biological weapons and depleted uranium weapons, etc.);
2. exclusion of companies that seriously and repeatedly violate one or more of the 10 principles of the Global Compact, without credible corrective measures;
3. sectoral exclusions of Amundi group on Coal and Tobacco (details of this policy are available in Amundi's Responsible Investment Policy available on the website [www.amundi.lu](http://www.amundi.lu))

Additionally, the Sub-Fund has defined exclusion criteria identifying Companies and/or Countries and/or underlying which should not be invested in or which should be invested in respecting predefined thresholds, subject to the Sub-fund's investments not complying with such exclusion criteria remaining below 10% of the relevant Sub-Fund's net assets.

4. Companies that are involved in severe violations of the UN Global Compact
5. Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations.
6. Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 10% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
7. Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact (a *de minimis* rule can be applied, i.e. companies with a minor involvement are not necessarily excluded, and the internal threshold limit on the Management Company's side will be set at 5%).
8. Companies involved in the tobacco production which derive from these businesses more than 5% of their consolidated revenues.
9. Companies involved in the nuclear energy production which derive from these businesses more than 15% of their consolidated revenues.
10. Companies involved in the weapons production which derive from these businesses more than 10% of their consolidated revenues.
11. Companies involved in the gambling business which derive from these businesses more than 15% of their consolidated revenues.
12. Companies involved in the adult entertainment business which derive from these businesses more than 15% of their consolidated revenues.

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

N/A. There is no minimum committed rate for the Sub-Fund.

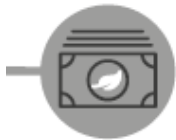
● ***What is the policy to assess good governance practices of the investee companies?***

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

The governance dimension, which is one of the three pillars of ESG rating methodology, is set to ensure that a company's management is able to organise a collaborative process between the different stakeholders that guarantees it will meet long-term objectives (therefore guaranteeing the company's value over the long term). This dimension provides an analysis of how a company integrates all of its stakeholders in its development model.

Among the criteria that contribute to the rating there are:

1. Independence of board
2. Audit and control
3. Compensation
4. Shareholders' rights
5. Ethics
6. ESG strategy
7. Tax practices



**Asset allocation** describes the share of investments in specific assets.

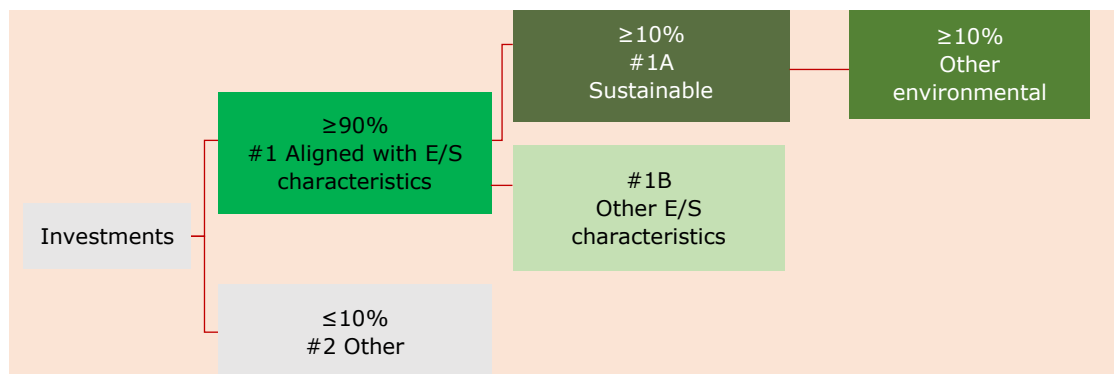
### What is the asset allocation planned for this financial product?

A minimum of 90% of the Sub-Fund's securities and instruments will be used to meet the promoted environmental or social characteristics, where they integrate sustainability factors through the exclusion of any issuers specified in the exclusion list of Amundi's responsible investment policy as further described in section "Sustainable Investment" of the Prospectus and on the website [www.amundi.lu](http://www.amundi.lu).

Furthermore, the sub-fund commits to have a minimum of 10% of Sustainable Investments according to article 2(17) SFDR.

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.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

Derivatives are not used to attain the environmental and social characteristics promoted by the sub-fund.



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

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>9</sup>?**

Yes:

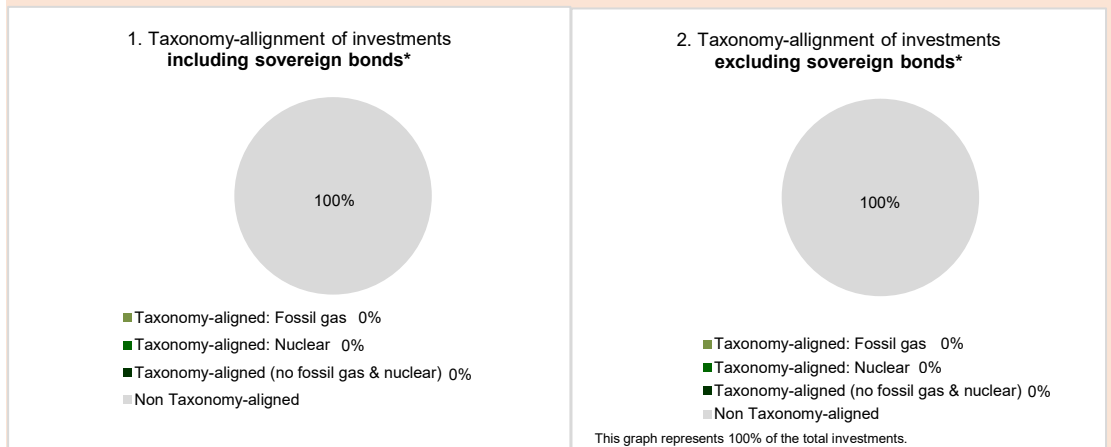
In fossil gas     In nuclear energy

No

*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.*

**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.



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

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

N/A. The Sub-Fund has no minimum proportion of investment in transitional or enabling activities.

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

*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.*



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

The Sub-Fund invests at least 10% of assets in Sustainable Investments according to article 2(17) SFDR, typically across both environmental and social objectives. It does not commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



### What is the minimum share of socially sustainable investments?

The Sub-Fund invests at least 10% of assets in Sustainable Investments according to article 2(17) SFDR, typically across both environmental and social objectives. It does not commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



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

Included in “#2 Other” are cash and unrated instruments for the purpose of liquidity and portfolio risk management. Unrated instruments may also include securities for which data needed for the measurement of attainment of environmental or social characteristics is not available.



### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The MSCI World Climate Paris Aligned Index is based on the MSCI World Index, its parent index, and includes large and midcap securities across 23 Developed Markets countries.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

The index is designed to support investors seeking to reduce their exposure to transition and physical climate risks and who wish to pursue opportunities arising from the transition to a lower carbon economy while aligning with the Paris Agreement requirements. The index incorporates the TCFD recommendations and is designed to exceed the minimum standards of the EU Paris-Aligned Benchmark.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

In building the portfolio, the investment manager will take into account the level of carbon emission of the benchmark in order to have alignment on a continuous basis.

- ***How does the designated index differ from a relevant broad market index?***

The MSCI World Climate Paris Aligned Index is based on the MSCI World Index but is designed to align with a 1.5°C climate scenario using the MSCI Climate Value-at-Risk and a “self-decarbonisation” rate of 10% year on year. The index aims to manage the “green transition” using the MSCI Low Carbon transition score and by excluding categories of fossil-fuel-linked companies. Furthermore, the index also aims to increase the weight of companies which are exposed to climate transition opportunities and reduce the weight of companies which are exposed to climate transition risks.

- ***Where can the methodology used for the calculation of the designated index be found?***

The methodology can be found in the website [www.msci.com](http://www.msci.com)



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

## **4. onemarkets Fidelity World Equity Income Fund**

### **1. Investment Objective:**

The Sub-Fund aims to provide income and long-term capital growth from a portfolio primarily made up of equity securities issued by companies throughout the world. As the Sub-Fund may invest globally, it may be exposed to countries considered to be emerging markets.

### **2. Investment Strategy:**

The Sub-Fund is actively managed.

The Sub-Fund's benchmark is the MSCI ACWI Index (the "Index"). The Index has been selected as the benchmark because it is representative of the investment universe of the Sub-Fund and it is therefore an appropriate performance comparator. The majority of the Sub-Fund's equity securities may not necessarily be components of or have weightings derived from the Index. The Investment Manager has a wide range of discretion relative to the Index. While the Sub-Fund will hold assets that are components of the Index, it may also invest in companies, countries or sectors that are not included in, and that have different weightings from, the Index in order to take advantage of investment opportunities. It is expected that over long time periods, the Sub-Fund's performance will differ to a significant extent from the Index. However, over short time periods, the Sub-Fund's performance may be close to the Index, depending on market conditions.

Investors' attention is also drawn to the fact, that the Index is not an index, which integrates environmental and social considerations. Instead, the Sub-Fund promotes environmental and social characteristics by adhering to the Fidelity Sustainable Family Framework, as described hereafter.

The Sub-Fund promotes environmental and social characteristics by investing in securities of issuers with favourable ESG characteristics. Favourable ESG characteristics are determined by reference to ESG ratings. ESG ratings consider environmental characteristics including carbon intensity, carbon emissions, energy efficiency, water and waste management and biodiversity, as well as social characteristics including product safety, supply chain, health and safety and human rights. Controversies involving environmental and social characteristics are regularly monitored. Environmental and social characteristics are analysed by Fidelity's fundamental analysts and rated through Fidelity's proprietary sustainability ratings. The Sub-Fund seeks to promote these characteristics by adhering to the Fidelity's Sustainable Family Framework, as described hereafter.

Also, the Sub-Fund does consider Principal Adverse Impact Indicators (PAIs) on sustainability factors in accordance with article Art. 7(1) of the Sustainable Finance Disclosure Regulation (SFDR) Regulation (EU) 2019/2088.

A detailed description of the ESG characteristics promoted as well as the methodology and applied criteria is set out in appendix 4a.

### 3. Investment Policy:

The Sub-Fund primarily invests in equity securities and exchange-traded derivatives providing an indirect exposure to the same in compliance with sections 3.4 and 3.7 of the general part of the Prospectus.

As the Sub-Fund may invest globally, it may invest across different countries and regions. It is unconstrained in the amount it may invest in any single country or region. Notwithstanding the fact that the Sub-Fund is actively managed, the Investment Manager may invest a portion of the Sub-Fund's assets from time to time in holdings and instruments eligible under the 2010 Law (including by applying, as the case may be, the look through eligibility test to their respective underlying) which provide passive exposure, such as ETFs and futures.

The Sub-Fund can directly invest in China A Shares through any permissible means available to the Sub-Fund under prevailing laws and regulations (including through the Stock Connect or any other eligible means). The Sub-Fund will invest less than 30% of its net assets directly and/or indirectly in onshore China A and B Shares on an aggregated basis.

The Sub-Fund will not invest in contingent convertible bonds ("CoCos").

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) as well as use securities financing techniques (as further described below) for hedging and efficient management purposes and to achieve its investment objective. To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors or currencies from time to time. The use of financial derivative instruments (e.g. futures, options, CFDs and swaps) is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund may invest up to 10% of its net assets in UCITS and UCIs eligible under article 41(1)e) of the 2010 Law.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e. bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

In addition to the bank deposits at sight referred to above and for liquidity management purposes and/or to deal with adverse market conditions, the Sub-Fund may invest in Money Market Instruments and/or money market funds.

A minimum of 75% of the Sub-Fund's net assets will be invested in securities deemed to maintain sustainable characteristics (as further described hereafter). Of these investments, a minimum of 20% of the Sub-Fund's total assets will be invested in Sustainable Investments, of which a minimum of 0% have an environmental objective (which is aligned with the EU Taxonomy), a minimum of 5% have an environmental objective (which is not aligned with the EU Taxonomy) and a minimum of 5% have a social objective.

**It cannot be assured, that the investment policy will achieve the investment objective.**



## 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR. The Sub-Fund promotes environmental or social characteristics and qualifies as an equity sub-fund applying the Fidelity's Sustainable Family Framework (as described below) while ensuring that the portfolio companies follow good governance practices. For this Sub-Fund, the identification of the material ESG Factors is based on sector and geographical exposure. The MSCI ACWI Index is the reference benchmark to this Sub-Fund. It is not an ESG index and not used for the purpose of attaining the material ESG Factors.

### *Fidelity's Sustainable Family Framework*

The Investment Manager considers a wide range of environmental and social characteristics on an ongoing basis for the Sub-Fund, as set out below and in the section investment strategy above, but the Investment Manager has the discretion to implement enhanced, stricter sustainable characteristics and exclusions from time to time.

A minimum of 75% of the Sub-Fund's net assets are invested in securities deemed to maintain ESG characteristics. ESG characteristics are defined by reference to a combination of different measurements such as ESG ratings provided by external agencies or Fidelity Sustainability Ratings. Further details on the methodology applied are set out at <https://fidelityinternational.com/sustainable-investing-framework/> and may be updated from time to time.

A maximum of 25% of the Sub-Fund's net assets are allowed in issuers that are not deemed to maintain ESG characteristics in accordance with the criteria above, but which demonstrate improving sustainable indicators. Improving sustainable indicators are issuers classified as such through the trajectory outlook of Fidelity Sustainability Ratings or issuers, which in the view of the Investment Manager demonstrate the potential for improvement through the implementation and execution of a formal engagement plan. The criteria used to determine this reference rating may change over time and will be updated at <https://fidelityinternational.com/sustainable-investing-framework/> accordingly.

The average ESG rating of the Sub-Fund will exceed the average ESG rating of the Sub-Fund's investment universe after the exclusion of 20% of the assets with the lowest ESG ratings.

In addition to the UniCredit Group exclusion policy as described under section 3.6 of the general part of the Prospectus, the Sub-Fund will exclude investment in issuers having exposure to adult entertainment, fossil fuel exploration and extraction, alcohol, cannabis, gambling, thermal coal-based power generation, or fossil fuel-based power generation and will further adhere to an enhanced principle-based exclusion policy incorporating both norms-based screening and negative screening of certain sectors, companies or practices based on specific ESG criteria to be determined by the Investment Manager from time to time. The norms-based screening includes issuers, which the Investment Manager considers have failed to conduct their business in accordance with accepted international norms, including as set out in the United Nations Global Compact. The negative screening includes issuers, which have exposure, or ties, to:

- controversial weapons (biological, chemical, incendiary weapons, depleted uranium, non-detectable fragment, blinding lasers, cluster munitions, landmines and nuclear weapons);
- production of conventional weapons (a weapon of warfare which is not nuclear, chemical or biological in nature);
- production of semi-automatic firearms intended for sale to civilians or sale of semi-automatic firearms to civilians;

- tobacco production, retailing, distribution and licensing; or
- thermal coal extraction and power generation provided that such will be permitted issuers where the revenue share from renewable energy activities exceeds the revenue share from thermal coal activities or where the issuer has made an effective commitment to a Paris Agreement aligned objective based on approved Science Based Targets or alignment with a Transition Pathway Initiative scenario or a reasonably equivalent public commitment.

The Investment Manager may apply revenue thresholds for more refined screens.

Through the investment management process, the Investment Manager aims to ensure that investee companies follow good governance practices.

In accordance with its objective and investment policy, the Sub-Fund promotes environmental characteristics within the meaning of article 8 of SFDR but does not have sustainable investment as its objective. The Sub-Fund currently has a medium-low exposure to sustainable investments in accordance with article 2(17) of SFDR. While the Sub-Fund does not commit to invest in investments which are in environmentally sustainable economic activities aligned with the Taxonomy Regulation, the Sub-Fund may have incidental exposure to such investments from time to time. It is expected that 0% of the Sub-Fund's portfolio will be aligned to taxonomy eligible activities and sectors within the meaning of the Taxonomy Regulation.

Because the Sub-Fund qualifies as an article 8 under the SFDR, the Sub-Fund is required by the Taxonomy Regulation to state that 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 the Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities. There is currently a lack of market data available to calculate the portfolio alignment of the Sub-Fund with the Taxonomy Regulation. Therefore, notwithstanding the above disclosure relating to do no significant harm, the Sub-Fund does not currently take into account the EU criteria for environmentally sustainable economic activities. In due course, as such data becomes available to enable accurate assessment of the Sub-Fund's investments, the calculation of portfolio alignment with the EU criteria for environmentally sustainable economic activities will be made available to investors.

A detailed description of the ESG characteristics promoted as well as the methodology and applied criteria is set out in appendix 4a.

## **5. Use of Securities Financing Transactions:**

The Sub-Fund will not enter into securities financing transactions under the SFTR. In the event that the Sub-Fund intends to enter into such transactions, this Prospectus shall be amended with the prior approval of the CSSF and the shareholders shall be notified of that intention with a one-month prior notice.

## 6. Investment Manager:

FIL (Luxembourg) S.A. (FILUX) will act as the Investment Manager and will sub-delegate investment activities to FIL Investments International (FII). FILUX will remain responsible for oversight of all activities including investment management activities performed by the investment management sub-delegate.

Contact details:

<p><b>FIL (Luxembourg) S.A.</b>  2a Rue Albert Borschette  BP 2174  L-1021 Luxembourg</p>	<p><b>FIL Investments International</b>  Beech Gate  Millfield Lane  Lower Kingswood  Tadworth  Surrey, KT20 6RP  United Kingdom</p>
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## 7. Benchmark used:

The Index is not used by the Sub-Fund as a benchmark under the Benchmark Regulation since the Index is not used for the purpose of tracking the return of the Index or defining the asset allocation of the Sub-Fund's portfolio or computing the performance fee.

## 8. Profile of the typical investor:

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept an increased volatility of the Sub-Fund and potentially high capital losses in order to achieve above-average potential investment performances. The Sub-Fund is intended for investors with a medium to long-term investment horizon.

## 9. Risk Management procedure:

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund. Risk indicators are used to assess sustainability risks. The risk indicators can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes. The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The global exposure of Sub-Fund is determined under the commitment approach.

The Sub-Fund pursues a growth-oriented investment strategy. In order to take advantage of opportunities for higher investment returns, a higher risk exposure is unavoidable. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## 10. Specific Risk factors:

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus and consider the additional specific risk factors below.

### **ESG Risk factors:**

#### *Sustainable Investing*

The Investment Manager considers that Sustainability Risks are relevant to the returns of the Sub-Fund. The identification of Sustainability Risks and their likely impact is performed on the holdings of a given portfolio. For investments relating to individual companies (e.g. bonds, equities), this assessment is made on the basis of the company's sector categorisation and their business model (e.g. carbon emissions for construction companies; ethics and culture for finance companies) in combination with regular dialogue between analysts, portfolio managers and the ESG team.

Where a fund does not have exposure directly to the underlying fund holdings, the assessment is made at both a fund level (where there is the potential for ESG input in the strategy (this would, for example, exclude passive funds tracking a broad market index) and, where possible, by performing analysis on the underlying fund holdings, which provides an understanding of the potential Sustainability Risk exposures. This approach permits a full materiality assessment to understand the potential impact on financial returns following the materialisation of a Sustainability Risk. The identified Sustainability Risks and their likely impact are described below. Failure to effectively manage these risks can lead to a deterioration in financial outcomes. Specific risks will vary in materiality across different sectors and business models, and companies may also be exposed to risks throughout value chains, including suppliers and customers. The materialisation of a Sustainability Risk is considered to be a sustainable risk event.

In the case of such an event there may be an impact on the returns of the Sub-Fund due to i) direct losses of the impacted investments following such an event (where the effects may be immediate or gradual), or ii) losses incurred due to rebalancing the portfolio following such an event.

Sustainability Risks are integrated in the investment decision and risk monitoring to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns.

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value.

Such assessment of the likely impact must therefore be conducted at portfolio level and mitigation actions are defined in order to maintain the sustainable characteristics of the fund as deemed relevant by the Investment Manager in alignment with the Risk Management function.

In addition to the above, this paragraph applies to funds subject to the disclosure requirements of article 8 of SFDR that will use ESG criteria provided by internal research teams and complemented by external ESG rating providers to form an assessment of a security's sustainable characteristics. The Investment Manager's focus on securities of issuers, which maintain sustainable characteristics that may affect the fund's investment performance and may result in a return that at times compares unfavourably to similar funds without such focus. Sustainable characteristics used in a fund's investment policy may result in such fund foregoing opportunities to buy certain securities when it might otherwise be advantageous to do so, and/or selling securities due to their sustainable characteristics when it might be disadvantaged to do so. Over the short term, focus on securities of issuers, which maintain sustainable characteristics may affect the fund's investment performance favourably or unfavourably in comparison to similar funds without such focus. Over the long term, we expect such a focus to have a favourable effect, though this is not guaranteed. Nevertheless, the application of ESG criteria may restrict the ability of a fund to acquire or dispose of its investments at the expected price and time, which may result in a loss for such fund. In addition, the ESG characteristics of securities may change over time, which may in some cases require the Investment Manager disposing of such securities when it might be disadvantageous to do so from a financial perspective only. This may lead to a decrease in the value of the fund. The use of ESG criteria may also result in a fund being concentrated in companies with ESG focus when compared to other funds having a more diversified portfolio of investments.

There is a lack of standardised taxonomy of ESG evaluation methodology and the way in which different funds will apply ESG criteria may vary, as there are not yet commonly agreed principles and metrics for assessing the sustainable characteristics of investments made by funds. In evaluating a security based on sustainable characteristics, the Investment Manager is dependent upon information and data sources provided by internal research teams and complemented by external ESG rating providers, which may be incomplete, inaccurate or unavailable. Consequently, there is a risk that the Investment Manager may incorrectly assess a security or issuer. Evaluation of sustainable characteristics of the securities and selection of such securities may involve the Investment Manager's subjective judgment. As a result, there is a risk that the relevant sustainable characteristics may not be applied correctly or that a fund could have indirect exposure to issuers who do not meet the relevant sustainable characteristics applied by such fund. In the event that the sustainable characteristics of a security held by a fund change, resulting in the Investment Manager having to sell the security, neither the fund, the Management Company nor the Investment Manager accept liability in relation to such change. No representation nor warranty is made with respect to the fairness, accuracy or completeness of such sustainable characteristics. The status of a security's sustainable characteristics can change over time. Further, due to the bespoke nature of the sustainable assessment process there is a risk that not all relevant Sustainability Risks will be taken into account, or that the materiality of a Sustainability Risk is different to what is experienced following a sustainable risk event.

### *Sustainability risks associated with investments in diversified developed markets*

The Sub-Fund may invest, in part or in whole, in diversified developed markets securities. A wide range of Sustainability Risks apply to companies within developed markets. Environmental risks include, but are not limited to; the ability of companies to mitigate and adapt to climate change and the potential for higher carbon prices, exposure to increasing water scarcity and potential for higher water prices, waste management challenges, and impact on global and local ecosystems. Social risks include but are not limited to; product safety, supply chain management and labour standards, health and safety and human rights, employee welfare, data & privacy concerns and increasing technological regulation. Governance risks include board composition and effectiveness, management incentives, management quality and alignment of management with shareholders. Failure to effectively manage these risks can lead to a deterioration in financial outcomes as well as a negative impact on society and the environment.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general part of the Prospectus.

## **12. Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in section 11 Liquidity Management Tools of the Fund to manage temporary constrained market liquidity of the general part of the Prospectus.

## **13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:**

Business Day	Each day on which banks and financial institutions in Luxembourg, are generally open for business except 24 and 31. December.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 4a. onemarkets Fidelity World Equity Income Fund – 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: onemarkets Fidelity World Equity Income Fund      Legal entity identifier: 5299009COHSZRTC04M52

### Environmental and/or social characteristics

**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, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

#### Does this financial product have a sustainable investment objective?

**Yes**

**No**

It will make a minimum of **sustainable investments with an environmental objective**: \_\_\_%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of **sustainable investments with a social objective**: \_\_\_%

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 20 % of sustainable investments.

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**



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

The Sub-Fund promotes environmental and social characteristics by investing in securities of issuers with favourable ESG characteristics. Favourable ESG characteristics are determined by reference to ESG ratings. ESG ratings consider environmental characteristics including carbon intensity, carbon emissions, energy efficiency, water and waste management and biodiversity, as well as social characteristics including product safety, supply chain, health and safety and human rights.

The Sub-Fund partially intends to make sustainable investments according to article 2(17) SFDR.

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

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

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

The sub-fund uses the following sustainability indicators in order to measure the attainment of the environmental or social characteristics that it promotes:

i) the percentage of the sub-fund invested in securities of issuers with favourable ESG characteristics in accordance with Fidelity's Sustainable Investing Framework;

From an environmental perspective, we consider many factors, including an issuer's approach and policies to address climate change and biodiversity loss, its approach to energy efficiency and managing waste and pollution. When considering an issuer's societal responsibility, we look to understand its diversity policies, its approach to human rights and supply chain management as well as its approach to health and safety and employee welfare. We also analyse the way an issuer manages data privacy and cyber security, both within the technology sector and more broadly across other industries. This ESG analysis leverages Fidelity's extensive research capabilities and ongoing engagement with issuers, supported by the expertise of the Sustainable Investing team, to provide a forward looking evaluation of an issuer's performance and trajectory on sustainability issues.

The sub-fund is required to have a minimum of 75% of its net assets in issuers (across both corporate and sovereign holdings) that maintain good 'sustainable characteristics', which are defined as:

1. Assets with a MSCI ESG rating of AAA→BBB for developed market securities;
2. Assets with a MSCI ESG rating of AAA→BB for non-developed market securities; and
3. In the absence of a MSCI ESG rating, the Fidelity Sustainability Rating is used. The Fidelity Sustainability rating assesses assets having a rating of A→C as having good sustainability characteristics.



Issuers that are not assessed as having positive sustainable characteristics for the purposes of the primary objective (minimum 75% of net assets) are eligible for inclusion, with up to 25% of net assets, provided they are able to demonstrate that they are on an improving trajectory with respect to their sustainable characteristics. Improving sustainable indicators are issuers classified as such through the trajectory outlook of Fidelity Sustainability Ratings or issuers which in our view demonstrate the potential for improvement through the implementation and execution of a formal engagement plan. Engagement plans must include key objectives and milestones to validate the improvement being sought and must be recorded in Fidelity's internal research platform. If the engagement has not resulted in an improvement in the sustainability characteristics of the issuer within a specified period of time, the security is subject to divestment in accordance with Fidelity's exclusion divestment procedure.

Controversies involving environmental and social characteristics are regularly monitored. Environmental and social characteristics are analysed by Fidelity's fundamental analysts and rated through Fidelity Sustainability Ratings:

1. in respect of its direct investments in corporate issuers, the percentage of the Sub-Fund invested in securities of issuers with exposure to the Exclusions (defined below);
2. the percentage of the sub-fund invested in environmentally sustainable investments; and
3. the percentage of sustainable investments with a social objective.

● ***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?***

The Sub-Fund determines a sustainable investment as follows:

1. issuers that undertake economic activities that contribute to one or more of the environmental objectives set out in the EU Taxonomy and qualify as environmentally sustainable in accordance with EU Taxonomy (currently the Sub-Fund does not commit to invest in assets aligned with the EU Taxonomy); or
2. issuers whereby the majority of their business activities (more than 50% of revenue) contribute to environmental or social objectives aligned with one or more of the United Nations Sustainable Development Goals ("SDGs") are defined as a sustainable investment in line with the strategy of the sub-fund. The total position will be considered as sustainable for the purpose of the allocation limits defined; or
3. issuers which have set a decarbonisation target consistent with a 1.5 degree warming scenario or lower (verified by the Science Based Target Initiative or a Fidelity Proprietary Climate Rating) which would be considered to contribute to environmental objectives;

provided they do no significant harm, meet minimum safeguards and good governance criteria.

**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.

***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?***

Sustainable investments are screened for involvement in activities that cause significant harm and controversies, assessed through a check that the issuer meets minimum safeguards and standards that relate to principal adverse indicators (PAIs) as well as performance on PAI metrics. This includes:

Norms-based screens - the screening out of securities identified under Fidelity's existing norms-based screens (as set out below);

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

Activity-based screens - the screening out of issuers based on their participation in activities with significant negative impacts on society or the environment, including issuers that are considered to have a 'Very Severe' controversy using controversy screens, covering 1) environmental issues, 2) human rights and communities, 3) labour rights and supply chain, 4) customers, 5) governance; and

PAI indicators: quantitative data (where available) on PAI indicators is used to evaluate whether an issuer is involved in activities that cause significant harm to any environmental or social objective.

Additionally, the sub-fund applies sector-based exclusions which are explained and detailed below.

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

For sustainable investments, as set out above, Fidelity undertakes a quantitative evaluation to identify issuers with challenging performance on PAI indicators. Issuers with a low score will be ineligible to be 'sustainable investments' unless Fidelity's fundamental research determines that the issuer is not breaching "do no significant harm" requirements or is on the path to mitigate the adverse impacts through effective management or transition.

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

Norms-based screens are applied: Issuers identified as failing to behave in a way which meets their fundamental responsibilities in the areas of human rights, labour, environmental and anti-corruption as aligned with international norms including those set out by the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, UN Global Compact (UNGC), ILO Standards International Labour Organisation (ILO) Conventions, are not considered sustainable investments.

*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?**

- Yes, Principal Adverse Impacts (PAI) on sustainability factors are considered through and incorporated into investment decisions through a variety of tools, including:
  1. Due Diligence - analysis of whether principle adverse impacts are material and negative.
  2. ESG rating - Fidelity references ESG ratings which incorporate material principal adverse impacts such as carbon emissions, employee safety and bribery and corruption, water management. For sovereign issued securities, principal adverse impacts are considered through and incorporated into investment decisions using ratings which incorporate material principal adverse impacts such as carbon emissions, social violations and freedom of expression.
  3. Exclusions - When investing directly in corporate issuers, the Sub-Fund applies the Exclusions (as defined below) to help mitigate PAI through excluding harmful sectors and prohibiting investment in issuers that breach international standards, such as the UNGC.
  4. Engagement - Fidelity uses engagement as a tool to better understand principal adverse impacts on sustainability factors and, in some circumstances, advocate for enhancing principal adverse impacts and sustainability metrics. Fidelity participates in relevant individual and collaborative engagements that target a number of principal adverse impacts (i.e. Climate Action 100+, Investors Against Slavery and Trafficking APAC).
  5. Voting - Fidelity’s voting policy includes explicit minimum standards for board gender diversity and engagement with climate change. Fidelity may also vote to enhance issuer performance on other indicators.
  6. Quarterly reviews - monitoring of principal adverse impacts through the Sub-Fund’s quarterly review process.

The specific PAI indicators that are taken into consideration are subject to data availability and may evolve with improving data quality and availability. In certain circumstances, such as indirect investments made by the Sub-Fund, PAI may not be considered.

A respective PAI policy outlining the PAI is available online:

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

Further information on principal adverse impacts will be provided in accordance with Art. 11 (2) of Regulation (EU) 2019/2088 in an annex to the Fund's annual report.

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.

A minimum of 90% of segregated Sub-Fund's net assets will be analysed as to whether they maintain ESG characteristics and a minimum of 75% of the Sub-Fund's net assets will be invested in securities deemed to maintain sustainable characteristics (as further described hereafter). The average ESG rating of the segregated Sub-Fund will exceed the average ESG rating of the Sub-Fund's investment universe after the exclusion of 20% of the assets with the lowest ESG ratings. Favourable ESG characteristics are determined by reference to ESG ratings provided by external agencies and Fidelity ESG ratings.

Within this investment universe, the investment manager selects equities through rigorous bottom-up financial analysis and valuation to select equities with strong investment return potential.

In respect of its direct investments in corporate issuers, the Sub-Fund is subject to:

1. a firm-wide exclusions list, excluding
  - a. issuers deriving any revenue from production of controversial weapons (biological, chemical, incendiary weapons, depleted uranium, non-detectable fragment, blinding lasers, cluster munitions, landmines and nuclear weapons);
  - b. issuers deriving over 5% of revenue from production of conventional weapons (a weapon of warfare which is not nuclear, chemical or biological in nature);
  - c. issuers deriving any revenue from production of semi-automatic firearms intended for sale to civilians or deriving over 5% of revenue from sale of semi-automatic firearms to civilians;
  - d. issuers deriving any revenue from tobacco production or issuers deriving over 5% of revenue from tobacco retailing, distribution and licensing; or
  - e. issuers deriving over 5% of revenue from thermal coal extraction and power generation, provided that such will be permitted issuers deriving less than 30% of revenue from thermal coal extraction and power generation where either: (i) the revenue share from renewable energy activities exceeds the revenue share from thermal coal activities, or (ii) the issuer has made an effective commitment to a Paris Agreement aligned objective based on approved Science Based Targets or alignment with a Transition Pathway Initiative scenario or a reasonably equivalent public commitment; and
2. a norms-based screening of issuers which the investment manager considers have failed to conduct their business in accordance with international norms, including as set out in the UNGC.

The above exclusions and screens (the "Exclusions") may be updated from time to time. Please refer to the website for further information Sustainable investing framework ([fidelityinternational.com](http://fidelityinternational.com)).

3. the UniCredit Group exclusion policy as described under Clause 1.14(f) and Annex K of the investment management agreement entered into between Structured Invest S.A. and FIL (Luxembourg) S.A. on 1st August 2022 and effective on 15th September 2022.

The investment manager also has discretion to implement enhanced, stricter sustainable requirements and exclusions from time to time.

● ***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?***

The Sub-Fund will invest:

1. a minimum of 75% of its assets in issuers with favourable ESG characteristics, of which
2. a minimum of 20% in sustainable investments of which a minimum of 0% have an environmental objective (which is aligned with the EU Taxonomy), a minimum of 5% have an environmental objective (which is not aligned with the EU Taxonomy) and a minimum of 5% have a social objective, according to article 2(17) SFDR.

Additionally, the Sub-Fund will apply specific exclusion criteria defined identifying Companies and/or Countries and/or underlying which should not be invested in or which should be invested in respecting predefined thresholds.

1. Companies that are involved in severe violations of the UN Global Compact
2. Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations.
3. Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 10% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
4. Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact (a *de minimis* rule can be applied, i.e. companies with a minor involvement are not necessarily excluded, and the internal threshold limit on the Management Company's side will be set at 5%).
5. Companies involved in the tobacco production which derive from these businesses more than 5% of their consolidated revenues.
6. Companies involved in the nuclear energy production which derive from these businesses more than 15% of their consolidated revenues.
7. Companies involved in the weapons production which derive from these businesses more than 10% of their consolidated revenues.
8. Companies involved in the gambling business which derive from these businesses more than 15% of their consolidated revenues.
9. Companies involved in the adult entertainment business which derive from these businesses more than 15% of their consolidated revenues.

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

N/A. There is no minimum committed rate for the Sub-Fund.

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

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

The governance practices of issuers are assessed using fundamental research, including Fidelity ESG ratings, data regarding controversies and UN Global Compact violations.

Key points that are analysed include track record of capital allocation, financial transparency, related party transactions, board independence and size, executive pay, auditors and internal oversight, minority shareholder rights, among other indicators.



**Asset allocation** describes the share of investments in specific assets.

**What is the asset allocation planned for this financial product?**

(#1 aligned with E/S characteristics) The Sub-Fund aims to invest:

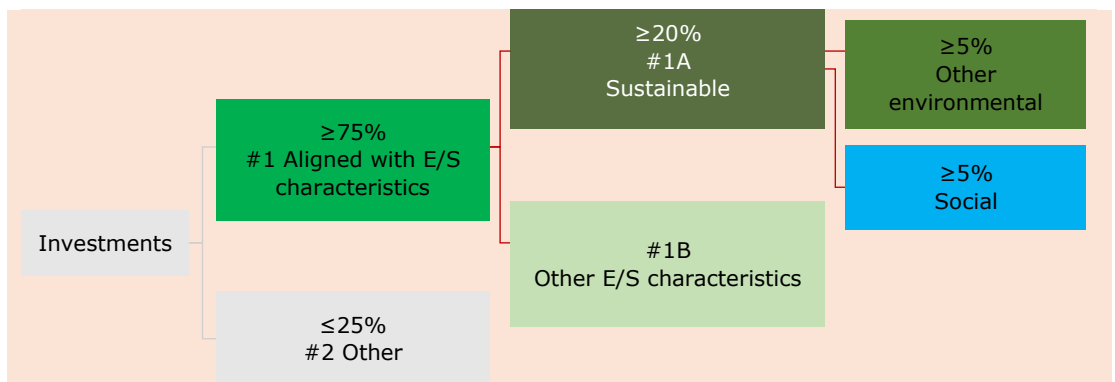
1. A minimum of 75% of its assets in securities of issuers with favourable ESG characteristics, of which
2. A minimum of 20% in sustainable investments (#1A sustainable)\* of which a minimum of 0% have an environmental objective (which is aligned with the EU Taxonomy), a minimum of 5% have an environmental objective (which is not aligned with the EU Taxonomy) and a minimum of 5% have a social objective.

(#1B Other E/S characteristics) Includes securities of issuers with favourable ESG characteristics but are not sustainable investments.

\*Fidelity determines the minimum overall percentage of sustainable investments on the basis of including issuers, as described above, whereby more than 50% of revenue contributes to a sustainable investment objective.

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.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

Where the security underlying a derivative has favourable ESG characteristics in accordance with Fidelity's Sustainable Investing Framework, the derivative may be included in determining the proportion of the Sub-Fund dedicated to promotion of environmental or social characteristics.



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

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>10</sup>?**

Yes:

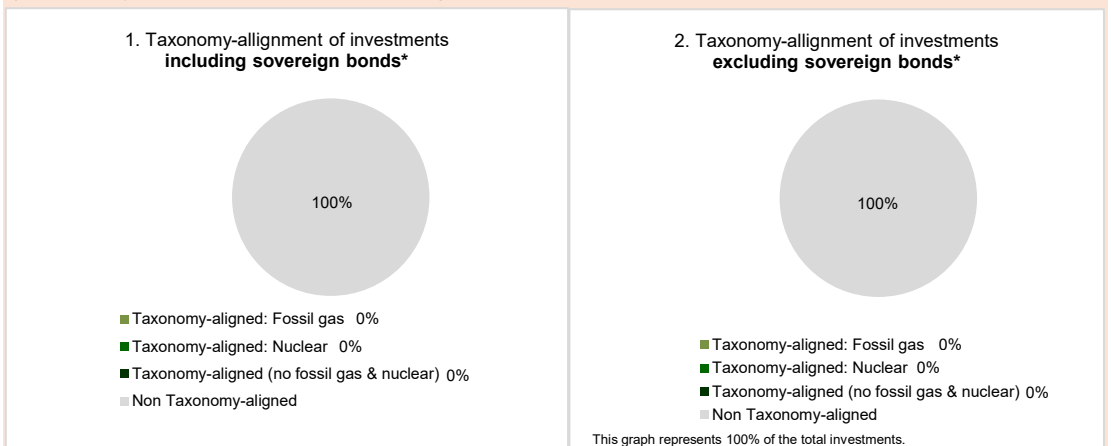
In fossil gas    In nuclear energy

No

*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.*

**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.



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

<sup>10</sup> 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.

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

N/A. The Sub-Fund has no minimum proportion of investment in transitional or enabling activities.



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

The Sub-Fund invests a minimum of 5% in sustainable investments with an environmental objective that is not aligned with the EU Taxonomy.

Sustainable investments with an environmental objective that is not aligned with the EU Taxonomy are those investment in issuers

- whereby the majority of their business activities (more than 50% of revenue) contribute to an environmental objective aligned with one or more of the United Nations Sustainable Development Goals (“SDGs”) or
- which have set a decarbonisation target consistent with a 1.5 degree warming scenario or lower (verified by the Science Based Target Initiative or a Fidelity Proprietary Climate Rating) which would be considered to contribute to environmental objectives.

Investments could be aligned with the EU Taxonomy but the investment manager is not currently in a position to specify the exact proportion of the Sub-Fund’s underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time


**What is the minimum share of socially sustainable investments?**

The Sub-Fund invests a minimum of 5% in sustainable investments with a social objective according to article 2(17) SFDR. Sustainable investments with a social objective are those investment in issuers whereby the majority of their business activities (more than 50% of revenue) contribute to a social objective aligned with one or more of the United Nations Sustainable Development Goals (“SDGs”).

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

The remaining investments of the Sub-Fund will be invested in assets aligned with the financial objective of the Sub-Fund, cash and cash equivalents for liquidity purposes and derivatives which may be used for investment and efficient portfolio management.

**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

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





There is no specific benchmark defined to assess the alignment with the promoted characteristics.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

N/A

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

N/A

- ***How does the designated index differ from a relevant broad market index?***

N/A

- ***Where can the methodology used for the calculation of the designated index be found?***

N/A



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

## **5. onemarkets BlackRock Global Equity Dynamic Opportunities Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is to maximise total return. The Sub-Fund invests globally, with no prescribed country or regional limits, at least 70% of its net assets in equity securities. The Sub-Fund will generally seek to invest in securities that are undervalued. The Sub-Fund may also invest in the equity securities of small and emerging growth companies. Currency exposure is managed flexibly.

### **2. Investment Strategy:**

The Sub-Fund adopts a flexible asset allocation policy and will invest in a diversified portfolio of assets. The asset allocation policy is consistent with the principles of environmental, social and governance ("ESG") focused investing. Although primarily an equity-oriented portfolio, individual investments may include bonds, distressed securities and contingent convertible bonds, as well as currencies and cash.

The Sub-Fund will invest in securities issued by corporations, governments and government related issuers, other non-government issuers, located in both developed and emerging markets, and denominated in global currencies. Such issuers will be systematically screened and considered suitable according to the Investment Manager's assessment and ESG criteria analysis and policy, as detailed below.

The Sub-Fund will seek to enhance exposure to investments that are deemed to have associated positive externalities (e.g., lower carbon emitting issuers and issuers with positive ESG credentials) and seek to limit exposure to investments that are deemed to have associated negative externalities.

The Sub-Fund invests in Sustainable Investments. As per the Sub-Fund's investment strategy Sustainable Investments are investments which contribute to a range of environmental and / or social objectives which may include but are not limited to, alternative and renewable energy, energy efficiency, pollution prevention or mitigation, reuse and recycling, health, nutrition, sanitation and education and the UN Sustainable Development Goals ("Environmental and Social Objectives").

Also, the Sub-Fund does consider Principal Adverse Impact Indicators (PAIs) on sustainability factors in accordance with article Art. 7(1) of the Sustainable Finance Disclosure Regulation (SFDR) Regulation (EU) 2019/2088.

A detailed description of the ESG characteristics promoted as well as the methodology and applied criteria is set out in appendix 5a.

The Sub-Fund's benchmark is the MSCI World ACWI Index (the "Index"). The Index has been selected as the benchmark because it is representative of the investment universe of the Sub-Fund and it is therefore an appropriate performance comparator. The majority of the Sub-Fund's equity securities may not necessarily be components of or have weightings derived from the Index. The Investment Manager has a wide range of discretion relative to the Index. While the Sub-Fund will hold assets that are components of the Index, it may also invest in companies, countries or sectors that are not included in, and that have different weightings from, the Index in order to take advantage of investment opportunities. It is expected that over long time periods, the Sub-Fund's performance will differ materially from the Index.

### **3. Investment Policy:**

The Sub-Fund will regularly invest a minimum of 70% of its net asset value in equity securities.

The Sub-Fund may invest up to 20% of its net assets in China A-Shares via the Shanghai-Hong Kong Stock Connect program.

The Sub-Fund may invest in initial public offerings ("IPOs"). Transferable securities of such IPOs which are not yet listed on or dealt in on a Regulated Market are eligible as non-core investments only and must be limited to maximum 10% of the Sub-Fund's net assets (actual percentage is expected to be well below the maximum level). Securities that, in the reasonable judgment of the Investment Manager, cannot be liquidated within 30 days (such as pre-IPO investments) are excluded.

The Sub-Fund may invest in highly rated / investment grade bonds. When a bond is subsequently downgraded, the Investment Manager determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio *versus* realisation of the same) in the best interest of the investors.

The Sub-Fund's exposure to contingent convertible bonds ("Cocos") is limited to 20% of its net assets.

The Sub-Fund's exposure to distressed securities is limited to 5% of its net assets.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the reference currency (EUR).

The Sub-Fund may use strategies to hedge developed market currency risks in relation to currencies different from EUR.

The Sub-Fund will invest no more than 10% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will benefit to the Sub-Fund.

The Sub-Fund may also buy Money Market Instruments (including time deposits and certificates of deposit) up to 10% of its net assets.

The Sub-Fund may in accordance with the investment policy use financial instruments and derivatives for investment and hedging purposes, in particular the global risk of an unfavourable evolution of the market(s), the currency exchange rate risk, if any, and other risks associated with the above market(s). It may also use derivative instruments – listed futures, currency forwards, options, Total Return Swaps, CFDs, interest rate swaps and credit default swaps – for investment purposes with the objective, among else, of an efficient management of cash flows, substitution for direct investments and better coverage of markets. To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors or currencies from time to time. All the underlying indices and single issues will always comply with all the diversification and eligibility criteria set out in the 2010 Law and related regulations, in particular the articles from 2) to 9) of the Grand Ducal Regulation of February 8, 2008 and CSSF Circular 14/592. The use of financial derivative instruments as well as the use of other techniques and instruments is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

For liquidity management purposes, the Sub-Fund may invest, in addition to the liquid assets referred to above, in the BlackRock range of ICS funds (short-term institutional money market funds).

The combined investments in Money Market Instruments, the BlackRock range of ICS funds (short-term institutional money market funds) and liquid assets (bank deposits at sight) shall not exceed 30% of the net assets of the Sub-Fund).

A minimum of 70% of the Sub-Fund's total assets will be invested in investments that are aligned with the environmental and/or social characteristics outlined below and in the aforementioned appendix 5a. Of these investments, a minimum of 20% of the Sub-Fund's total assets will be invested in Sustainable Investments.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### **4. Sustainability approach:**

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR and has been categorised as an ESG Promotion Strategy Sub-fund, as promoting, among other characteristics, environmental and social values, which are a binding component for the assets selection and investment decision-making process, and the companies in which the Sub-Fund shall invest are required to follow good governance practices.

The Sub-Fund will apply the BlackRock EMEA Baseline Screens which is available at <https://www.blackrock.com/corporate/literature/publication/blackrock-baseline-screens-in-europe-middleeast-and-africa.pdf>.

Additional screens include:

- deriving over 5% of revenue from the production of alcohol related products and issuers deriving over 15% of revenue in aggregate from the production, retail distribution and supply of alcohol-related products;
- deriving over 5% of revenue from the ownership or operation of gambling-related business activities and issuers deriving over 15% of revenue from gambling related business activities;
- deriving more than 10% of their consolidated revenues from nuclear energy production; unless such issuers either (i) have made commitments to reduce climate impact or (ii) derive revenue from alternative energy sources
- deriving over 5% of revenue or more than \$500 million in annual revenue from the production of adult entertainment;
- that are on the People for the Ethical Treatment of Animals (PETA) list of facilities that manufacture animal-tested products, as well as brands that are owned by companies that have not yet adopted a permanent “no animal testing” policy;
- that are within the MSCI World ACWI index and that possess an MSCI ESG rating that falls in the bottom 20% of that index, based on the number of securities in the index.

The Investment Manager will also employ a proprietary methodology to assess investments based on the extent to which they are associated with positive or negative externalities, that is environmental and social benefits or costs as defined by the Investment Manager. The Investment Manager will seek to enhance exposure to investments that are deemed to have associated positive externalities (e.g. lower carbon emitting issuers and issuers with positive ESG credentials) and seek to limit exposure to investments that are deemed to have associated negative externalities including limiting direct investment in securities of issuers involved in the ownership or operation of gambling related activities or facilities, production, supply and mining activities related to nuclear power and production of adult entertainment materials.

The assessment of the level of involvement in each activity may be based on percentage of revenue, a defined total revenue threshold, or any connection to a restricted activity regardless of the amount of revenue received.

The remaining issuers (i.e. those issuers which have not yet been excluded from investment by the Sub-Fund) are then evaluated by the Investment Manager based on, among other factors, their ability to manage the risks and opportunities associated with ESG compliant business practices and their ESG risk and opportunity credentials, such as their leadership and governance framework, which is considered essential for sustainable growth, their ability to strategically manage longer-term issues surrounding ESG and the potential impact this may have on an issuer’s financials.

At least 90% of the issuers of securities the Sub-Fund invests in are ESG rated or have been analysed for ESG purposes. To undertake this analysis, the Investment Manager may use data provided by external ESG Providers, proprietary models and local intelligence and may undertake site visits.

In any case, the costs related to the analysis of the issuers and related ESG criteria will be supported by the Investment Manager. Further information about the ESG research provider(s) and/or ESG proprietary models used by the Investment Manager to manage the Sub-Fund can be obtained on request at the registered office of the Management Company.

The Sub-Fund currently has a medium-low exposure to sustainable investments in accordance with article 2(17) of SFDR. The Sub-Fund may gain limited exposure (through, including but not limited to, derivatives, cash and near cash instruments and shares or units of collective investment schemes and fixed income transferable securities (also known as debt securities) issued by governments and agencies worldwide) to issuers with exposures that do not meet the ESG criteria described above.

The Sub-Fund's investments do not take into account the criteria for environmentally sustainable economic activities, including enabling or transitional activities, within the meaning of the Taxonomy Regulation and the Sub-Fund may only hold such investments on an incidental basis. It is expected that 0% of the Sub-Fund's portfolio will be aligned to taxonomy eligible activities and sectors within the meaning of the Taxonomy Regulation.

## 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a continuous basis:

Securities financing transactions	Permitted	Used	Maximum amount	Estimated amount
Total Return Swaps	Yes	Yes	2%	0.2%

The Sub-Fund will invest in Total Return Swaps for investment purposes with the objective, among else, of an efficient management of cash flows, substitution for direct investments and better coverage of markets.

In respect to Total Return Swap revenues, the gross income generated by the transactions is credited for 100% to the Sub-Fund and for 0% to the counterparty in these transactions (subject to the funding and trading costs that will be borne by the Sub-Fund). The Sub-Fund will enter into Total Return Swaps with multiple counterparties (the top 10 counterparties will be listed in the annual report of the Fund in accordance with SFTR). The proportion of the assets held by the Sub-Fund that may be subject to Total Return Swap transactions is generally expected to around 0.2% of the Sub-Fund's Net Asset Value. This proportion may on an opportunistic and temporary basis be increased up to a maximum of 2% of the Sub-Fund's Net Asset Value.

The Sub-Fund will not enter into securities lending transactions and repurchase transactions.

## 6. Investment Manager and Sub-Investment Manager:

BlackRock Investment Management (UK) Limited will act as the Investment Manager.

BlackRock Investment Management (LLC) will act as Sub-Investment Manager.

Contact details:

<p><b>BlackRock Investment Management (UK) Limited</b></p> <p>12 Throgmorton Avenue London EC2N 2DL United Kingdom Registration number: 02020394</p>	<p><b>BlackRock Investment Management (LLC)</b></p> <p>1 University Square Drive Princeton New Jersey 08540 USA</p>
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## 7. **Benchmark used:**

The Index is not used by the Sub-Fund as a benchmark under the Benchmark Regulation since the Index is not used for the purpose of tracking the return of the Index or defining the asset allocation of the Sub-Fund's portfolio.

## 8. **Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept an increased volatility of the Sub-Fund and potentially high capital losses in order to achieve above-average potential investment performances. The Sub-Fund is intended for investors with a medium to long-term investment horizon.

## 9. **Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund. Risk indicators are used to assess sustainability risks. The risk indicators can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes. The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The Sub-Fund's global exposure will be measured and monitored by using the Relative VaR approach. The reference portfolio for the Sub-Fund is the MSCI World ACWI Index. Detailed information on the reference portfolio can be obtained free of charge from the Management Company. The Management Company calculates the level of the leverage of the Sub-Fund using the sum of notional approach and expects that this level will in principle not be higher than 200% (in relation to the total net assets of the Sub-Fund). In exceptional cases, the level of leverage may exceed this figure.

The Sub-Fund pursues a growth-oriented investment strategy. In order to take advantage of opportunities for higher investment returns, a higher risk exposure is unavoidable. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## 10. Specific Risk factors:

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## 11. Sub-Fund Currency:

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, and London, are generally open for business except 24 and 31 December and for which both the New York Stock Exchange and the NASDAQ are open.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)



Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 5.a onemarkets BlackRock Global Equity Dynamic Opportunities Fund – 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:

onemarkets BlackRock Global Equity Dynamic Opportunities Fund

Legal entity identifier:

529900HZH9S00BUCKK86

**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, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

### Environmental and/or social characteristics

#### Does this financial product have a sustainable investment objective?

   **Yes**
   **No**
 It will make a minimum of **sustainable investments with an environmental objective: \_\_\_%**
 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 20 % of sustainable investments.

 in economic activities that qualify as environmentally sustainable under the EU Taxonomy

 with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

 in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

 with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

 with a social objective

 It will make a minimum of **sustainable investments with a social objective: \_\_\_%**
 It promotes E/S characteristics, but **will not make any sustainable investments**



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

The BlackRock Global Equity Dynamic Opportunities Sub-Fund invests in a manner consistent with the principles of environmental, social and governance “ESG” focused investing.

The Sub-Fund promotes Environmental/Social (E/S) characteristics and aims to invest in sustainable investments, as well as achieve a reduction in carbon emissions intensity score relative to the Index.

The Sub-Fund seeks to optimize an asset allocation within the Investment Manager’s internal externalities framework. Under this framework, all securities are classified according to the externalities they produce and/or their ESG assessment.

The Investment Manager will seek to enhance exposure to investments that are deemed to have associated positive externalities (e.g., lower carbon emitting issuers and issuers with positive ESG credentials) and seek to limit exposure to investments that are deemed to have associated negative externalities.

The Sub-Fund invests in Sustainable Investments according to article 2(17) SFDR. The Investment Manager defines Sustainable Investments as investments which contribute to a range of environmental and / or social objectives which may include but are not limited to, alternative and renewable energy, energy efficiency, pollution prevention or mitigation, reuse and recycling, health, nutrition, sanitation and education and the UN Sustainable Development Goals (“Environmental and Social Objectives”).

The Investment Manager will employ a proprietary methodology to assess investments based on the extent to which they are associated with positive or negative externalities, that is environmental and social benefits or costs as defined by the Investment Manager. The Investment Manager will seek to enhance exposure to investments that are deemed to have associated positive externalities (e.g. lower carbon emitting issuers and issuers with positive ESG credentials) and seek to limit exposure to investments that are deemed to have associated negative externalities including, but not limited to, limiting direct investment in securities of issuers involved in the ownership or operation of gambling related activities or facilities; production, supply and mining activities related to nuclear power and production of adult entertainment materials. The assessment of the level of involvement in each activity may be based on percentage of revenue, a defined total revenue threshold, or any connection to a restricted activity regardless of the amount of revenue received.

Investment Manager will seek to limit and/or exclude direct investment (as applicable) in corporate issuers which, in the opinion of the Investment Manager, have exposure to, or ties with, certain sectors (in some cases subject to specific revenue thresholds) will furthermore seek to limit exposure to investments that are deemed to have associated negative externalities including but not limited to:

1. the production of certain types of controversial weapons
2. the distribution or production of firearms or small arms ammunition intended for retail civilians
3. the extraction of certain types of fossil fuel and/or the generation of power from them
4. the production of tobacco products or certain activities in relation to tobacco-related products; and

5. issuers which have been deemed to have failed to comply with United Nations Global Compact Principles
6. issuers involved in the ownership or operation of gambling related activities or facilities
7. production, supply and mining activities related to nuclear power
8. production of adult entertainment materials, and
9. companies that are on the People for the Ethical Treatment of Animals (PETA) list of facilities that manufacture animal-tested products, as well as brands that are owned by companies that have not yet adopted a permanent "no animal testing" policy.

Additionally, UniCredit has defined an exclusion policy with exclusion criteria identifying Companies and/or Countries and/or underlying which should not be invested in or which should be invested in respecting predefined thresholds.

1. Companies that are involved in severe violations of the UN Global Compact
2. Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations.
3. Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 10% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
4. Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact (*a de minimis* rule can be applied, i.e. companies with a minor involvement are not necessarily excluded, and the internal threshold limit on the Management Company's side will be set at 5%).
5. Companies involved in the tobacco production which derive from these businesses more than 5% of their consolidated revenues.
6. Companies involved in the nuclear energy production which derive from these businesses more than 15% of their consolidated revenues.
7. Companies involved in the weapons production which derive from these businesses more than 10% of their consolidated revenues.
8. Companies involved in the gambling business which derive from these businesses more than 15% of their consolidated revenues.
9. Companies involved in the adult entertainment business which derive from these businesses more than 15% of their consolidated revenues.

To undertake this analysis, the Investment Manager may use data provided by external ESG Providers, proprietary models and local intelligence and may undertake site visits. Should existing holdings, compliant at the time of investment subsequently become ineligible, they will be divested within a reasonable period of time.

Further, the Sub-Fund seeks to substantially restrict/exclude investment in companies that have failed to meet minimum ESG standards by eliminating from consideration the bottom 20% of all securities included with its benchmark index (MSCI ACWI) according to MSCI rating.

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

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

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

The Sub-Fund's holdings in Sustainable Investments, as described above.

Other sustainability indicators include the % AUM investments in companies classified as possessing "Positive Externalities" (PEXT), as per the Investment Manager's proprietary ESG framework.

The Sub-Fund's consideration of principal adverse impacts (PAIs) on sustainability factors, as described below.

In addition, the Sub-Fund will have 0% of its AUM invested in companies classified as possessing "Negative Externalities" (NEXT) and will furthermore systematically exclude the bottom 20% of all securities in the MSCI ACWI based on MSCI score.

1. Issuers or securities associated with some positive environmental or social impact, highlighted as preferred holdings. Includes best-in-class companies, equity ESG leaders (top quartile) and those that have set science-based targets, companies rapidly decarbonising, green/social bonds, Impact sectors and companies ("positive externalities" or "PEXT").
2. Issuers that do not have any explicit positive impact characteristics but have no associated negative externalities either, are defined as neutral. Examples include equities that fall into the second quartile of ESG ratings relative to peers (ex-fossil fuels) and those that have committed science-based targets, US Treasuries, required for liquidity purposes/efficient portfolio management ("baseline externalities" or "BEXT").
3. Where externalities of corporate issuers or securities are unclear (e.g. because of inadequate disclosures, as the company may be in the process of updating its global emissions targets, or the company's sustainability goals are unknown as the company may have only recently gone public), credit analysts, portfolio managers and the sustainability team will engage in an active discussion on "externalities" or "DEXT" with the goal of classifying the company into one of the other broad categories: PEXT, BEXT, or NEXT.
4. Issuers associated with negative environmental or social impact that are consequently avoided for ESG portfolios, since exposure is not justified in a sustainable strategy. Those issuers are closely monitored and engaged to improve sustainability characteristics of 'worst' offenders and identify potential upgrades ("negative externalities" or "NEXT").

● ***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?***

This Sub-Fund invests at least 20% of its holdings in Sustainable Investments according to article 2(17) SFDR. All Sustainable Investments will be assessed by the Investment Manager to comply with the Investment Manager's DNSH standard outlined below.

The Investment Manager invests in Sustainable Investments which contribute to a range of environmental and / or social objectives which may include but are not limited to, alternative and renewable energy, energy efficiency, pollution prevention or mitigation, reuse and recycling, health, nutrition, sanitation and education and the UN Sustainable Development Goals (“Environmental and Social Objectives”).

A sustainable investment will be assessed as contributing to an Environmental and/or Social Objective where:

1. minimum proportion of the issuer’s business activity contributes to an Environmental and/or Social Objective; or
2. the issuer’s business practices contribute to an Environmental and/or Social Objective.

**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.

***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?***

Sustainable Investments meet the DNSH requirements, as defined by applicable law and regulation. The Investment Manager has developed a set of criteria across all Sustainable Investments to assess whether an issuer or investment does significant harm. Investments considered to be causing significant harm do not qualify as Sustainable Investments.

The Investment Manager considers all mandatory principal adverse impacts listed in Annex I Table I of the SFDR-RTS (EU 2022/1288).

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

The indicators for PAIs are considered through the Investment Manager’s DNSH standard for Sustainable Investments. The process specifically considers PAIs and assesses securities against those criteria. The Investment Manager makes use of internal analysis and third-party data sources to measure how issuers negatively impact sustainability factors and cause significant harm.

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

Sustainable Investments are assessed to consider any detrimental impacts and ensure compliance with international standards of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight Sub-Fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. Issuers deemed to have violated these conventions are not considered as Sustainable Investments.

*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?

- Yes, the Sub-Fund considers PAIs on sustainability factors through the application of its exclusionary policy as described above.

The Sub-Fund takes into account the following PAIs:

1. GHG intensity of investee companies
2. Share of investments in companies active in the fossil fuel sector
3. Shares of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas
4. Share of investments in investee companies that have been negatively involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises
5. Share of investments in investee companies involved in the manufacture or selling of controversial weapons

In addition, this Sub-Fund takes into account the PAIs through the Investment Manager’s DNSH standard for Sustainable Investments.

A respective PAI policy outlining the PAI is available online:

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

Further information on principal adverse impacts will be provided in accordance with Art. 11 (2) of Regulation (EU) 2019/2088 in an annex to the Fund’s annual report.

- 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 Sub-Fund's investment objective is to maximise total return. The Sub-Fund invests globally, with no prescribed country or regional limits, at least 70% of its net assets in equity securities. The Sub-Fund will generally seek to invest in securities that are undervalued. The Sub-Fund may also invest in the equity securities of small and emerging growth companies. Currency exposure is managed flexibly.

The Sub-Fund adopts a flexible asset allocation policy and will invest in a diversified portfolio of assets. The asset allocation policy is consistent with the principles of environmental, social and governance ("ESG") focused investing. Although primarily an equity-oriented portfolio, individual investments may include bonds, distressed securities and contingent convertible bonds, as well as currencies and cash.

The Investment Manager will employ a proprietary methodology to assess investments based on the extent to which they are associated with positive or negative externalities, that is environmental and social benefits or costs relative to the holding's sector as defined by the Investment Manager. The Investment Manager will seek to restrict exposure to investments that are deemed to have associated negative externalities ("NEXT") while enhancing exposure to investments that are deemed to have associated positive externalities ("PEXT"), compared to the Fund's investable universe. After applying exclusionary policies, the Investment Manager evaluates the risks and opportunities of the remaining issuers, combining ESG principles with top-down macro asset allocation and bottom-up security analysis.

● ***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?***

The binding elements of the investment strategy are as follows:

1. Maintain that the Sub-Fund holds at least 20% in Sustainable Investments according to article 2(17) SFDR. Sustainable Investment figures are calculated by counting fully issuers that have a significant exposure (i.e., "pass & fail" methodology) to economic activities that contribute to environmental or social objectives.
2. Enhancing exposure to investments that are deemed to have associated positive externalities while excluding investments that are deemed to have associated negative externalities, compared to the Sub-Fund's benchmark.
  - a. The Sub-Fund will possess a minimum of 50% of the exposure by assets under management invested in companies deemed by the Investment Manager to classify as "PEXT".
  - b. The Sub-Fund will possess no exposure (0%) to any issuer deemed by the Investment Manager to classify as "NEXT".
3. Apply the exclusionary screens as outlined in the prospectus.
4. Reduce the investable universe of the Sub-Fund by at least 20%

The Sub-Fund's total assets will be invested in accordance with the ESG Policy described.

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



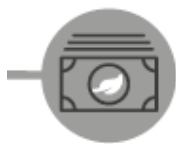
The Sub-Fund’s investment approach will eliminate the bottom 20% of all securities in its relevant benchmark index (the MSCI ACWI) by number of securities. In addition, the firm will eliminate all securities deemed by the Investment Manager to be classified as “negative externality” companies, which is outlined in greater detail above.

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

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

The Investment Manager assesses good governance practices of the investee companies by combining proprietary insights and shareholder engagement by the Investment Manager, with data from external ESG research providers. The Investment Manager uses data from external ESG research providers to initially identify issuers which may not have satisfactory governance practices in relation to key performance indicators (KPIs) related to sound management structure, employee relations, remuneration of staff and tax compliance.

Where issuers are identified as potentially having issues with regards to good governance, the issuers are reviewed to ensure that, where the Investment Manager agrees with this external assessment, the Investment Manager is satisfied that the issuer has either taken remediation actions or will take remedial actions within a reasonable time frame based on the Investment Manager’s direct engagement with the issuer. The Investment Manager may also decide to reduce exposure to such issuers.



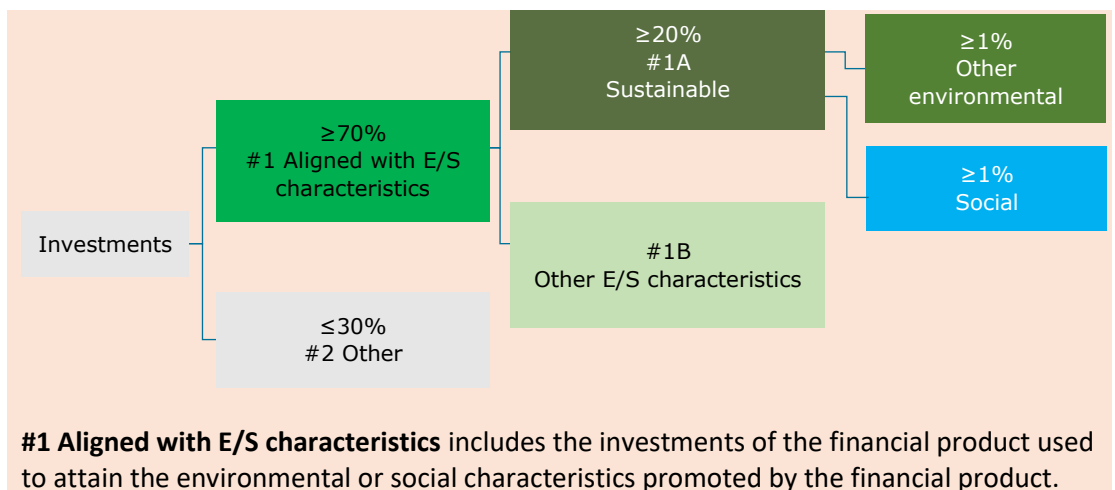
**Asset allocation** describes the share of investments in specific assets.

**What is the asset allocation planned for this financial product?**

A minimum of 70% of the Sub-Fund’s total assets will be invested in investments that are aligned with the environmental and/or social characteristics described above (#1 Aligned with E/S characteristics). Of these investments, a minimum of 20% of the Sub-Fund’s total assets will be invested in Sustainable Investments (#1A Sustainable), and the remainder will be invested in investments aligned with other environmental and/or social characteristics described above (#1B Other E/S characteristics). The Sub-Fund may invest up to 30% of its total assets in other investments (#2 Other investments).

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.



**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

The Sub-Fund may use derivatives for investment purposes and as part of its strategy to attain the environmental and social characteristics of the Sub-Fund. Such investment would include, for example, the use of options or futures providing exposure to investments that are deemed to be consistent with the investment strategy of the Sub-Fund.



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

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

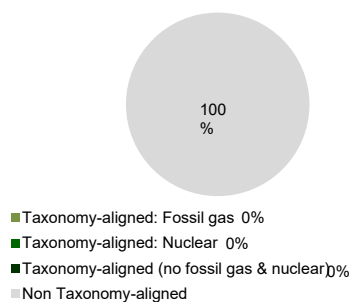
Yes:

In fossil gas     In nuclear energy

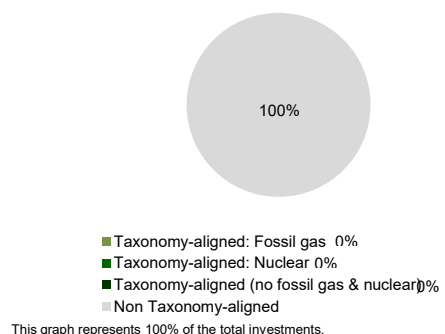
No

*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.*

1. Taxonomy-alignment of investments including sovereign bonds\*




2. Taxonomy-alignment of investments excluding sovereign bonds\*



**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.

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

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

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

N/A. The Sub-Fund has no minimum proportion of investment in transitional or enabling activities.



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

The Sub-Fund invests at least 20% of assets in Sustainable Investments according to article 2(17) SFDR, typically across both environmental and social objectives. It does not commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



**What is the minimum share of socially sustainable investments?**

The Sub-Fund invests at least 20% of assets in Sustainable Investments according to article 2(17) SFDR, typically across both environmental and social objectives. It does not commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



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

Other holdings are limited to 30% and may include derivatives, cash and near cash instruments and shares or units of CIS and fixed income transferable securities (also known as debt securities) issued by governments and agencies worldwide. These investments may be used for investment purposes in pursuit of the Sub-Fund's (non ESG) investment objective, for the purposes of liquidity management and/or hedging. No other holdings are considered against minimum environmental or social safeguards.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The index selected for this product is the MSCI ACWI. That index was selected due to its breadth of global equities. It was not selected to determine whether the Sub-Fund is aligned with the environment and/or social goals it promotes. The Investor Manager's sustainability framework "PEXT/NEXT" that is applied to the management of the product is the mechanism that helps ensure that the Sub-Fund is aligned with the sustainability characteristics that it promotes.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

N/A

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

N/A

- ***How does the designated index differ from a relevant broad market index?***

N/A

- ***Where can the methodology used for the calculation of the designated index be found?***

N/A



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

## **6. onemarkets PIMCO Global Balanced Allocation Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is to seek maximising total return, consistent with preservation of capital and prudent investment management.

### **2. Investment Strategy:**

The Sub-fund is a multi-asset portfolio, which will invest primarily in equities, government bonds, corporate bonds; exposures will be obtained via plain vanilla securities, as well as derivatives.

The Sub-Fund aims to achieve its investment objective by taking exposure to a wide range of asset classes, including – but not limited to – equities, fixed income, foreign exchange as outlined below. The Sub-Fund shall not invest directly in commodities.

The Sub-Fund promotes environmental characteristics by actively engaging with companies and issuers on material climate and biodiversity related matters, which may include encouraging companies to align to the Paris Agreement, adopt science-based targets for carbon emissions reduction and/or broadly advance their sustainability commitments. The sub-fund is pursuing environmental and social characteristics both through a set of exclusion and active engagement with issuers in the portfolio.

The Sub-Fund does not consider Principal Adverse Impact Indicators (PAIs) on sustainability factors in accordance with article Art. 7(1) of the Sustainable Finance Disclosure Regulation (SFDR) Regulation (EU) 2019/2088.

A detailed description of the ESG characteristics promoted as well as the methodology and applied criteria is set out in appendix 6a.

The minimum amount of investments used to meet the environmental or social characteristics promoted by the Sub-Fund will be 51% of its net assets. In making investment decisions, the Investment Manager considers various quantitative and qualitative data relating to global economies and projected growth of various industrial sectors and asset classes. The Investment Manager uses a three-factor approach to evaluating asset classes and their risks in seeking to achieve the Sub-Fund's investment objective which consists of a) fundamental analysis relating to global economics and projected growth of various industrial sectors, b) valuation analysis, and c) assessment of market demand of and supply for asset classes. The Investment Manager evaluates these factors on an ongoing basis and uses a combination of direct investment, derivative exposure and marginally collective investment schemes to implement a resulting mix of asset classes within the Sub-Fund that reflects the Sub-Fund's investment objective.

Similarly, although the Sub-Fund has the capability to use the types of investment outlined in this policy, it is possible that certain instrument types are not used all of the time. While analysis is performed daily, material shifts in investment exposures typically take place over medium to longer periods of time.

### 3. Investment Policy:

The Sub-Fund's investment universe comprises:

Government bonds, Corporate bonds, hybrid bonds<sup>11</sup>, convertible bonds, subordinated bonds and perpetual bonds issued by financial and non-financial institutions (i.e., companies in the industrial and utilities sectors), Units of UCITS and/or of other UCIs eligible under article 41(1)e) of the 2010 Law, Money Market Instruments and funds, cash;

Equities and Equity-related Securities (such as warrants and securities which are convertible into equity securities), Fixed Income Instruments and/or investment in underlying collective investment schemes and/or derivatives (such as -among others- swap agreements, futures and options, which may be exchange traded or Over-The-Counter), as appropriate. The Sub-Fund's bond investments may be of any quality (investment grade or below). Investments in bonds with a rating below investment grade will not exceed 25% of the Sub-Fund's net assets. The selection process of bonds is based on fundamental analysis. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals, a relative value analysis and bond evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio *versus* realisation of the same) in the best interest of the investors.

Investments in contingent convertible bonds ("CoCos") will not exceed 20% of the Sub-Fund's net assets.

In case of investments in units of undertakings for collective investment in transferable securities or UCITS exchange traded funds (UCITS-ETFs) potential retrocessions will benefit the Sub-Fund.

The Sub-Fund will not invest in defaulted or distressed securities.

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<sup>11</sup> hybrid bonds combine a bond with an option or forward contract. Generally, the principal amount payable upon maturity or redemption, or interest rate of a hybrid security, is tied (positively or negatively) to the price of some currency or securities index or another interest rate or some other economic factor (each a "benchmark"). The interest rate or (unlike most fixed income securities) the principal amount payable at maturity of a hybrid security may be increased or decreased, depending on the changes in the value of the benchmark).

The Sub-fund may in accordance with the investment policy use financial instruments and derivatives for investment and hedging purposes, in particular the global risk of an unfavourable evolution of the market(s), the currency exchange rate risk, if any, and other risks associated with the above market(s). It may also use derivative instruments – listed futures, currency forwards, options, TRS, interest rate swaps and credit default swaps, among others –for investment purposes with the objective, among else, of an efficient management of cash flows and better coverage of markets. To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors or currencies from time to time. All the underlying indices and single issues will always comply with all the diversification and eligibility criteria set out in the 2010 Law and related regulations, in particular the articles from 2) to 9) of the Grand Ducal Regulation of February 8, 2008 and CSSF Circular 14/592. The use of financial derivative instruments as well as the use of other techniques and instruments is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus. When using derivatives, the portfolio management team will take into consideration, among others, E/S characteristics. For this purpose, some of the derivatives might be exposed to sustainable assets via underlying indices or securities.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular leverage, is therefore excluded.

The Sub-Fund may not invest in units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law for more than 10% of its net assets.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e. bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

The minimum amount of investments used to meet the environmental or social characteristics promoted by the Sub-Fund will be 51% of its net assets.

**It cannot be assured, that the investment policy will achieve the investment objective.**

## 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR.

The Sub-Fund will promote environmental characteristics by actively engaging with companies and issuers on material climate and biodiversity related matters, which may include encouraging companies to align to the Paris Agreement, adopt science-based targets for carbon emissions reduction and/or broadly advance their sustainability commitments. All securities are selected according to PIMCO's internal screening process designed to incorporate ESG factors. PIMCO relies primarily on internal research for decision-making; however, PIMCO also screens substantial amounts of external research. The research and analysis provided by external data providers is one of many factors in PIMCO's ESG analysis of issuers, the outcome of which is a proprietary ESG assessment and score which may differ from that of other providers.

In addition, the Sub-Fund will promote environmental characteristics through an exclusion screening process. The Sub-Fund will comply with the exclusions set in section 3.6 ESG and Sustainability Considerations in the general part of the prospectus. PIMCO will continue to assess market conditions in order to ensure the Sub-Fund is up to date with relevant ESG and Sustainability Regulations. The screening process may exclude sectors deemed by the Investment Manager to be harmful to the environment, including the coal industry and unconventional oil (such as arctic oil and oil sands).

Notwithstanding this, green, social, sustainable and other sustainability labelled Fixed Income Securities from excluded sectors, may be permitted, if the Investment Manager determines such investments are aligned with the Sub-Fund's promotion of environmental characteristics. Green Bonds: are a type of bond whose proceeds are used to finance or re-finance new and existing projects or activities with positive environmental impact. Eligible project categories include: renewable energy, energy efficiency, clean transportation, green buildings, wastewater management and climate change adaptation.

In practice, not all issuers demonstrate full compliance to being "green" bonds; this is something that the Investment Manager takes into account through its internal ESG Bond Scoring framework based on the evaluation on three key pillars: Strategic Fit, Impact Assessment and Red Flags/Reporting.

The Investment Manager evaluates and weighs a variety of financial factors and non-financial factors (such as the exclusion screening process and issuer engagement as described herein) when making investment decisions. Increasing and diversifying the information assessed by the portfolio management team of the Investment Manager generates a more holistic view. Furthermore, the Investment Manager applies internal processes with binding criteria to incorporate such exclusions. In addition, the companies in which investments are made follow good governance practices as determined by the Investment Manager.

The Investment Manager assesses "good governance" by reference to alignment with industry-established practices and norms on management, board structure, corporate culture, diversity process etc. These are identified by its team of credit analysts through a proprietary ESG scoring system which considers how an issuer currently fares relative to its peers in the industry, and the issuer's ESG momentum.

The Investment Manager regularly evaluates ESG research providers, which may add additional input into its in-house analysis conducted by its credit, sovereign and mortgage analyst teams. The Investment Manager currently utilises MSCI as the primary external provider of ESG ratings and research, but it also uses Reprisk for controversies, CDP for climate change (e.g., including granular data on corporate issuer's carbon emissions and their strategy), TPI for low-carbon transition (e.g., forward looking and industry specific carbon intensity metrics), Maplecroft for sovereign insights, and Freedom House for data on sovereigns to mention a few. MSCI data flows directly into the Investment Manager's proprietary IT systems, enabling credit analysts to use this information efficiently. The research and analysis provided by external data providers is one of many factors in PIMCO's ESG analysis of issuers, the outcome of which is a proprietary ESG assessment and score, which may differ significantly from that of other providers. This process is subject to evolution over time, where the Investment Manager sees fit.



The Investment Manager developed a proprietary scoring methodology that covers the broad fixed income universe. Its enhanced research process incorporates a detailed ESG asset assessment that complements the traditional ratings assigned by analysts. The Investment Manager has proprietary ESG scores for corporate issuers, sovereigns, securitised issuers and municipal issuers, in addition to PIMCO's proprietary ESG labelled bond scoring framework to evaluate green, social and sustainability bond issuances. It uses MSCI and other data providers for reference but make its own assessment based on our own, independent analysis of the industry and relevant ESG factors.

The Investment Manager's team generally assesses the ESG profile of the issuers that they cover relative to peers with a goal of separating leading issuers from issuers who are not as advanced on their sustainability journey. Additionally, its credit analysts include a forwarding looking view of the issuers by indicating improving/ deteriorating or stable. The Investment Manager believes it is important to have all of its expert analysts monitor the ESG risks that are relevant to their particular sector and universe of securities; as such, each analyst is responsible for the issuers that are part of his/her coverage, and has the final say in determining the ESG profile of the said issuer. Analysts review their companies' ESG performance based on information available in public filings, recent news and controversies, as well as through regular engagement with company management teams to assign separate scores for "E", "S", and "G." In determining the efficacy of an issuer's ESG practices, the Investment Manager will use its own proprietary assessments of material ESG issues. In the end, PIMCO's resulting assessments are proprietary and distinct from those provided by ESG rating providers. To facilitate the integration of ESG risk factors in our analysis and help to monitor ESG related risks, we are continually enhancing our proprietary research with specific ESG related attributes and dedicated scoring. The analysts, portfolio managers and dedicated ESG resources regularly meet to exchange and challenge ideas, and update frameworks when needed. In addition, we have hosted training sessions for our analysts on available scoring methodologies, ESG systems, data and tools.

In accordance with its objective and investment policy, the Sub-Fund promotes environmental characteristics within the meaning of article 8 of SFDR but does not have sustainable investment as its objective. The Sub-Fund currently does not commit to any minimum exposure to sustainable investments in accordance with article 2(17) of SFDR. While the Sub-Fund does not commit to invest in investments which are in environmentally sustainable economic activities aligned with the Taxonomy Regulation, the Sub-Fund may have incidental exposure to such investments from time to time. It is expected that 0% of the Sub-Fund's portfolio will be aligned to taxonomy eligible activities and sectors within the meaning of the Taxonomy Regulation.

## 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions under the SFTR that are used on a continuous basis:

Securities financing transactions	Permitted	Used	Maximum amount	Estimated amount
Total Return Swaps	Yes	Yes	100%	75%

Total Return Swap transactions may be used to gain an efficient exposure to specific segments of the equity and fixed income markets and benefit from the returns on a reference asset without purchasing the asset directly.

In respect to Total Return Swap revenues, the gross income generated by the transactions is credited for 100% to the Sub-Fund and for 0% to the counterparty in these transactions. The Sub-Fund will enter into Total Return Swaps with multiple counterparties (the top 10 counterparties will be listed in the annual report of the Fund in accordance with SFTR). The proportion of the assets held by the Sub-Fund that may be subject to Total Return Swap transactions is generally expected to around 75% of the Sub-Fund's Net Asset Value. That proportion will fluctuate subject to different factors, including but limited to the defined asset allocation, valuation, liquidity, efficiency and pricing considerations. This proportion may on an opportunistic basis be increased up to a maximum of 100% of the Sub-Fund's Net Asset Value.

The Sub-Fund will not enter into securities lending transactions and repurchase transactions.

## 6. Investment Manager and Investment Sub-Managers:

PIMCO Europe GmbH will act as the Investment Manager and will sub-delegate investment activities/portfolio management services to: Pacific Investment Management Company LLC and PIMCO Europe Ltd. The Investment Manager will remain responsible for providing discretionary investment management services with respect to the Sub-Fund's assets including investment management activities performed by the investment management sub-delegates.

Contact details:

<p><b>PIMCO Europe GmbH</b> Seidlstrasse 24-24 A, 80335 Munich Germany</p>	<p><b>Pacific Investment Management Company LLC</b> 650 Newport Center Drive Newport Beach 92660 CA United States</p>	<p><b>PIMCO Europe Ltd</b> 11 Baker Street W1U 3AH London United Kingdom</p>
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## 7. Benchmark used:

The Sub-Fund does not use any index as a benchmark under the Benchmark Regulation.

## 8. Profile of the typical investor:

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept an increased volatility of the Sub-Fund and potentially high capital losses in order to achieve above-average potential investment performances. The Sub-Fund is intended for investors with a medium to long-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes.

The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The Sub-Fund's global exposure will be measured and monitored by using the Absolute VaR approach. The Management Company calculates the level of the leverage of the Sub-Fund using the sum of notional approach and expects that this level will in principle not be higher than 600% (in relation to the total net assets of the Sub-Fund). In exceptional cases, the level of leverage may exceed this figure.

The Sub-Fund pursues a growth-oriented investment strategy. In order to take advantage of opportunities for higher investment returns, a higher risk exposure is unavoidable. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## **12. Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

### **13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:**

Business Day	Each day on which banks and financial institutions in Luxembourg, and New-York, are generally open for business except 24 and 31 December.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 6a. onemarkets Pimco Global Balanced Allocation Fund – 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:  
onemarkets Pimco Global Balanced Allocation  
Fund

Legal entity identifier:  
29900IOCRFOWJOB2E74

**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, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes

No

It will make a minimum of **sustainable investments with an environmental objective**: \_\_\_%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of **sustainable investments with a social objective**: \_\_\_%

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.

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**



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

The Sub-Fund will promote environmental characteristics by actively engaging with companies and issuers on material climate and biodiversity related matters, which may include encouraging companies to align to the Paris Agreement, adopt science-based targets for carbon emissions reduction and/or broadly advance their sustainability commitments. The sub-fund is pursuing environmental and social characteristics both through a set of exclusion and active engagement with issuers in the portfolio. Exclusions include severe violations of UN Global Compact, involvement in controversial weapons and controversial fuel production, as well as revenue thresholds for thermal coal, tobacco, nuclear energy, weapons, gambling, and adult entertainment. For more details please see the section about the binding elements of the investment strategy.

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

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

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

In relation to exclusions, an important indicator is the Pictet percentage of portfolio holdings with consolidated revenues above a certain threshold as well as any flags indicating involvement in controversial activities. For more details please see the section about the binding elements of the investment strategy. As per the exclusion set outlined below (“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”), PIMCO will exclude companies that generate a specific % of revenues coming from pre-defined sectors considered as pivotal to avoid in order to meet the sub-fund sustainable framework. In addition to the sectors detailed under the exclusion framework, the screening process may exclude further sectors deemed by the Investment Manager to be harmful to the environment, including the coal industry and unconventional oil (such as arctic oil and oil sands). For additional details on the exclusions, please refer to section “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 relation to engagement: the objective of engagement at PIMCO is to influence change, improve returns and reduce risks for our clients. As one of the largest bondholders in the world, PIMCO has a large and important platform to engage with issuers to drive meaningful change on sustainability dimensions. Importantly, we prioritise engagement where financial exposure, influence and thematic exposure are the greatest. We believe that bondholder engagement in the research phase is critical to understanding the risk and reward profile of an issuance and ultimately making buy/sell decisions. PIMCO identifies the top three to five ESG topics for each company based on our internal ESG assessment, external ESG data, research by Non-Governmental Organisations (NGOs), and expertise input from collaborative initiatives. PIMCO initiates engagement by setting up meetings or calls with the company with specific questions identified as material. Our goal is to maintain a constructive and ongoing dialogue by providing specific recommendations and references and setting regular follow-up where appropriate. PIMCO also leverages collaborative engagement to amplify our reach and reinforce the message.

Providing objectives to our ESG Engagement framework is the first step to measure the level of success of our activity. To that end, rather than focus on certain ESG issues, we have established a priority to develop a methodology that demonstrates measurement and the progress of PIMCO's ESG engagement. Our proposed approach seeks to include clear milestones, metrics and actionable steps to quantify issuer performance including:

1. Internal Evaluation: transparency and willingness to engage, policy and process review, impact assessment and engagement objective setting, as well as a flag system (e.g. red/green) of identifying credit risk that could drag on performance or opportunity for positive impact, etc.
2. External Issuer: acknowledgement of objective by issuer, a solid commitment and action plan, evidence of implementation, evaluation of outcomes (e.g. TCFD reporting), etc.

● ***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?***

The Sub-Fund does not intend to make any sustainable investments according to article 2(17) SFDR.

● ***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?***

N/A

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

**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.

N/A

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

N/A

*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?**

Yes

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.

- ***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?***

Additionally, the Sub-Fund has defined exclusion criteria identifying Companies and/or Countries and/or underlying which should not be invested in or which should be invested in respecting predefined thresholds, subject to the Sub-fund's investments not complying with such exclusion criteria remaining below 10% of the relevant Sub-Fund's net assets.

1. Companies that are involved in severe violations of the UN Global Compact



2. Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations.
3. Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 10% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
4. Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact (a *de minimis* rule can be applied, i.e. companies with a minor involvement are not necessarily excluded and the internal threshold limit on the Management Company's side will be set at 5%).
5. Companies involved in the tobacco production which derive from these businesses more than 5% of their consolidated revenues.
6. Companies involved in the nuclear energy production which derive from these businesses more than 15% of their consolidated revenues.
7. Companies involved in the weapons production which derive from these businesses more than 10% of their consolidated revenues.
8. Companies involved in the gambling business which derive from these businesses more than 15% of their consolidated revenues.
9. Companies involved in the adult entertainment business which derive from these businesses more than 15% of their consolidated revenues.

Furthermore, PIMCO will continue to assess market conditions in order to ensure the Sub-Fund is up to date with relevant ESG and Sustainability Regulations. The screening process may exclude sectors deemed by the Investment Manager to be harmful to the environment, including the coal industry and unconventional oil (such as arctic oil and oil sands).

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

N/A. There is no minimum committed rate for the Sub-Fund.

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

The sub-fund assesses "good governance" by reference to alignment with industry-established practices and norms on management, board structure, corporate culture, diversity process etc. These are identified by its team of credit analysts through a proprietary ESG scoring system which considers how an issuer currently fares relative to its peers in the industry, and the issuer's ESG momentum.

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



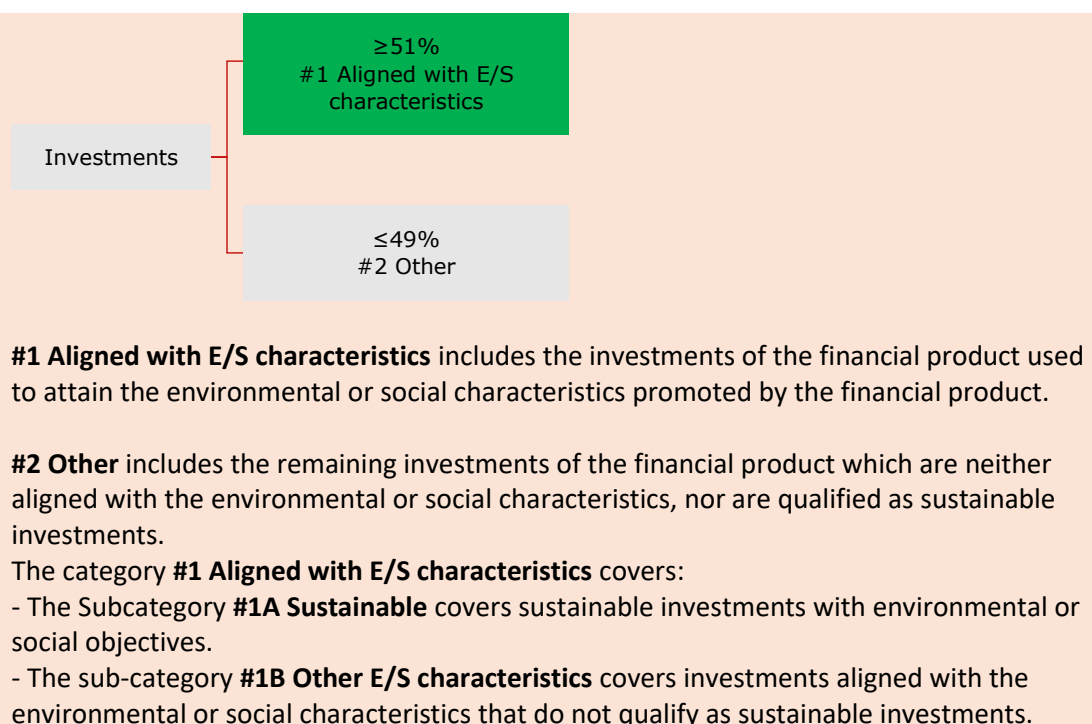
**Asset allocation** describes the share of investments in specific assets.

**What is the asset allocation planned for this financial product?**

The fund is a multi-asset portfolio which will invest primarily in equities, government bonds, corporate bonds; exposures will be obtained via plain vanilla securities, as well as derivatives. The fund applies exclusion criteria to all of its holdings and as a result invests 51% of its net assets in investments that are aligned with the promoted environmental and social characteristics (#1 Aligned with E/S characteristics). A residual portion of the sub-fund holdings are not aligned with these characteristics (#2 Other) and includes cash and other instruments used for hedging and risk management of the fund.

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 used for investment and hedging purposes. When implementing either function, the portfolio management team will take into consideration, among others, E/S characteristics. For this purpose, some of the derivatives might be exposed to sustainable assets via underlying indices or securities.



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

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>12</sup>?**

Yes:

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

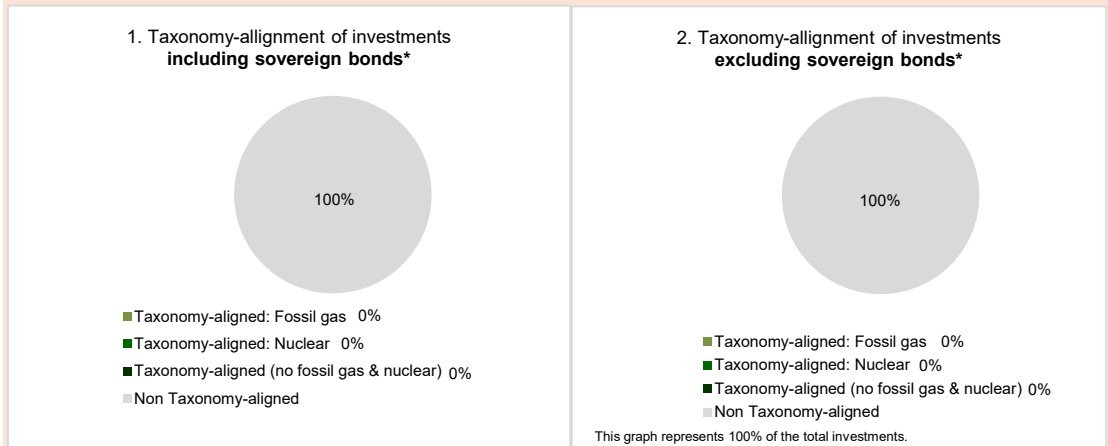
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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


In fossil gas    In nuclear energy

No

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

 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 investments in transitional and enabling activities?**

N/A. The Sub-Fund has no minimum proportion of investment in transitional or enabling activities.



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

The Sub-Fund does not intend to make any sustainable investments.



**What is the minimum share of socially sustainable investments?**

The Sub-Fund does not intend to make any sustainable investments.



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

A residual portion of the Sub-Fund holdings are not aligned with these characteristics (#2 Other) and includes cash and other instruments used for hedging and risk management of the fund. Those instruments are not screened against environmental and/or social safeguards.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

There is no specific benchmark defined to assess the alignment with the promoted characteristics.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

N/A

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

N/A

- ***How does the designated index differ from a relevant broad market index?***

N/A

- ***Where can the methodology used for the calculation of the designated index be found?***

N/A



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

## **7. onemarkets PIMCO Global Strategic Bond Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is to maximize total return, consistent with preservation of capital.

### **2. Investment Strategy:**

The Sub-Fund seeks to achieve its investment objective by investing in a diversified portfolio of Fixed Income Instruments denominated in developed and emerging markets currencies. "Fixed Income Instruments" include bonds, debt securities and other similar instruments issued by various public or private sector entities as further described below under the section "Investment Policy".

The Sub-fund is a global fixed income portfolio, which will actively invest primarily, but not only, in government, government-related and corporate bonds, with a full maturity profile being considered and denominated in major world currencies. Exposures will be obtained via plain vanilla securities, as well as derivatives.

The Investment Manager selects the Sub-Fund's foreign country and currency compositions based on an evaluation of various factors, including, but not limited to, relative interest rates, exchange rates, monetary and fiscal policies, trade and current account balances.

The average portfolio duration of this Sub-Fund normally varies between 2 and 8 years. Duration is a measure used to determine the sensitivity of a security's price to changes in interest rates. The longer a security's duration, the more sensitive it will be to changes in interest rates.

### **3. Investment Policy:**

The Sub-Fund may invest in Fixed Income Instruments (with fixed, variable, or floating rates of interest, and may vary inversely with respect to a reference rate) comprising the following, but not limited to:

- securities issued or guaranteed by Member States and non-Member States, their sub-divisions, agencies or instrumentalities;
- corporate debt securities and corporate commercial paper;
- mortgage-backed and other asset-backed securities eligible under the 2010 Law;
- inflation-indexed bonds issued both by governments and corporations;
- securities of international agencies or supranational entities;
- debt securities whose interest is, in the opinion of bond counsel for the issuer at the time of issuance, exempt from U.S. federal income tax (municipal bonds);
- freely transferable and unleveraged structured notes, including securitised loan participations eligible under the 2010 Law;

- freely transferable and unleveraged hybrid securities which are derivatives that combine a traditional equity or bond with an option or forward contract;
- loan participations and loan assignments which constitute Money Market Instruments.

The Sub-Fund invests primarily in investment grade debt securities (with a minimum average rating of A- for the Sub-Fund's portfolio of Fixed Income Instruments), but may invest up to 20% of its net assets in high yield securities ("junk bonds"), as rated by the credit rating agencies Moody's Investors Service, Inc. ("Moody's"), Standard & Poor's Ratings Services ("S&P") or Fitch, Inc. ("Fitch"), or, if unrated (up to 10% of its net assets), as determined following the Investment Manager's assessment. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals, a relative value analysis and fixed income security evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realisation of the same) in the best interest of the investors.

The Sub-Fund may invest up to 40% of its net assets in securities and instruments that are economically tied to emerging market countries including China Onshore market (through the Shanghai-Hong Kong Stock/Bond Connect).

The Sub-Fund may invest without restriction in instruments denominated in currencies other than the Sub-Fund's reference currency (EUR) but will normally limit its foreign currency exposure (from non-EUR-denominated securities or currencies) to 20% of its total net assets (by using strategies to hedge currency risks in relation to currencies different from EUR).

The Sub-Fund will invest no more than 10% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund.

The Sub-Fund's exposure to contingent convertible bonds ("Cocos") is limited to 10% of its net assets.

The Sub-Fund's exposure to Asset-Backed Securities ("ABS") and Mortgage-Backed Securities (MBS) and other securitised assets is limited to 20% of its net assets. ABS, MBS and other securitised assets shall be eligible investments under the 2010 Law.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

The Sub-Fund may in accordance with the investment policy use derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) such as futures, options and swap agreements (which may be listed or over-the counter) and may also enter into currency forward contracts. Such derivative instruments may be used (i) for hedging purposes and/or (ii) for investment purposes and/or (iii) efficient portfolio management. For example, the Sub-Fund may use derivatives (which will be based only on underlying assets or sectors which are permitted under the investment policy of the Sub-Fund) (i) to hedge a currency exposure, (ii) as a substitute for taking a position in the underlying asset where the Investment Manager feels that a derivative exposure to the underlying asset represents better value than a direct exposure, (iii) to tailor the Sub-Fund's interest rate exposure to the Investment Manager's outlook for interest rates, and/or (iv) to gain an exposure to the composition and performance of a particular index (provided always that the Sub-Fund may not have an indirect exposure through an index to an instrument, issuer or currency to which it cannot have a direct exposure). The use of derivatives will give rise to an additional leveraged exposure.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e. bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

For liquidity management purposes, the Sub-Fund may invest, in addition to the liquid assets referred to above, in cash equivalents meaning: time deposits, certificates of deposit, term deposits, notes, Money Market Instruments and money market funds.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 6 of SFDR. The investments underlying the Sub-fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

#### 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a temporary basis:

Securities financing transactions	Permitted	Used	Maximum amount	Estimated amount
Total Return Swaps	Yes	Yes	10-15%	0-5%
Repurchase transactions	Yes	Yes	20-25%	5-10%

The Investment Manager classifies repurchase agreements as transactions whereby a counterparty sells a security to the Sub-Fund with a simultaneous agreement to repurchase the security from the Sub-Fund at a fixed future date at a stipulated price reflecting a market rate of interest unrelated to the coupon rate of the securities. The Investment Manager classifies reverse repurchase agreements as transactions whereby a counterparty purchases securities from a Sub-Fund and simultaneously commits to resell the securities to the Sub-Fund at an agreed upon date and price.

In respect to repurchase transaction revenues, all revenues remain with the Sub-Fund subject to standard transaction costs. Such direct fees and costs are determined in accordance with market practice and consistent with the current market levels.

The proportion of the assets held by the Sub-fund that may be subject to repurchase transactions is generally expected to be around 5-10% the Sub-Fund's Net Asset Value. That proportion will be impacted downwards when interest rates are low and upwards when getting higher. When considered for cash management purposes in case of important movements of subscriptions and redemptions, the use of reverse repurchase and repurchase agreements will fluctuate depending on the occurrence of the latte. Depending on the occurrence of the above circumstances, the 5-10% proportion may on an opportunistic and temporary basis be increased up to a maximum of 25% of the Sub-Fund's Net Asset Value, depending also on the Sub-Fund's liquidity profile and anticipated liquidity needs.

Total Return Swaps may be entered into for any purpose that is consistent with the investment objective of the Sub-Fund, including efficient portfolio management (such as hedging purposes or the reduction of portfolio expenses), speculative purposes (in order to increase income and profits for the portfolio), or to gain exposure to certain markets.

In respect to Total Return Swap revenues, the gross income generated by the transactions is credited for 100% to the Sub-Fund and for 0% to the counterparty in these transactions (subject to the funding and trading costs that will be borne by the Sub-Fund). The Sub-Fund will enter into Total Return Swaps with multiple counterparties (the top 10 counterparties will be listed in the annual report of the Fund in accordance with SFTR). The proportion of the assets held by the Sub-Fund that may be subject to Total Return Swap transactions is generally expected to around 5% of the Sub-Fund's Net Asset Value. This proportion may on an opportunistic and temporary basis be increased up to a maximum of 15% of the Sub-Fund's Net Asset Value.

The Sub-Fund shall not enter into securities lending transactions until such time as an updated prospectus is approved by the CSSF.

## 6. Investment Manager and Investment Sub-Managers:

PIMCO Europe GmbH will act as the Investment Manager and will sub-delegate investment activities/portfolio management services to: Pacific Investment Management Company LLC and PIMCO Europe Ltd. The Investment Manager will remain responsible for providing discretionary investment management services with respect to the Sub-Fund's assets including investment management activities performed by the investment management sub-delegates.

Contact details:

<b>Investment Manager</b>	<b>Sub-Investment Managers</b>	
<b>PIMCO Europe GmbH</b>	<b>Pacific Investment Management Company LLC</b>	<b>PIMCO Europe Ltd</b>
Seidlstrasse 24-24 A, 80335 Munich Germany	650 Newport Center Drive Newport Beach 92660 CA United States	11 Baker Street W1U 3AH London United Kingdom

## 7. Benchmark used:



The Sub-Fund does not use any index under the Benchmark Regulation.

## **8. Profile of the typical investor:**

An investment in this sub-fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a medium volatility of the Sub-Fund and potentially capital losses in order to achieve moderate potential investment performances. The Sub-Fund is intended for investors with a medium-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Absolute VaR Approach. The Management Company calculates the level of the leverage of the Sub-Fund using the sum of notional approach and expects that this level will in principle not be higher than 500 % (in relation to the total net assets of the Sub-Fund). In exceptional cases (e.g., roll-over of the existing FX forward contracts), the level of leverage may exceed this figure.

The Sub-Fund pursues a conservative investment strategy. A steady and stable investment performance is the aim in return for a moderate risk appetite. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as reduced risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## **12. Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

### 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg and New York, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## **8. onemarkets PIMCO Global Short Term Bond Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is to maximize total return, consistent with preservation of capital.

### **2. Investment Strategy:**

The Investment Manager will have full discretion within the investment policy to invest in Fixed Income Instruments and related securities. "Fixed Income Instruments" include bonds, debt securities and other similar instruments issued by various public or private sector entities as further described below under the section "Investment Policy".

The Sub-Fund is a global fixed income portfolio, which will actively invest primarily in investment grade fixed income instruments denominated in major world currencies across a broad range of fixed income sectors including (but not limited to) government, government related and corporate bonds with short-medium term maturity profile. Exposures will be obtained via plain vanilla securities, as well as derivatives.

The Investment Manager selects the Sub-Fund's foreign country and currency compositions based on an evaluation of various factors, including, but not limited to, relative interest rates, exchange rates, monetary and fiscal policies, trade and current account balances.

The average portfolio duration of the Sub-Fund normally varies between 0 and 5 years. Duration is a measure used to determine the sensitivity of a security's price to changes in interest rates. The longer a security's duration, the more sensitive it will be to changes in interest rates.

### **3. Investment Policy:**

The Sub-Fund may invest in Fixed Income Instruments (with fixed, variable, or floating rates of interest, and may vary inversely with respect to a reference rate) comprising the following, but not limited to:

- securities issued or guaranteed by Member States and non-Member States, their sub-divisions, agencies or instrumentalities;
- corporate debt securities and corporate commercial paper;
- mortgage-backed and other asset-backed securities eligible under the 2010 Law;
- inflation-indexed bonds issued both by governments and corporations;
- securities of international agencies or supranational entities;
- debt securities whose interest is, in the opinion of bond counsel for the issuer at the time of issuance, exempt from U.S. federal income tax (municipal bonds);
- freely transferable and unleveraged structured notes, including securitised loan participations eligible under the 2010 Law;

- freely transferable and unleveraged hybrid securities which are derivatives that combine a traditional equity or bond with an option or forward contract;
- loan participations and loan assignments which constitute Money Market Instruments.

The Sub-Fund primarily invests in investment grade debt securities (with a minimum average rating of A- for the Sub-Fund's portfolio of Fixed Income Instruments) but may invest up to 20% of its net assets in high yield securities ("junk bonds"), as rated by the credit rating agencies Moody's Investors Service, Inc. ("Moody's"), Standard & Poor's Ratings Services ("S&P") or Fitch, Inc. ("Fitch"), or, if unrated (up to 10% of its net assets), as determined following the Investment Manager's assessment. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals, a relative value analysis and fixed income security evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realisation of the same) in the best interest of the investors.

The Sub-Fund will normally limit its investments in securities and instruments that are economically tied to emerging market countries, including China Onshore market (through the Shanghai-Hong Kong Stock/Bond Connect) to 20% of its net assets.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the Sub-Fund's reference currency (EUR) but will normally limit its foreign currency exposure (from non-EUR-denominated securities or currencies) to 20% of its net assets (by using strategies to hedge currency risks in relation to currencies different from EUR).

The Sub-Fund will invest no more than 10% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund.

The Sub-Fund's exposure to Asset-Backed Securities ("ABS") and Mortgage-Backed Securities (MBS) and other securitised assets is limited to 10% of its net assets. ABS, MBS and other securitised assets shall be eligible investments under the 2010 Law.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

The Sub-Fund may in accordance with the investment policy use derivative instruments such as futures, options and swap agreements (which may be listed or over-the counter) and may also enter into currency forward contracts. Such derivative instruments may be used (i) for hedging purposes and/or (ii) for investment purposes and/or (iii) efficient portfolio management. For example, the Sub-Fund may use derivatives (which will be based only on underlying assets or sectors which are permitted under the investment policy of the Sub-Fund) (i) to hedge a currency exposure, (ii) as a substitute for taking a position in the underlying asset where the Investment Manager feels that a derivative exposure to the underlying asset represents better value than a direct exposure, (iii) to tailor the Sub-Fund's interest rate exposure to the Investment Manager's outlook for interest rates, and/or (iv) to gain an exposure to the composition and performance of a particular index (provided always that the Sub-Fund may not have an indirect exposure through an index to an instrument, issuer or currency to which it cannot have a direct exposure). The use of derivatives will give rise to an additional leveraged exposure.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e. bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

For liquidity management purposes, the Sub-Fund may invest, in addition to the liquid assets referred to above, in cash equivalents meaning: time deposits, certificates of deposit, term deposits, notes, Money Market Instruments and money market funds.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 6 of SFDR. The investments underlying the Sub-fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

#### 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a temporary basis:

Securities financing transactions	Permitted	Used	Maximum amount	Estimated amount
Total Return Swaps	Yes	Yes	10-15%	0-5%
Repurchase transactions	Yes	Yes	20-25%	5-10%

The Investment Manager classifies repurchase agreements as transactions whereby a counterparty sells a security to the Sub-Fund with a simultaneous agreement to repurchase the security from the Sub-Fund at a fixed future date at a stipulated price reflecting a market rate of interest unrelated to the coupon rate of the securities. The Investment Manager classifies reverse repurchase agreements as transactions whereby a counterparty purchases securities from a Sub-Fund and simultaneously commits to resell the securities to the Sub-Fund at an agreed upon date and price.

In respect to repurchase transaction revenues, all revenues remain with the Sub-Fund subject to standard transaction costs. Such direct fees and costs are determined in accordance with market practice and consistent with the current market levels.

The proportion of the assets held by the Sub-fund that may be subject to repurchase transactions is generally expected to be around 5-10% of the Sub-Fund's Net Asset Value. That proportion will be impacted downwards when interest rates are low and upwards when getting higher. When considered for cash management purposes in case of important movements of subscriptions and redemptions, the use of reverse repurchase and repurchase agreements will fluctuate depending on the occurrence of the latte. Depending on the occurrence of the above circumstances, the 5-10% proportion may on an opportunistic and temporary basis be increased up to a maximum of 25% of the Sub-Fund's Net Asset Value, depending also on the Sub-Fund's liquidity profile and anticipated liquidity needs.

Total Return Swaps may be entered into for any purpose that is consistent with the investment objective of the Sub-Fund, including efficient portfolio management (such as hedging purposes or the reduction of portfolio expenses), speculative purposes (in order to increase income and profits for the portfolio), or to gain exposure to certain markets.

In respect to Total Return Swap revenues, the gross income generated by the transactions is credited for 100% to the Sub-Fund and for 0% to the counterparty in these transactions (subject to the funding and trading costs that will be borne by the Sub-Fund). The Sub-Fund will enter into Total Return Swaps with multiple counterparties (the top 10 counterparties will be listed in the annual report of the Fund in accordance with SFTR). The proportion of the assets held by the Sub-Fund that may be subject to Total Return Swap transactions is generally expected to around 5% of the Sub-Fund's Net Asset Value. This proportion may on an opportunistic and temporary basis be increased up to a maximum of 15% of the Sub-Fund's Net Asset Value.

The Sub-Fund shall not enter into securities lending transactions until such time as an updated prospectus is approved by the CSSF.

## 6. Investment Manager and Investment Sub-Managers:

PIMCO Europe GmbH will act as the Investment Manager and will sub-delegate investment activities/portfolio management services to: Pacific Investment Management Company LLC and PIMCO Europe Ltd. The Investment Manager will remain responsible for providing discretionary investment management services with respect to the Sub-Fund's assets including investment management activities performed by the investment management sub-delegates.

Contact details:

<b>Investment Manager</b>	<b>Sub-Investment Managers</b>	
<b>PIMCO Europe GmbH</b>	<b>Pacific Investment Management Company LLC</b>	<b>PIMCO Europe Ltd</b>
Seidlstrasse 24-24 A, 80335 Munich Germany	650 Newport Center Drive Newport Beach 92660 CA United States	11 Baker Street W1U 3AH London United Kingdom

## **7. Benchmark used:**

The Sub-Fund intends to measure its performance against the Bloomberg Global Aggregate 1-3 years EUR hedged (the "Benchmark"). The Sub-Fund is considered to be actively managed in reference to the Benchmark by virtue of the fact that it uses the Benchmark for performance comparison purposes. However, the Benchmark is not used to track the return of the Benchmark, to define the asset allocation of the Sub-Fund's portfolio or to compute performance fees. Therefore, the Benchmark is not used by the Sub-Fund as a benchmark under the Benchmark Regulation.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a low volatility of the Sub-Fund and potentially capital losses in order to achieve returns slightly higher than the usual market's interest level. The Sub-Fund is intended for investors with a short-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by the CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Absolute VaR Approach. The Management Company calculates the level of the leverage of the Sub-Fund using the sum of notional approach and expects that this level will in principle not be higher than 500 % (in relation to the total net assets of the Sub-Fund). In exceptional cases (e.g., roll-over of the existing FX forward contracts), the level of leverage may exceed this figure.

The Sub-Fund pursues a safety-oriented investment strategy. The security of the investments has primary importance. Risks are not ruled out completely, but the aim is to minimise them as far as possible. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as low risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## 11. Sub-Fund Currency:

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg and New York, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.



## **9. onemarkets J.P. Morgan Emerging Countries Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is to provide long-term capital growth by investing primarily in emerging market companies. The primary objective is to harvest portfolio manager alpha across a diverse range of strategies with proven track records.

### **2. Investment Strategy:**

In managing the Sub-Fund, the Investment Manager uses both a top down and bottom up research process as well as a combination of fundamental and quantitative inputs to allocate the Sub-Fund's assets among a range of sectors. In buying and selling investments for the Sub-Fund, the Investment Manager looks for countries and individual securities that it believes will perform well over time. A proprietary multi-factor model is used to quantitatively rank countries, which supports the Sub-Fund's portfolio construction. The Investment Manager selects individual securities after performing a risk/reward analysis to address the Sub-Fund's objective of providing a high total return. Research produced by the Investment Manager includes in-depth, fundamental research into individual securities conducted by research analysts, who emphasise each issuer's long-term prospects and disciplined top-down macro and quantitative research using the latest technology available to the Investment Manager. Research analysts use their local expertise to identify, research, and rank companies according to their expected performance.

The Sub-Fund promotes a broad range of environmental and social characteristics through its inclusion criteria for investments that promote environmental and / or social characteristics. It also promotes certain norms and values by excluding particular companies from the portfolio.

Through its inclusion criteria, the Sub-Fund promotes environmental characteristics which may include effective management of toxic emissions and waste, as well as good environmental record. It also promotes social characteristics which may include effective sustainability disclosures, positive scores on labour relations and management of safety issues.

Through its exclusion criteria, the Sub-Fund promotes certain norms and values such as support for the protection of internationally proclaimed human rights and reducing toxic emissions, by fully excluding companies that are involved in particular activities such as manufacturing controversial weapons and applying maximum revenue, production or distribution percentage thresholds to others such as those that are involved in thermal coal and tobacco.

Also, the Sub-Fund does consider Principal Adverse Impact Indicators (PAIs) on sustainability factors in accordance with article Art. 7(1) of the Sustainable Finance Disclosure Regulation (SFDR) Regulation (EU) 2019/2088.

A detailed description of the ESG characteristics promoted as well as the methodology and applied criteria is set out in appendix 4a.

### 3. Investment Policy:

The Sub-Fund invests (directly and indirectly) at least 80% of its assets in equity securities and equity-related instruments that are tied economically to emerging markets (i.e., companies that are either incorporated in emerging markets, or derive a majority of their revenue or have significant operation in emerging markets). Emerging markets include most countries in the world except Australia, Canada, Japan, New Zealand, the United Kingdom, the United States, most of the countries of Western Europe and Hong Kong, although the Sub-Fund may invest in securities tied to those countries as well. The Sub-Fund's investments represent allocations to a variety of the actively managed emerging market equity strategies, including country, region and style strategies, among others. The Investment Manager selects the strategies utilised in the portfolio based on risk/return analyses and relative value considerations.

The Sub-Fund may invest in companies across all market capitalizations, although the Sub-Fund may invest a significant portion of its assets in companies of any one particular market capitalization category.

Equity securities and equity-related instruments tied economically to an emerging market include: (i) securities of issuers that are organised under the laws of an emerging market country or that maintain their principal place of business in an emerging market country; (ii) securities that are traded principally in an emerging market country; (iii) securities of issuers that, during their most recent fiscal year, derived at least 50% of their revenues or profits from goods produced or sold, investments made, or services performed in an emerging market country or that have at least 50% of their assets in an emerging market country; or (iv) securities or other instruments that expose the Sub-Fund to the economic fortunes and risks of one or more emerging market countries.

There is no limit on the number of countries in which the Sub-Fund may invest, and the Sub-Fund may focus its investments in a single country or a small group of countries. The Sub-Fund may use exchange-traded funds to gain exposure to particular foreign securities or markets and for the efficient management of cash flows. The Sub-Fund will have significant exposure to investments in the China Region (e.g., China A-Shares via the Shanghai-Hong Kong Stock Connect program), South Korea and India.

The Sub-Fund may invest in securities denominated in any currency and will invest substantially in securities denominated in foreign currencies.

The Sub-Fund's benchmark is the MSCI Emerging Markets Index (Total Return Net) (the "Index"). The Index has been selected as the benchmark because it is representative of the investment universe of the Sub-Fund and it is therefore an appropriate performance comparator. The majority of the Sub-Fund's equity securities may not necessarily be components of or have weightings derived from the Index. The Investment Manager has a wide range of discretion relative to the Index. While the Sub-Fund will hold assets that are components of the Index, it may also invest in companies, countries or sectors that are not included in, and that have different weightings from, the Index in order to take advantage of investment opportunities. It is expected that over long time periods, the Sub-Fund's performance will differ significantly from the Index.

The Sub-Fund will not invest in contingent convertible bonds ("CoCos").

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) for hedging purposes and efficient management and to achieve its investment objective. The use of financial derivative instruments (e.g. futures and options) is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular leverage, is therefore excluded.

The Sub-Fund may not invest in units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law for more than 10% of its net assets.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e. bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

For liquidity management purposes, the Sub-Fund may invest, in addition to the liquid assets referred to above, in cash equivalents meaning: time deposits, certificates of deposit, term deposits, notes, commercial paper, short-term government debt such as treasury-bills, bills of exchange and other instruments with a remaining period to maturity not exceeding twelve months and money market funds.

The Sub-Fund plans to allocate at least 67% of its assets to companies with positive environmental and / or social characteristics and a minimum of 10% of assets to Sustainable Investments according to article 2(17) SFDR. The share of Sustainable Investments is included in the aforementioned 67%.

**It cannot be assured, that the investment policy will achieve the investment objective.**

## 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR.

As part of its investment process, the Investment Manager seeks to assess the impact of environmental, social and governance ("ESG") factors on the companies in which the Sub-Fund invests. The Investment Manager's assessment is based on a proprietary analysis of key opportunities and risks across industries to seek to identify financially material issues on the Sub-Fund's investments in securities and ascertain key issues that merit engagement with company management. These assessments may not be conclusive and securities of companies may be purchased and retained by the Sub-Fund for reasons other than material ESG factors.

The portfolio reflects many of the shared environmental, social and governance values of investors through the exclusion of certain industries and companies engaged in specific activities. The portfolio fully excludes certain industries and applies maximum revenue / production percentage thresholds to others. The portfolio also fully excludes companies which the Investment Manager deems to be in severe violation of the UN Global Compact (together, the exclusionary framework).

### Exclusionary framework

- 1) Norms based exclusions: Serious violations of UN Global Compact (full exclusion)
- 2) Value based exclusions:
  - a) Full exclusions (% of revenue)
    - i) Controversial Weapons (> 0%)
    - ii) White Phosphorus (> 0%)
    - iii) Nuclear:
      - (1) Fissile Materials (> 0%)
      - (2) Warheads and Missiles (> 0%)
      - (3) Intended Use-Component Parts (> 0%)

- b) Threshold exclusions (% of revenue)
  - i) Conventional Weapons (> 10%)
  - ii) Tobacco production (> 5)
  - iii) Thermal Coal (> 30%)
  - iv) Nuclear Weapons not named above (> 2%)

#### Promoting E/S/G characteristics

A minimum of 67% of assets in the portfolio are invested in companies with positive environmental and/or social characteristics that follow good governance practices ("good ESG characteristics") as measured through the Investment Manager's proprietary ESG scoring methodology and/or third party data.

In order to determine a security to have "good" characteristics, the company must be within the top 80% percentile threshold of its respective peer group. For E, S and G characteristics, the primary sources used to assess companies are the relevant pillars of the Investment Manager's proprietary 40 question ESG Checklist (Risk Profile – as further described below) which has 12 environmental, 14 social, and 14 governance related questions. For the G pillar, additional questions from the Investment Manager's research analyst team checklist database are also referenced. Where the Investment Manager's proprietary data is not available, a quantitative score using third party data is used in the interim until the analyst has been able to source the information. In all three categories (E, S, G), the bottom quintile of securities will not count towards "promoting E, S, G characteristics" (the 67%).

#### Risk Profile

The Risk Profile analysis is a near-100 question ESG checklist of which 40 questions are globally consistent across Equities. The primary goal of which is identifying the key risks associated with a company. The overall assessment influences our strategic classification.

The Risk Profile analysis is designed to address risks associated with the economics, duration and governance of a business. It includes both negative and positive questions, as well as a severity assessment. ESG considerations are addressed with 12 specific questions on environmental, 14 on social and 14 on governance including environmental damage, support of local communities and corruption issues.

Among the ESG-related questions, the following questions (as a matter of example) are raised:

#### *Environmental*

- Does the company lack a credible/measurable strategy or plan to reduce greenhouse gas emissions?
- Does the company have issues with toxic emissions, waste management, non-recyclable waste, or other environmental damage?
- Is the company poised to benefit as a result of their actions related to environmental considerations?

#### *Social*

- Does the company have unaddressed issues with labor relations?
- Has the company failed to implement effective procedures to protect data security and customer privacy?
- Does the company engage in anti-competitive behavior and/or treat its customers unfairly?

#### *Governance*

- Does the board lack a diverse slate of directors?
- Does the owner have a history of poor governance or of abusing minority shareholders?
- Is top management/board accountable to their ESG targets?

The Risk Profile is not a “pass/fail” exercise. Rather, it is a tool to inform discussions between portfolio managers and analysts and an important driver behind the Investment Manager's engagement with the companies covered. Not surprisingly, companies classified as “Premium” and “Quality” will have fewer red flags than those classified as “Trading” or “Structurally Challenged”. The strategy has a clear preference for Premium and Quality companies.

The Sub-Fund currently has a medium-low exposure to sustainable investments in accordance with article 2(17) of SFDR.

The Sub-Fund's investments do not take into account the criteria for environmentally sustainable economic activities, including enabling or transitional activities, within the meaning of the Taxonomy Regulation and the Sub-Fund may only hold such investments on an incidental basis. It is expected that 0% of the Sub-Fund's portfolio will be aligned to taxonomy eligible activities and sectors within the meaning of the Taxonomy Regulation.

## 5. Use of Securities Financing Transactions:

The Sub-Fund will not enter into securities financing transactions under the SFTR. In the event that the Sub-Fund intends to enter into such transactions, this Prospectus shall be amended with the prior approval of the CSSF and the shareholders shall be notified of that intention with a one-month prior notice.

## 6. Investment Manager and Investment Sub-Managers:

JPMorgan Asset Management (UK) Limited will act as the Investment Manager and will sub-delegate investment activities to J.P. Morgan Investment Management Inc. The Investment Manager will remain responsible for oversight of all activities including investment management activities performed by the investment management sub-delegate.

Contact details:

<p><b>JPMorgan Asset Management (UK) Limited</b> 25 Bank Street, Canary Wharf, London, E14 5JP, U.K.</p>	<p><b>J.P. Morgan Investment Management Inc.</b> 245 Park Avenue New York, NY 10167, U.S.A.</p>
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## 7. Benchmark used:

The Index is not used by the Sub-Fund as a benchmark under the Benchmark Regulation since the Index is not used for the purpose of tracking the return of the Index or defining the asset allocation of the Sub-Fund's portfolio or computing the performance fee.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a significant volatility of the Sub-Fund and potentially high capital losses in order to achieve high potential investment performances. The Sub-Fund is intended for investors with a long-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund. The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes.

The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The global exposure of the Sub-Fund is determined under the commitment approach.

The Sub-Fund pursues an opportunity-oriented investment strategy. The focus is on maximising the potential return to investors, rather than minimising risks. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as increased risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4. Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, London, New York and Hong Kong, are generally open for business except 24 and 31 December.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 9a. onemarkets J.P. Morgan Emerging Countries Fund – 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

### 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, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Product name:  
onemarkets J.P. Morgan Emerging Countries  
Fund

Legal entity identifier:  
29900F3CH3CCB2JBK02

## Environmental and/or social characteristics

### Does this financial product have a sustainable investment objective?

Yes

No

It will make a minimum of **sustainable investments with an environmental objective**: \_\_\_%

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 10 % of sustainable investments.

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It will make a minimum of **sustainable investments with a social objective**: \_\_\_%

It promotes E/S characteristics, but **will not make any sustainable investments**



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

The Sub-Fund promotes a broad range of environmental and social characteristics which may include effective management of toxic emissions and waste. It also promotes social characteristics which may include effective sustainability disclosures, positive scores on labour relations and management of safety issues. It is required to invest at least 67% of its assets in such securities. It also promotes certain norms and values by excluding particular companies from the portfolio.



Through its exclusion criteria, the Sub-Fund promotes certain norms and values such as support for the protection of internationally proclaimed human rights and reducing toxic emissions, by fully excluding companies that are involved in particular activities such as manufacturing controversial weapons and applying maximum revenue, production or distribution percentage thresholds to others such as those that are involved in thermal coal and tobacco.

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

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

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

A combination of the Investment Manager's proprietary ESG scoring methodology and/or third-party data is used to measure the attainment of the environmental and/ or social characteristics that the Sub-Fund promotes.

The methodology is based on a company's management of relevant environmental or social issues such as its toxic emissions, waste management, labour relations and safety issues. To be included in the 67% of assets promoting environmental and/or characteristics, a company must score in the top 80% relative to its peers on either its environmental score or social score and follow good governance practices. Please refer to "What is the policy to assess good governance practices of the investee companies?" below for further detail on good governance.

To promote certain norms and values, the Investment Manger utilises data to measure a company's participation in certain related activities. Screening on that data results in full exclusions on certain potential investments and partial exclusions based on maximum percentage thresholds on revenue, production or distribution on others. A subset of the "Adverse Sustainability Indicators" as set out in the EU SFDR Regulatory Technical Standards is also incorporated in the screening and the relevant metrics are used to identify and screen out identified violators.

● ***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?***

The objectives of the Sustainable Investments that the Sub-Fund partially intends to make may include any individual or combination of the following:

Environmental Objectives (i) climate risk mitigation, (ii) transition to a circular economy; Social Objectives (i) inclusive and sustainable communities - increased female executive representation, (ii) inclusive and sustainable communities - increased female representation on boards of directors and (iii) providing a decent working environment and culture.

**Principal adverse impacts** are the most significant negative impacts of

Contribution to such objectives is determined by either (i) products and services sustainability indicators which may include the percentage of revenue derived from providing products and / or services that contribute to the relevant sustainable objective, such as a company producing solar panels or clean energy technology that meets the Investment Manager's proprietary thresholds contributing to climate risk mitigation; or (ii) being an operational peer group leader contributing to the relevant objective. Being a peer group leader is defined as scoring in the top 20% relative to peers based on certain operational sustainability indicators. For example, scoring in the top 20% relative to peers on total waste impact contributes to a transition to a circular economy.

***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 Sustainable Investments that the Sub-Fund partially intends to make are subject to a screening process that identifies and excludes from qualifying as a Sustainable Investment, the worst offending companies, in relation to certain environmental considerations such as climate change, protection of water and marine resources, transition to a circular economy, pollution and protection of biodiversity and ecosystems. The Investment Manager also applies a screen to align with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights as provided for under the Minimum Safeguards in the EU Taxonomy Regulation.

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

Indicators for adverse impacts on sustainability factors as set out in the EU SFDR Regulatory Technical Standards (Table 1 of Annex 1 and select indicators from Tables 2 and 3) are taken into account to demonstrate that an investment qualifies as a Sustainable Investment.

These have been taken into account through values and norms-based exclusions; 'do no significant harm' purposed exclusions; being incorporated into the investment criteria of a Sustainable Investment and a via an adverse impact indicator led central engagement framework.

*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 norms based portfolio exclusions as described above under "What environmental and/or social characteristics are promoted by this financial product?" seek alignment with these guidelines and principles. Third party data is used to identify violators and prohibit relevant investments in these companies.

*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?

- Yes, the Sub-Fund considers select principal adverse impacts on sustainability factors through values and norms-based screening to implement exclusions. Indicators 10 and 14 in relation to violations of the UN Global Compact and controversial weapons from the EU SFDR Regulatory Technical Standards are used in respect of such screening.

The Sub-Fund also uses certain of the indicators as part of the “Do No Significant Harm” screen as detailed in the response to the question directly above to demonstrate that an investment qualifies as a Sustainable Investment.

A respective PAI policy outlining the PAI is available online:

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

Further information on principal adverse impacts will be provided in accordance with Art. 11 (2) of Regulation (EU) 2019/2088 in an annex to the Fund’s annual report.

- No



### What investment strategy does this financial product follow?

The Sub-Funds strategy can be considered in respect of its general investment approach and ESG approach as follows:

Investment approach

1. Uses a fundamental, bottom- up equity selection process.
2. Seeks to identify the most attractive investment ideas from the value and growth investment universes, across the market capitalisation spectrum.
3. Combined top down and bottom-up research process as well as a combination of fundamental and quantitative inputs.
4. Proprietary multi-factor model is used to quantitatively rank countries, which support the Sub-Fund’s portfolio construction.
5. Investments in individual securities after performing a risk/reward analysis.

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

6. Excludes certain sectors, companies or practices based on specific values or norms-based criteria.
7. Ensures at least 67% of assets to be invested in companies with positive environmental and/ or social characteristics.
8. Ensures all companies follow good governance practices.

● ***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?***

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics are:

- The requirement to invest at least 67% of assets in companies with positive environment and/or social characteristics.
- The values and norm-based screening to implement full exclusions in relation issuers that are involved in certain activities such as manufacturing controversial weapons and applying maximum revenue, production or distribution percentage thresholds to others such as those that are involved in thermal coal and tobacco.
- The requirement for all issuers in the portfolio to follow good governance practices.

The Sub-Fund also commits to investing at least 10% of assets in Sustainable Investments according to article 2(17) SFDR. Sustainable Investment figures are calculated by counting fully issuers that have a significant exposure (i.e., "pass & fail" methodology) to economic activities that contribute to environmental or social objectives.

Additionally, the Sub-Fund has defined exclusion criteria identifying Companies and/or Countries and/or underlying which should not be invested in or which should be invested in respecting predefined thresholds, subject to the Sub-fund's investments not complying with such exclusion criteria remaining below 10% of the relevant Sub-Fund's net assets.

1. Companies that are involved in severe violations of the UN Global Compact
2. Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations.
3. Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 10% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
4. Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact (a *de minimis* rule can be applied, i.e. companies with a minor involvement are not necessarily excluded, and the internal threshold limit on the Management Company's side will be set at 5%).
5. Companies involved in the tobacco production which derive from these businesses more than 5% of their consolidated revenues.
6. Companies involved in the nuclear energy production which derive from these businesses more than 15% of their consolidated revenues.

7. Companies involved in the weapons production which derive from these businesses more than 10% of their consolidated revenues.
8. Companies involved in the gambling business which derive from these businesses more than 15% of their consolidated revenues.
9. Companies involved in the adult entertainment business which derive from these businesses more than 15% of their consolidated revenues.

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

N/A. There is no minimum committed rate for the Sub-Fund.

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

All investments (excluding cash and derivatives) are screened to exclude known violators of good governance practices. In addition, for those investments included in the 67% of assets promoting environmental and/or social characteristics or qualifying Sustainable Investments, additional considerations apply. For these investments, the Sub-Fund incorporates a peer group comparison and screens out companies that do not score in the top 80% relative to peers based on good governance indicators.

**Good governance**

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



**Asset allocation**

describes the share of investments in specific assets.

**What is the asset allocation planned for this financial product?**

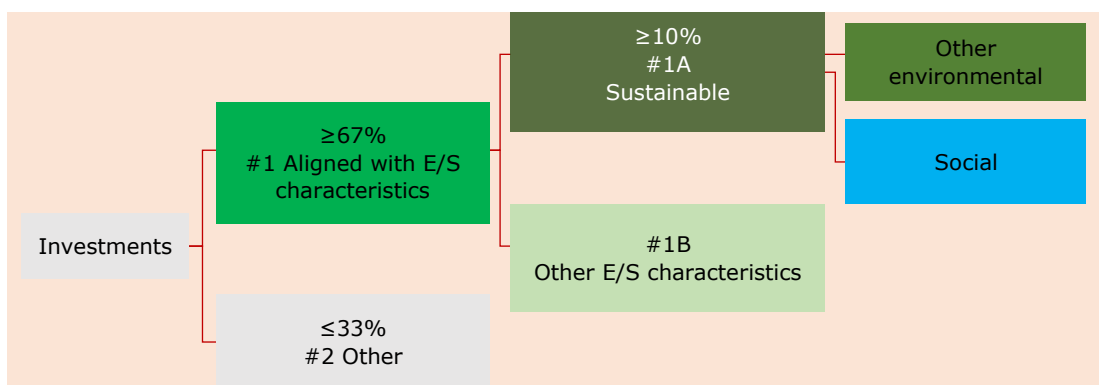
The Sub-Fund plans to allocate at least 67% of its assets to companies with positive environmental and / or social characteristics and a minimum of 10% of assets to Sustainable Investments.

The Sub-Fund does not commit to investing any proportion of assets specifically in companies exhibiting positive environmental characteristics or specifically in positive social characteristics nor is there any commitment to any specific individual or combination of environmental or social objectives in respect of the Sustainable Investments. Therefore, there are no specific minimum allocations to environmental or social objectives referred to in the diagram below.

Ancillary cash / liquidity and EPM / hedging derivatives are not included in the % of assets set out in the diagram below as these holdings are minimal, fluctuate depending on investment flows and are ancillary to the investment policy with minimal or no impact on investment operations.

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.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

Derivatives are not used to attain the environmental or social characteristics promoted by the Sub-Fund.



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

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>13</sup>?**

Yes:

In fossil gas     In nuclear energy

No

*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.*

#### Enabling activities

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

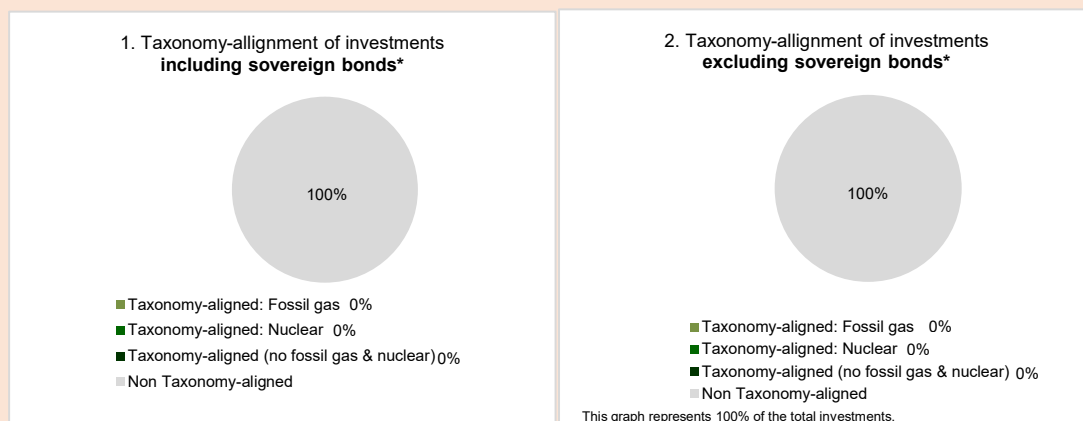
#### Transitional activities are

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

<sup>13</sup> 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.



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

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

N/A. The Sub-Fund has no minimum proportion of investment in transitional or enabling activities.



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

The Sub-Fund invests at least 10% of assets in Sustainable Investments according to article 2(17) SFDR, however, 0% of assets are committed to Sustainable Investments with an environmental objective aligned with the EU Taxonomy.



**What is the minimum share of socially sustainable investments?**

The Sub-Fund invests at least 10% of assets in Sustainable Investments according to article 2(17) SFDR, typically across both environmental and social objectives. It does not commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



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

The “other” investments are comprised of companies that that did not meet the criteria described in response to above question entitled, “What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product? To qualify as exhibiting positive environmental and/or social characteristics. They are investments for diversification purposes (including indirect investments and investments in derivatives). There are minimum environmental and social safeguards in respect of the “Other” investments. The norms and values-based screening described in the answers to various questions above, in particular, “What environmental and/or social characteristics are promoted by this financial product?” is applied at portfolio level, including to the “other” investments.

Furthermore, the Sub-Fund may invest in financial derivative instruments for hedging purposes and efficient management and in units of other UCITS or other UCIs. No further safeguards apply to those instruments.

The norms and values based screening does only apply to direct investments.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

There is no specific benchmark defined to assess the alignment with the promoted characteristics.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

N/A

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

N/A

- ***How does the designated index differ from a relevant broad market index?***

N/A

- ***Where can the methodology used for the calculation of the designated index be found?***

N/A



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

)



## **10. onemarkets J.P. Morgan US Equities Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is to provide long-term capital growth by investing primarily in US companies with positive E/S characteristics or US companies that demonstrate improving E/S characteristics. Companies with positive E/S characteristics are those that the Investment Manager believes to have effective governance and superior management of environmental and social issues ("Sustainable Characteristics").

### **2. Investment Strategy:**

The investment approach uses a fundamental, bottom-up equity selection process, built on leveraging the insights of a team of US sector specialist analysts that seeks to identify attractive sustainable long-term investments. The investment process integrates ESG aspects to identify companies with strong or improving Sustainability Characteristics.

The Sub-Fund is actively managed. Though the majority of its holdings are likely to be components of the benchmark, the Investment Manager has broad discretion to deviate materially from its securities, weightings and risk characteristics. The degree to which the Sub-Fund may resemble the composition and risk characteristics of the benchmark will vary over time and its performance may be meaningfully different.

### **3. Investment Policy:**

The Sub-Fund will invest at least 67% of its assets in equities of companies belonging to the benchmark (the S&P 500 Index) with positive E/S characteristics or companies that demonstrate improving E/S characteristics anywhere carrying out the main part of their economic activity, in the US.

Companies with positive E/S characteristics and companies that demonstrate improving E/S characteristics are selected using proprietary research and third-party data. Fundamental analysis is used to better understand sustainability risks and opportunities that may impact a company. This analysis is also an important driver behind active company engagement when seeking to positively influence business practices to improve sustainability.

The Sub-Fund promotes a broad range of environmental and/or social characteristics through its inclusion criteria for its investments with positive or improving environmental and/or social characteristics. It also promotes certain norms and values by excluding particular companies from the portfolio.

Through its inclusion criteria based on Principal Adviser Impact indicators (PAIs), the Sub-Fund promotes environmental characteristics which may include effective management of toxic emissions and waste as well as good environmental record. It also promotes social characteristics which may include effective sustainability disclosures, positive scores on labour relations and management of safety issues.

Through its exclusion criteria based on Principal Adviser Impact indicators (PAIs) and the UN Global Compact, the Sub-Fund promotes certain norms and values, such as support for the protection of internationally proclaimed human rights and reducing toxic emissions, by fully excluding companies that are involved in particular activities such as manufacturing controversial weapons and applying maximum revenue, production or distribution percentage thresholds to others such as those that are involved in thermal coal and tobacco. Please refer to the exclusions policy for the Sub-Fund on [www.jpmorganassetmanagement.lu](http://www.jpmorganassetmanagement.lu) for further information.

No benchmark has been designated for the purpose of attaining the environmental or social characteristics.

The Sub-Fund will invest at least 40% of assets in Sustainable Investments, as defined under SFDR, contributing to environmental or social objectives.

The Sub-Fund systematically includes ESG criteria in investment analysis and investment decisions on at least 90% of securities purchased (excluding cash). The Sub-Fund excludes the bottom 20% of securities from its investable universe based on its ESG criteria.

The Sub-Fund will invest no more than 10% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund's assets.

The Sub-Fund may invest up to 10% of its net assets in closed-ended REITs as well as up to 10% of its net assets in depository receipts (American Depository Receipts (ADRs) and Global Depository Receipts (GDRs) eligible (including their respective underlying) under the 2010 Law). The Sub-Fund may invest without limitation in instruments denominated in currencies other than the reference currency (EUR). The investments will mainly be in assets denominated in USD and may also invest in CAD denominated assets.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular leverage, is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e. bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

For liquidity management purposes, the Sub-Fund may invest, in addition to the liquid assets referred to above, in cash equivalents meaning: time deposits, certificates of deposit, term deposits, notes, commercial paper, short-term government debt such as treasury-bills, bills of exchange and other instruments with a remaining period to maturity not exceeding twelve months and money market funds.

**It cannot be assured that, the investment policy will achieve the investment objective.**

## 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR.

As part of its investment process, the Investment Manager seeks to assess the impact of environmental, social and governance (“ESG”) factors on the companies in which the Sub-Fund invests. The Investment Manager’s assessment is based on a proprietary analysis of key opportunities and risks across industries to seek to identify financially material issues on the Sub-Fund’s investments in securities and ascertain key issues that merit engagement with company management. These assessments may not be conclusive and securities of companies may be purchased and retained by the Sub-Fund for reasons other than material ESG factors.

The portfolio reflects many of the shared environmental, social and governance values of investors through the exclusion of certain industries and companies engaged in specific activities. The portfolio fully excludes certain industries and applies maximum revenue / production percentage thresholds to others. The portfolio also fully excludes companies which the Investment Manager deems to be in severe violation of the UN Global Compact (together, the exclusionary framework).

### *Exclusionary framework*

- 1) Norms based exclusions: Serious violations of UN Global Compact (full exclusion)
- 2) Value based exclusions:
  - a) Full exclusions (% of revenue)
    - i) Controversial Weapons (> 0%)
    - ii) White Phosphorus (> 0%)
    - iii) Nuclear:
      - (1) Fissile Materials (> 0%)
      - (2) Warheads and Missiles (> 0%)
      - (3) Intended Use-Component Parts (> 0%)
  - b) Threshold exclusions (% of revenue)
    - i) Conventional Weapons (> 10%)
    - ii) Tobacco production (> 5)
    - iii) Thermal Coal (> 30%)
    - iv) Nuclear Weapons not named above (> 2%)

### *Promoting E/S/G characteristics*

A minimum of 67% of assets in the portfolio are invested in companies with positive environmental and/or social characteristics that follow good governance practices (“good ESG characteristics”) as measured through the Investment Manager’s proprietary ESG scoring methodology and/or third-party data.

In order to determine a security to have “good” characteristics, the company must be within the top 80% percentile threshold of its respective peer group. For E, S and G characteristics, the primary sources used to assess companies are the relevant pillars of the Investment Manager’s proprietary 40 question ESG Checklist (Risk Profile – as further described below) which has 12 environmental, 14 social, and 14 governance related questions. For the G pillar, additional questions from the Investment Manager’s research analyst team checklist database are also referenced. Where the Investment Manager’s proprietary data is not available, a quantitative score using third party data is used in the interim until the analyst has been able to source the information. In all three categories (E, S, G), the bottom quintile of securities will not count towards “promoting E, S, G characteristics” (the 51%).

#### *Risk Profile*

The Risk Profile analysis is a near-100 question ESG checklist of which 40 questions are globally consistent across Equities. The primary goal of which is identifying the key risks associated with a company. The overall assessment influences our strategic classification.

The Risk Profile analysis is designed to address risks associated with the economics, duration and governance of a business. It includes both negative and positive questions, as well as a severity assessment. ESG considerations are addressed with 12 specific questions on environmental, 14 on social and 14 on governance including environmental damage, support of local communities and corruption issues.

Among the ESG-related questions, the following questions (as a matter of example) are raised:

#### *Environmental*

- Does the company lack a credible/measurable strategy or plan to reduce greenhouse gas emissions?
- Does the company have issues with toxic emissions, waste management, non-recyclable waste, or other environmental damage?
- Is the company poised to benefit as a result of their actions related to environmental considerations?

#### *Social*

- Does the company have unaddressed issues with labor relations?
- Has the company failed to implement effective procedures to protect data security and customer privacy?
- Does the company engage in anti-competitive behavior and/or treat its customers unfairly?

#### *Governance*

- Does the board lack a diverse slate of directors?
- Does the owner have a history of poor governance or of abusing minority shareholders?
- Is top management/board accountable to their ESG targets?

The Risk Profile is not a “pass/fail” exercise. Rather, it is a tool to inform discussions between portfolio managers and analysts and an important driver behind the Investment Manager’s engagement with the companies covered. Not surprisingly, companies classified as “Premium” and “Quality” will have fewer red flags than those classified as “Trading” or “Structurally Challenged”. The strategy has a clear preference for Premium and Quality companies.

The Sub-Fund currently has a medium-low exposure to sustainable investments in accordance with article 2(17) of SFDR.

The Sub-Fund's investments do not take into account the criteria for environmentally sustainable economic activities, including enabling or transitional activities, within the meaning of the Taxonomy Regulation and the Sub-Fund may only hold such investments on an incidental basis. It is expected that 0% of the Sub-Fund's portfolio will be aligned to taxonomy eligible activities and sectors within the meaning of the Taxonomy Regulation.

## 5. Use of Securities Financing Transactions:

The Sub-Fund will not enter into securities lending transactions, Total Return Swap transactions and repurchase transactions.

## 6. Investment Manager and Investment Sub-Managers:

JPMorgan Asset Management (UK) Limited will act as the Investment Manager and will sub-delegate investment activities to J.P. Morgan Investment Management Inc. The Investment Manager will remain responsible for oversight of all activities including investment management activities performed by the investment management sub-delegate.

Contact details:

<p><b>JPMorgan Asset Management (UK) Limited act</b> 25 Bank Street, Canary Wharf, London, E14 5JP, U.K.</p>	<p><b>J.P. Morgan Investment Management Inc.</b> 245 Park Avenue New York, NY 10167, U.S.A.</p>
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## 7. Benchmark used:

The Sub-Fund is using the S&P 500 Index (Total Return Net of 30% withholding tax) under the Benchmark Regulation.

## 8. Profile of the typical investor:

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a significant volatility of the Sub-Fund and potentially high capital losses in order to achieve high potential investment performances. The Sub-Fund is intended for investors with a long-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes.

The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues an opportunity-oriented investment strategy. The focus is on maximising the potential return to investors, rather than minimising risks. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as increased risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## **12. Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

### 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg and the United States of America, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 10a. onemarkets J.P. Morgan US Equities Fund – 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:** onemarkets J.P. Morgan US Equities Fund      **Legal entity identifier:** 529900TFFDAMI5D4HP37

**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 **environmentally 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.

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes

- It will make a minimum of **sustainable investments with an environmental objective:** \_\_\_\_ %
- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of **sustainable investments with a social objective:** \_\_\_\_ %

No

- 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 40 % of sustainable investments
- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- with a social objective
- It promotes E/S characteristics, but **will not make any sustainable investments**





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

The Sub-Fund promotes a broad range of environmental and/or social characteristics through its inclusion criteria for its investments with positive or improving environmental and/or social characteristics. It is required to invest at least 67% of its assets in such companies. It also promotes certain norms and values by excluding particular companies from the portfolio.

Through its inclusion criteria, the Sub-Fund promotes environmental characteristics which may include effective management of toxic emissions and waste as well as good environmental record. It also promotes social characteristics which may include effective sustainability disclosures, positive scores on labour relations and management of safety issues.

Through its exclusion criteria, the Sub-Fund promotes certain norms and values, such as support for the protection of internationally proclaimed human rights and reducing toxic emissions, by fully excluding companies that are involved in particular activities such as manufacturing controversial weapons and applying maximum revenue, production or distribution percentage thresholds to others such as those that are involved in thermal coal and tobacco. Please refer to the exclusions policy for the Sub-Fund on [www.jpmorganassetmanagement.lu](http://www.jpmorganassetmanagement.lu) for further information.

No benchmark has been designated for the purpose of attaining the environmental or social characteristics.

### Sustainability indicators

measure how the sustainable objectives of this financial product are attained.

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

A combination of the Investment Manager's proprietary ESG scoring methodology and/or third party data are used as indicators to measure the attainment of the environmental and/ or social characteristics that the Sub-Fund promotes.

The methodology is based on a company's management of relevant environmental or social issues such as its toxic emissions, waste management, labour relations and safety issues. To be included in the 67% of assets promoting environmental and/or characteristics, a company must score in the top 80% relative to its peers on either its environmental score or social score and follow good governance practices. Please refer to "What is the policy to assess good governance practices of the investee companies?" below for further detail on good governance.

To promote certain norms and values, the Investment Manager utilises data to measure a company's participation in certain related activities. Screening on that data results in full exclusions on certain potential investments and partial exclusions based on maximum percentage thresholds on revenue, production or distribution on others. A subset of the "Adverse Sustainability Indicators" as set out in the EU SFDR Regulatory Technical Standards is also incorporated in the screening and the relevant metrics are used to identify and screen out identified violators.

● ***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?***

The objectives of the Sustainable Investments that the Sub-Fund partially intends to make may include any individual or combination of the following: Environmental Objectives (i) climate risk mitigation, (ii) transition to a circular economy; Social Objectives (i) inclusive and sustainable communities - increased female executive representation, (ii) inclusive

and sustainable communities - increased female representation on boards of directors and (iii) providing a decent working environment and culture.

Contribution to such objectives is determined by either (i) products and services sustainability indicators which may include the percentage of revenue derived from providing products and / or services that contribute to the relevant sustainable objective,

such as a company producing solar panels or clean energy technology that meets the Investment Manager's proprietary thresholds contributing to climate risk mitigation; or (ii) being an operational peer group leader contributing to the relevant objective. Being a peer group leader is defined as scoring in the top 20% relative to peers based on certain operational sustainability indicators. For example, scoring in the top 20% relative to peers on total waste impact contributes to a transition to a circular economy.

● ***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 Sustainable Investments that the Sub-Fund partially intends to make are subject to a screening process that identifies and excludes, from qualifying as a Sustainable Investment, the worst offending companies, in relation to certain environmental considerations such as climate change, protection of water and marine resources, transition to a circular economy, pollution and protection of biodiversity and ecosystems. The Investment Manager also applies a screen to align with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights as provided for under the Minimum Safeguards in the EU Taxonomy Regulation.

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

Certain indicators for adverse impacts on sustainability factors as set out in the EU SFDR Regulatory Technical Standards are taken into account to demonstrate that an investment qualifies as a Sustainable Investment.

In particular, adverse sustainability indicators 10 and 14 from the EU SFDR Regulatory Technical Standards in relation to violations of the UN Global Compact

**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.

and controversial weapons have been taken into account through the values and norms based exclusions described above in the answer to “What environmental and/or social characteristics are promoted by this financial product?”

Further additional adverse sustainability indicators, such as indicators 3, 5, 6 and 9 as set out in the EU SFDR Regulatory Technical Standards in relation to GHG intensity, share of non-renewable energy consumption and production, energy consumption and hazardous waste are considered as part of the do no significant harm screen described in the answer to the above question. Companies below a predefined threshold using the relevant EU SFDR Regulatory Technical Standards metrics will be screened out. The Investment Manager may consider a broader set of indicators for adverse impacts on sustainability factors at its discretion.

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

The norms based portfolio exclusions as described above under “What environmental and/or social characteristics are promoted by this financial product?” seek alignment with these guidelines and principles. Third party data is used to identify violators and prohibit relevant investments in these companies.

*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?**

Yes

The Sub-Fund considers principal adverse impacts on sustainability factors through values and norms based screening to implement exclusions and active engagement with select investee issuers.

Indicators 3,4,5,10,13 and 14 from Table 1 and indicator 2 from Table 2 and 3 from the EU SFDR Regulatory Technical Standards are used in respect of such screening. These indicators respectively relate to GHG intensity, fossil fuel, renewable energy, violations of the UN Global Compact, board gender diversity, controversial weapons, emissions of air pollutants and accidents / injury in the workplace.

A subset of the indicators will be used to identify a target list of issuers to engage with based on their performance. The Sub-Fund also uses certain of the indicators as part of the "Do No Significant Harm" screen as detailed in the response to the question directly above to demonstrate that an investment qualifies as a Sustainable Investment.

Further information can be found in future annual reports in respect of the Sub-Fund and under "Approach to EU MiFID Sustainability Preferences" on:

[www.jpmorganassetmanagement.lu](http://www.jpmorganassetmanagement.lu).

No



### What investment strategy does this financial product follow?

The Sub- Funds strategy can be considered in respect of its general investment approach and ESG approach as follows:

#### Investment approach

- Uses a fundamental, bottom-up equity selection process.
- Investment process built on leveraging the insights of a team of US sector specialist analysts that seeks to identify attractive sustainable long-term investments.
- Integrates ESG aspects to identify companies with strong or improving sustainability characteristics.

#### ESG approach: Best-in-Class

- Excludes certain sectors, companies or practices based on specific values or norms based criteria.
- At least 67% of assets to be invested in companies with positive or improving environmental and/ or social characteristics.
- At least 40% of assets to be invested in Sustainable Investments.
- All companies follow good governance practices.

Please refer to the Sub- Fund details under "Sub- Fund Descriptions" for further detail.

### ● **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?**

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics are:

- The requirement to invest at least 67% of assets in companies with positive or improving E/S characteristics.
- The values and norms based screening to implement full exclusions in relation issuers that are involved in certain activities such as manufacturing controversial weapons and applying maximum revenue, production or distribution percentage thresholds to others such as those that are involved in thermal coal and tobacco.
- The requirement for all companies in the portfolio to follow good governance practices.

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

The Sub-Fund also commits to investing at least 40% of assets in Sustainable Investments. Sustainable Investment figures are calculated by counting fully issuers that have a significant exposure (i.e., "pass & fail" methodology to economic activities that contribute to environmental or social objectives.

- ***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 excludes the bottom 20% of securities from its investable universe based on its ESG criteria.

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

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

All investments (excluding cash and derivatives) are screened to exclude known violators of good governance practices. In addition, for those investments included in the 67% of assets with positive or improving environmental and/or social characteristics or qualifying Sustainable Investments, additional considerations apply. For these investments, the Sub-Fund incorporates a peer group comparison and screens out companies that do not score in the top 80% relative to peers based on good governance indicators.



#### **What is the asset allocation planned for this financial product?**

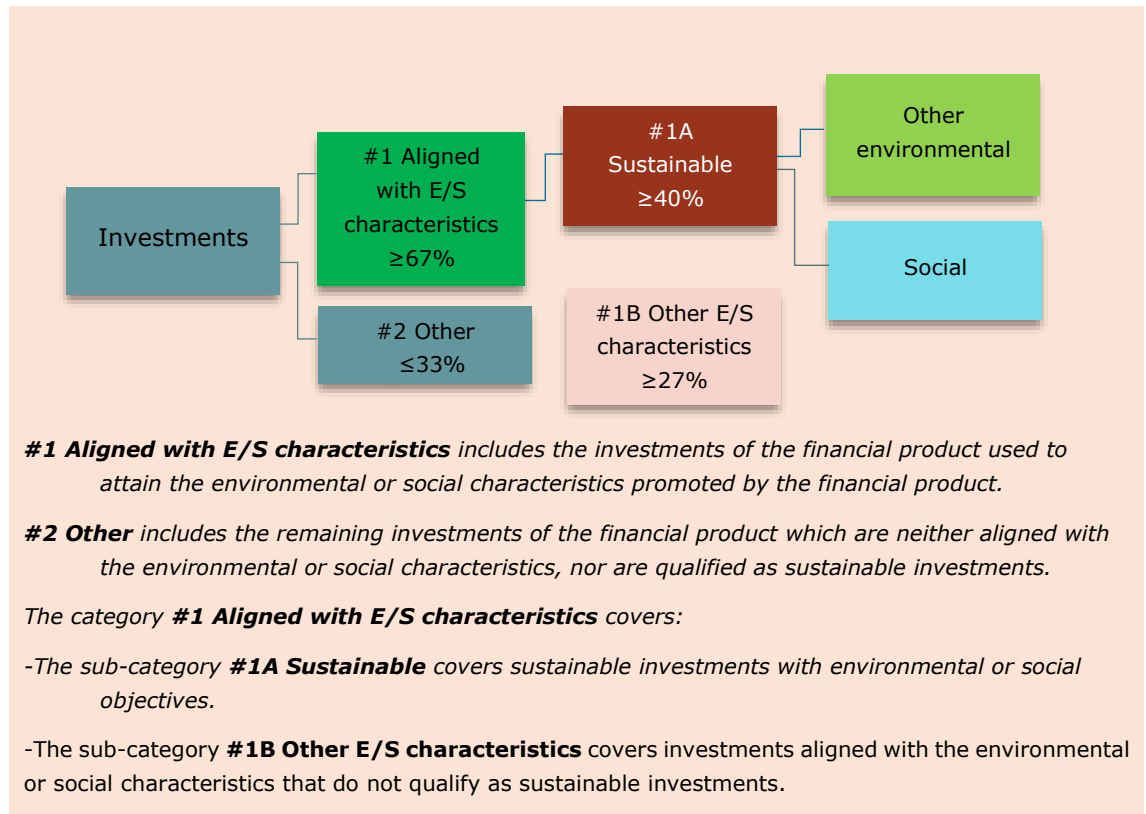
The Sub-Fund plans to allocate at least 67% of its assets to companies with positive or improving E/S characteristics and a minimum of 40% of assets to Sustainable Investments. The Sub-Fund does not commit to investing any proportion of assets specifically in companies exhibiting positive environmental characteristics or specifically in positive social characteristics nor is there any commitment to any specific individual or combination of environmental or social objectives in respect of the Sustainable Investments. Therefore, there are no specific minimum allocations to environmental or social objectives referred to in the diagram below.

Ancillary Liquid Assets, Deposits with Credit Institutions, Money Market Instruments / funds (for managing cash subscriptions and redemptions as well as current and exceptional payments) and derivatives for EPM are not included in the % of assets set out in the table below. These holdings fluctuate depending on investment flows and are ancillary to the investment policy with minimal or no impact on investment operations.

**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 environmental or social characteristics promoted by the Sub-Fund.



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

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>14</sup>?**

Yes:

In fossil gas     In nuclear energy

No

<sup>14</sup> 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.

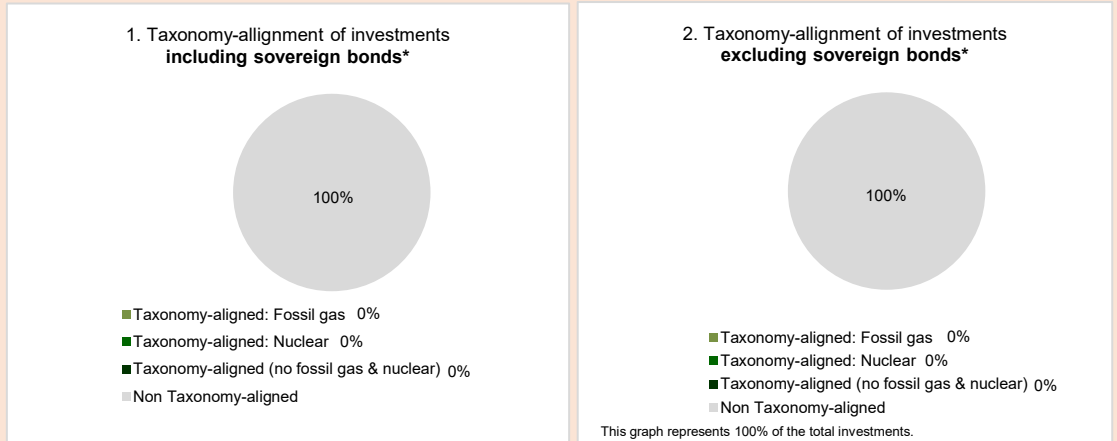
**Enabling activities**

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.

**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 paragraph 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*



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

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

The Sub-Fund invests at least 40% of assets in Sustainable Investments, however, 0% of assets are committed to Sustainable Investments with an environmental objective aligned with the EU Taxonomy. Accordingly, 0% of assets are committed to transitional and enabling activities.



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

The Sub-Fund invests at least 40% of assets in Sustainable Investments, typically across both environmental and social objectives. It does not commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



### What is the minimum share of socially sustainable investments?

The Sub-Fund invests at least 40% of assets in Sustainable Investments, typically across both environmental and social objectives. It does not commit to any specific individual or combination of Sustainable Investment objectives and therefore here is no committed minimum share.



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

The “other” investments are comprised of companies that did not meet the criteria described in response to above question entitled, “What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?” to qualify as exhibiting positive environmental and/or social characteristics. They are investments for diversification purposes.

All investments, including “other” investments are subject to the following ESG Minimum Safeguards/principle:

- The minimum safeguards as outlined by Article 18 of the EU Taxonomy Regulation (including alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights).
- Q Application of good governance practices (these include sound management structures, employee relations, remuneration of staff and tax compliance).
- Q Compliance with the Do No Significant Harm principle as prescribed under the definition of Sustainable Investment in EU SFDR.



### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

Not applicable

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

Not applicable

- ***How does the designated index differ from a relevant broad market index?***

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



Not applicable

- ***Where can the methodology used for the calculation of the designated index be found?***

Not applicable



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**

More product-specific information can be found on the website:

[www.jpmorganassetmanagement.lu](http://www.jpmorganassetmanagement.lu).

## **11. onemarkets Allianz Global Equity Future Champions Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is to invest in global equity markets with a focus on sustainability leaders as determined by the Investment Manager. In doing so, the Sub-Fund takes environmental, social, human rights, governance, and business behaviour factors into account over a long-term investment horizon.

### **2. Investment Strategy:**

The sustainability factors comprising the Sub-Fund's investment objective are analysed through SRI Research by the Investment Manager in order to assess how sustainable development and long-term issues are taken into account in the strategy of an issuer. "SRI Research" means the overall process of identifying potential risks as well as potential opportunities of an investment in securities of an issuer related to the analysis of sustainability factors. SRI Research data combines external research data (which might have some limitations) with internal analyses.

Based on a combination of the results of the external and/or internal analyses of the sustainability factors, an internal rating is derived monthly (the "SRI Rating") and is afterwards assigned to a corporate or sovereign issuer. SRI Rating is to be understood as an internal rating assessment which is based on SRI Research. Each SRI Rating is therefore based upon the analysis of criteria considering the domains human rights, social, environmental, business behaviour and governance. SRI Ratings may be used to apply negative or positive screens on the Sub-Fund's investment universe in accordance with the investment objective of the Sub-Fund. While most holdings of the Sub Fund will have a corresponding SRI Rating, some investments cannot be rated according to the SRI Research methodology. Examples of instruments not attaining to the SRI Rating include, but are not limited to, cash, deposits, and non-rated investments.

The Sub-Fund's internal SRI Rating is an integral part of the portfolio construction, supplemented by the GHG intensity which assesses GHG emissions of a company in tCO<sub>2</sub>e per millions of sales. Both the SRI Rating and the GHG intensity factor are used to rank and select or weight securities for the portfolio construction.

### **3. Investment Policy:**

The Sub-Fund will invest a minimum of 51% of its net asset value in equities and similar securities eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying), such as preference shares, convertible preference shares, equity warrants, depositary receipts (e.g., American depositary receipts, global depositary receipts), REIT equities, REIT units, equity linked notes, warrants to subscribe for equities. Equities also include index certificates, equity certificates, other comparable certificates and equity baskets as well as assets whose risk profile correlates with the relevant equity or with the investment markets to which these assets can be allocated.

The Sub-Fund is not bound by any sector or country restrictions although the exposure to emerging markets (if any) will be limited to 40%. The Sub-Fund will invest no more than 15% in Hong Kong listed shares.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the reference currency (EUR).

The Sub-Fund will invest no more than 10% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will benefit to the Sub-Fund.

The Sub-Fund may in accordance with the investment policy use financial instruments and derivatives for investment and hedging purposes, in particular the global risk of an unfavourable evolution of the market(s), the currency exchange rate risk, if any, and other risks associated with the above market(s). It may also use derivative instruments – listed futures, currency forwards, options, for investment purposes with the objective, among else, of an efficient management of cash flows, substitution for direct investments and better coverage of markets. To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors or currencies from time to time. All the underlying indices and single issues will always comply with all the diversification and eligibility criteria set out in the 2010 Law and related regulations, in particular the articles from 2) to 9) of the Grand Ducal Regulation of February 8, 2008 and CSSF Circular 14/592. The use of financial derivative instruments as well as the use of other techniques and instruments is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions. For liquidity management purposes, the Sub-Fund may invest, in addition to the liquid assets referred to above, in money market funds.

A minimum of 90% of the Sub-Fund's securities and instruments will be used to meet the promoted environmental or social characteristics. Furthermore, the Sub-Fund commits to have a minimum of 50% of Sustainable Investments according to article 2(17) SFDR which are part of the 90% mentioned above.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### **4. Sustainability approach:**

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR.

The Sub-Fund takes sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption, anti-bribery matters, and any other governance matters) into account and selects securities as evaluated by the Sub-Fund's Investment Manager based on exclusions, negative and positive screening, described as follows:

- Minimum rating coverage: at least 90% of the Sub-Fund's portfolio is required to have an SRI Rating (portfolio in this respect does not comprise non-rated derivatives and instruments that are non-rated by nature e.g., cash and deposits). While most holdings of the Sub-Fund will have a corresponding SRI Rating, some investments cannot be rated according to the SRI Research methodology. Examples of instruments not attaining to the SRI Rating include, but are not limited to cash, deposits, target funds, and non-rated investments.
- 90% of the rated instruments are adhering to the minimum rating threshold of 2 (out of a rating scale from 0 – 4; 0 being the worst rating and 4 the best rating).
- Minimum Sustainable Investment share of more than 50% of Sub-Fund's assets.
- For at least 80% of the holdings in the Sub-Fund, each investee company shall have a share of minimum 20% of Sustainable Investments, for the remaining 20% of the holdings in the Sub-Fund each investee company shall have a share of minimum 5% of Sustainable Investments. Cash and derivatives are excluded from these thresholds.
- For at least 70% of the holdings in the Sub-Fund, each investee company shall have a GHG intensity within the best 50% GHG intensity of the respective peer group. Cash and derivatives are excluded from these thresholds.
- Application of the below sustainable minimum exclusion criteria and Sub-Fund specific exclusion criteria.

The following sustainable minimum exclusion criteria for direct investments apply:

- securities issued by companies having a severe violation / breach of principles and guidelines such as the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles for Business and Human Rights on the grounds of problematic practices around human rights, labour rights, environment, and corruption issues,
- securities issued by companies involved in controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, biological weapons, depleted uranium, white phosphorus, and nuclear weapons),
- securities issued by companies that derive more than 10% of their revenues from weapons, military equipment, and services,
- securities issued by companies that derive more than 10% of their revenue from thermal coal extraction,
- securities issued by utility companies that generate more than 10% of their revenues from coal,
- securities issued by companies involved in the production of tobacco, and securities issued by companies involved in the distribution of tobacco with more than 5% of their revenues.
- securities issued by countries that are not compliant with FATF Recommendations (Black and Grey list) or those which are not signatories of Paris 2015 Agreement on climate change.

The following Sub-Fund specific exclusion criteria for direct investments apply:

- Sub-Fund's assets may not be invested in equities and similar securities (as described above) of issuers which are involved in the production of hydraulic fracturing and/or which provide services in relation to hydraulic fracturing of more than 0% of their revenues

- Sub-Fund's assets may not be invested in Equities of issuers which are involved in the production of alcohol (limited to spirits) of more than 10% of their revenues
- Sub-Fund's assets may not be invested in Equities of issuers which are involved in the production of agricultural genetically modified organisms -GMOs- of more than 5% of their revenues
- Sub-Fund's assets may not be invested in Equities of issuers which are involved in the production of nuclear power and/or which provide services in relation to nuclear power of more than 10% of their revenues
- Sub-Fund's assets may not be invested in Equities of issuers which are involved in the production of arctic drilling
- Sub-Fund's assets may not be invested in Equities of issuers which are involved in the production of gambling and/or which are involved in the distribution/sales of gambling and/or which provide services in relation to gambling of more than 5% of their revenues
- Sub-Fund's assets may not be invested in Equities of issuers which are involved in the production and/or exploration of oil sands of more than 0% of their revenues
- Sub-Fund's assets may not be invested in Equities of issuers which are involved in the production of military equipment and services and/or which are involved in the distribution/sales of military equipment and services and/or which provide services in relation to military equipment and services of more than 5% of their revenues
- Sub-Fund's assets may not be invested in Equities of issuers which are involved in the production of pornography of more than 1% of their revenues and/or which are involved in the distribution/sales of pornography of more than 1% of their revenues

Direct investments in sovereign issuers with an insufficient freedom house index score are excluded.

The sustainable minimum exclusion criteria are based on information from an external data provider and coded in pre- and post-trade compliance. The review is performed at least half-yearly.

## 5. Use of Securities Financing Transactions:

The Sub-Fund will not enter into securities lending transactions, Total Return Swap transactions and repurchase transactions.

## 6. Investment Manager and Investment Sub-Managers:

Allianz Global Investors GmbH will act as the Investment Manager.

Contact details:

**Allianz Global Investors GmbH**

Bockenheimer Landstrasse 42 – 44  
60323 Frankfurt/Main - Germany

## 7. Benchmark used:

The Sub-Fund does not use any index under the Benchmark Regulation.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept an increased volatility of the Sub-Fund and potentially high capital losses in order to achieve above-average potential investment performances. The Sub-Fund is intended for investors with a medium to long-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes.

The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a growth-oriented investment strategy. In order to take advantage of opportunities for higher investment returns, a higher risk exposure is unavoidable. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, Germany and the United States, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 11.00 am (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

# 11a. onemarkets Allianz Global Equity Future Champions Fund - 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:**

onemarkets Allianz Global Equity Future Champions Fund

**Legal entity identifier:**

529900710IQMOCCH4Y24

## Environmental and/or social characteristics

**Does this financial product have a sustainable investment objective?**

**Yes**

**No**

It will make a minimum of **sustainable investments with an environmental objective**: \_\_\_\_ %

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of **sustainable investments with a social objective**: \_\_\_\_\_ %

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 **50.00 %** of sustainable investments.

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**

**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 **environmentally 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.





### Sustainability indicators

measure how the sustainable objectives of this financial product are attained.

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

onemarkets Allianz Global Equity Future Champions Fund (the "Sub-Fund") invests in companies deemed as Future Champions by the Investment Manager within the global equity universe. Future Champions are identified by exhibiting superior sustainability features alongside environmental, social, human rights, governance, and business behaviour factors. This encompasses the evaluation of issuers based on an SRI Rating which is used to construct the portfolio. In addition, Future Champions are companies providing products and solutions which contribute to the achievement of positive environmental and/or social outcomes. Finally, Future Champions are companies having lower Greenhouse Gas (GHG) intensity in their respective peer group. The Sub-Fund will invest more than 50% into Sustainable Investments determined according to article 2(17) SFDR by applying the revenue-weighted methodology. In addition, sustainable minimum exclusion criteria apply.

No reference benchmark has been designated for the purpose of meeting the sustainable investment objective.

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

To measure the attainment of the environmental and/or social characteristics the following sustainability indicators are used and reported on, at the fiscal year end:

- The actual percentage of the Sub-Fund's Portfolio (Portfolio in this respect does not comprise non-rated derivatives and instruments that are non-rated by nature (e. g., cash and deposits)) assets invested in best-in-class issuers (issuers with a minimum SRI Rating of 2 out of a scale from 0-4; 0 being the worst rating and 4 the best rating)
- The actual Sustainable Investment share
- Confirmation that Principal Adverse Impacts (PAIs) of investment decisions on sustainability factors are considered through the application of exclusion criteria
- Confirmation that the Sub-Fund adhered to the GHG-intensity related Binding Element

### ● **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?**

Sustainable investments contribute to environmental and/or social objectives, for which the Investment Managers uses as reference frameworks, among others, the UN Sustainable Development Goals (SDGs), as well as the objectives of the EU Taxonomy:

1. Climate Change Mitigation
2. Climate Change Adaptation
3. Sustainable Use and Protection of Water and Marine Resources
4. Transition to a Circular Economy
5. Pollution Prevention and Control
6. Protection and Restoration of Biodiversity and Ecosystems

The assessment of the positive contribution to the environmental or social objectives is based on a proprietary framework which combines quantitative elements with qualitative inputs from internal research. The methodology applies first a quantitative break down of an investee company into its business activities. The qualitative element of the framework is an assessment if business activities contribute positively to an environmental or a social objective. To calculate the positive contribution on the Sub-Fund level the revenue share of each issuer attributable to business activities contributing to environmental and/or social objectives is considered provided the issuer is satisfying the Do No Significant Harm (“DNSH”) and Good Governance principles, and an asset-weighted aggregation is performed as a second step. Moreover, for certain types of securities, which finance specific projects contributing to environmental or social objectives the overall investment is considered to contribute to environmental and/or social objectives, but also for these a DNSH as well as a Good Governance check for issuers is performed.

● ***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?***

In order to ensure that Sustainable Investments do not significantly harm any other environmental and/or social objective, the Investment Manager is leveraging the PAI indicators, whereby significance thresholds have been defined to identify significantly harmful issuers. Issuers not meeting the significance threshold can be engaged for a limited time period to remediate the adverse impact. Otherwise, if the issuer does not meet the defined significance thresholds twice subsequently or in case of a failed engagement, it does not pass the DNSH assessment. Investments in securities of issuers which do not pass the DNSH assessment are not counted as sustainable investments.

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

PAI indicators are considered either as part of the application of the exclusion criteria or through thresholds on a sectorial or absolute basis. Significance thresholds have been defined and they refer to a qualitative or quantitative criteria.

Recognizing the lack of data coverage for some of the PAI indicators equivalent data points are used to assess PAI indicators when applying the DNSH assessment, when relevant, for the following indicators for corporates: share of non-renewable energy consumption and production, activities negatively affecting biodiversity-sensitive areas, emissions to water, lack of processes and compliance mechanisms to monitor compliance with UNGC principles and OECD Guidelines for Multinational Enterprises; for sovereigns: GHG Intensity and investee countries subject to social violations. In case of securities which finance specific projects contributing to environmental or social objectives equivalent data at project level might be used to ensure that Sustainable Investments do not significantly harm any other environmental and/or social objective. The Investment Manager will strive to increase data coverage for PAI indicators with low data coverage by engaging with issuers and data providers. The Investment Manager will regularly evaluate whether the availability of data has increased sufficiently to potentially include assessment of such data in the investment process.

**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.

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

The Investment Manager's sustainable minimum exclusion list screens out companies based on their involvement in controversial practices against international norms. The core normative framework consists of the Principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights. Securities issued by companies having a severe violation of these frameworks will be restricted from investment universe.

*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?**

Yes

The Investment Manager has joined the Net Zero Asset Manager Initiative and considers PAI indicators through stewardship including engagement, both are relevant to mitigate potential adverse impact as a company.

Due to the commitment to the Net Zero Asset Manager Initiative, the Investment Manager aims to reduce greenhouse gas emissions in partnership with asset owner clients on decarbonisation goals, consistent with an ambition to reach net zero emission by 2050 or sooner across all assets under management. As part of this objective the Investment Manager will set an interim target for the proportion of assets to be managed in line with the attainment of net zero emissions by 2050 or sooner.

The Sub-Fund's Investment Manager considers PAI indicators regarding greenhouse gas emission, biodiversity, water, waste as well as social and employee matters for corporate issuers, and, where relevant, the freedom house index is applied to investments in sovereigns. PAI indicators are considered within the Investment Manager's investment process through the means of exclusions as described in the "environmental and/or social characteristics" section of the Sub-Fund.

The data coverage for the data required for the PAI indicators is heterogenous. The data coverage related to biodiversity, water and waste is low and the related PAI indicators are considered through exclusion of securities issued by companies having a severe violation / breach of principles and guidelines such as the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles for Business and Human Rights on the grounds of problematic

practices around human rights, labour rights, environment, and corruption issues. Therefore, the Investment Manager will strive to increase data coverage for PAI indicators with low data coverage. The Investment Manager will regularly evaluate whether the availability of data has increased sufficiently to potentially include assessment of such data in the investment process.

Additionally, PAI indicators are considered as part of the requirement of the Sub-Fund to invest more than 50% into Sustainable Investments. PAI indicators are used as part of the DNSH assessment. Investments in securities of issuers who do not pass the DNSH assessment are not counted as sustainable investments.

The following PAI indicators are considered:

#### GHG Emissions

- Carbon footprint
- GHG Intensity of investee companies
- Exposure to companies active in the fossil fuel sector
- Share of non-renewable energy consumption and production
- Energy consumption intensity per high impact climate sector
- Activities negatively affecting biodiversity-sensitive areas
- Emissions to water
- Hazardous waste ratio
- Violation of UN Global compact principles
- Lack of processes and compliance mechanisms to monitor compliance with UN

#### Global Compact principles

- Unadjusted gender pay gap
- Board gender diversity
- Exposure to controversial weapons

Applicable to sovereign and supranational issuers

- GHG Intensity
- Investee countries subject to social violations

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 Sub-Fund's investment objective is to invest in global Equity Markets with focus on Future Champions as determined by the Investment Manager. As part of the approach, the Sub-Fund takes environmental, social, human rights, governance, and business behaviour factors into account as follows:

- The aforesaid sustainability factors are analysed through SRI Research by the Investment Manager in order to assess how sustainable development and long-term issues are taken into account in the strategy of an issuer. SRI Research means the overall process of identifying potential risks as well as potential opportunities of an investment in securities of an issuer related to the analysis of sustainability factors. SRI Research data combines external research data (which might have some limitations) with internal analyses.

- Based on a combination of the results of the external and/or internal analyses of the sustainability factors, an internal rating is derived monthly (SRI Rating) and is afterwards assigned to a corporate or sovereign issuer.

This internal SRI Rating is used to rank and select or weight securities for the portfolio construction.

In addition, as part of the approach, the Sub-Fund takes the GHG Intensity (in tCO<sub>2</sub>e per Millions of sales) into account as follows:

This GHG intensity of a company is used to rank and select or weight securities for the portfolio construction.

● ***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?***

The binding elements are:

- Minimum rating coverage: At least 90% of the Sub-Fund's portfolio is required to have an SRI Rating (portfolio in this respect does not comprise non-rated derivatives and instruments that are non-rated by nature e.g., cash and deposits). While most holdings of the Sub-Fund will have a corresponding SRI Rating some investments cannot be rated according to the SRI Research methodology. Examples of instruments not attaining to the SRI Rating include, but are not limited to cash, deposits, Target Funds, and non-rated investments.

- 90% of the rated instruments are adhering to the minimum rating threshold of 2 (out of a rating scale from 0 – 4; 0 being the worst rating and 4 the best rating)

- Minimum Sustainable Investment share of more than 50% of Sub-Fund's assets

- For at least 80% of the holdings in the Sub-Fund, each investee company shall have a share of a minimum of 20% Sustainable Investment, for the remaining 20% of the holdings in the Sub-Fund each investee company shall have a share of a minimum of at least 5% Sustainable Investment. Cash and derivatives are excluded from these thresholds.

- For at least 70% of the holdings in the Sub-Fund, each investee company shall have a GHG intensity within the best 50% GHG intensity of the respective peer group. Cash and derivatives are excluded from these thresholds.

- Application of the below sustainable minimum exclusion criteria and Sub-Fund specific exclusion criteria.

The following sustainable minimum exclusion criteria for direct investments apply:

- securities issued by companies having a severe violation / breach of principles and guidelines such as the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles for Business and Human Rights on the grounds of problematic practices around human rights, labour rights, environment, and corruption issues,

- securities issued by companies involved in controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, biological weapons, depleted uranium, white phosphorus, and nuclear weapons),
- securities issued by companies that derive more than 10% of their revenues from weapons, military equipment, and services,
- securities issued by companies that derive more than 10% of their revenue from thermal coal extraction,
- securities issued by utility companies that generate more than 10% of their revenues from coal,
- securities issued by companies involved in the production of tobacco, and securities issued by companies involved in the distribution of tobacco with more than 5% of their revenues.

The following Sub-Fund specific exclusion criteria for direct investments apply:

- Sub-fund assets may not be invested in Equities of issuers which are involved in the production of hydraulic fracturing and/or which provide services in relation to hydraulic fracturing of more than 0% of their revenues
- Sub-fund assets may not be invested in Equities of issuers which are involved in the production of alcohol (limited to spirits) of more than 10% of their revenues
- Sub-fund assets may not be invested in Equities of issuers which are involved in the production of agricultural genetically modified organisms -GMOs- of more than 5% of their revenues
- Sub-fund assets may not be invested in Equities of issuers which are involved in the production of nuclear power and/or which provide services in relation to nuclear power of more than 10% of their revenues
- Sub-fund assets may not be invested in Equities of issuers which are involved in the production of arctic drilling
- Sub-Fund assets may not be invested in Equities of issuers which are involved in the production of gambling and/or which are involved in the distribution/sales of gambling and/or which provide services in relation to gambling of more than 5% of their revenues
- Sub-Fund assets may not be invested in Equities of issuers which are involved in the production and/or exploration of oil sands of more than 0% of their revenues
- Sub-Fund assets may not be invested in Equities of issuers which are involved in the production of military equipment and services and/or which are involved in the distribution/sales of military equipment and services and/or which provide services in relation to military equipment and services of more than 5% of their revenues
- Sub-Fund assets may not be invested in Equities of issuers which are involved in the production of pornography of more than 1% of their revenues and/or which are involved in the distribution/sales of pornography of more than 1% of their revenues

Direct investments in sovereign issuers with an insufficient freedom house index score are excluded.

The sustainable minimum exclusion criteria are based on information from an external data provider and coded in pre- and post-trade compliance. The review is performed at least half yearly.

● ***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 does not commit to reduce the scope of the investments by a certain minimum rate.

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

Good governance principles are considered by screening out companies based on their involvement in controversies around international norms corresponding to the four good governance practices: sound management structures, employee relations, remuneration of staff and tax compliance. Companies having a severe violation in either of those areas will not be investible. For certain cases, flagged issuers shall be on a watch list. These companies will appear on this watch list when the Investment Manager believes that engagement may lead to improvements or when the company is assessed to take remedial actions. Companies on the watch list remain investible unless the Investment Manager believes that our engagement or the remedial actions of the company does not lead to the desired remedy of the severe controversy.

In addition, the Sub-Fund's Investment Manager is committed to actively encourage open dialogues with investee companies on corporate governance, proxy voting and broader sustainability issues in advance of shareholder meetings. The Sub-Fund's Investment Manager's approach to proxy voting and company engagement is set out in the Investment Manager's Stewardship Statement.



**What is the asset allocation planned for this financial product?**

Min. 90% of the Sub-Funds' assets (excluding cash and non-rated derivatives) are used to meet the environmental or social characteristics promoted by this Sub-Fund. A low portion of the Sub-Fund might contain assets which do not promote environmental or social characteristics. Examples of such instruments are derivatives, cash and deposits and investment with temporarily divergent or absent environmental, social, or good governance qualifications. Min. 50% of the Sub-Funds' assets will be invested in Sustainable Investments. The minimum percentage of investments that are aligned with the EU Taxonomy is 0%.

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

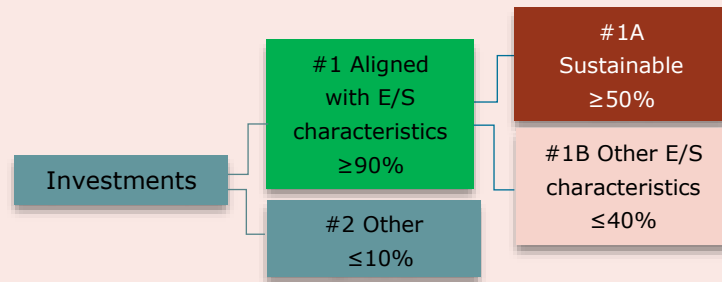
**Asset allocation** describes the share of investments in specific assets.

**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.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

-The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

-The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

Not applicable



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

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>15</sup>?**

Yes:

In fossil gas     In nuclear energy

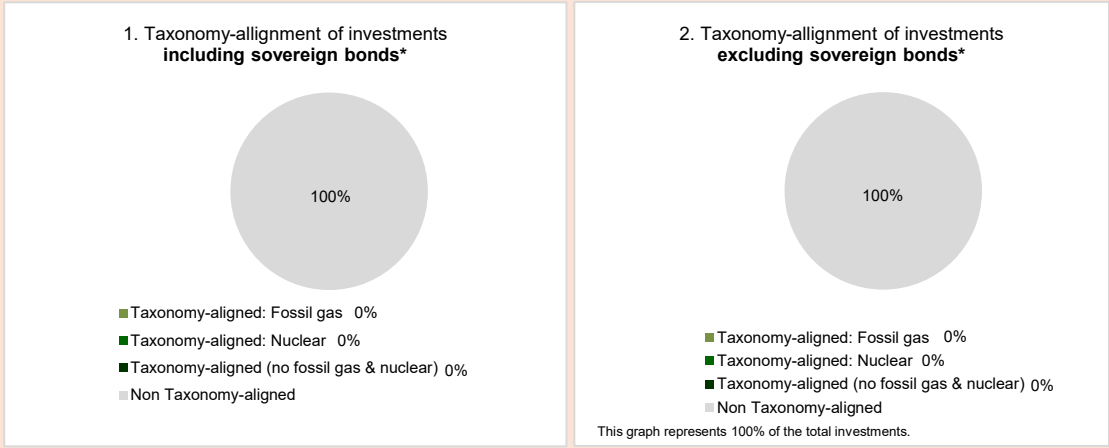
No



**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.

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

<sup>15</sup> 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.



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

Taxonomy-aligned investments are considered a sub-category of Sustainable Investments. If an investment is not Taxonomy-aligned since the activity is not yet covered under the EU Taxonomy or the positive contribution is not substantial enough to comply with the Taxonomy technical screening criteria, the investment can still be considered an environmentally Sustainable Investment provided it complies with all criteria. The Investment Manager does not commit to a minimum share of environmentally Sustainable Investments that are not aligned with the EU Taxonomy.



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



### **What is the minimum share of socially sustainable investments?**

The Investment Manager defines Sustainable Investments based on internal research, which uses, among others, the UN Sustainable Development Goals (SDGs), as well as the objectives of the EU Taxonomy as reference frameworks. The Investment Manager does not commit to a minimum share of socially Sustainable Investments, as the SDGs contain environmental as well as social objectives.



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

Under “#2 Other” investments into cash, Targets Funds, or derivatives can be included. Derivatives might be used for efficient portfolio management (including risk hedging) and/or investment purposes, and Target Funds to benefit from a specific strategy. For those investments no environmental or social safeguards are applied.



### **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No reference benchmark has been designated for the purpose of meeting the sustainable investment objective.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

Not applicable

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

**Reference**

**benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



Not applicable

- ***How does the designated index differ from a relevant broad market index?***

Not applicable

- ***Where can the methodology used for the calculation of the designated index be found?***

Not applicable

***Where can I find more product specific information online?***

***More product-specific information can be found on the website:***

More product-specific information can be found on the website:

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

## 12. onemarkets Allianz Conservative Multi-Asset Fund

### 1. Investment Objective:

The Sub-Fund's investment objective is to aim for long term capital growth by investing in a broad range of asset classes, with a focus on global equity, bond and money markets in order to achieve over the medium-term a performance comparable to a balanced portfolio within a volatility range of 3% to 7% in accordance with the Sustainable and Responsible Investment Strategy ("SRI Strategy"). The assessment of the volatility of the capital markets by the Investment Manager is an important factor in this process, with the aim of typically not falling below or exceeding a volatility of the share price within a range of 3% to 7% on a medium to long-term average, similar to a portfolio consisting of 15% global equity markets and 85% European bond markets.

### 2. Investment Strategy:

The Sub-Fund's investment strategy combines active asset allocation with innovative risk management and aims to deliver a superior return compared to a static asset allocation over a market cycle, while mitigating downside risks in times of market stress.

To benefit from diversification effects, the Sub-Fund invests in a broad range of asset classes with a specific focus on global equities and European bonds, which apply SRI criteria (as further described below). The Investment Manager strives to further enhance returns through investments in other opportunistic asset class segments, i.e., satellite investments such as closed-ended REITs, inflation linked bonds or listed private equity as well as emerging markets equities and bonds, high yield bonds or other alternative asset classes, e.g. long volatility strategy.

### 3. Investment Policy:

The Sub-Fund will invest:

- up to 100% of its net assets in debt securities, which carry an average rating of at least BBB- (Standard & Poors);
- up to 30% of its net assets in equities and comparable securities (e.g., equity certificates eligible under the 2010 Law, equity funds);
- up to 25% of its net assets in emerging markets (including China and Hong Kong);
- up to 15% of its net assets in high-yield investments, which carry a rating between BB+ and CCC- (Standard & Poors) (if two different ratings exist, the lower rating determines whether a debt security is included in the limits set out before; in case of three or more different ratings, the lower of the two best ratings shall be used);
- up to 10% of its net assets in shares or units of other UCITS or other UCIs (in case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund);
- up to 20% of its net assets in commodities through investments in ETFs and ETCs that are eligible under the 2010 Law;
- up to 10% of its net assets in contingent convertible bonds ("CoCos");

with a view to achieving a duration on NAV level comprised between minus 2 and 10 years (negative duration will be achieved, as the case may, be by selling more futures than physical bonds held in by the Sub-Fund).

The Sub-Fund will implement its SRI Strategy as follows:

- a minimum of 70% of the Sub-Fund's portfolio shall be evaluated by an SRI Rating (non-rated derivatives and instruments that are non-rated by nature (e.g., cash and deposits) are not considered);
- derivatives on both, SRI indices or non-SRI indices, which are used for hedging purposes are not included in the calculation to determine the compliance with the SRI Strategy.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the reference currency (EUR). The Sub-Fund may use strategies to hedge currency risks in relation to currencies different from EUR.

The Sub-Fund may in accordance with the investment policy use financial instruments and derivatives for investment and hedging purposes, in particular the global risk of an unfavourable evolution of the market(s), the currency exchange rate risk, if any, and other risks associated with the above market(s). It may also use derivative instruments – listed futures, currency forwards, options, Total Return Swaps, CFDs, interest rate swaps and credit default swaps – for investment purposes with the objective, among else, of an efficient management of cash flows, substitution for direct investments and better coverage of markets. To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors or currencies from time to time. All the underlying indices and single issues will always comply with all the diversification and eligibility criteria set out in the 2010 Law and related regulations, in particular the articles from 2) to 9) of the Grand Ducal Regulation of February 8, 2008 and CSSF Circular 14/592. The use of financial derivative instruments as well as the use of other techniques and instruments is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions. For liquidity management purposes, the Sub-Fund may invest, in addition to the liquid assets referred to above, in Money Market Instruments or short term fixed income funds.

A minimum of 70% of the Sub-Fund's securities and instruments will be used to meet the promoted environmental or social characteristics. Furthermore, the Sub-Fund commits to have a minimum of 1% of Sustainable Investments according to article 2(17) SFDR which are part of the 70% mentioned above.

**It cannot be assured that, the investment policy will achieve the investment objective.**

## 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR.

The Sub-Fund is managed according to the Sustainable and Responsible Investment Strategy ("SRI Strategy") which takes sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption, anti-bribery matters, and any other governance matters) into account. The SRI Strategy's responsible portion aspect includes engagement and proxy voting. The SRI Strategy's sustainable portion aspect includes the following aspects:

- Environmental characteristics assess securities based on the issuer's environmental management.
- Social characteristics assess securities based on the issuer's social responsibility.
- Human rights characteristics assess securities based on the issuer's respect of human rights in its business conduct.
- Governance characteristics assess securities based on the issuer's system of rules, practices, and processes by which it is directed and controlled.
- Business behaviour assess securities based on the issuer's trade relationships and their product safety (this Domain does not apply for securities issued by a Sovereign issuer).

The aforesaid Environment, Social, Human Rights, Governance, and Business behaviour domains are analysed by the Sub-Fund's Investment Manager in order to assess how sustainable development and long-term issues are taken into account in the strategy of an issuer.

Furthermore, the aforementioned domains (including any sub-categories) are set by the Sub-Fund's Investment Manager in a certain relationship to each other and define the Sub-Fund's investment universe which may be used within the framework of the implementation of the SRI Strategy. The SRI Strategy is also based on SRI Ratings to apply negative or positive screens on the Sub-Fund's investment universe. Based on a combination of the results of the external and/or internal analyses of the sustainability factors, an internal rating is derived monthly (the "SRI Rating") and is afterwards assigned to a corporate or sovereign issuer. SRI Rating is to be understood as an internal rating assessment which is based on SRI Research. Each SRI Rating is therefore based upon the analysis of criteria considering the domains human rights, social, environmental, business behaviour and governance. SRI Ratings may be used to apply negative or positive screens on the Sub-Fund's investment universe in accordance with the investment objective of the Sub-Fund.

The majority of the Sub-Fund's assets shall be evaluated by an SRI Rating. The proportion of assets which do not have an SRI Rating is expected to be low. Examples of instruments not attaining to the SRI Rating are cash and deposits, some target funds, and investments with temporarily divergent or absent environmental, social, or good governance qualifications.

In addition, the SRI Strategy applies minimum exclusion criteria for:

- severe violations of United Nations Global Compact Violators (Divestment of issuers that are unwilling to change after engagement);
- securities issued by companies involved in controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, biological weapons, depleted uranium, white phosphorus, and nuclear weapons), and securities issued by companies that derive more than 10% of their revenues from weapons, military equipment, and services;
- securities issued by companies that derive more than 10% of their revenue from thermal coal extraction and securities issued by utility companies that generate more than 10% of their revenues from coal;

- in securities of issuers which are involved in the production of hydraulic fracturing and/or which provide services in relation to hydraulic fracturing of more than 0% of their revenues;
- in securities of issuers which are involved in the production and/or exploration of oil sands of more than 0% of their revenues;
- in securities of issuers which are involved in the production of nuclear power and/or which provide services in relation to nuclear power of more than 15% of their revenues;
- in securities of issuers which are involved in the production of gambling and/or which are involved in the distribution/sales of gambling and/or which provide services in relation to gambling of more than 15% of their revenues;
- in securities of issuers which are involved in the production of pornography of more than 15% of their revenues and/or which are involved in the distribution/sales of pornography of more than 15% of their revenues;
- Bonds issued by Countries that are not compliant with FATF Recommendations (Black and Grey list) or those which are not signatories of Paris 2015 Agreement on climate change are excluded; and,
- securities issued by companies involved in the production of tobacco, and securities issued by companies involved in the distribution of tobacco more than 5% of their revenues.

Direct investments in sovereign issuers with an insufficient freedom house index score are excluded. The current exclusion criteria (including additional details) may be updated from time to time and can be consulted on the website <https://regulatory.allianzgi.com/ESG/SRI-exclusions>.

To undertake this exclusion, various external data and research providers are used.

The Sub-Fund's Investment Manager will, if possible, give preference to transactions with derivatives that serve to fulfil the advertised environmental or social characteristics of the Sub-Fund in accordance with the SRI Strategy.

## 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions under the SFTR that are used on a temporary basis and for efficient portfolio management purposes:

Securities financing transactions	Permitted	Used	Maximum amount	Estimated amount
Total Return Swaps	Yes	Yes	30%	10%

The Sub-Fund uses TRS mainly to gain long or short exposure to certain asset classes in various situations e.g., where exposure to the asset is core meeting the stated investment objectives. In addition, TRS might also be used in e.g., situations where access to specific opportunistic and/or thematic investments via securities is either not possible or not possible to a sufficient extent and therefore TRS are used for gaining more efficient exposure.

When used for efficient portfolio management purposes, securities financing transactions are helping to meet any investment objective, for example to achieve exposure to assets while limiting costs, reducing risks, offer combined investments and/or facilitate the access to the market in a timely manner. For example, Total Return Swaps may be used to gain exposure and benefit from the returns on a reference asset without purchasing the asset directly.

In respect to Total Return Swap revenues, the gross income generated by the transactions is credited for 100% to the Sub-Fund and for 0% to the counterparty in these transactions. The Sub-Fund will enter into Total Return Swaps with multiple counterparties (the top 10 counterparties will be listed in the annual report of the Fund in accordance with SFTR). The proportion of the assets held by the Sub-Fund that may be subject to Total Return Swap transactions is generally expected to around 10% of the Sub-Fund's Net Asset Value. That proportion will fluctuate subject to different factors, including but limited to the defined asset allocation, valuation, liquidity, efficiency and pricing considerations. This proportion may on an opportunistic basis be increased up to a maximum of 30% of the Sub-Fund's Net Asset Value.

The Sub-Fund will not enter into securities lending transactions and repurchase transactions.

## **6. Investment Manager and Investment Sub-Managers:**

Allianz Global Investors GmbH will act as the Investment Manager.

Contact details:

**Allianz Global Investors GmbH**

Bockenheimer Landstrasse 42 – 44  
60323 Frankfurt/Main - Germany

## **7. Benchmark used:**

The Sub-Fund does not use any index under the Benchmark Regulation.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a medium volatility of the Sub-Fund and potentially capital losses in order to achieve moderate potential investment performances. The sub-fund is intended for investors with a medium-term investment horizon.



## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes.

The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a conservative investment strategy. A steady and stable investment performance is the aim in return for a moderate risk appetite. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as reduced risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## **12. Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

### 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, Germany and New York, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	<p>Not later than 6.00 pm (Central European Time) on any Dealing Day preceding a Dealing Day.</p> <p>Subscription and redemption applications received by 6.00 p.m. CET or CEST on any Dealing Day preceding a Dealing Day are settled at the Subscription or Redemption Price of the next Dealing Day.</p> <p>Subscription and redemption applications received after that time are settled at the Subscription or Redemption Price of the second Dealing Day following the Dealing Day.</p>
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 12a. onemarkets Allianz Conservative Multi-Asset Fund – 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:  
onemarkets Allianz Conservative Multi-Asset Fund

Legal entity identifier:  
529900X1AW2NOLT5PT42

### Environmental and/or social characteristics

**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 **environmentally 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.

#### Does this financial product have a sustainable investment objective?

**Yes**

**No**

It will make a minimum of **sustainable investments with an environmental objective**: \_\_\_\_ %

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of **sustainable investments with a social objective**: \_\_\_\_\_ %

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 5 % of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**



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

onemarkets Allianz Conservative Multi-Asset Fund (the "Sub-Fund") promotes environmental, social, human rights, governance, and business behaviour factors (this domain does not apply for sovereigns issued by a Sovereign Entity) through integration of a best-in-class approach into the Sub-Fund's investment process. This encompasses the evaluation of corporate or sovereign issuers based on an SRI Rating which is used to construct the portfolio.

In addition, sustainable minimum exclusion criteria apply.

No reference benchmark has been designated for the purpose of attaining the characteristics promoted by the Sub-Fund.

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

To measure the attainment of the environmental and/or social characteristics the following sustainability indicators are used and reported on, at the fiscal year end:

- The actual percentage of the Sub-Fund's Portfolio (Portfolio in this respect does not comprise non-rated derivatives and instruments that are non-rated by nature (e. g., cash and deposits)) assets invested in best-in-class issuers (issuers with a minimum SRI Rating of 1 out of a scale from 0-4; 0 being the worst rating and 4 the best rating)
- Confirmation that Principal Adverse Impacts (PAIs) of investment decisions on sustainability factors are considered through the application of exclusion criteria.

● **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?**

Sustainable investments determined according to article 2(17) SFDR by applying the revenue-weighted methodology contribute to environmental and/or social objectives, for which the Investment Manager uses as reference frameworks, among others, the UN Sustainable Development Goals (SDGs), as well as the objectives of the EU Taxonomy:

1. Climate Change Mitigation
2. Climate Change Adaptation
3. Sustainable Use and Protection of Water and Marine Resources
4. Transition to a Circular Economy
5. Pollution Prevention and Control
6. Protection and Restoration of Biodiversity and Ecosystems

The assessment of the positive contribution to the environmental or social objectives is based on a proprietary framework which combines quantitative elements with

**Sustainability indicators**

measure how the sustainable objectives of this financial product are attained.

qualitative inputs from internal research. The methodology applies first a quantitative break down of an investee company into its business activities. The qualitative element of the framework is an assessment if business activities contribute positively to an environmental or a social objective.

To calculate the positive contribution on the Sub-Fund level the revenue share of each issuer attributable to business activities contributing to environmental and/or social objectives is considered provided the issuer is satisfying the Do No Significant Harm ("DNSH") and Good Governance principles, and an asset-weighted aggregation is performed as a second step. Moreover, for certain types of securities, which finance specific projects contributing to environmental or social objectives the overall investment is considered to contribute to environmental and/or social objectives, but also for these a DNSH as well as a Good Governance check for issuers is performed.

● ***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?***

In order to ensure that Sustainable Investments do not significantly harm any other environmental and/or social objective, the Investment Manager is leveraging the PAI indicators, whereby significance thresholds have been defined to identify significantly harmful issuers. Issuers not meeting the significance threshold can be engaged for a limited time period to remediate the adverse impact. Otherwise, if the issuer does not meet the defined significance thresholds twice subsequently or in case of a failed engagement, it does not pass the DNSH assessment. Investments in securities of issuers which do not pass the DNSH assessment are not counted as sustainable investments.

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

PAI indicators are considered either as part of the application of the exclusion criteria or through thresholds on a sectorial or absolute basis. Significance thresholds have been defined and they refer to a qualitative or quantitative criteria.

Recognizing the lack of data coverage for some of the PAI indicators equivalent data points are used to assess PAI indicators when applying the DNSH assessment, when relevant, for the following indicators for corporates: share of non-renewable energy consumption and production, activities negatively affecting biodiversity-sensitive areas, emissions to water, lack of processes and compliance mechanisms to monitor compliance with UNGC principles and OECD Guidelines for Multinational Enterprises; for sovereigns: GHG Intensity and investee countries subject to social violations. In case of securities which finance specific projects contributing to environmental or social objectives equivalent data at project level might be used to ensure that Sustainable Investments do not significantly harm any other environmental and/or social objective. The Investment Manager will strive to increase data coverage for PAI indicators with low data coverage by engaging with issuers and data providers. The Investment Manager will regularly evaluate whether the availability of data has increased sufficiently to potentially include assessment of such data in the investment process.

**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.

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

The Investment Manager's sustainable minimum exclusion list screens out companies based on their involvement in controversial practices against international norms. The core normative framework consists of the Principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights. Securities issued by companies having a severe violation of these frameworks will be restricted from investment universe.

*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?**

Yes

The Investment Manager has joined the Net Zero Asset Manager Initiative and considers PAI indicators through stewardship including engagement, both are relevant to mitigate potential adverse impact as a company.

Due to the commitment to the Net Zero Asset Manager Initiative, the Investment Manager aims to reduce greenhouse gas emissions in partnership with asset owner clients on decarbonisation goals, consistent with an ambition to reach net zero emission by 2050 or sooner across all assets under management. As part of this objective the Investment Manager will set an interim target for the proportion of assets to be managed in line with the attainment of net zero emissions by 2050 or sooner.

The Sub-Fund's Investment Manager considers PAI indicators regarding greenhouse gas emission, biodiversity, water, waste as well as social and employee matters for corporate issuers, and, where relevant, the freedom house index is applied to investments in sovereigns. PAI indicators are considered within the Investment

Manager's investment process through the means of exclusions as described in the "environmental and/or social characteristics" section of the Sub-Fund.

The data coverage for the data required for the PAI indicators is heterogenous. The data coverage related to biodiversity, water and waste is low and the related PAI indicators are considered through exclusion of securities issued by companies having a severe violation / breach of principles and guidelines such as the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles for Business and Human Rights on the grounds of problematic practices around human rights, labour rights, environment, and corruption issues. Therefore, the Investment Manager will strive to increase data coverage for PAI indicators with low data coverage. The Investment Manager will regularly evaluate whether the availability of data has increased sufficiently to potentially include assessment of such data in the investment process.

Additionally, PAI indicators are, among other sustainability factors, applied to derive the SRI Rating. The SRI Rating is used for the portfolio construction.

The following PAI indicators are considered:

Applicable to corporate issuers

- GHG Emissions
- Carbon footprint
- GHG Intensity of investee companies
- Exposure to companies active in the fossil fuel sector
- Activities negatively affecting biodiversity-sensitive areas
- Emissions to water
- Hazardous waste ratio
- Violation of UN Global compact principles
- Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles
- Board gender diversity
- Exposure to controversial weapons

Applicable to sovereign and supranational issuers

- Investee countries subject to social violations

No



## What investment strategy does this financial product follow?

The Sub-Fund's investment objective is to invest in a broad range of asset classes, with a focus on global Equity, Bond and Money Markets in order to achieve over the medium-term a performance comparable to a balanced portfolio within a volatility range of 3% to 7% in accordance with the Sustainable and Responsible Investment Strategy (SRI Strategy).

The assessment of the volatility of the capital markets by the Investment Manager is an important factor in this process, with the aim of typically not falling below or exceeding a volatility of the Share price within a range of 3% to 7% on a medium to long-term average, similar to a portfolio consisting of 15% global equity markets and 85% European bond markets. As part of the SRI best-in-class approach, the Sub-Fund takes environmental, social, human rights, governance, and business behaviour factors into account as follows:

- The aforesaid sustainability factors are analysed through SRI Research by the Investment Manager in order to assess how sustainable development and long-term issues are taken into account in the strategy of an issuer. SRI Research means the overall process of identifying potential risks as well as potential opportunities of an investment in securities of an issuer related to the analysis of sustainability factors. SRI Research data combines external research data (which might have some limitations) with internal analyses.
- Based on a combination of the results of the external and/or internal analyses of the sustainability factors, an internal rating is derived monthly (SRI Rating) and is afterwards assigned to a corporate or sovereign issuer.

This internal SRI Rating is used to rank and select or weight securities for the portfolio construction.

The Sub-Fund's general investment approach (Sub-Fund's applicable General Asset Class Principles in combination with its individual investment restrictions) is described in the prospectus.

### ● **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?**

The binding elements are:

- Minimum rating coverage: At least 70% of the Sub-Fund's portfolio is required to have an SRI Rating (portfolio in this respect does not comprise non-rated derivatives and instruments that are non-rated by nature e.g., cash and deposits). While most holdings of the Sub-Fund will have a corresponding SRI Rating some investments cannot be rated according to the SRI Research methodology. Examples of instruments not attaining to the SRI Rating include, but are not limited to cash, deposits, Target Funds, and non-rated investments.

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



- 80% of the rated instruments are adhering to the minimum rating threshold of 1 (out of a rating scale from 0 – 4; 0 being the worst rating and 4 the best rating) for equities, and 100% for debt securities

Application of the following sustainable minimum exclusion criteria for direct investments:

- securities issued by companies having a severe violation / breach of principles and guidelines such as the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles for Business and Human Rights on the grounds of problematic practices around human rights, labour rights, environment, and corruption issues,
- securities issued by companies involved in controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, biological weapons, depleted uranium, white phosphorus, and nuclear weapons),
- securities issued by companies that derive more than 10% of their revenues from weapons, military equipment, and services,
- securities issued by companies that derive more than 10% of their revenue from thermal coal extraction,
- securities issued by utility companies that generate more than 10% of their revenues from coal,
- securities issued by companies involved in the production of tobacco, and securities issued by companies involved in the distribution of tobacco with more than 5% of their revenues.
- securities issued by countries that are not compliant with FATF Recommendations (Black and Grey list) or those which are not signatories of Paris 2015 Agreement on climate change

The following Sub-Fund specific exclusion criteria for direct investments apply:

- Sub-fund assets may not be invested in Equities of issuers which are involved in the production of hydraulic fracturing and/or which provide services in relation to hydraulic fracturing of more than 5% of their revenues
- Sub-fund assets may not be invested in Equities of issuers which are involved in the production of alcohol (limited to spirits) of more than 10% of their revenues
- Sub-fund assets may not be invested in Equities of issuers which are involved in the production of agricultural genetically modified organisms -GMOs- of more than 5% of their revenues
- Sub-fund assets may not be invested in Equities of issuers which are involved in the production of nuclear power and/or which provide services in relation to nuclear power of more than 10% of their revenues
- Sub-fund assets may not be invested in Equities of issuers which are involved in the production of arctic drilling
- Sub-Fund assets may not be invested in Equities of issuers which are involved in the production of gambling and/or which are involved in the distribution/sales of gambling

and/or which provide services in relation to gambling of more than 5% of their revenues

- Sub-Fund assets may not be invested in Equities of issuers which are involved in the production and/or exploration of oil sands of more than 5% of their revenues

- Sub-Fund assets may not be invested in Equities of issuers which are involved in the production of military equipment and services and/or which are involved in the distribution/sales of military equipment and services and/or which provide services in relation to military equipment and services of more than 5% of their revenues

- Sub-Fund assets may not be invested in Equities of issuers which are involved in the production of pornography of more than 15% of their revenues and/or which are involved in the distribution/sales of pornography of more than 15% of their revenues

Direct investments in sovereign issuers with an insufficient freedom house index score are excluded.

The sustainable minimum exclusion criteria are based on information from an external data provider and coded in pre- and post-trade compliance. The review is performed at least half yearly.

● ***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 does not commit to reduce the scope of the investments by a certain minimum rate.

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

Good governance principles are considered by screening out companies based on their involvement in controversies around international norms corresponding to the four good governance practices: sound management structures, employee relations, remuneration of staff and tax compliance. Companies having a severe violation in either of those areas will not be investible. For certain cases, flagged issuers shall be on a watch list. These companies will appear on this watch list when the Investment Manager believes that engagement may lead to improvements or when the company is assessed to take remedial actions. Companies on the watch list remain investible unless the Investment Manager believes that our engagement or the remedial actions of the company does not lead to the desired remedy of the severe controversy.

In addition, the Sub-Fund's Investment Manager is committed to actively encourage open dialogues with investee companies on corporate governance, proxy voting and broader sustainability issues in advance of shareholder meetings. The Sub-Fund's Investment Manager's approach to proxy voting and company engagement is set out in the Management Company's Stewardship Statement.

**What is the asset allocation planned for this financial product?**

Min. 70% of the Sub-Funds' assets (excluding cash and non-rated derivatives) are used to meet the environmental or social characteristics promoted by this Sub-Fund.

**Good governance**

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



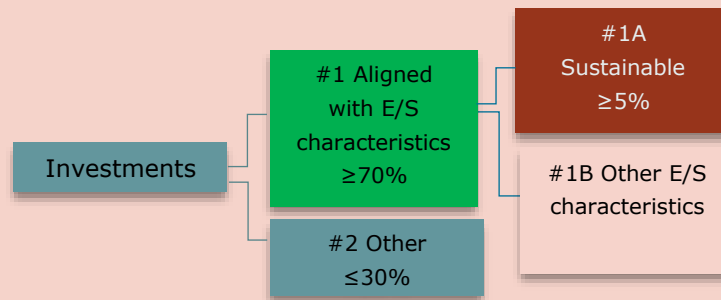
**Asset allocation**

describes the share of investments in specific assets.

A low portion of the Sub-Fund might contain assets which do not promote environmental or social characteristics. Examples of such instruments are derivatives, cash and deposits, some Target Funds and investment with temporarily divergent or absent environmental, social, or good governance qualifications. Min. 5% of the Sub-Funds' assets will be invested in Sustainable Investments. The minimum percentage of investments that are aligned with the EU Taxonomy is 0%.

**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.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

-The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

-The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

Not applicable



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

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>16</sup>?**

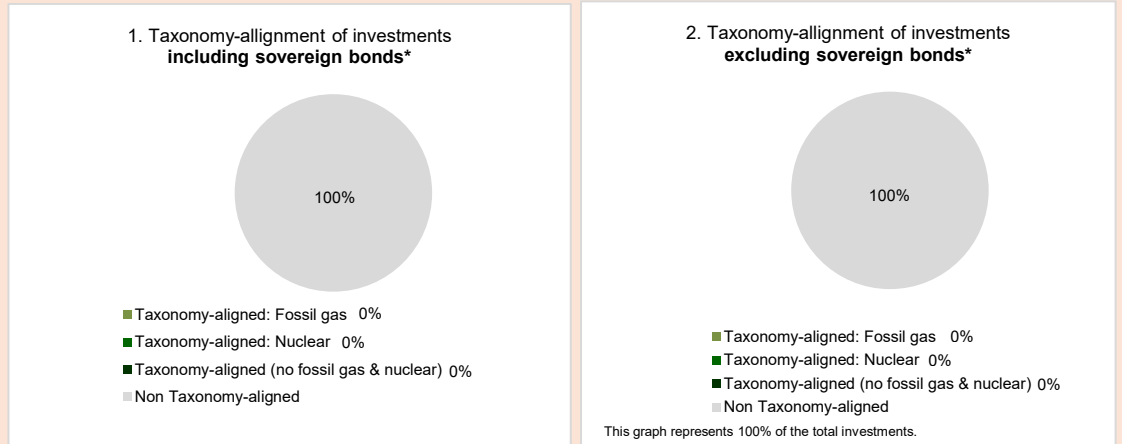
Yes:

<sup>16</sup> 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.

In fossil gas    In nuclear energy

No


*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

**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.

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

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

The Investment Manager does not commit to a split of minimum taxonomy alignment into transitional, enabling activities and own performance.



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

Taxonomy-aligned investments are considered a sub-category of Sustainable Investments. If an investment is not Taxonomy-aligned since the activity is not yet covered under the EU Taxonomy or the positive contribution is not substantial enough to comply with the Taxonomy technical screening criteria, the investment can still be considered an environmentally Sustainable Investment provided it complies with all criteria. The Investment Manager does not commit to a minimum share of environmentally Sustainable Investments that are not aligned with the EU Taxonomy.



**What is the minimum share of socially sustainable investments?**

The Investment Manager defines Sustainable Investments based on internal research, which uses, among others, the UN Sustainable Development Goals (SDGs), as well as the objectives of the EU Taxonomy as reference frameworks. The Investment Manager does not commit to a minimum share of socially Sustainable Investments, as the SDGs contain environmental as well as social objectives.



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

Under “#2 Other” investments into cash, Targets Funds, or derivatives can be included. Derivatives might be used for efficient portfolio management (including risk hedging) and/or investment purposes, and Target Funds to benefit from a specific strategy. For those investments no environmental or social safeguards are applied.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

### Reference benchmarks

are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***  
Not applicable
- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***  
Not applicable
- ***How does the designated index differ from a relevant broad market index?***  
Not applicable
- ***Where can the methodology used for the calculation of the designated index be found?***  
Not applicable



***Where can I find more product specific information online?***

**More product-specific information can be found on the website:**

More product-specific information can be found on the website:

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

## **13. onemarkets Pictet Global Opportunities Allocation Fund**

### **1. Investment Objective:**

The Sub-Fund is actively managed. The investment objective is to achieve medium term capital growth mainly through the direct investment in equities and investment grade fixed income bonds of issuers from OECD countries or indirectly through and investments in shares/units in UCITS.

### **2. Investment Strategy:**

The Sub-Fund combines a thematic approach and a quantitative equity selection approach within a multi-asset allocation strategy, unrelated to benchmark constraints. Both thematic and quantitative approaches to equity selection are based on a fundamental analysis of companies, even though they use different drivers. The combination of the two approaches is an efficient solution to ensure a more stable long-term performance. The target direct exposure to equities is at 60% most of the time. The asset allocation and the portfolio management activity will have a strategic perspective, but it will also be possible to change it in an opportunistic and tactical manner. Investment views based on market conditions can be taken either by reallocating exposure between asset classes or through the use derivatives acting as overlay to modify exposures to the different asset classes comprising the investment universe, or a mix of both.

The investment process integrates ESG factors based on proprietary and third-party research to evaluate investment risks and opportunities. The proportion of the Sub-Fund's portfolio subject to ESG analysis is at least 90% of the net assets or number of issuers. When selecting investments, the Sub-Fund adopts a best in class approach which seeks to invest in securities of issuers with low sustainability risks while avoiding those with high sustainability risks, reducing the investment universe by at least 20%. This strategy applies an additional exclusion policy relating to direct investment in companies and countries and that are deemed incompatible with Pictet Asset Management's approach to responsible investment. Please refer to our responsible investment policy <https://www.am.pictet/-/media/pam/pam-commongallery/article-content/2021/pictet-asset-management/responsible-investment-policy.pdf> for further information.

### **3. Investment Policy:**

The Sub-Fund will mainly invest in a broad range of securities from around the world, including up to 40% of its net assets into emerging markets (e.g., China H-Shares via the Shanghai-Hong Kong Stock Connect program). This may include equities (up to 80% of the net assets), government and corporate bonds and Money Market Instruments (up to 100% of the net assets).

The Sub-Fund's bond investments may be of any quality (investment grade or below) while targeting an average rating in the range of AAA to BBB-. Investments in bonds with a rating below investment grade will not exceed 25% of the Sub-Fund's net assets whilst there are no investments in unrated bonds. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals and bond evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realization of the same) in the best interest of the investors. The Sub-Fund will not invest in defaulted or distressed securities.

The Sub-Fund may in accordance with the investment policy use financial instruments and derivatives eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) for investment and hedging purposes, in particular in order to deal with the global risk of an unfavourable evolution of the market(s), the currency exchange rate risk, if any, and other risks associated with the above market(s). It may also use derivative instruments – listed futures, currency forwards, options, Total Return Swaps (TRSs), and Credit Default Swaps on indices (CDX), among others for investment purposes with the objective, among else, of an efficient management of cash flows and better coverage of markets.

To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors or currencies from time to time. All the underlying indices and single issues will always comply with all the diversification and eligibility criteria set out in the 2010 Law and related regulations, in particular the articles from 2) to 9) of the Grand Ducal Regulation of February 8, 2008 and CSSF Circular 14/592. The use of financial derivative instruments as well as the use of other techniques and instruments are subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund will invest no more than 10% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the reference currency (EUR). The Sub-Fund may use strategies to hedge currency risks in relation to currencies different from EUR.

The Sub-Fund has no exposure to contingent convertible bonds ("Cocos") and no exposure to securitizations (ABS/MBS).

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

A minimum of 90% of the Sub-Fund's securities and instruments will be used to meet the promoted environmental or social characteristics. Furthermore, the Sub-Fund commits to have a minimum of 5% of Sustainable Investments according to article 2(17) SFDR which are part of the 90% mentioned above.

**It cannot be assured that, the investment policy will achieve the investment objective.**



## 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR.

The Sub-Fund promotes environmental or social characteristics and qualifies as an equity sub-fund applying Pictet's Responsible Investment Policy (as described below).

The environmental and social characteristics of this financial product are:

- Best-in-class:  
The Sub-Fund seeks to invest in securities of issuers with low sustainability risks while avoiding those with high sustainability risks, reducing the investment universe by at least 20%.
- Norms- and values-based exclusions:  
The Sub-Fund excludes issuers that are in severe breach of international norms or have significant activities with adverse impacts on society or the environment.
- Active ownership:  
The Sub-Fund methodically exercises its voting rights. The Sub-Fund may also engage with the management of companies on material ESG issues and may discontinue investment if progress proves unsatisfactory.

Indicators the Sub-Fund uses include:

- exposure to companies that derive a significant proportion of revenue, EBIT, enterprise value or similar metrics from economic activities that contribute to environmental or social objectives;
- exposure to revenues from economic activities that contribute to environmental and/ or social objectives;
- reduction of the investment universe based on ESG factors;
- Principle Adverse Impact (PAI) indicators including exposure to issuers that are in severe breach of international norms or have significant activities with adverse E/S impacts on society or the environment;
- percentage of eligible company meetings where voting rights were exercised.

The Sub-Fund may partially invest in securities financing economic activities that substantially contribute to the environmental and/or social objectives listed below.

- Other environmental
  - o climate change mitigation or adaptation
  - o sustainable use and protection of water and marine resources
  - o transition to a circular economy
  - o pollution prevention and control, or
  - o protection and restoration of biodiversity and ecosystems
- Social
  - o inclusive and sustainable communities
  - o adequate living standards and well-being for end users, or

- o decent work

This is achieved by investing in securities financing economic activities that substantially contribute to the environmental and/or social objectives listed above.

Eligible securities include equities issued by companies with a significant proportion of activities (as measured by revenue, EBIT, enterprise value or similar metrics) derived from such economic activities.

## 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a temporary basis:

Securities financing transaction	Permitted	Used	Maximum amount	Estimated amount
Total Return Swaps	Yes	Yes	10%	0%

Total Return Swap transactions may be used to gain an efficient exposure to specific segments of the equity and fixed income markets and benefit from the returns on a reference asset without purchasing the asset directly.

In respect to Total Return Swap revenues, the gross income generated by the transactions is credited for 100% to the Sub-Fund and for 0% to the counterparty in these transactions. The Sub-Fund will enter into Total Return Swaps with multiple counterparties (the top 10 counterparties will be listed in the annual report of the Fund in accordance with SFTR). The proportion of the assets held by the Sub-Fund that may be subject to Total Return Swap transactions is generally expected to around 0% of the Sub-Fund's Net Asset Value. That proportion will fluctuate subject to different factors, including but limited to the defined asset allocation, valuation, liquidity, efficiency and pricing considerations. This proportion may on an opportunistic basis be increased up to a maximum of 10% of the Sub-Fund's Net Asset Value.

The Sub-Fund will not enter into securities lending transactions and repurchase transactions.

## 6. Investment Manager and Investment Sub-Managers:

Pictet Asset Management SA will act as the Investment Manager.

Contact details:

<p><b>Pictet Asset Management SA</b> Route des Accacias 60 1211 Geneva 73 Switzerland</p>
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## **7. Benchmark used:**

The Sub-Fund does not use any index under the Benchmark Regulation.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept an increased volatility of the Sub-Fund and potentially high capital losses in order to achieve above-average potential investment performances. The Sub-Fund is intended for investors with a medium to long-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes.

The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a growth-oriented investment strategy. In order to take advantage of opportunities for higher investment returns, a higher risk exposure is unavoidable. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## 10. Specific Risk factors:

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## 11. Sub-Fund Currency:

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, Geneva, London and New-York are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 11.00 am (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 13a. onemarkets Pictet Global Opportunities Allocation Fund

### 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:** onemarkets Pictet Global Opportunities Allocation Fund

**Legal entity identifier:** 529900HXPLSW0P5FXM28

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
●● <input type="checkbox"/> Yes	●● <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ___ %	<input checked="" type="checkbox"/> It promotes <b>Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5 % of sustainable investments
<input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy	<input type="checkbox"/> with an environmental objective 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 checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> _____ %	<input checked="" type="checkbox"/> with a social objective
	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>

**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 **environmentally 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.



### Sustainability indicators

measure how the sustainable objectives of this financial product are attained.

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

The environmental and social characteristics of this financial product are:

- Best-in-class:

The fund seeks to invest in securities of issuers with low sustainability risks while avoiding those with high sustainability risks, reducing the investment universe by at least 20%.

- Norms- and values-based exclusions:

The fund excludes issuers that are in severe breach of international norms or have significant activities with adverse impacts on society or the environment.

- Active ownership:

The fund methodically exercises its voting rights. The fund may also engage with the management of companies on material ESG issues and may discontinue investment if progress proves unsatisfactory.

The fund does not use any reference benchmark to determine whether it is aligned with the environmental and/or social characteristics that it promotes.

See also: “What investment strategy does this financial product follow?” and “Does this financial product consider principal adverse impacts on sustainability factors?”.

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

Indicators the fund uses include:

- exposure to companies that derive a significant proportion of revenue, EBIT, enterprise value or similar metrics from economic activities that contribute to environmental or social objectives
- exposure to revenues from economic activities that contribute to environmental and/ or social objectives
- reduction of the investment universe based on ESG factors
- Adverse Impact indicators including exposure to issuers that are in severe breach of international norms or have significant activities with adverse E/S impacts on society or the environment
- percentage of eligible company meetings where voting rights were exercised

- ***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?***

The fund may partially invest in securities financing economic activities that substantially contribute to the environmental and/or social objectives listed below.

- Other environmental
  - climate change mitigation or adaptation
  - sustainable use and protection of water and marine resources
  - transition to a circular economy
  - pollution prevention and control, or
  - protection and restoration of biodiversity and ecosystems
- Social
  - inclusive and sustainable communities
  - adequate living standards and well-being for end users,
 or
  - decent work

This is achieved by investing in securities financing economic activities that substantially contribute to the environmental and/or social objectives listed above.

Eligible securities include equities issued by companies with a significant proportion of activities (as measured by revenue, EBIT, enterprise value or similar metrics) derived from such economic activities.

● ***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?***

Subject to data availability, the Investment Manager applies technical screening criteria defined under the EU Taxonomy to determine the eligibility of relevant economic activities.

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

The fund considers and, where possible, mitigates adverse impacts of its investments on society and the environment through a combination of portfolio management decisions, active ownership activities, and exclusion of issuers associated with controversial conduct or activities.

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

The fund excludes issuers that are subject to severe controversies in areas such as human rights, labour standards, environmental protection and anti-corruption. OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights (incl. ILO

**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.

conventions and Bill of Human Rights) are not considered explicitly beyond these exclusions.

*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?**

Yes

Yes, the fund considers and, where possible, mitigates adverse impacts of its investments on society and the environment that are deemed material to the investment strategy through a combination of portfolio management decisions, active ownership activities, and exclusion of issuers associated with controversial conduct or activities.

Subject to data availability, the Investment Manager is committed to report at least annually on a best effort basis the adverse impacts of its investments through the mandatory principal adverse impact (PAI) indicators and metrics proposed by the Regulation.

Please refer to Pictet Asset Management's Responsible Investment policy for the list of Adverse Impact indicators.

See also detailed information on exclusions in Pictet Asset Management's Responsible Investment policy (<https://am.pictet/-/media/pam/pam-common-gallery/pictet-asset-management/responsible-investment-policy.pdf>).

No



**What investment strategy does this financial product follow?**

**Objective:**

To increase the value of your investment.

**Reference index:**



N/A

**Portfolio assets:**

The fund mainly invests in equities of companies that appear to have above-average management and financials. The fund invests worldwide.

**Derivatives and structured products:**

The fund may use derivatives to reduce various risks (hedging) and for efficient portfolio management, and may use structured products to gain exposure to portfolio assets.

**Investment process:**

In actively managing the fund, the investment manager uses a combination of market and fundamental company analysis to select securities that it believes offer favourable growth prospects at a reasonable price. The investment manager considers ESG factors a core element of its strategy by adopting a best in class approach which seeks to invest in securities of issuers with low sustainability risks while avoiding those with high sustainability risks, subject to good governance practices. Activities that adversely affect society or the environment are also avoided. Voting rights are methodically exercised and there may be engagement with companies to positively influence ESG practices. For further information, please refer to the Investment Manager's exclusion framework in the Responsible Investment policy (<https://am.pictet/-/media/pam/pam-common-gallery/pictet-asset-management/responsible-investment-policy.pdf>), SFDR product category Article 8.

Additionally, the Sub-Fund has defined exclusion criteria identifying companies and/or countries and/or underlying which should not be invested in or which should be invested in respecting predefined thresholds.

**Fund currency:**

EUR

● ***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?***

The fund's binding elements include:

- exclusion of issuers that:
  - are involved with nuclear weapons from countries that are not signatories to the Treaty on the Non-Proliferation of Nuclear Weapons (NPT) and other controversial weapons
  - derive a significant portion of their revenue from activities detrimental to society or the environment, such as thermal coal extraction and power generation, unconventional oil and gas exploration and production, conventional oil and gas production, nuclear power generation, conventional weapons and small arms, military contracting weapons and weapon-related products and

services, tobacco production, adult entertainment production, gambling operations, Pictet Asset Management's Responsible Investment policy for further details on exclusion thresholds applicable to the above activities.

- severely violate the UN Global Compact principles on human rights, labour standards, environmental protection and anti-corruption
- ESG criteria analysis of eligible securities that covers at least 90% of net assets or the number of issuers in the portfolio

To ensure ongoing compliance, the fund monitors the ESG profile of all securities and issuers that form part of the minimum percentage of E/S investments stated in "What is the asset allocation planned for this financial product?". The fund draws on information from various sources, such as proprietary fundamental analysis, ESG research providers, third-party analyses (including those from brokers), credit rating services and financial and general media. Based on this information, the investment manager may decide to add or discontinue certain securities, or increase or decrease its holdings in certain securities.

See also: "What investment strategy does this financial product follow?" and "Does this financial product consider principal adverse impacts on sustainability factors?".

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

The fund reduces its investment universe by removing at least 20% of issuers with the highest sustainability risks.

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

The fund assesses company decision-making processes and controls, as well as how management balances the interests of shareholders, employees, suppliers, customers, the community and other stakeholders.

Assessed areas may include:

- the composition of the executive team and board of directors, including the experience, diversity and distribution of roles, along with succession planning and board evaluation
- executive remuneration, including short term and long term incentives and their alignment with investor interests
- risk control and reporting, including auditor independence and tenure
- shareholder rights, including one-share-one-vote and related-party transactions

#### **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?

### Notes:

- Sustainable investments are calculated on a pass/fail basis including labelled bonds (where relevant to the asset class), and securities from issuers with a minimum exposure (measured by revenue, EBIT, enterprise value or similar metrics) to economic activities that contribute to environmental or social objectives.
- In the absence of an EU social taxonomy, Pictet has developed a proprietary social taxonomy framework. The framework is based on the Report on Social Taxonomy published by the EU Platform on Sustainable Finance in 2022. Eligible activities are defined as socially beneficial goods and services that substantially contribute to one of the following three social objectives: (1) inclusive and sustainable communities, (2) adequate living standards and well-being for end users and (3) decent work.
- EU Green taxonomy-aligned investments are calculated on a revenue-weighted basis (ie security weights are multiplied by the proportion of revenues from economic activities that contribute to relevant environmental objectives) and cannot be consolidated with other numbers following a pass/fail approach. Screening criteria are applied on a best effort basis to mitigate significant harm and uphold minimum social safeguards.
- Whilst the fund includes achieving a positive environmental or social objective, its investment policy does not target specifically investments with climate change mitigation and climate change adaptation objectives as defined by the technical screening criteria of the Taxonomy Regulation.

#### Asset allocation

describes the share of investments in specific assets.

**Taxonomy-aligned** activities are expressed as a share of:

#### - turnover

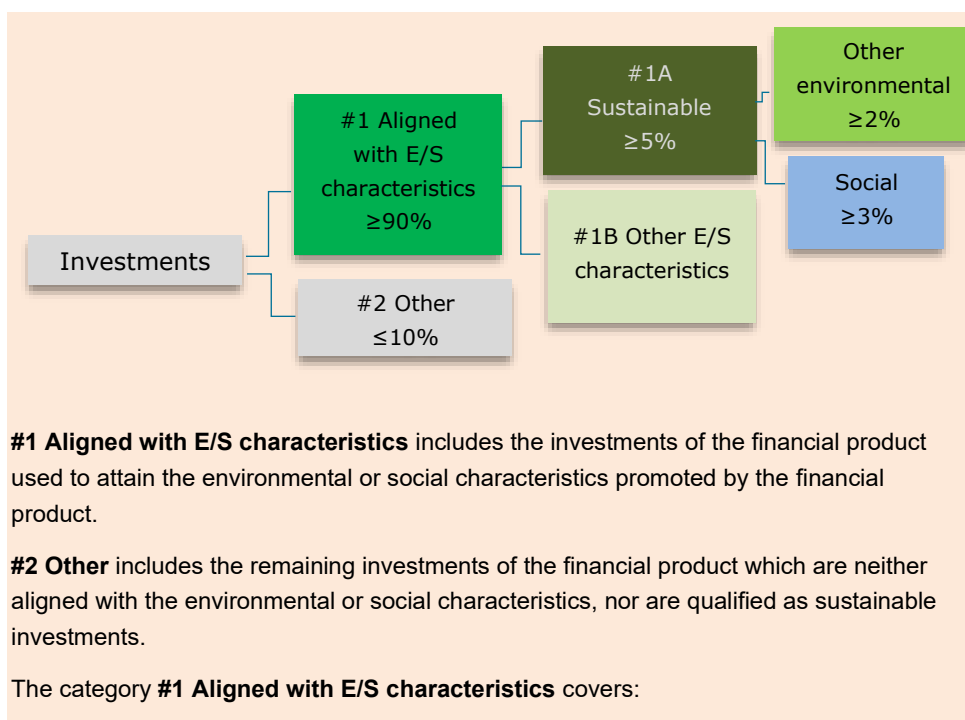
reflecting the share of revenue from green activities of investee companies

#### - 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



-The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

-The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

The fund does not use derivatives to attain the promoted environmental or social characteristics.

However, exclusions are applied to all types of securities (equities, bonds, convertible bonds) issued by excluded entities, including participation notes and derivatives issued by third parties on such securities.



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

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>17</sup>?**

Yes

In fossil gas     In nuclear energy

No

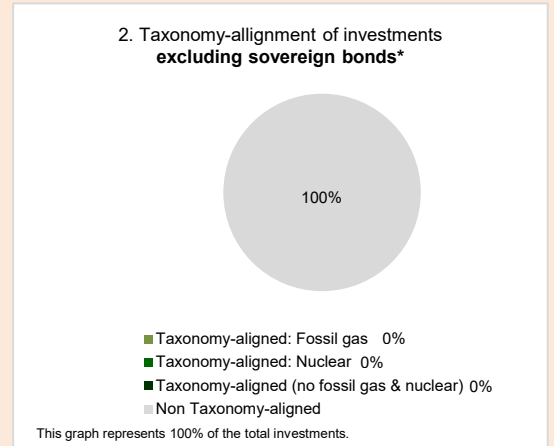
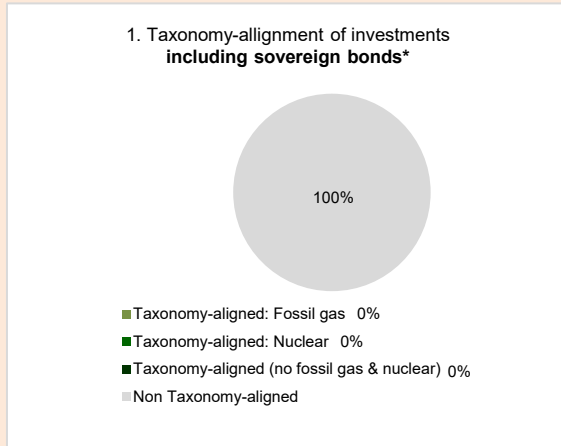
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<sup>17</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory 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.

**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.

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 paragraph 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

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

Not applicable

are environmentally sustainable investments 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?**

2%



**What is the minimum share of socially sustainable investments?**

3%



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

The fund's "other" investments include cash positions, and derivatives.

See also: "What investment strategy does this financial product follow?".



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No specific ESG index has been designated.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***  
Not applicable
- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***  
Not applicable
- ***How does the designated index differ from a relevant broad market index?***  
Not applicable
- ***Where can the methodology used for the calculation of the designated index be found?***  
Not applicable



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**  
<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

## **14. onemarkets VP Global Flexible Bond Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is to generate an attractive degree of sustainable income, together with potential long-range capital growth over a medium to long term horizon.

The Sub-Fund achieves its investment objective primarily through an asset allocation which invests in a diversified subset of fixed income securities across a broad universe of asset classes, sectors and regions. Fixed income securities consist of fixed and floating rate bonds (or a mix/hybrid capital) issued by governments, SSA issuers (supranationals, sub-sovereigns and agencies) and corporates without any limits to credit exposure and ratings, industry segmentation or currency.

### **2. Investment Strategy:**

The Sub-Fund will implement a flexible strategy, without referring to any benchmark, while adopting a defensive orientation in the sense that the Sub-Fund will mainly invest in high quality investment grade rated fixed income assets, with an overall medium-term maturity and diversified across sectors and countries. The focus is on mid to long term investments and the instrument selection and the corresponding strategic asset allocation is supported by an active risk management.

By implementing a strategic asset allocation that invests primarily in fixed income securities, the benchmark-free concept allows the Sub-Fund to follow its investment objective, engage in a broad universe both on the macro as well as on the single name investment side to identify superior risk-return opportunities, and to exploit market inefficiencies. The Sub-Fund is not bound by country/sector restrictions although the exposure to emerging countries will be limited as further specified below.

Within the diverse investment approach, the Sub-Fund actively manages a broader range of investment strategies, such as single title selection, duration control, macro strategies, cross-sector strategies, capital structure/collateralization, emerging markets, participation in DCM ("debt capital markets") activities, derivative instruments and currencies.

The Sub-Fund will target a portfolio with an average rating in the range A to BBB-, where the average portfolio rating is defined as the market-weighted sum of the respective single securities ratings (cash will be excluded). For each individual security, the highest rating from the respective published rating agency's rating will be applied.

Complementary, under certain market phases and circumstances, e.g. an expected unfavorable market evolution or for short term portfolio optimization purposes, the Sub-Fund may be exposed to asset classes and financial instruments outside of the above mentioned investment strategies, such as equities, derivative instruments, hedging strategies and/or relative value trades via long and short risk positions. This will further foster the achievement of the Sub-Fund's investment objective.

Given the flexible allocation of risks and the possibility to minimize unwanted risks, the Sub-Fund achieves an optimised diversification of risks between different asset classes.

### 3. Investment Policy:

The Sub-Fund may invest:

- up to 100% of its net assets in fixed income securities;
- up to 15% of its net assets in equities included in the MSCI All Country World Index and Stoxx Europe 600 Index; and,
- up to 100% of its net assets in Money Market Instruments and, subject to the further restrictions below, in bank deposits.

Exposure to emerging countries shall not exceed 10% of the Sub-Fund's net assets.

Investments in fixed income securities with a rating below investment grade will not exceed 20% of the Sub-Fund's net assets whilst investments in unrated fixed income securities will only represent a very limited portion of the Sub-Fund's portfolio (not exceeding 5% of the Sub-Fund's net assets). In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals, a relative value analysis and fixed income security evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio *versus* realisation of the same) in the best interest of the investors.

The Sub-Fund will invest no more than 10% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law. The Sub-Fund may not acquire more than 25% of the issued shares or units of another UCITS or other UCI. In case of investments in units of undertakings for collective investment in Transferrable Securities or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund.

The Sub-Fund will also use financial derivative instruments – such as listed futures, options, puts, calls, forward contracts, swaps (including Interest Rate Swaps and Currency swaps), as well as credit derivatives such as credit default swaps – for hedging purposes and investment purposes with the objective, among else, of an efficient management of cashflows and better coverage of markets.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the Sub-Fund's reference currency (EUR).

The Sub-Fund may use strategies to hedge currency risks within the Sub-Fund's portfolio in relation to currencies different from EUR.

The Sub-Fund's exposure to financial contingent convertible bonds ("CoCos") is limited to 15% of its net assets.

The Sub-Fund's exposure to financial sub-ordinated bonds which are not CoCos is limited to 15% of its net assets.

The Sub-Fund's exposure to non-financial perpetual bonds is limited to 15% of its net assets.

The Sub-Fund shall not invest in defaulted or distressed securities.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavorable market conditions.



For liquidity management purposes, the Sub-Fund may invest, in addition to the liquid assets referred to above, in short-term institutional money market funds or Money Market Instruments. The combined investments in short-term institutional money market funds/Money Market Instruments and liquid assets (bank deposits at sight) shall not exceed 30% of the net assets of the Sub-Fund).

**It cannot be assured that, the investment policy will achieve the investment objective.**

## 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR.

The Sub-Fund currently has a medium exposure to sustainable investments in accordance with article 2(17) of SFDR.

The Sub-Fund's investments do not take into account the criteria for environmentally sustainable economic activities, including enabling or transitional activities, within the meaning of the Taxonomy Regulation and the Sub-Fund may only hold such investments on an incidental basis. It is expected that 0% of the Sub-Fund's portfolio will be aligned to taxonomy eligible activities and sectors within the meaning of the Taxonomy Regulation.

In addition to traditional financial analysis, the active investment selection process takes into account environmental and social characteristics as well as good corporate governance practices ('ESG characteristics'). At least 70% of the Sub-Fund's assets are invested in securities of issuers that meet defined minimum standards in terms of ESG characteristics.

For this purpose, portfolio management rates potential issuers according to the ISS ESG Corporate Rating. This rating methodology analyses companies based on a variety of universal as well as industry-specific ESG characteristics on a best-in-class basis. From a total pool of more than 700 indicators, ISS ESG applies around 100 ESG indicators per rating, covering topics such as employee affairs, supply chain management, business ethics, corporate governance, environmental management or eco-efficiency. Differentiated weightings of the indicators per sector ensure that the topics that are essential for a particular business model are taken into account appropriately in each case. A so-called 'prime status' is awarded to industry leaders that meet demanding absolute performance expectations and are thus well positioned to manage critical ESG risks as well as take advantage of opportunities arising from the transformation towards sustainable development. Issuers in industries with high ESG risks, such as the oil and gas sector, must perform better to earn industry-specific Prime status than issuers in low-risk industries, such as the real estate sector.

The ESG Corporate Rating integrates a detailed evaluation of the sustainability-related impacts of business activities based on risk exposure, as well as an assessment of management approaches to material sustainability risks along the entire value chain. At the same time, it also takes into account positive and negative sustainability impacts of the product portfolio, which are included in the rating based on the proportion of sales of products and services that contribute to or hinder the achievement of global sustainability goals. In addition, the ESG Corporate Rating integrates issuer compliance with recognised international standards and guidelines as a stress test of ESG performance while identifying sustainability risks.

The ISS ESG Corporate Rating uses a twelve-point rating system ranging from A+/4.00 (excellent performance) to D-/1.00 (poor performance). From the individual ratings and the weightings of the indicators, the results are aggregated into an overall rating. "Prime" status is awarded to industry leaders who achieve the respective prime threshold. This is a threshold determined by ISS ESG in relation to the most material sustainability issues of the respective industry and therefore differs depending on the industry affiliation of the issuer.

The portfolio management will invest at least 70% of the Sub-Fund's assets in securities of issuers that are rated a maximum of one grade below the industry-specific Prime Status according to the ISS ESG Corporate Rating presented above.

Further information on the consideration of environmental as well as social characteristics, their integration into the investment process, the selection criteria and our ESG-related guidelines can be found on the management company's website [www.structuredinvest.lu](http://www.structuredinvest.lu). Further information on the ISS ESG Corporate Rating can be found at <https://www.issgovernance.com/esg/methodology-information/>.

## **5. Use of Securities Financing Transactions:**

The Sub-Fund will not enter into securities lending transactions, Total Return Swap transactions and repurchase transactions.

## **6. Investment Manager and Investment Sub-Managers:**

UniCredit International Bank (Luxembourg) S.A. will act as the Investment Manager.

Contact details:

**UniCredit International Bank (Luxembourg) S.A.**

8-10, rue Jean Monnet  
L-2180 Luxembourg

## **7. Benchmark used:**

The Sub-Fund does not use any index under the Benchmark Regulation.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a medium volatility of the Sub-Fund and potentially capital losses in order to achieve moderate potential investment performances. The Sub-Fund is intended for investors with a medium-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes. The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a conservative investment strategy. A steady and stable investment performance is the aim in return for a moderate risk appetite. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as reduced risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## **12. Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

### 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 14a. onemarkets VP Global Flexible Bond Fund – 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

**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

**The EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally 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.

**Product name:** onemarkets VP Global Flexible Bond Fund

**Legal entity identifier:**  
529900RCOUKJJ7AJU273

### Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
<p><span style="color: green;">●●</span> <input type="checkbox"/> <b>Yes</b></p>	<p><span style="color: green;">●</span> <span style="color: white;">●</span> <input checked="" type="checkbox"/> <b>No</b></p>
<p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b>: ____ %</p> <p style="margin-left: 20px;"><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b>: _____ %</p>	<p><input type="checkbox"/> It promotes <b>Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ____ % of sustainable investments</p> <p style="margin-left: 20px;"><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input type="checkbox"/> with a social objective</p> <p><input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b></p>



### Sustainability indicators

measure how the sustainable objectives of this financial product are attained.

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

The onemarkets VP Global Flexible Bond Fund promotes environmental as well as social characteristics, invests only in companies that are characterised by good corporate practices and thus fulfills the criteria of Art. 8 of the EU Disclosure Regulation (2019/2088). The environmental and/or social characteristics aim, in particular, to reduce or entirely prevent the main adverse impacts on sustainability factors. On the basis of sustainability strategies and by taking into account exclusion criteria and minimum ESG rating requirements for companies and sovereigns, it is ensured that the investment universe includes financial instruments that comply with defined environmental and/or social standards.

The Investment Manager has defined extensive exclusion criteria for the fund:

1. Companies with serious violations of the UN Global Compact principles in the areas of human rights, labor standards, environmental protection and anti-corruption
2. for companies that are active in controversial business areas and generate revenues from these activities:
  - Controversial/ banned weapons (production, service and trade) > 0 %.
  - Coal production and extraction and coal-based power generation > 10 %.
  - controversial oil extraction and production > 0 %.
  - Military equipment (production, service, trade) > 10 %.
  - Tobacco (production, service, trade) > 5 %.
3. Furthermore, sovereign issuers are excluded that
  - are classified as "not free" in terms of political and civil liberties;
  - are classified as non-cooperative according to the OECD's Financial Action Task Force (FATF) on Money Laundering;
  - have not ratified the Paris Agreement on the occasion of the United Nations Framework Convention on Climate Change of 2015.

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

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

In addition to the classic financial analysis, the active investment selection process takes into account environmental and social characteristics as well as good corporate governance practices ('ESG characteristics').

For this purpose, the portfolio management measures potential issuers according to the ISS ESG Corporate Rating. This rating methodology analyses companies based on a variety of universal as well as industry-specific ESG characteristics on a best-in-class basis. From a total pool of more than 700 indicators, ISS ESG applies around 100 ESG indicators per rating, covering topics such as employee affairs, supply chain management, business ethics, corporate governance, environmental

management or eco-efficiency. Differentiated weightings of the indicators per sector ensure that the topics that are essential for a particular business model are taken into account appropriately in each case.

Issuers in industries with high ESG risks, such as the oil and gas sector, must perform better to obtain industry-specific Prime status than issuers in low-risk industries, such as the real estate sector.

The ESG Corporate Rating integrates a detailed evaluation of the sustainability-related impacts of business activities based on risk exposure as well as an assessment of management approaches regarding material sustainability risks along the entire value chain. At the same time, negative sustainability impacts of the product portfolio are taken into account and included in the rating based on the share of sales of products and services that contribute to or hinder the achievement of global sustainability goals. In addition, the ESG Corporate Rating integrates issuers' compliance with recognised international standards and guidelines as a stress test of ESG performance, while also identifying sustainability risks.

The ISS ESG Corporate Rating uses a twelve-point rating system ranging from A+/4.00 (excellent performance) to D/1.00 (poor performance). From the individual ratings and the weightings of the indicators, the results are aggregated into an overall rating. A so-called 'Prime Status' is awarded to industry leaders that meet demanding absolute performance expectations and are thus well positioned to manage critical ESG risks as well as seize opportunities arising from the transformation towards sustainable development. This is a threshold set by ISS ESG, which is determined in relation to the most material sustainability issues of the respective industry and therefore differs depending on the industry affiliation of the issuer.

The portfolio management will invest at least 70% of the fund's assets in securities of issuers that meet the defined best-in-class requirements in terms of ESG characteristics and are classified no more than one grade below the industry-specific prime status according to the ISS ESG Corporate Rating presented in advance.

In addition to the factors of the active selection process, the Investment Manager has defined extensive exclusion criteria:

1. Companies with serious violations of the UN Global Compact principles in the areas of human rights, labor standards, environmental protection and anti-corruption
2. for companies that are active in controversial business areas and generate revenues from these activities:
  - Controversial/ banned weapons (production, service and trade) > 0 %.
  - Coal production and extraction and coal-based power generation > 10 %.
  - controversial oil extraction and production > 0 %.
  - Military equipment (production, service, trade) > 10 %.
  - Tobacco (production, service, trade) > 5 %.
3. Furthermore, sovereign issuers are excluded that

- are classified as "not free" in terms of political and civil liberties;
- are classified as non-cooperative according to the OECD's Financial Action Task Force (FATF) on Money Laundering;
- have not ratified the Paris Agreement on the occasion of the United Nations Framework Convention on Climate Change of 2015.

- **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?**

N/A

- **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?**

N/A

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

N/A

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

N/A

*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?**

Yes

The Investment Manager considers the principal adverse impacts of its investment decisions on sustainability factors. In this regard, sustainability factors include, but are not limited to, all environmental, social and labor concerns, respect for human rights and the fight against corruption and bribery. In this regard, the Investment Manager has committed to compliance with internationally recognised standards, such as the Universal Declarations of Human Rights, UN Global Compact, Principles for Responsible Banking (PRB), thus ensuring compliance with minimum environmental and social standards.

To counteract the principal adverse effects on sustainability factors, sustainability risks are taken into account in the overall economic view and development of market opinion as well as in portfolio composition. Sustainability risks are taken into account by applying minimum ESG ratings as well as defined exclusion criteria. Through a company and country rating, environmental and socially responsible companies (per sector) and issuers are identified, taking into account minimum requirements and exclusion criteria. In addition, the Investment

**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.





Manager pursues the approach of diversifying investments as broadly as possible in order to take advantage of opportunities from different economic sectors and to reduce the impact of sustainability risks, as these can have varying degrees of impact on individual sectors, regions, currencies and asset classes.

Under the EU Disclosure Regulation (EU) 2019/2088, data is collected on the environmental and social indicators set out in the regulation to measure, assess and prioritize negative impacts on sustainability factors. Compliance with the sustainability criteria is reviewed every quarter. If a financial instrument no longer meets the sustainability requirements, it is deallocated from the portfolio within three months.

The ability to systematically consider key adverse sustainability impacts depends largely on the quality of data available.

Further information on the consideration of PAI can be found in a dedicated PAI policy. This is available online (<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>).

A respective PAI policy outlining the PAI is available online:

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

Further information on principal adverse impacts will be provided in accordance with Art. 11 (2) of Regulation (EU) 2019/2088 in an annex to the Fund's annual report.

No

#### What investment strategy does this financial product follow?

The primary objective of the onemarkets VP Global Flexible Bond Fund's investment policy is to generate attractive, steady returns over a medium to long-term cycle, in addition to long-term capital appreciation, irrespective of general market conditions within the framework of a fixed income strategy with a balanced risk-reward ratio and taking into account a best-in-class approach with regard to environmental and social characteristics.

- ***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 addition to the classic financial analysis, the active investment selection process takes into account environmental and social characteristics as well as good corporate governance practices ('ESG characteristics'). For this purpose, the portfolio management measures potential issuers according to the ISS ESG Corporate Rating.

The results are aggregated from the individual scores and the weightings of the indicators into an overall score. Prime" status is awarded to industry leaders that meet the respective prime threshold. This is a threshold set by ISS ESG that is determined in relation to the most material sustainability issues of the respective industry and therefore differs depending on the industry affiliation of the issuer.

Portfolio management will invest at least 70% of the fund's assets in securities of issuers that are rated no more than one notch below industry-specific prime status according to the ISS ESG Corporate Rating outlined above.

In addition to the factors of the active selection process, the Investment Manager has defined extensive exclusion criteria:



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

1. Companies with serious violations of the UN Global Compact principles in the areas of human rights, labor standards, environmental protection and anti-corruption
2. for companies that are active in controversial business areas and generate revenues from these activities:
  - Controversial/ banned weapons (production, service and trade) > 0 %.
  - Coal production and extraction and coal-based power generation > 10 %.
  - controversial oil extraction and production > 0 %.
  - Military equipment (production, service, trade) > 10 %.
  - Tobacco (production, service, trade) > 5 %.
3. Furthermore, sovereign issuers are excluded that
  - are classified as "not free" in terms of political and civil liberties;
  - are classified as non-cooperative according to the OECD's Financial Action Task Force (FATF) on Money Laundering;
 have not ratified the Paris Agreement on the occasion of the United Nations Framework Convention on Climate Change of 2015.

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

N/A. There is no minimum committed rate for the Sub-Fund.

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

Companies that engage in controversial business practices are excluded. This includes companies that clearly violate one or more of the ten principles of the "United Nations Global Compact" without any prospect of positive change.

These consist of requirements regarding human and labor rights, environmental protection and corruption. In line with the approach, companies whose violations of the principles are rated as "severe" or "very severe" are excluded. The assessment is based on information from the data provider ISS.

The selected procedure allows, in addition to the exclusion of relevant issuers, a management of adverse impact (PAI) number 10 (violations of UN Global Compact Principles or OECD Guidelines for Multinational Enterprises) and 11 (lack of processes and compliance mechanisms to monitor compliance with UN Global Compact Principles or OECD Guidelines for Multinational Enterprises) from Table 1, Annex 1 of Delegated Regulation (EU) 2022/1288.

In addition, ISS' ESG Corporate Rating integrates issuers' compliance with recognised international standards and guidelines, as a stress test of ESG performance, while high-lighting sustainability risks, which are also considered.

An assessment of good corporate governance is not made for investments in government bonds.

**What is the asset allocation planned for this financial product?**

The Sub-Fund plans to allocate at least 70% of its assets into investments with positive environmental and / or social characteristics.



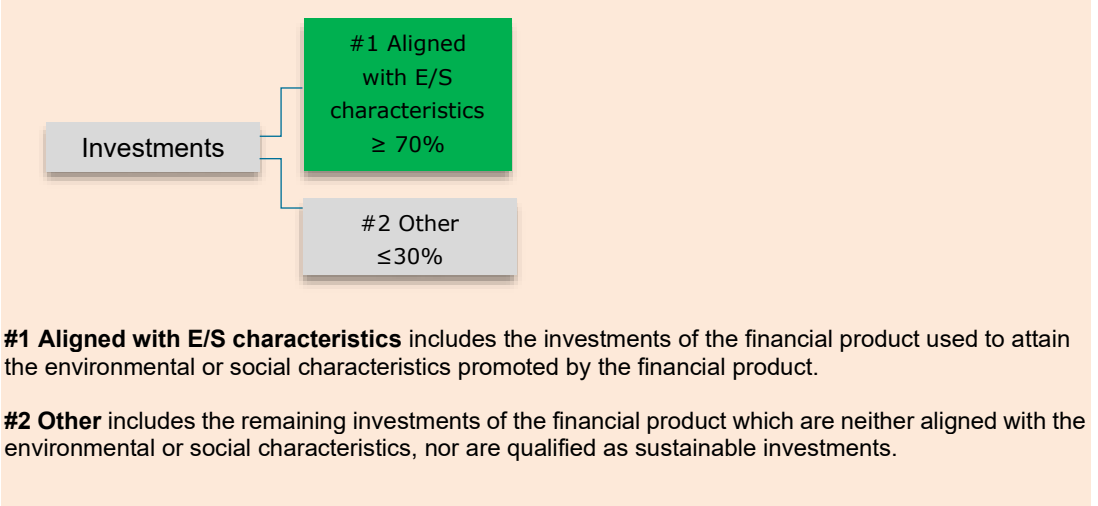
**Good governance**

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

**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.



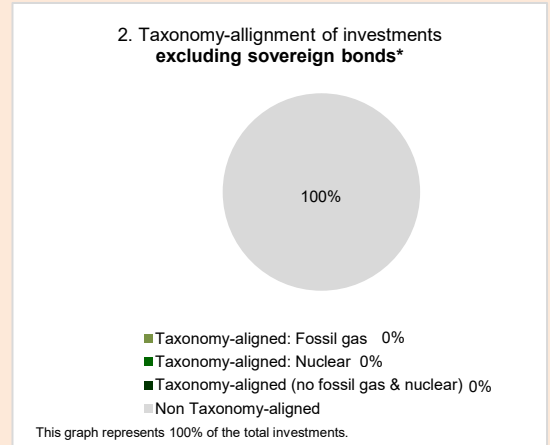
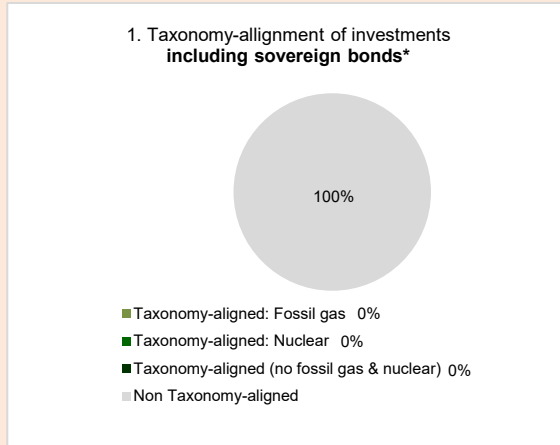
**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

	<ul style="list-style-type: none"> <li>● <b>How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?</b></li> </ul>
	<p>Derivatives are not used to attain the environmental or social characteristics promoted by the Sub-Fund.</p>
	<p><b>To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?</b></p> <ul style="list-style-type: none"> <li>● <b>Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>18</sup>?</b></li> </ul> <p><input type="checkbox"/> Yes:</p> <p style="padding-left: 40px;"><input type="checkbox"/> In fossil gas    <input type="checkbox"/> In nuclear energy</p> <p><input checked="" type="checkbox"/> No</p>

<sup>18</sup> 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.

**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 paragraph 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

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

N/A




**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.




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

N/A

are environmentally sustainable investments that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.

	<p><b>What is the minimum share of socially sustainable investments?</b></p> <p>N/A</p>
	<p><b>What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?</b></p> <p>The fund may invest in investments that are not consistent with the advertised characteristics (#2 other investments). Investments may include any of the asset classes contemplated in the specific investment policy, including, but not limited to, securities that do not have an ISS ESG rating, as well as derivatives, units in UCITS or other UCIs, bank de-posits, and others.</p> <p>The above minimum exclusions apply to direct investments in securities and government bonds.</p> <p>For all other investments, there is no minimum environmental and/or social protection.</p>
	<p><b>Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?</b></p> <p>There is no specific benchmark defined to assess the alignment with the promoted characteristics.</p>
	<ul style="list-style-type: none"> <li>● <b><i>How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?</i></b></li> </ul>
	<p>N/A</p>
	<ul style="list-style-type: none"> <li>● <b><i>How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?</i></b></li> </ul>
	<p>N/A</p>
	<ul style="list-style-type: none"> <li>● <b><i>How does the designated index differ from a relevant broad market index?</i></b></li> </ul>

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

	N/A
	<ul style="list-style-type: none"> <li>● <b>Where can the methodology used for the calculation of the designated index be found?</b></li> </ul>
	N/A
	<b>Where can I find more product specific information online?</b> <b>More product-specific information can be found on the website:</b>
	<a href="https://www.structuredinvest.lu/de/en/fund-platform/esg.html">https://www.structuredinvest.lu/de/en/fund-platform/esg.html</a>

## 15. onemarkets VP Flexible Allocation Fund

### 1. Investment Objective:

The Sub-Fund's investment objective is to achieve an adequate risk adjusted performance over the long term, taking into account the risks taken and the development of the capital markets.

### 2. Investment Strategy:

The fundamental orientation of the Sub-Fund is defensive in the sense that the Sub-Fund will invest in a mixed portfolio of investments across various asset classes as further specified below and with the lowest possible correlation while the corresponding strategic asset allocation is supported by an active risk management.

Under this condition, the Sub-Fund's investments are generally spread across various asset classes (equities, bonds, currencies, cash and alternative investments). The relative attractiveness of the various asset classes is continuously checked, and the findings are used for an adequate portfolio composition.

The Sub-Fund can rebalance its portfolio continuously and comprehensively and also make concentrated investments.

### 3. Investment Policy:

In order to achieve its investment objective, the Sub-Fund invests in:

- Equity funds whose risk profile correlates with the equity markets;
- Shares, participation certificates, convertible bonds;
- Exchange-traded funds (ETFs), index-linked funds, each tracking the performance of equity indices;
- Certificates on shares, securities similar to shares; and,
- Fixed income securities, such as Sovereign bonds, Supranational bonds and corporate bonds.

The Sub-Fund invests globally in Developed and Emerging Markets without any country, region or sector constraints. The exposure to Emerging Markets (including China and Russia, in the latter case subject to the sanctions being lifted) shall be diversified and shall not exceed in aggregate 50% of the Sub-Fund's net assets. Direct exposure to China will only be through the Shanghai-Hong Kong Bond Connect.

Up to 100% of the Sub-Fund's net assets may be invested in fixed income securities, Money Market Instruments, money market funds, short term fixed income funds and, subject to the 20% limitation referred to below, in bank deposits.

In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals, a relative value analysis and fixed income security evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realisation of the same) in the best interest of the investors.

Up to 70% of the Sub-Fund's net assets may be invested in equity securities and equity-linked instruments eligible under the 2010 Law (i.e., participation certificates, convertible bonds, certificates on shares).

The Sub-Fund can invest up to 100% of its net assets in shares or units of other UCITS or other UCIs ("Target Funds") eligible under article 41(1)e) of the 2010 Law. The Sub-Fund may not acquire more than 25% of the issued shares or units of another UCITS or other UCI. In case of investments in units of undertakings for collective investment in Transferable Securities or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund's assets.

Where the Sub-Fund invests in units/shares of other UCITS and/or other UCI that are managed, directly or by delegation, by the Management Company or by any other company with which the Company is linked by common management or control, or by a direct or indirect holding of more than 10% of the capital or votes ("Affiliated Funds"), the Company or the other company may not charge subscription or redemption fees on account of the Sub-Fund's investment in the units/shares of such Affiliated Funds. Besides the expenses incurred by the Management Company in managing the Sub-Fund, a management fee may also be charged for investments in Target Funds considered to be Affiliated Funds and be indirectly charged from the assets of the Sub-Fund in respect of the Target Funds contained therein. In addition to such management fee, a performance fee may be indirectly charged from the assets of the Sub-Fund in respect of the Target Funds contained therein.

Investors should note that for investments in units/shares of Target Funds, costs may generally arise both at the Sub-Fund level and at the level of the Target Funds. The cumulative management fee (excluding performance fees, if applicable) at Sub-Fund and relevant Target Fund level shall not exceed 5%.

The Sub-Fund may also hold investments, up to 100% of its net assets, which are linked to prices of 'real assets' (i.e., real estate, infrastructure or commodities. The above exposure will be achieved through investments eligible under the 2010 Law such as closed-ended REITs, ETC, Indices and UCITS funds exposed to commodities but also listed equities of companies active in businesses that are exposed to such 'real assets'.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the reference currency (EUR).

The Sub-Fund may use strategies to hedge currency risks of the investments comprising the Sub-Fund's portfolio in relation to currencies different from EUR.

The Sub-Fund's exposure to contingent convertible bonds ("Cocos") is limited to 20% of its net assets.

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) for hedging and efficient management purposes and to achieve its investment objective. The use of financial derivative instruments (e.g., listed futures, listed options and OTC derivatives) is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.



The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavorable market conditions.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### **4. Sustainability approach:**

The Sub-Fund qualifies as a financial product under Art. 6 of SFDR. The investments underlying the Sub-fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

#### **5. Use of Securities Financing Transactions:**

The Sub-Fund will not enter into securities lending transactions, Total Return Swap transactions and repurchase transactions.

#### **6. Investment Manager and Investment Sub-Managers:**

UniCredit International Bank (Luxembourg) S.A. will act as the Investment Manager.

Contact details:

**UniCredit International Bank (Luxembourg) S.A.**

8-10, rue Jean Monnet  
L-2180 Luxembourg

#### **7. Benchmark used:**

The Sub-Fund does not use any index under the Benchmark Regulation.

#### **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a medium volatility of the Sub-Fund and potentially capital losses in order to achieve moderate potential investment performances. The Sub-Fund is intended for investors with a medium-term investment horizon.

## 9. Risk Management procedure:

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a conservative investment strategy. A steady and stable investment performance is the aim in return for a moderate risk appetite. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as reduced risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## 10. Specific Risk factors:

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## 11. Sub-Fund Currency:

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg and Munich are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)

NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 16. onemarkets Global Multibrand Selection Fund

### 1. Investment Objective:

The Sub-Fund's investment objective is to seek increasing the value of the investor's investment over time, providing a broad participation in the main asset classes in each of the main (both developed and emerging) capital markets of the world. The Sub-Fund will not have any benchmark, maintaining a flexible investment philosophy.

### 2. Investment Strategy:

The Sub-Fund's investment strategy is a flexible asset allocation strategy deployed through a top-down approach determining the most attractive asset types and geographical regions and the most attractive instruments in terms of risk/reward over mid-long term.

The Sub-Fund's investment strategy is further primarily an indirect investment strategy implemented by the Investment Manager through investments in Target Funds as further described below under "Investment Policy".

### 3. Investment Policy:

The Sub-Fund will mainly invest (i.e., at least 70% of its net assets) in a broad range of shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law (the "**Target Funds**"), from around the world, including emerging markets (e.g., China and Russia, in the latter case subject to the sanctions being lifted). The exposure to emerging markets (if any) will be limited to 40% of the Sub-Fund's net assets. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund's assets.

Where the Sub-Fund invests in units/shares of other UCITS and/or other UCI that are managed, directly or by delegation, by the Management Company or by any other company with which the Company is linked by common management or control, or by a direct or indirect holding of more than 10% of the capital or votes ("Affiliated Funds"), the Company or the other company may not charge subscription or redemption fees on account of the Sub-Fund's investment in the units/shares of such Affiliated Funds. Besides the expenses incurred by the Management Company in managing the Sub-Fund, a management fee may also be charged for investments in Target Funds considered to be Affiliated Funds and be indirectly charged from the assets of the Sub-Fund in respect of the Target Funds contained therein. In addition to such management fee, a performance fee may be indirectly charged from the assets of the Sub-Fund in respect of the Target Funds contained therein.

Investors should note that for investments in units/shares of Target Funds, costs may generally arise both at the Sub-Fund level and at the level of the Target Funds. The cumulative management fee (excluding performance fees, if applicable) at Sub-Fund and relevant Target Fund level shall not exceed 5%.

The exposure to equities through Target Funds will not exceed 70% of the Sub-Fund's net assets. The exposure to non-equity investments through Target Funds will mainly consist in investments in fixed income securities and Money Market Instruments.

The Sub-Fund's exposure through Target Funds to high yield securities, as rated by the credit rating agencies Moody's Investors Service, Inc. ("Moody's"), Standard & Poor's Ratings Services ("S&P") or Fitch, Inc. ("Fitch"), will not exceed 20% of its net assets.

Investments in other multi-assets and flexible UCITS funds (including long-short and global macro) may represent up to 70% of the Sub-Fund's net assets.

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) for efficient management purposes and to achieve its investment objective as well as for hedging purposes, in particular the global risk of an unfavourable evolution of the market(s), the currency exchange rate risk, if any, and other risks associated with the above market(s). It may also use derivative instruments (e.g., listed futures, currency forwards and listed options) for investment purposes with the objective, among else, of an efficient management of cash flows, substitution for direct investments and better coverage of markets.

The Sub-Fund will not invest through Target Funds in defaulted or distressed securities.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the reference currency (EUR) of the Sub-Fund.

The Sub-Fund may use strategies to hedge currency risks in relation to currencies different from EUR.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions. For liquidity management purposes, the Sub-Fund may invest, in addition to the liquid assets referred to above, in cash equivalents meaning: time deposits, certificates of deposit, term deposits, notes, commercial paper, short-term government debt such as treasury-bills, bills of exchange and other instruments with a remaining period to maturity not exceeding twelve months and money market funds.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### **4. Sustainability approach:**

The Sub-Fund qualifies as a financial product under Art. 6(1) of SFDR. The investments underlying the Sub-fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

## 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a temporary basis:

Securities financing transaction	Permitted	Used	Maximum amount	Estimated amount
Total Return Swaps	Yes	Yes	10%	0%
Repurchase transactions	Yes	Yes	10%	0%

Total Return Swap transactions may be used to gain an efficient exposure to specific segments of the equity and fixed income markets and benefit from the returns on a reference asset without purchasing the asset directly.

In respect to Total Return Swap revenues, the gross income generated by the transactions is credited for 100% to the Sub-Fund and for 0% to the counterparty in these transactions. The Sub-Fund will enter into Total Return Swaps with multiple counterparties (the top 10 counterparties will be listed in the annual report of the Fund in accordance with SFTR). The proportion of the assets held by the Sub-Fund that may be subject to Total Return Swap transactions is generally expected to around 0% of the Sub-Fund's Net Asset Value. That proportion will fluctuate subject to different factors, including but limited to the defined asset allocation, valuation, liquidity, efficiency and pricing considerations. This proportion may on an opportunistic basis be increased up to a maximum of 10% of the Sub-Fund's Net Asset Value.

When used for efficient portfolio management purposes, securities financing transactions are helping to meet any investment objective, for example to achieve exposure to assets while limiting costs, reducing risks, offer combined investments and/or facilitate the access to the market in a timely manner.

When used for cash management purposes, securities financing transactions are used as a treasury management tool, to facilitate a cost-efficient flow of cash with the objective to contribute to a complementary financing of its investment strategies (repurchase agreements) or to affect temporary excess of cash while optimising revenues (reverse repurchase agreements).

When used to generate additional income, securities financing transactions contribute to generate additional income and/or to offset costs.

In respect to repurchase transaction revenues, all revenues remain with the Sub-Fund, and standard transaction costs of 0.005% on gross value of the transaction are separately charged. Such direct fees and costs are determined in accordance with market practice and consistent with the current market levels.

The proportion of the assets held by the Sub-fund that may be subject to repurchase transactions is generally expected to be around 0% of the Sub-Fund's Net Asset Value. That proportion will be impacted downwards when interest rates are low and upwards when getting higher. When considered for cash management purposes in case of important movements of subscriptions and redemptions, the use of reverse repurchase and repurchase agreements will fluctuate depending on the occurrence of the latter. Depending on the occurrence of the above circumstances, the 0% proportion may on an opportunistic and temporary basis be increased up to a maximum of 10% of the Sub-Fund's Net Asset Value, depending also on the Sub-Fund's liquidity profile and anticipated liquidity needs.

## 6. Investment Manager and Investment Sub-Managers:

UniCredit International Bank (Luxembourg) S.A. will act as the Investment Manager.

Contact details:

<p><b>UniCredit International Bank (Luxembourg) S.A.</b> 8-10, rue Jean Monnet L-2180 Luxembourg</p>
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## 7. Benchmark used:

The Sub-Fund does not use any index under the Benchmark Regulation.

## 8. Profile of the typical investor:

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept an increased volatility of the Sub-Fund and potentially high capital losses in order to achieve above-average potential investment performances. The Sub-Fund is intended for investors with a medium to long-term investment horizon.

## 9. Risk Management procedure:

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a growth-oriented investment strategy. In order to take advantage of opportunities for higher investment returns, a higher risk exposure is unavoidable. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## 10. Specific Risk factors:

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## 11. Sub-Fund Currency:

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, and Italy, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Four (4) Business Days after the NAV Valuation Day.



## **17. onemarkets Balanced Eastern Europe Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is primarily to generate income and, secondarily, increase the value of the investor's investment over the recommended holding period (as further specified under the section "Profile of the typical investor below).

### **2. Investment Strategy:**

The Investment Manager uses its own economic analysis to determine the most attractive asset types and countries, then uses analysis of individual issuers to identify individual securities that offer the best potential gain for the risk involved. The Investment Manager seeks investment prospects paying above average income. The Investment Manager pursues a flexible multi-asset allocation strategy.

When investing, the Investment Manager uses a top-down approach. The Investment Manager starts from collecting data on macroeconomic developments for individual countries, or regions that are of interest for it. The Investment Manager monitors central bank announcements about monetary policy, and interest rate levels. Also, the political situation in the country, the dates of parliamentary elections, different indicators of economic activity and fiscal system are considered. Based on this approach, the Investment Manager identifies potential risks and investment opportunities. When investing in bonds, the Investment Manager also follows the change in bond ratings. When investing in equities, the Investment Manager uses an internally developed model which describes the quality of business model. With that model the Investment Manager assigns a rating to each company using information available from company report.

### **3. Investment Policy:**

The Sub-Fund will mainly invest in a broad range of securities from around Central and Eastern Europe. This may include equities (up to 40% of its net assets), government and corporate bonds and Money Market Instruments.

The Sub-Fund's equity investments will be invested dominantly in CEE blue chip companies with market capitalisation above EUR 500 mln (a minor part could be allocated to securities of CEE companies with market capitalisation above EUR 250 mln).

The Sub-Fund's bond investments may be of any quality (investment grade or below) subject to an average rating of BBB+. Investments in bonds with a rating below investment grade (subject to the following minimum ratings: S&P – BB, Fitch – BB and Moody's – Ba3) will not exceed 60% of the Sub-Fund's net assets whilst investments in unrated bonds will only represent a very limited portion of the Sub-Fund's portfolio (not exceeding 5% of the Sub-Fund's net assets). The selection process of bonds is based on fundamental analysis. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals and bond evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realization of the same) in the best interest of the investors.

The Sub-Fund will not invest in defaulted or distressed securities.

The Sub-Fund may invest up to 50% of its net assets, in securities that are denominated in currencies other than Euro.

The Sub-Fund may invest in (up to 10% of its net assets in each of these two categories):

- convertible bonds and contingent convertible bonds ("CoCos") eligible under the 2010 Law, the above 10% limitation applying to all those instruments considered together;
- other UCITS and UCIs eligible under article 41(1)e) of the 2010 Law. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs) potential retrocessions will benefit to the Sub-Fund.

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) as well as use securities financing techniques (as further described below) for hedging and efficient management purposes and to achieve its investment objective. To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors, or currencies from time to time. The use of financial derivative instruments (e.g., futures, options and swaps) as well as the use of securities financing techniques is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular leverage, is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavorable market conditions.

**It cannot be assured that the investment policy will achieve the investment objective.**

#### **4. Sustainability approach:**

The Sub-Fund qualifies as a financial product under Art. 6 of SFDR. The investments underlying the Sub-fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

#### **5. Use of Securities Financing Transactions:**

The following overview describes the securities financing transactions as defined under the SFTR that are used on a continuous basis:

<b>Securities financing transaction</b>	<b>Permitted</b>	<b>Used</b>	<b>Maximum amount</b>	<b>Estimated amount</b>
Repurchase transactions	Yes	Yes	20%	5%

When used for efficient portfolio management purposes, securities financing transactions are helping to meet any investment objective, for example to achieve exposure to assets while limiting costs, reducing risks, offer combined investments and/or facilitate the access to the market in a timely manner.

When used for cash management purposes, securities financing transactions are used as a treasury management tool, to facilitate a cost-efficient flow of cash with the objective to contribute to a complementary financing of its investment strategies (repurchase agreements) or to affect temporary excess of cash while optimising revenues (reverse repurchase agreements).

When used to generate additional income, securities financing transactions contribute to generate additional income and/or to offset costs.

In respect to repurchase transaction revenues, all revenues remain with the Sub-Fund, and standard transaction costs of 0.005% on gross value of the transaction are separately charged. Such direct fees and costs are determined in accordance with market practice and consistent with the current market levels.

The proportion of the assets held by the Sub-fund that may be subject to repurchase transactions is generally expected to be around 5% of the Sub-Fund's Net Asset Value. That proportion will be impacted downwards when interest rates are low and upwards when getting higher. When considered for cash management purposes in case of important movements of subscriptions and redemptions, the use of reverse repurchase and repurchase agreements will fluctuate depending on the occurrence of the latter. Depending on the occurrence of the above circumstances, the 5% proportion may on an opportunistic and temporary basis be increased up to a maximum of 20% of the Sub-Fund's Net Asset Value, depending also on the Sub-Fund's liquidity profile and anticipated liquidity needs.

The Sub-Fund will not enter into Total Return Swaps and securities lending transactions.

## 6. Investment Manager and Investment Sub-Managers:

ZB Invest Ltd. Will act as the Investment Manager.

Contact details:

**ZB Invest Ltd.**

Samoborska cesta 145  
Zagreb, 10090  
Croatia

## 7. Benchmark used:

The Sub-Fund does not use any index under the Benchmark Regulation.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a medium volatility of the Sub-Fund and potentially capital losses in order to achieve moderate potential investment performances. The Sub-Fund is intended for investors with a medium-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a conservative investment strategy. A steady and stable investment performance is the aim in return for a moderate risk appetite. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as reduced risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## **12. Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

### 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, and Croatia, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## **18. onemarkets Multi-Asset Value Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is to achieve a superior risk adjusted total return over the market cycle – creating value through a risk adjusted total return. Realizing long-term capital appreciation and underlying income through a long-term focus on valuation and the market cycles is paramount to achieving the Sub-Fund's objectives.

### **2. Investment Strategy:**

The Sub-Fund is a global multi-asset and multi-strategy total return portfolio.

The Sub-Fund seeks to achieve its objectives by investing globally with exposure in both OECD and non-OECD markets. The Sub-Fund will vary its exposure to a variety of asset classes such as, but not limited to, equity, debt, currency and, through Transferable Securities and/or other permitted investments under the 2010 Law, real assets.

In order to achieve the risk-adjusted total return objective, the Investment Manager organizes its investment idea generation process around multiple investment opportunities or strategies including, but not limited to, some or all of the following:

- Global macro strategies include directional and relative ideas across a wide range of asset classes, including, but not limited to, equity markets, interest rates, credit markets and currencies;
- Income generating investments strive to build a stable source of carry for the Sub-Fund through cash flow generating assets such as equities and credit;
- Compounder ideas involve investing in companies across their capital structure with emphasis on the companies' capability of sustaining significant long-term return on capital generation and stable growth;
- Special event driven ideas arise where a significant event or change is occurring or expected to occur, such as major corporate restructuring, mergers and acquisitions, governance changes, structural business changes and so on;
- Alternative risk premia ideas involve, but are not limited to, allocation to investments with values linked to prices of 'real assets' such as, but not limited to, real estate, infrastructure or commodities, and other investment exposures including, but not limited to, volatility, carbon certificates or carbon credits.

There is no pre-determined overall exposure of the Sub-Fund to asset classes and/or to specific factor risk premia. Neither the strategies above nor any particular risk premia exposure should be considered the basis for an ex-ante allocation or structural positioning. The Investment Manager determines and may vary the asset classes allocation based on analysis of macro-economic and market conditions and expectations with close consideration to risks and the potential for returns. The Investment Manager actively selects individual positions based on specific research and valuation assessments conducted by external providers and/or the Investment Manager.

### 3. Investment Policy:

In line with the above investment objective and strategy, it is expected that, under normal market circumstances, the Sub-Fund will essentially invest its net assets in a flexible allocation to the different assets listed below. The Sub-Fund may utilize a variety of instruments to create the desired exposures including equities and equity-linked securities, sovereign, quasi-sovereign and corporate debt (including convertible bonds, structured notes, participating notes, Cocos, and other forms of debt instruments with similar debt features), UCITS and/or other UCIs, REITs, ETCs as well as, to achieve long and/or synthetic short positions, derivatives instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) such as, but not limited to, Delta One securities, index or single name futures, swaps (such as funded or unfunded TRS), forwards and options. Long positions benefit from an increase in the price of the underlying instrument or asset class, while short positions benefit from a decrease in that price. Issuers of the aforementioned securities may be located in any OECD or non-OECD country, including emerging markets (e.g., China and Russia, in the latter case subject to the sanctions being lifted) up to 70% of its net assets and frontier markets, without any pre-determined limitation in terms of geographic area, capitalization size, sector, or currency, as the case may be. Direct investments in securities listed on Chinese stock exchanges (e.g. China A Shares) shall be made through the Stock Connect in line with prevailing laws and regulations. The Sub-Fund will not be bound by any asset, sector or country limitations. The Sub-Fund may also invest in initial public offerings ("IPOs") on an ancillary basis (up to 10% of its net assets).

For treasury and liquidity management purposes and/or in case of unfavourable market conditions, the Sub-Fund may invest, in addition to liquid assets referred to below, in cash equivalents (i.e., bank deposits, Money Market Instruments and/or money market funds, time deposits, certificates of deposit, term deposits, notes, commercial paper, short-term government debt such as treasury-bills, bills of exchange and other instruments with a remaining period to maturity not exceeding twelve months and money market funds). The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions. Under exceptional market conditions, if the Investment Manager considers it to be in the best interest of the Shareholders, on a temporary basis and for defensive purposes, the Sub-fund may hold ancillary liquid assets and invest in cash equivalents on a principal basis.

The Sub-Fund may invest up to 50% of its net assets in high yield securities, as rated by the credit rating agencies Moody's Investors Service, Inc. ("Moody's"), Standard & Poor's Ratings Services ("S&P") or Fitch, Inc. ("Fitch"). The Sub-Fund may further invest up to 10% of its net assets in unrated fixed income securities. The expected average rating is BB-, but it may change according to the macroeconomic conditions and credit cycle.

The Sub-Fund may also hold investments, up to 35% of its net assets, linked to prices of 'real assets' such as, but not limited to, real estate, infrastructure or commodities. These investments will be done through UCITS eligible investments such as closed-ended REITs, ETC, Indices and UCITS compliant commodity funds that provide a proxy return of the underlying 'real assets'.

The Sub-Fund will invest no more than 10% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund's assets.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the reference currency (EUR). The Sub-Fund may use strategies to hedge currency risks in relation to currencies different from EUR.

The Sub-Fund's exposure to contingent convertible bonds ("Cocos") is limited to 20% of its net assets. The Sub-Fund's exposure to perpetual bonds not included in the Cocos limit above is limited to 10% its net assets. The Sub-Fund may also invest in Green Bonds up to 20% of its net assets.

The Sub-Fund will not invest in asset-backed securities (ABS) and mortgage-backed securities (MBS).

The Sub-Fund may invest in defaulted or distressed securities (typically defined with a credit rating of less than B-) up to 5% of its net assets.

The Sub-Fund may also invest up to 10% of its net assets in Rule 144A Securities with an exchange right registered under the US Securities Act of 1933.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 6 of SFDR. The investments underlying the Sub-fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

#### 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a continuous basis:

Securities financing transaction	Permitted	Used	Maximum amount	Estimated amount
Total Return Swaps	Yes	Yes	100%	25%

Total Return Swap transactions may be used to gain an efficient exposure to specific segments of the equity and fixed income markets and benefit from the returns on a reference asset without purchasing the asset directly.



In respect to Total Return Swap revenues, the gross income generated by the transactions is credited for 100% to the Sub-Fund and for 0% to the counterparty in these transactions. The Sub-Fund will enter into Total Return Swaps with multiple counterparties (the top 10 counterparties will be listed in the annual report of the Fund in accordance with SFTR). The proportion of the assets held by the Sub-Fund that may be subject to Total Return Swap transactions is generally expected to around 25% of the Sub-Fund's Net Asset Value. That proportion will fluctuate subject to different factors, including but not limited to the defined asset allocation, valuation, liquidity, efficiency and pricing considerations. This proportion may on an opportunistic basis be increased up to a maximum of 100% of the Sub-Fund's Net Asset Value.

The Sub-Fund will not enter into securities lending transactions and repurchase transactions.

## 6. Investment Manager and Investment Sub-Managers:

Plenisfer Investments SGR SpA will act as the Investment Manager.

Contact details:

**Plenisfer Investments SGR SpA**

Registered address:

via Niccolò Macchiavelli n. 4

Trieste, 34132 Italy

Head Office address:

via Sant'Andrea 10/A

Milan, 20121 Italy

## 7. Benchmark used:

The Sub-Fund does not use any index under the Benchmark Regulation.

## 8. Profile of the typical investor:

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept an increased volatility of the Sub-Fund and potentially high capital losses in order to achieve above-average potential investment performances. The Sub-Fund is intended for investors with a medium to long-term investment horizon.

## 9. Risk Management procedure:

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Absolute VaR Approach. The Management Company calculates the level of the leverage of the Sub-Fund using the sum of notional approach and expects that this level will in principle not be higher than 350% (in relation to the total net assets of the Sub-Fund). In exceptional cases, the level of leverage may exceed this figure.

The Sub-Fund pursues a growth-oriented investment strategy. In order to take advantage of opportunities for higher investment returns, a higher risk exposure is unavoidable. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as risk tolerant.

or further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## 10. Specific Risk factors:

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Specific Risk Factors in the general part of the Prospectus.

## 11. Sub-Fund Currency:

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

### Business Day

Each day on which banks and financial institutions in Luxembourg are generally open for business except 24 and 31 December of each year.

<b>Dealing Day</b>	Every Business Day
<b>NAV Valuation Day</b>	T (each Business Day)
<b>NAV Calculation Day</b>	T + 1
<b>Cut-Off Time</b>	Not later than 2.00 pm (Central European Time)
<b>Authorised Payment Currencies</b>	Euro
<b>Settlement (subscriptions and redemptions)</b>	Two (2) Business Days after the NAV Valuation Day.

## **19. onemarkets Short Term Bond HUF Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is primarily to generate income and, secondarily, increase the value of the investor's investment over the recommended holding period (as further specified under the section "Profile of the typical investor below).

### **2. Investment Strategy:**

The Investment Manager actively manages the Sub-Fund's diversified portfolio of various fixed income securities such as government and corporate bonds (including financial and non-financial issuers) and Money Market Instruments and bank deposits with dominant focus on Hungarian debt market but also investing in other EU Member States.

The Investment Manager selects the Sub-Fund's foreign country and currency compositions based on an evaluation of various factors, including, but not limited to, relative interest rates, exchange rates, monetary and fiscal policies, trade and current account balances.

### **3. Investment Policy:**

The Sub-Fund aims to achieve its investment objective through exposure to fixed income markets as follows:

- exposure to bond markets without limitations through direct investments into bonds and through indirect investments into UCITS or UCIs eligible under article 41(1)e) of the 2010 Law with dominant exposure to bonds and financial derivatives with bonds, baskets of bonds or bond market indices as underlying instruments;
- exposure to Money Market Instruments up to 50% of the total Sub-Fund exposure through direct investments into Money Market Instruments and bank deposits and through indirect investment into UCITS or UCIs eligible under article 41(1)e) of the 2010 Law with dominant exposure to Money Market Instruments and financial derivatives with Money Market Instruments, baskets of Money Market Instruments or money market indices as underlying instruments.

The Sub-Fund will undertake investments that are exposed to the markets of Hungary, Czech Republic, Slovakia, Romania, Poland, Italy, Germany and France, which include investments in financial instruments issued or guaranteed by one of the aforementioned countries or units of local and regional (regional) self-government of the aforementioned countries, i.e. in financial instruments of other issuers from the aforementioned countries or who operate or generate most of their income in the aforementioned countries (direct exposure), as well as investing in derivative financial instruments and investment funds that are exposed to the listed financial instruments (indirect exposure).

The average portfolio duration of the Sub-Fund is normally below 3 years. Duration is a measure used to determine the sensitivity of a security's price to changes in interest rates. The longer a security's duration, the more sensitive it will be to changes in interest rates.

The Sub-Fund's fixed income investments are primarily investment grade subject to an average rating of BBB-. Investments with a rating below investment grade (subject to the following minimum ratings: S&P – BB, Fitch – BB and Moody's – Ba2) will not exceed 50% of the Sub-Fund's net assets whilst unrated investments will only represent a very limited portion of the Sub-Fund's portfolio (not exceeding 10% of the Sub-Fund's net assets). The selection process of fixed income investments is based on fundamental analysis which is in turn based on macroeconomic analysis, evaluation of various factors, including, but not limited to relative interest rates, exchange rates, monetary and fiscal policies, trade and current account balances when investing in government bonds. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals, a relative value analysis and fixed income security evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realisation of the same) in the best interest of the investors. Unrated investments will be assigned an internal rating determined by the Investment Manager for the purposes of the determination of the average rating of the Sub-Fund's portfolio.

Under normal market circumstances, a minimum of 50% of the Sub-Fund's net assets will be invested in Hungarian debt market and Hungarian financial assets (i.e., bonds and bond funds, cash equivalents meaning: time deposits, certificates of deposit, term deposits, notes, Money Market Instruments and money market funds).

**Up to 100% of the Sub-Fund's net assets can be invested in bonds and Money Market Instruments issued or guaranteed by Hungary and Germany.**

The Sub-Fund does not qualify as money market fund under EU Regulation 2017/1131 on money market funds.

The Sub-Fund will not invest in:

- equity securities,
- defaulted or distressed securities,
- convertible bonds and contingent convertible bonds ("CoCos") eligible under the 2010 Law,
- ABS/MBS/CDOs,
- ADR's/GDR's and REITs.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the Sub-Fund's reference currency (HUF) but will normally limit its foreign currency exposure (from non-HUF-denominated securities or currencies) to 20% of its net assets (by using strategies to hedge currency risks in relation to currencies different from HUF).

The Sub-Fund will invest up to 100% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law ("Target Funds"). Investors should note that for investments in units/shares of Target Funds, costs may generally arise both at the Sub-Fund level and at the level of the Target Funds. The cumulative management fee (excluding performance fees, if applicable) at Sub-Fund and relevant Target Fund level shall not exceed 4.50%. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) as well as use securities financing techniques (as further described below) for hedging and efficient management purposes and to achieve its investment objective. To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors, or currencies from time to time. The use of financial derivative instruments (e.g., futures, options and swaps) as well as the use of securities financing techniques is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 6 of SFDR. The investments underlying the Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

#### 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a continuous basis:

Securities financing transaction	Permitted	Used	Maximum amount	Estimated amount
Repurchase transactions	Yes	Yes	20%	5%

When used for efficient portfolio management purposes, securities financing transactions are helping to meet any investment objective, for example to achieve exposure to assets while limiting costs, reducing risks, offer combined investments and/or facilitate the access to the market in a timely manner.

When used for cash management purposes, securities financing transactions are used as a treasury management tool, to facilitate a cost-efficient flow of cash with the objective to contribute to a complementary financing of its investment strategies (repurchase agreements) or to affect temporary excess of cash while optimizing revenues (reverse repurchase agreements).

When used to generate additional income, securities financing transactions contribute to generate additional income and/or to offset costs.

In respect to repurchase transaction revenues, all revenues remain with the Sub-Fund, and standard transaction costs on gross value of the transaction are separately charged. Such direct fees and costs are determined in accordance with market practice and consistent with the current market levels.

The proportion of the assets held by the Sub-fund that may be subject to repurchase transactions is generally expected to be around 5% of the Sub-Fund's Net Asset Value. That proportion will be impacted downwards when interest rates are low and upwards when getting higher. When considered for cash management purposes in case of important movements of subscriptions and redemptions, the use of reverse repurchase and repurchase agreements will fluctuate depending on the occurrence of the latter. Depending on the occurrence of the above circumstances, the 5% proportion may on an opportunistic and temporary basis be increased up to a maximum of 20% of the Sub-Fund's Net Asset Value, depending also on the Sub-Fund's liquidity profile and anticipated liquidity needs.

The Sub-Fund will not enter into Total Return Swaps and securities lending transactions.

## **6. Investment Manager and Investment Sub-Managers:**

ZB Invest Ltd. Will act as the Investment Manager.

Contact details:

**ZB Invest Ltd.**

Samoborska cesta 145  
Zagreb, 10090  
Croatia

## **7. Benchmark used:**

The Sub-Fund does not use any index under the Benchmark Regulation.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a medium volatility of the Sub-Fund and potentially capital losses in order to achieve moderate potential investment performances. The Sub-Fund is intended for investors with a medium-term investment horizon.

## 9. Risk Management procedure:

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a conservative investment strategy. A steady and stable investment performance is the aim in return for a moderate risk appetite. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as reduced risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## 10. Specific Risk factors:

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Risk Factors in the general part of the Prospectus.

## 11. Sub-Fund Currency:

The reference currency of the Sub-Fund is the Hungarian Forint. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, and Croatia, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)



NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	HUF
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 20. onemarkets Short Term Bond CZK Fund

### 1. Investment Objective:

The Sub-Fund's investment objective is primarily to generate income and, secondarily, increase the value of the investor's investment over the recommended holding period (as further specified under the section "Profile of the typical investor" below).

### 2. Investment Strategy:

The Investment Manager actively manages the Sub-Fund's diversified portfolio of various fixed income securities such as government and corporate bonds (including financial and non-financial/corporate issuers) and Money Market Instruments and bank deposits with dominant focus on Czech debt market but also investing in other EU Member States.

The Investment Manager selects the Sub-Fund's foreign country and currency compositions based on an evaluation of various factors, including, but not limited to, relative interest rates, exchange rates, monetary and fiscal policies, trade and current account balances.

### 3. Investment Policy:

The Sub-Fund aims to achieve its investment objective through exposure to fixed income markets as follows:

- exposure to bond markets without limitations through direct investments into bonds and through indirect investments into UCITS or UCIs eligible under article 41(1)e) of the 2010 Law with dominant exposure to bonds and financial derivatives with bonds, baskets of bonds or bond market indices as underlying instruments;
- exposure to Money Market Instruments up to 50% of the total Sub-Fund exposure through direct investments into money market instruments and bank deposits and through indirect investment into UCITS or UCIs eligible under article 41(1)e) of the 2010 Law with dominant exposure to Money Market Instruments and financial derivatives with Money Market Instruments, baskets of Money Market Instruments or money market indices as underlying instruments.

The Sub-Fund will undertake investments that are exposed to the markets of Czech Republic, Hungary, Slovakia, Romania, Poland, Italy, Germany and France, which include investments in financial instruments issued or guaranteed by one of the aforementioned countries or units of local and regional (regional) self-government of the aforementioned countries, i.e. in financial instruments of other issuers from the aforementioned countries or who operate or generate most of their income in the aforementioned countries (direct exposure), as well as investing in derivative financial instruments and investment funds that are exposed to the listed financial instruments (indirect exposure).

The average portfolio duration of the Sub-Fund is normally below 3 years. Duration is a measure used to determine the sensitivity of a security's price to changes in interest rates. The longer a security's duration, the more sensitive it will be to changes in interest rates.

The Sub-Fund's fixed income investments are primarily investment grade subject to an average rating of BBB-. Investments with a rating below investment grade (subject to the following minimum ratings: S&P – BB, Fitch – BB and Moody's – Ba2) will not exceed 50% of the Sub-Fund's net assets whilst unrated investments will only represent a very limited portion of the Sub-Fund's portfolio (not exceeding 10% of the Sub-Fund's net assets). The selection process of fixed income investments is based on fundamental analysis which is in turn based on macroeconomic analysis, evaluation of various factors, including, but not limited to relative interest rates, exchange rates, monetary and fiscal policies, trade and current account balances when investing in government bonds. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals, a relative value analysis and fixed income security evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realisation of the same) in the best interest of the investors. Unrated investments will be assigned an internal rating determined by the Investment Manager for the purposes of the determination of the average rating of the Sub-Fund's portfolio.

Under normal market circumstances, minimum of 50% of the Sub-Fund's net assets will be invested in Czech debt market and Czech financial assets (i.e., bonds and bond funds, cash equivalents meaning: time deposits, certificates of deposit, term deposits, notes, Money Market Instruments and money market funds).

**Up to 100% of the Sub-Fund's net assets can be invested in bonds and Money Market Instruments issued or guaranteed by Czech Republic and Germany.**

The Sub-Fund does not qualify as money market fund under EU Regulation 2017/1131 on money market funds.

The Sub-Fund will not invest in:

- equity securities,
- defaulted or distressed securities,
- convertible bonds and contingent convertible bonds ("CoCos") eligible under the 2010 Law,
- ABS/MBS/CDOs,
- ADR's/GDR's and REITs.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the Sub-Fund's reference currency (CZK) but will normally limit its foreign currency exposure (from non-CZK-denominated securities or currencies) to 20% of its net assets (by using strategies to hedge currency risks in relation to currencies different from CZK).

The Sub-Fund will invest up to 100% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law ("Target Funds"). Investors should note that for investments in units/shares of Target Funds, costs may generally arise both at the Sub-Fund level and at the level of the Target Funds. The cumulative management fee (excluding performance fees, if applicable) at Sub-Fund and relevant Target Fund level shall not exceed 4.50%. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) as well as use securities financing techniques (as further described below) for hedging and efficient management purposes and to achieve its investment objective. To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors, or currencies from time to time. The use of financial derivative instruments (e.g., futures, options and swaps) as well as the use of securities financing techniques is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 6 of SFDR. The investments underlying the Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

#### 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a continuous basis:

Securities financing transaction	Permitted	Used	Maximum amount	Estimated amount
Repurchase transactions	Yes	Yes	20%	5%

When used for efficient portfolio management purposes, securities financing transactions are helping to meet any investment objective, for example to achieve exposure to assets while limiting costs, reducing risks, offer combined investments and/or facilitate the access to the market in a timely manner.

When used for cash management purposes, securities financing transactions are used as a treasury management tool, to facilitate a cost-efficient flow of cash with the objective to contribute to a complementary financing of its investment strategies (repurchase agreements) or to affect temporary excess of cash while optimizing revenues (reverse repurchase agreements).

When used to generate additional income, securities financing transactions contribute to generate additional income and/or to offset costs.

In respect to repurchase transaction revenues, all revenues remain with the Sub-Fund, and standard transaction costs on gross value of the transaction are separately charged. Such direct fees and costs are determined in accordance with market practice and consistent with the current market levels.

The proportion of the assets held by the Sub-Fund that may be subject to repurchase transactions is generally expected to be around 5% of the Sub-Fund's Net Asset Value. That proportion will be impacted downwards when interest rates are low and upwards when getting higher. When considered for cash management purposes in case of important movements of subscriptions and redemptions, the use of reverse repurchase and repurchase agreements will fluctuate depending on the occurrence of the latter. Depending on the occurrence of the above circumstances, the 5% proportion may on an opportunistic and temporary basis be increased up to a maximum of 20% of the Sub-Fund's Net Asset Value, depending also on the Sub-Fund's liquidity profile and anticipated liquidity needs.

The Sub-Fund will not enter into Total Return Swaps and securities lending transactions.

## **6. Investment Manager and Investment Sub-Managers:**

ZB Invest Ltd. Will act as the Investment Manager.

Contact details:

**ZB Invest Ltd.**

Samoborska cesta 145  
Zagreb, 10090  
Croatia

## **7. Benchmark used:**

The Sub-Fund does not use any index under the Benchmark Regulation.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a medium volatility of the Sub-Fund and potentially capital losses in order to achieve moderate potential investment performances. The sub-fund is intended for investors with a medium-term investment horizon.

## 9. Risk Management procedure:

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a conservative investment strategy. A steady and stable investment performance is the aim in return for a moderate risk appetite. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as reduced risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## 10. Specific Risk factors:

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Risk Factors in the general part of the Prospectus.

## 11. Sub-Fund Currency:

The reference currency of the Sub-Fund is the Czech Koruna. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, and Croatia, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)

NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	CZK
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## **21. onemarkets Bond HUF Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is primarily to generate income and, secondarily, increase the value of the investor's investment over the recommended holding period (as further specified under the section "Profile of the typical investor" below).

### **2. Investment Strategy:**

The Investment Manager actively manages the Sub-Fund's diversified portfolio of various fixed income securities such as government and corporate bonds (including financial and non-financial issuers) and Money Market Instruments and bank deposits with dominant focus on Hungarian debt market but also investing in other EU Member States.

The Investment Manager selects the Sub-Fund's foreign country and currency compositions based on an evaluation of various factors, including, but not limited to, relative interest rates, exchange rates, monetary and fiscal policies, trade and current account balances.

### **3. Investment Policy:**

The Sub-Fund aims to achieve its investment objective through exposure to fixed income markets as follows:

- exposure to bond markets without limitations through direct investments into bonds and through indirect investments into UCITS or UCIs eligible under article 41(1)e) of the 2010 Law with dominant exposure to bonds and financial derivatives with bonds, baskets of bonds or bond market indices as underlying instruments;
- exposure to Money Market Instruments up to 30% of the total Sub-Fund exposure through direct investments into Money Market Instruments and bank deposits and through indirect investment into UCITS or UCIs eligible under article 41(1)e) of the 2010 Law with dominant exposure to Money Market Instruments and financial derivatives with Money Market Instruments, baskets of Money Market Instruments or money market indices as underlying instruments.

The Sub-Fund will undertake investments that are exposed to the markets of Hungary, Czech Republic, Slovakia, Romania, Poland, Italy, Germany and France, which include investments in financial instruments issued or guaranteed by one of the aforementioned countries or units of local and regional (regional) self-government of the aforementioned countries, i.e. in financial instruments of other issuers from the aforementioned countries or who operate or generate most of their income in the aforementioned countries (direct exposure), as well as investing in derivative financial instruments and investment funds that are exposed to the listed financial instruments (indirect exposure).



The average portfolio duration of the Sub-Fund is normally above 2 years. Duration is a measure used to determine the sensitivity of a security's price to changes in interest rates. The longer a security's duration, the more sensitive it will be to changes in interest rates.

The Sub-Fund's fixed income investments are primarily investment grade subject to an average rating of BBB-. Investments with a rating below investment grade (subject to the following minimum ratings: S&P – BB, Fitch – BB and Moody's – Ba2) will not exceed 50% of the Sub-Fund's net assets whilst unrated investments will only represent a very limited portion of the Sub-Fund's portfolio (not exceeding 10% of the Sub-Fund's net assets). The selection process of fixed income investments is based on fundamental analysis which is in turn based on macroeconomic analysis, evaluation of various factors, including, but not limited to relative interest rates, exchange rates, monetary and fiscal policies, trade and current account balances when investing in government bonds. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals, a relative value analysis and fixed income security evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realisation of the same) in the best interest of the investors. Unrated investments will be assigned an internal rating determined by the Investment Manager for the purposes of the determination of the average rating of the Sub-Fund's portfolio.

Under normal market circumstances, minimum of 50% of the Sub-Fund's net assets will be invested in Hungarian debt market and Hungarian financial assets (i.e., bonds and bond funds, cash equivalents meaning: time deposits, certificates of deposit, term deposits, notes, Money Market Instruments and money market funds).

**Up to 100% of the Sub-Fund's net assets can be invested in bonds and Money Market Instruments issued or guaranteed by Hungary and Germany.**

The Sub-Fund does not qualify as money market fund under EU Regulation 2017/1131 on money market funds.

The Sub-Fund will not invest in:

- equity securities,
- defaulted or distressed securities,
- convertible bonds and contingent convertible bonds ("CoCos") eligible under the 2010 Law,
- ABS/MBS/CDOs,
- ADR's/GDR's and REITs.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the Sub-Fund's reference currency (HUF) but will normally limit its foreign currency exposure (from non-HUF-denominated securities or currencies) to 20% of its net assets (by using strategies to hedge currency risks in relation to currencies different from HUF).

The Sub-Fund will invest up to 100% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law ("Target Funds"). Investors should note that for investments in units/shares of Target Funds, costs may generally arise both at the Sub-Fund level and at the level of the Target Funds. The cumulative management fee (excluding performance fees, if applicable) at Sub-Fund and relevant Target Fund level shall not exceed 5.00%. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) as well as use securities financing techniques (as further described below) for hedging and efficient management purposes and to achieve its investment objective. To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors, or currencies from time to time. The use of financial derivative instruments (e.g., futures, options and swaps) as well as the use of securities financing techniques is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 6 of SFDR. The investments underlying the Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

#### 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a continuous basis:

Securities financing transaction	Permitted	Used	Maximum amount	Estimated amount
Repurchase transactions	Yes	Yes	20%	5%

When used for efficient portfolio management purposes, securities financing transactions are helping to meet any investment objective, for example to achieve exposure to assets while limiting costs, reducing risks, offer combined investments and/or facilitate the access to the market in a timely manner.

When used for cash management purposes, securities financing transactions are used as a treasury management tool, to facilitate a cost-efficient flow of cash with the objective to contribute to a complementary financing of its investment strategies (repurchase agreements) or to affect temporary excess of cash while optimizing revenues (reverse repurchase agreements).

When used to generate additional income, securities financing transactions contribute to generate additional income and/or to offset costs.

In respect to repurchase transaction revenues, all revenues remain with the Sub-Fund, and standard transaction costs on gross value of the transaction are separately charged. Such direct fees and costs are determined in accordance with market practice and consistent with the current market levels.

The proportion of the assets held by the Sub-fund that may be subject to repurchase transactions is generally expected to be around 5% of the Sub-Fund's Net Asset Value. That proportion will be impacted downwards when interest rates are low and upwards when getting higher. When considered for cash management purposes in case of important movements of subscriptions and redemptions, the use of reverse repurchase and repurchase agreements will fluctuate depending on the occurrence of the latter. Depending on the occurrence of the above circumstances, the 5% proportion may on an opportunistic and temporary basis be increased up to a maximum of 20% of the Sub-Fund's Net Asset Value, depending also on the Sub-Fund's liquidity profile and anticipated liquidity needs.

The Sub-Fund will not enter into Total Return Swaps and securities lending transactions.

## 6. **Investment Manager and Investment Sub-Managers:**

ZB Invest Ltd. Will act as the Investment Manager.

Contact details:

**ZB Invest Ltd.**

Samoborska cesta 145  
Zagreb, 10090  
Croatia

## 7. **Benchmark used:**

The Sub-Fund does not use any index under the Benchmark Regulation.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a medium volatility of the Sub-Fund and potentially capital losses in order to achieve moderate potential investment performances. The sub-fund is intended for investors with a medium-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a conservative investment strategy. A steady and stable investment performance is the aim in return for a moderate risk appetite. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as reduced risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Hungarian Forint. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## **12. Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

### 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, and Croatia, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	HUF
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## **22. onemarkets Bond Target 2029 Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is the preservation and increase of the value of the investor's investment over the investment period of the Sub-Fund.

### **2. Investment Strategy:**

The Investment Manager actively manages the Sub-Fund's diversified portfolio of various fixed income securities such as government and corporate bonds (including financial and non-financial issuers) and Money Market Instruments and bank deposits in EU Member States, EFTA Member States, the United States of America and the United Kingdom markets.

The Investment Manager selects the Sub-Fund's foreign country and currency compositions based on an evaluation of various factors, including, but not limited to, relative interest rates, exchange rates, monetary and fiscal policies, trade and current account balances.

The Sub-Fund has a portfolio with an investment period of 5 years. In the months preceding the end of the investment period date, the Sub-Fund's portfolio may comprise significant cash positions resulting from matured bonds and the Board of Directors may decide to merge this Sub-Fund into another sub-fund promoted and/or managed by companies of the group to which the Management Company belongs or of another UCITS or to liquidate it or reformulate its investment policy in the best interests of the Shareholders. Consequently, the Shareholders will receive a notice advising them of the decision of the Board of Directors in this respect and this Prospectus will be updated accordingly. In case of significant cash positions as referred to above and in order to comply with the usual limitations applying to such cash positions under the 2010 Law, temporary investments in other liquid assets (cash equivalents) may be made pending the decision of the Board of Directors to merge, liquidate or restructure the Sub-Fund.

### **3. Investment Policy:**

The Sub-Fund aims to achieve its investment objective through exposure to fixed income markets as follows:

- exposure to bond markets without limitations through direct investments into bonds and through indirect investments into UCITS or UCIs eligible under article 41(1)e) of the 2010 Law with dominant exposure to bonds and financial derivatives with bonds, baskets of bonds or bond market indices as underlying instruments;
- exposure to Money Market Instruments up to 30% of the total Sub-Fund exposure through direct investments into money market instruments and bank deposits and through indirect investment into UCITS or UCIs eligible under article 41(1)e) of the 2010 Law with dominant exposure to Money Market Instruments and financial derivatives with Money Market Instruments, baskets of Money Market Instruments or money market indices as underlying instruments.

The Sub-Fund will undertake investments that are exposed to the markets of EU Member States, EFTA Member States, the United States of America or the United Kingdom, which include investments in financial instruments issued or guaranteed by one of the aforementioned countries or units of local and regional (regional) self-government of the aforementioned countries, i.e. in financial instruments of other issuers from the aforementioned countries or who operate or generate most of their income in the aforementioned countries (direct exposure), as well as investing in derivative financial instruments and investment funds that are exposed to the listed financial instruments (indirect exposure). **Up to 100% of the Sub-Fund's net assets can be invested in bonds and Money Market Instruments issued or guaranteed by Austria, France, Germany, Hungary, Italy, Poland, Romania or the United States of America.**

The maturity or call date of the bonds will generally be before the end of Sub-Fund's investment period. The Sub-Fund may invest up to 20% of its net assets in puttable bonds maturing after the Sub-Fund's investment period provided that they have a put date before the end of the Sub-Fund's investment period.

The Sub-Fund's fixed income investments are primarily investment grade subject to an average rating of BBB+. Investments with a rating below investment grade (subject to the following minimum ratings: S&P – BB, Fitch – BB and Moody's – Ba2) will not exceed 20% of the Sub-Fund's net assets whilst unrated investments will only represent a very limited portion of the Sub-Fund's portfolio (not exceeding 10% of the Sub-Fund's net assets). The selection process of fixed income investments is based on fundamental analysis. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals, a relative value analysis and fixed income security evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realisation of the same) in the best interest of the investors. Unrated investments will be assigned an internal rating determined by the Investment Manager for the purposes of the determination of the average rating of the Sub-Fund's portfolio.

The Sub-Fund will not invest in:

- equity securities,
- defaulted or distressed securities,
- convertible bonds and contingent convertible bonds ("CoCos") eligible under the 2010 Law,
- ABS/MBS/CDOs,
- ADR's/GDR's and REITs.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the Sub-Fund's reference currency (EUR) but will normally limit its foreign currency exposure (from non-EUR denominated securities or currencies) to 20% of its net assets (by using strategies to hedge currency risks in relation to currencies different from EUR).

The Sub-Fund will invest up to 100% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law ("Target Funds"). Investors should note that for investments in units/shares of Target Funds, costs may generally arise both at the Sub-Fund level and at the level of the Target Funds. The cumulative management fee (excluding performance fees, if applicable) at Sub-Fund and relevant Target Fund level shall not exceed 4.75%. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) as well as use securities financing techniques (as further described below) for hedging and efficient management purposes and to achieve its investment objective. To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors, or currencies from time to time. The use of financial derivative instruments (e.g., futures, options and swaps) as well as the use of securities financing techniques is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 6 of SFDR. The investments underlying the Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

#### 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a continuous basis:

Securities financing transaction	Permitted	Used	Maximum amount	Estimated amount
Repurchase transactions	Yes	Yes	20%	5%



When used for efficient portfolio management purposes, securities financing transactions are helping to meet any investment objective, for example to achieve exposure to assets while limiting costs, reducing risks, offer combined investments and/or facilitate the access to the market in a timely manner.

When used for cash management purposes, securities financing transactions are used as a treasury management tool, to facilitate a cost-efficient flow of cash with the objective to contribute to a complementary financing of its investment strategies (repurchase agreements) or to affect temporary excess of cash while optimizing revenues (reverse repurchase agreements).

When used to generate additional income, securities financing transactions contribute to generate additional income and/or to offset costs.

In respect to repurchase transaction revenues, all revenues remain with the Sub-Fund, and standard transaction costs on gross value of the transaction are separately charged. Such direct fees and costs are determined in accordance with market practice and consistent with the current market levels.

The proportion of the assets held by the Sub-fund that may be subject to repurchase transactions is generally expected to be around 5% of the Sub-Fund's Net Asset Value. That proportion will be impacted downwards when interest rates are low and upwards when getting higher. When considered for cash management purposes in case of important movements of subscriptions and redemptions, the use of reverse repurchase and repurchase agreements will fluctuate depending on the occurrence of the latter. Depending on the occurrence of the above circumstances, the 5% proportion may on an opportunistic and temporary basis be increased up to a maximum of 20% of the Sub-Fund's Net Asset Value, depending also on the Sub-Fund's liquidity profile and anticipated liquidity needs.

The Sub-Fund will not enter into Total Return Swaps and securities lending transactions.

## 6. **Investment Manager and Investment Sub-Managers:**

ZB Invest Ltd. Will act as the Investment Manager.

Contact details:

**ZB Invest Ltd.**

Samoborska cesta 145  
Zagreb, 10090  
Croatia

## 7. **Benchmark used:**

The Sub-Fund does not use any index under the Benchmark Regulation.

## 8. **Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a low volatility of the Sub-Fund and potentially capital losses in order to achieve returns slightly higher than the usual market's interest level. The Sub-Fund is intended for investors with a medium-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a safety-oriented investment strategy. The security of the investments has primary importance. Risks are not ruled out completely, but the aim is to minimise them as far as possible. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as low risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## **12. Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

### 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, and Croatia, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day (of the subscription period as far as subscriptions are concerned)
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## **23. onemarkets Bond Target 2029 II Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is the preservation and increase of the value of the investor's investment over the investment period of the Sub-Fund.

### **2. Investment Strategy:**

The Investment Manager actively manages the Sub-Fund's diversified portfolio of various fixed income securities such as government and corporate bonds (including financial and non-financial issuers) and Money Market Instruments and bank deposits in EU Member States, EFTA Member States, the United States of America and the United Kingdom markets.

The Investment Manager selects the Sub-Fund's foreign country and currency compositions based on an evaluation of various factors, including, but not limited to, relative interest rates, exchange rates, monetary and fiscal policies, trade and current account balances.

The Sub-Fund has a portfolio with an investment period of 5 years. In the months preceding the end of the investment period, the Sub-Fund's portfolio may comprise significant cash positions resulting from matured bonds and the Board of Directors may decide to merge this Sub-Fund into another sub-fund promoted and/or managed by companies of the group to which the Management Company belongs or of another UCITS or to liquidate it or reformulate its investment policy in the best interests of the Shareholders. Consequently, the Shareholders will receive a notice advising them of the decision of the Board of Directors in this respect and this Prospectus will be updated accordingly. In case of significant cash positions as referred to above and in order to comply with the usual limitations applying to such cash positions under the 2010 Law, temporary investments in other liquid assets (cash equivalents) may be made pending the decision of the Board of Directors to merge, liquidate or restructure the Sub-Fund.

### **3. Investment Policy:**

The Sub-Fund aims to achieve its investment objective through exposure to fixed income markets as follows:

- exposure to bond markets without limitations through direct investments into bonds and through indirect investments into UCITS or UCIs eligible under article 41(1)e) of the 2010 Law with dominant exposure to bonds and financial derivatives with bonds, baskets of bonds or bond market indices as underlying instruments;
- aggregate exposure to Money Market Instruments up to 30% of the Sub-Fund's net assets through direct investments into money market instruments and through indirect investment into UCITS or UCIs eligible under article 41(1)e) of the 2010 Law with dominant exposure to Money Market Instruments and financial derivatives with Money Market Instruments, baskets of Money Market Instruments or money market indices as underlying instruments.

The Sub-Fund will undertake investments that are exposed to the markets of EU Member States, EFTA Member States, the United States of America or the United Kingdom, which include investments in financial instruments issued or guaranteed by one of the aforementioned countries or units of local and regional (regional) self-government of the aforementioned countries, i.e. in financial instruments of other issuers from the aforementioned countries or who operate or generate most of their income in the aforementioned countries (direct exposure), as well as investing in derivative financial instruments and investment funds that are exposed to the listed financial instruments (indirect exposure). **Up to 100% of the Sub-Fund's net assets can be invested in bonds and Money Market Instruments issued or guaranteed by Austria, France, Germany, Hungary, Italy, Poland, Romania or the United States of America.**

The maturity or call date of the bonds will generally be before end of the Sub-Fund's investment period. The Sub-Fund may invest up to 20% of its assets in puttable bonds maturing after the Sub-Fund's investment period provided that they have a put date before the Sub-Fund's investment period.

The Sub-Fund's fixed income investments are primarily investment grade subject to an average rating of BBB+. Investments with a rating below investment grade (subject to the following minimum ratings: S&P – BB, Fitch – BB and Moody's – Ba2) will not exceed 20% of the Sub-Fund's net assets whilst unrated investments will only represent a very limited portion of the Sub-Fund's portfolio (not exceeding 10% of the Sub-Fund's net assets). The selection process of fixed income investments is based on fundamental analysis. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals, a relative value analysis and fixed income security evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realisation of the same) in the best interest of the investors. Unrated investments will be assigned an internal rating determined by the Investment Manager for the purposes of the determination of the average rating of the Sub-Fund's portfolio.

The Sub-Fund will not invest in:

- equity securities,
- defaulted or distressed securities,
- convertible bonds and contingent convertible bonds ("CoCos") eligible under the 2010 Law,
- ABS/MBS/CDOs,
- ADR's/GDR's and REITs.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the Sub-Fund's reference currency (EUR) but will normally limit its foreign currency exposure (from non-EUR denominated securities or currencies) to 20% of its net assets (by using strategies to hedge currency risks in relation to currencies different from EUR).

The Sub-Fund will invest up to 100% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law ("Target Funds"). Investors should note that for investments in units/shares of Target Funds, costs may generally arise both at the Sub-Fund level and at the level of the Target Funds. The cumulative management fee (excluding performance fees, if applicable) at Sub-Fund and relevant Target Fund level shall not exceed 4.75%. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) as well as use securities financing techniques (as further described below) for hedging and efficient management purposes and to achieve its investment objective. To enhance investment returns, the Investment Manager may use both long and short positions to vary asset, currency and market allocations in response to market conditions and opportunities. As a result, the Sub-Fund may have net long or net short exposure to certain markets, sectors, or currencies from time to time. The use of financial derivative instruments (e.g., futures, options and swaps) as well as the use of securities financing techniques is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

**It cannot be assured that the investment policy will achieve the investment objective.**

#### 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 6 of SFDR. The investments underlying the Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

#### 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a continuous basis:

Securities financing transaction	Permitted	Used	Maximum amount	Estimated amount
Repurchase transactions	Yes	Yes	20%	5%

When used for efficient portfolio management purposes, securities financing transactions are helping to meet any investment objective, for example to achieve exposure to assets while limiting costs, reducing risks, offer combined investments and/or facilitate the access to the market in a timely manner.

When used for cash management purposes, securities financing transactions are used as a treasury management tool, to facilitate a cost-efficient flow of cash with the objective to contribute to a complementary financing of its investment strategies (repurchase agreements) or to affect temporary excess of cash while optimizing revenues (reverse repurchase agreements).

When used to generate additional income, securities financing transactions contribute to generate additional income and/or to offset costs.

In respect to repurchase transaction revenues, all revenues remain with the Sub-Fund, and standard transaction costs on gross value of the transaction are separately charged. Such direct fees and costs are determined in accordance with market practice and consistent with the current market levels.

The proportion of the assets held by the Sub-fund that may be subject to repurchase transactions is generally expected to be around 5% of the Sub-Fund's Net Asset Value. That proportion will be impacted downwards when interest rates are low and upwards when getting higher. When considered for cash management purposes in case of important movements of subscriptions and redemptions, the use of reverse repurchase and repurchase agreements will fluctuate depending on the occurrence of the latter. Depending on the occurrence of the above circumstances, the 5% proportion may on an opportunistic and temporary basis be increased up to a maximum of 20% of the Sub-Fund's Net Asset Value, depending also on the Sub-Fund's liquidity profile and anticipated liquidity needs.

The Sub-Fund will not enter into Total Return Swaps and securities lending transactions.

## 6. Investment Manager and Investment Sub-Managers:

ZB Invest Ltd. Will act as the Investment Manager.

Contact details:

**ZB Invest Ltd.**

Samoborska cesta 145  
Zagreb, 10090  
Croatia

## 7. Benchmark used:

The Sub-Fund does not use any index under the Benchmark Regulation.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a low volatility of the Sub-Fund and potentially capital losses in order to achieve returns slightly higher than the usual market's interest level. The Sub-Fund is intended for investors with a medium-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a safety-oriented investment strategy. The security of the investments has primary importance. Risks are not ruled out completely, but the aim is to minimise them as far as possible. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as low risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## **12. Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.



### 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, and Croatia, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day (of the subscription period as far as subscriptions are concerned)
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 24. onemarkets Libra Fund

### 1. Investment Objective:

The investment objective of the Sub-Fund is to increase the value of the investor's investment over the recommended holding period (as further specified under the section "Profile of the typical investor" below).

### 2. Investment Strategy:

The Sub-Fund invests worldwide in equities of corporates. The balance is invested in EUR denominated bonds of high credit quality (at least investment grade rating issued by reputable credit rating agencies). The selection of both equities and bonds is undertaken on the basis of the Investment Manager's selection methodology in addition to ethical minimum standards. The Investment Manager's selection methodology is thereby based on six core criteria (as further described below). One star can be awarded for each of these criteria. If a potential investment receives all six possible stars, it is considered an excellent investment, whereby four stars are the minimum for the eligibility of a security. The Investment Manager's core rating and selection criteria in the equity segment include: long-term defensible competitive advantage, solid balance sheet, low dependency on business cycles, capable management, long-term growth prospects and sustainable earnings per share. The selection of sustainable equities and bonds is performed on the basis of the Investment Manager's data service provider. Sustainability factors are integrated into the Sub-Fund's investment process and the Sub-Fund only purchases financial instruments that have been categorised as sustainable by the Investment Manager on the basis of a predefined screening process. The Investment Manager makes the investment decisions for this Sub-Fund by applying sustainability factors on the investment universe defined through the rigorously quality focused screening process. The Investment Manager's investment committee makes centralised asset allocation decisions by way of a majority vote in accordance with the Investment Manager's internally defined rules and based on countercyclical considerations. These asset allocation decisions must be implemented by the Investment Manager. Individual securities are selected based on the Investment Manager's star ratings.

### 3. Investment Policy:

The Sub-Fund invests at least 30% and up to 70% of its net assets worldwide in listed equities of corporates. The Sub-Fund is not bound by any sector or country restrictions although the exposure to emerging markets (if any) will be limited to 10% of its net assets. At least 30% of the Sub-Fund's assets are invested in bonds denominated in EUR, covered bonds, convertible bonds, municipal bonds, government bonds and inflation linked government bonds predominantly with a high (at least investment grade) credit rating (issued by reputable credit rating agencies). The average rating of the Sub-Fund's bond portfolio will not be below single A under normal market conditions. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals and bond evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realization of the same) in the best interest of the investors.

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) for hedging purposes. The use of financial derivative instruments (e.g. futures, options, CFDs and swaps) is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus. The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular leverage, is therefore excluded.

The Sub-Fund may invest in currencies other than the reference currency (EUR).

The Sub-Fund will not invest in:

- defaulted or distressed securities;
- contingent convertible bonds ("CoCos");
- ABS/MBS/CDOs;
- REITs.

The Investment Manager has developed a two-step process that collects appropriate parameters of investments in order to assess environmental and social characteristics as described in "4. Sustainability approach" section below.

The Sub-Fund will invest no more than 10% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law. In case of investments in UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund's assets.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

For liquidity management purposes, the Sub-Fund may invest on a temporary basis, in addition to the liquid assets referred to above, in cash equivalents meaning: time deposits, certificates of deposit, term deposits, notes, commercial paper, short-term government debt such as treasury-bills, bills of exchange and other instruments with a remaining period to maturity not exceeding twelve months and money market funds.

A minimum of 80% of the Sub-Fund's net assets will be invested in investments that are aligned with the environmental and/or social characteristics outlined below in the SFDR Appendix. Of these investments, a minimum of 10% of the Sub-Fund's net assets will be invested in Sustainable Investments.

**It cannot be assured that, the investment policy will achieve the investment objective.**

## 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR. This financial product 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 10% of sustainable investments, with an environmental and/or with a social objective.

The Investment Manager has developed a two-step process that collects appropriate measures of investments in order to assess environmental and social characteristics.

The first step is a “negative screening” (selection according to exclusion criteria as well as compliance with the UN Global Compact). The Sub-Fund has defined the following exclusion criteria identifying companies and/or countries and/or underlying which cannot be invested.

First of all, the Sub-Fund has defined serious or very serious violations of companies against the principles of the UN Global Compact as exclusion criteria. The framework is strictly based on the 10 Principles of the UN Global Compact in respect of human rights, labour relations, environmental protection and anti-corruption.

Regarding companies as issuers, the following exclusion criteria apply:

- Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations. For nuclear weapons the exclusion is applicable to all those companies which derive from nuclear weapons more than 5% of their consolidated revenues.
- Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 2% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
- Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact (a de minimis rule can be applied, i.e. companies with a minor involvement are not necessarily excluded).
- Companies involved in the tobacco business which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the nuclear energy production which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the weapons business which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the gambling business which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the adult entertainment business which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the production of high-proof alcohol business which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the genetically modified organism's business which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the animal testing business (unless there is a legal need for it) which derive from these businesses more than 5% of their consolidated revenues.

Regarding countries as issuers, the following exclusion criteria apply:

- Bonds issued by countries that are not compliant with FATF Recommendations (Black and Grey lists).
- Bonds issued by countries that are not signatories of Paris 2015 Agreement on climate change are excluded.
- Bonds issued by countries classified with 'partly free or not free'- status according to freedom house index.
- Bonds issued by countries that violate democratic principles and fundamental/human rights or/and have a controversy in Human Rights, Labour Rights, Freedom of Speech and Press, Freedom of Association, Discrimination or Child Labour.
- Bonds issued by countries which apply the death penalty.
- Bonds issued by countries with high military budgets (more than 3% of GDP).

- Bonds issued by countries with inadequate efforts to protect the climate (Climate Change Performance Index (CCPI) < 40).
- Bonds issued by countries with more than 10% of total primary energy supply and no moratorium on building NP plants and no decision on abandoning NP plants.
- Bonds issued by countries classified as Non-Ratifier of the Convention on Biological Diversity.
- Bonds issued by countries in which corruption in the public sector is perceived to be too high (Corruption Perception Index (CPI) of Transparency International e. V. < 50).

In the second step, the remaining issuers go through a "positive screening" with regard to their social and environmental standards. Positive criteria are indicators that speak for an above-average performance of a company or state with regard to the advertised environmental and social characteristics.

First, the taxonomy compliant activities, as defined in Regulation (EU) 2020/852, are collected for all investments.

Second, the Investment Manager identifies other environmental and social investments based on its own defined criteria.

A company that meets all of the following positive factors in addition to the exclusion criteria is considered to be an investment "with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy".

- Companies and countries with a below-average greenhouse gas emission intensity – PAI 3 from Table 1 for companies or PAI 15 from Table 1 for countries set the total greenhouse gas emissions (tons of CO<sub>2</sub> equivalent) in relation to sales (companies) or the number of inhabitants (countries). This indicator is compared with a reference value, which corresponds to the mean value of the investment universe. If the reference value is not reached, then this criterion is met.
- Companies that initiate initiatives to reduce CO<sub>2</sub> emissions in accordance with the Paris Agreement – PAI 4 from Table 2 evaluates companies based on the targets set in terms of reducing greenhouse gas emissions in order to achieve climate targets.
- Non-Fossil Fuel Companies – PAI 4 from Table 1 relates to the extraction, processing and marketing of fossil fuels and the generation of energy using coal, oil or natural gas.
- Businesses whose operations do not adversely affect areas of vulnerable biodiversity – PAI 7 from Table 1 measures the proportion of businesses located or operating in or near areas of vulnerable biodiversity where the operations of those businesses adversely affect those areas affect.
- Companies and countries with above-average overall performance in climate change mitigation or adaptation – This is assessed by the Investment Manager's data provider using a proprietary scoring model: The Carbon Risk Rating.

Those companies that do not meet all the environmental positive criteria are now assessed with regard to social positive criteria: investments "with a social objective". This means that an investment can only be considered ecological or social.

If, in addition to the exclusion criteria, a company also meets all of the following criteria and is not already included among the environmental investments, it is designated as a social investment.

- Companies with internal human rights compliance processes – PAI 9 from Table 3.
- Companies that have procedures and mechanisms in place to monitor compliance with the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises – PAI 11 from Table 1.

- Companies that have at least one third of their supervisory board occupied by women – PAI 13 from Table 1.
- Countries where ISS ESG has assessed that there are no relevant violations of established social norms, as defined by international treaties and conventions, United Nations Principles or, where applicable, national legislation – PAI 16 from Table 1.
- Companies and countries with a positive impact score in achieving the 17 United Nations Sustainable Development Goals – This is assessed by the Investment Manager’s data provider using the SGD Solution Score.

In order to be able to assess the ecological and social characteristics of an investment, the Investment Manager relies on data from the Investment Manager’s data provider, which has internationally recognized expertise in all areas related to sustainable and responsible investment. The Investment Manager’s data provider provides the Investment Manager with extensive expertise and data on companies, states and supranational entities in the context of sustainability analyses, sustainability ratings, sustainability and climate-related data and consulting services. The spectrum of the Investment Manager’s data provider also includes topics such as climate change, the impact on achieving the UN Sustainable Development Goals, human rights, labor standards, corruption, controversial weapons and much more.

The exclusions and positive criteria are subject to constant monitoring and may be amended or adapted based on new information and developments in the market.

## 5. Use of Securities Financing Transactions:

The Sub-Fund will not enter into securities lending transactions, Total Return Swap transactions and repurchase transactions.

## 6. Investment Manager and Sub-Investment Manager:

Schoellerbank Invest AG will act as the Investment Manager.

Contact details:

**Schoellerbank Invest AG**

Sterneckstraße 5

A-5027 Salzburg

## 7. Benchmark used:

The Sub-Fund does not use any index under the Benchmark Regulation.

## 8. Profile of the typical investor:

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a medium volatility of the Sub-Fund and potentially capital losses in order to achieve moderate potential investment performances. The sub-fund is intended for investors with a medium-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a conservative investment strategy. A steady and stable investment performance is the aim in return for a moderate risk appetite. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as reduced risk tolerant. For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## **12. Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

### 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, and Austria, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.



## 24a. onemarkets Libra Fund

### Template pre-contractual disclosure for the 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:**

onemarkets Libra Fund

**Legal entity identifier:**

tbd

## Environmental and/or social characteristics

**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, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Does this financial product have a sustainable investment objective?**

**Yes**

**No**

It will make a minimum of **sustainable investments with an environmental objective**: \_\_\_%

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 10% of sustainable investments.

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It will make a minimum of **sustainable investments with a social objective**: \_\_\_%

It promotes E/S characteristics, but **will not make any sustainable investments**



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

The Sub-Fund promotes a broad range of environmental and/or social characteristics. The characteristics are defined in cooperation with the "Advisory Board for Ethics and Sustainability". The advisory board was established for two reasons. On the one hand, the reason lies in the legal requirements regarding sustainability, which sometimes have to be discussed controversially and for which the highest level of expertise is required. On the other hand, the advisory board was introduced in order to continuously develop the sustainability criteria.

In the **ecological area**, climate protection and the protection of natural ecosystems are important investment principles. Investments are avoided in economic activities that are particularly detrimental to these environmental goals, such as coal extraction and power generation, oil and gas extraction using problematic methods (e.g. fracking) or in particularly sensitive ecosystems (e.g. arctic oil) to do. On the other hand, companies that are working on improving their greenhouse gas footprint and do not endanger biodiversity in their sphere of influence are to be funded. In addition, investments are made in bonds from countries that are committed to climate protection and the preservation of biodiversity. Additional environmental factors to be considered include phasing out nuclear power, avoiding the use of genetically modified organisms in food production, and banning animal testing unless there is a legal need for it.

In the **social sphere**, investments are made to promote democracy, respect human rights, fight corruption, gender equality and overcome discrimination. This is to be achieved through a catalog of criteria based on the Universal Declaration of Human Rights and the principles of the UN Global Compact. This also includes avoiding investments in companies that produce weapons and in countries with particularly high military spending. In addition, investments in the following controversial business areas are avoided: alcohol, tobacco, pornography and gambling.

The Investment Manager has developed a **two-step process** that collects appropriate measures of investments in order to assess environmental and social characteristics.

The **first step** is a "**negative screening**" (selection according to exclusion criteria as well as compliance with the UN Global Compact). Issuers that meet an exclusion criteria are eliminated in the first stage, so that no investment is made in their securities, either indirectly or directly.

In the **second step**, the remaining issuers go through a "**positive screening**" with regard to their social and environmental standards. Positive criteria are indicators that speak for an above-average performance of a company or state with regard to the advertised environmental and social characteristics.

In order to be able to assess the ecological and social characteristics of an investment, the Investment Manager relies on data from the company ISS ESG, which has internationally recognized expertise in all areas related to sustainable and responsible investment. ISS ESG provides the company with extensive expertise and data on companies, states and supranational entities in the context of sustainability analyses, sustainability ratings, sustainability and climate-related data and consulting services. The spectrum of ISS ESG also includes topics such as climate change, the impact on achieving the UN Sustainable Development Goals, human rights, labor standards, corruption, controversial weapons and much more. In this way, we combine the expertise of two specialists – and thus offer the sustainable investor added value. The Investment Manager randomly checks the data provided by ISS ESG – including estimates – for plausibility as far as possible.

No reference–benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

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

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

The Investment Manager of the Sub-Fund has developed a two-step process that collects appropriate measures of investments in order to assess environmental and social characteristics.

The first step is a “negative screening” (selection according to exclusion criteria as well as compliance with the UN Global Compact). The Sub-Fund has defined following exclusion criteria identifying Companies and/or Countries and/or underlying which cannot be invested.

First of all, the Sub-Fund has defined serious or very serious violations of companies against the principles of the UN Global Compact as exclusion criteria. The framework is strictly based on the 10 Principles of the UN Global Compact in respect of human rights, labour relations, environmental protection and anti-corruption.

#### **Human Rights**

- support and respect the protection of internationally proclaimed human rights
- make sure that they are not complicit in human rights abuses

#### **Labour**

- uphold the freedom of association and the effective recognition of the right to collective bargaining
- elimination of all forms of forced and compulsory labour
- the effective abolition of child labour
- the elimination of discrimination in respect of employment and occupation

#### **Environment**

- support a precautionary approach to environmental challenges
- undertake initiatives to promote greater environmental responsibility
- encourage the development and diffusion of environmentally friendly technologies

#### **Anti-Corruption**

- work against corruption in all its forms, including extortion and bribery

Regarding companies as issuers, following exclusion criteria apply:

- Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations. For nuclear weapons the exclusion is applicable to all those companies which derive from nuclear weapons more than 5% of their consolidated revenues.
- Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 2% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
- Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact (a *de minimis* rule can be applied, i.e. companies with a minor involvement are not necessarily excluded, and the internal threshold limit on the Management Company's side will be set at 5%).
- Companies involved in the tobacco business which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the nuclear energy production which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the weapons business which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the gambling business which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the adult entertainment business which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the production of high-proof alcohol business which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the genetically modified organisms business which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the animal testing business (unless there is a legal need for it) which derive from these businesses more than 5% of their consolidated revenues.

Regarding countries as issuers, following exclusion criteria apply:

- Bonds issued by Countries that are not compliant with FATF Recommendations (Black and Grey list).
- Bonds issued by Countries that are not signatories of Paris 2015 Agreement on climate change are excluded.
- Bonds issued by Countries classified with 'partly free or not free'- status according to freedom house index
- Bonds issued by Countries that violate democratic principles and fundamental/human rights or/and have a controversy in Human Rights, Labour Rights, Freedom of Speech and Press, Freedom of Association, Discrimination or Child Labour.
- Bonds issued by Countries which apply the death penalty.
- Bonds issued by Countries with high military budgets (more than 3% of GDP).
- Bonds issued by Countries with inadequate efforts to protect the climate (Climate Change Performance Index (CCPI) < 40).
- Bonds issued by Countries with more than 10% of total primary energy supply and no moratorium on building NP plants and no decision on abandoning NP plants.
- Bonds issued by Countries classified as Non-Ratifier of the Convention on Biological Diversity.

- Bonds issued by Countries in which corruption in the public sector is perceived to be too high (Corruption Perception Index (CPI) of Transparency International e. V. < 50).

In the **second step**, the remaining issuers go through a “positive screening” with regard to their social and environmental standards. Positive criteria are indicators that speak for an above-average performance of a company or state with regard to the advertised environmental and social characteristics.

First, the taxonomy compliant activities, as defined in Regulation (EU) 2020/852, are collected for all investments.

Second, the Investment Manager identifies other environmental and social investments based on its own defined criteria.

A company that meets all of the following positive factors in addition to the exclusion criteria is considered to be an investment “with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy”.

- Companies and countries with a below-average greenhouse gas emission intensity – PAI 3 from Table 1 for companies or PAI 15 from Table 1 for countries set the total greenhouse gas emissions (tonnes of CO<sub>2</sub> equivalent) in relation to sales (companies) or the number of inhabitants (countries). This indicator is compared with a reference value, which corresponds to the mean value of the investment universe. If the reference value is not reached, then this criterion is met.
- Companies that initiate initiatives to reduce CO<sub>2</sub> emissions in accordance with the Paris Agreement – PAI 4 from Table 2 evaluates companies based on the targets set in terms of reducing greenhouse gas emissions in order to achieve climate targets.
- Non-Fossil Fuel Companies – PAI 4 from Table 1 relates to the extraction, processing and marketing of fossil fuels and the generation of energy using coal, oil or natural gas.
- Businesses whose operations do not adversely affect areas of vulnerable biodiversity – PAI 7 from Table 1 measures the proportion of businesses located or operating in or near areas of vulnerable biodiversity where the operations of those businesses adversely affect those areas affect.
- Companies and countries with above-average overall performance in climate change mitigation or adaptation – This is assessed by ISS ESG using a proprietary scoring model: The Carbon Risk Rating.

Those companies that do not meet all the environmental positive criteria are now assessed with regard to social positive criteria: investments “with a social objective”. This means that an investment can only be considered ecological or social.

If, in addition to the exclusion criteria, a company also meets all of the following criteria and is not already included among the environmental investments, it is designated as a social investment.

- Companies with internal human rights compliance processes – PAI 9 from Table 3.
- Companies that have procedures and mechanisms in place to monitor compliance with the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises – PAI 11 from Table 1.

- Companies that have at least one third of their supervisory board occupied by women – PAI 13 from Table 1.
- Countries where ISS ESG has assessed that there are no relevant violations of established social norms, as defined by international treaties and conventions, United Nations Principles or, where applicable, national legislation – PAI 16 from Table 1.
- Companies and countries with a positive impact score in achieving the 17 United Nations Sustainable Development Goals – This is assessed by ISS ESG using the SGD Solution Score.

Data that are used for the analysis of companies and countries are obtained from an independent rating agency (ISS ESG). These developments are monitored and documented on an ongoing basis by the risk management unit of Schoellerbank Invest AG. Schoellerbank Invest AG has no influence on the analysis or completeness of data that is supplied by third-party providers.

The exclusions and positive criteria are subject to constant monitoring and may be amended or adapted on the basis of new information and developments in the market.

● ***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?***

The above-mentioned ecological and social principles and the sustainability indicators – exclusion criteria and positive criteria – which are used to measure them, should lead to the promotion of those countries and companies in the context of the investment which support the ecological and social characteristics through their activities and products. By providing capital, these issuers should be able to expand their activities.

The sustainable investments underlying this financial product are intended to contribute to the following environmental objectives:

- Climate protection
- Pollution prevention and control
- Protection and restoration of biodiversity and ecosystems

Ecological characteristics are promoted by avoiding investments in economic activities that are particularly harmful to ecological goals. The exclusion of affected companies ensures that support is not provided to companies characterised by environmental awareness violations, the lack of a precautionary approach with regard to environmental problems, the failure to develop and prepare environmentally friendly technologies, and companies that generate their core revenues in fields that are harmful to the environment. Environmental characteristics are promoted at the country level by requiring investee countries to be signatories to the UN Biodiversity Convention and the Paris Agreement and excluding countries that do not make adequate efforts towards climate protection.

Social characteristics are promoted by avoiding investment in economic activities that are particularly harmful to social goals. The exclusion of affected companies promotes and positively impacts the following social characteristics: prohibition of discrimination in the workplace, prohibition of child labour, and prevention of human rights violations. The exclusion of countries that use the death penalty and countries that continuously violate human rights and the rights pertaining to democracy promotes social characteristics at the country level.

**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.

***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?***

In the two-step screening process described above, the environmental and social characteristics are determined at the first stage by means of mandatory exclusion criteria that all securities must comply with. In the second stage, the remaining investment universe is assessed for the performance of environmental and social characteristics using positive criteria.

Compliance with the exclusion criteria and positive criteria as well as ongoing monitoring of the PAI indicators are aimed at verifying the suitability of the investments as ecological or sustainable investments. The ongoing monitoring of all exclusion criteria and positive criteria also evaluates whether the investments are detrimental to the sustainable investment objectives, resulting in the immediate disposal of the investment. For this purpose, the Investment Manager has established internal control systems and processes that monitor investments in terms of the defined criteria.

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

The PAI indicators are reflected in both the exclusion criteria and the positive criteria. The exclusion criteria prohibit any investment in activities that severely violate the principles of the UN Global Compact. Furthermore, investments in controversial weapons are also not permitted (PAI 14 from Table 1).

Within the positive criteria, the following environmental PAI indicators are considered for companies:

- GHG intensity of investee companies (PAI 3 from Table 1)
- Exposure to companies active in the fossil fuel sector (PAI 4 from Table 1)
- Activities negatively affecting biodiversity sensitive areas (PAI 7 from Table 1)
- Investments in companies without carbon emission reduction initiatives (PAI 4 from Table 2)

These social PAI indicators are observed at companies, within the positive criteria:

- Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10 from Table 1)
- Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (PAI 11 from Table 1)
- Board gender diversity (PAI 13 from Table 1)
- Exposure to controversial weapons (PAI 14 from Table 1)
- Lack of a human rights policy (PAI 9 from Table 3)

The following PAI indicators apply to government bonds:

- GHG intensity (PAI 15 from Table 1)
- Investee countries subject to social violations (PAI 16 from Table 1)

The following PAIs are taken into account as part of the two-step process that collects appropriate measures of investments in order to assess environmental and social characteristics:

PAI 1 from Table 1: GHG emissions (Scope 1, 2 and 3)

PAI 2 from Table 1: Carbon footprint

PAI 3 from Table 1: GHG intensity of investee companies

PAI 4 from Table 1: Exposure to companies active in the fossil fuel sector

PAI 7 from Table 1: Activities negatively affecting biodiversity sensitive area

PAI 10 from Table 1: Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises

PAI 11 from Table 1: Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises

PAI 13 from Table 1: Board gender diversity

PAI 14 from Table 1: Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

PAI 15 from Table 1: GHG intensity of investee countries

PAI 16 from Table 1: Investee countries subject to social violations

PAI 4 from Table 2: Investments in companies without carbon emission reduction initiatives

PAI 9 from Table 3: Lack of a human rights policy

The PAIs 1-4 (avoiding investments in coal), PAI 7 (biodiversity), PAIs 10 and 11 (UN Global Compact), PAI 13 (gender diversity), PAI 14 (controversial weapons), PAI 15 (GHG intensity of investee countries) PAI 16 (human rights, social rights), PAI 4 from Table 2 (reduction of greenhouse gas emissions) and PAI 9 from Table 3 (human rights policies) are integrated in the investment process for targeting mitigate measures to principal adverse impacts (PAI) and contribute to the check of sustainable Investments in terms of do not cause significant harm.

Data availability is still low in some areas. For the PAIs Share of non-renewable energy consumption and production (PAI 5), Energy consumption intensity per high impact climate sector (PAI 6), Emissions to water (PAI 8), Hazardous waste and radioactive waste ratio (PAI 9) and Unadjusted gender pay gap (PAI 12), data is available for only a small number of companies. This PAIs are not yet taken into account in the assessment process because the database is still insufficient. As soon as there is adequate data availability, these PAIs will be integrated in a reasonable way.

PAI 17 (Exposure to fossil fuels through real estate assets) and PAI 18 (Exposure to energy-inefficient real estate assets) in Table 1 are not considered due to the absence of real estate investments.

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



As part of the sustainable investment process, criteria have been defined in order to comply with the following:

- the Universal Declaration of Human Rights,
- the principles of the UN Global Compact,
- the OECD Guidelines for Multinational Enterprises,
- the United Nations Guiding Principles on Business and Human Rights,
- including the fundamental principles and rights from the eight core conventions set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work (ILO Core Labor Standards)

The exclusion criteria for companies exclude those that show serious violations of the principles of the UN Global Compact. These include, among others, violations of human rights, violations of labor standards and the right to collective bargaining, as well as discrimination occurring in the company's sphere of activity.

In addition, shares and bonds are only considered sustainable investments by companies that have procedures and mechanisms in place to monitor compliance with the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises (PAI indicator 11 in table 1) and that have implemented internal processes and controls to ensure compliance with human rights (PAI indicator 9 in table 3).

Under the exclusion criteria for sovereigns, bonds are not purchased from countries that do not respect human rights and fundamental freedoms (freedom of expression, freedom of religion, freedom of assembly, right to a fair trial etc.), tolerate child labor and forced labor, or enforce the death penalty. States in which discrimination against people on the basis of their gender, ethnicity, religion, sexual orientation, religion or disability is widespread or in which too little effort is made to achieve gender equality are also excluded. Furthermore, sovereign bonds are only considered sustainable if they do not violate social provisions in accordance with international treaties and conventions, United Nations principles or, if applicable, national legislation (PAI indicator 16 from table 1).

*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?

- Yes, Principal Adverse Impacts (PAI) on sustainability factors are, as part of the sustainable investment process, considered.

As part of the sustainable investment process, the principal adverse impacts (PAIs) on sustainability factors are considered. The principal adverse impacts are assessed using the selection process already detailed in this document, while adhering to the exclusion criteria and observing the positive criteria for all investments.

- No



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

## What investment strategy does this financial product follow?

All selected securities must meet the environmental and social criteria of the Investment Manager. This means that all securities must not violate any of the exclusion criteria and the defined minimum share for sustainable investments of 10% must be complied with. The selection of companies and countries according to environmental and social criteria is carried out with the support of the expertise of ISS ESG. This agency provides the data with which the metrics are verified.

The portfolio is managed in accordance with the investment companies guidelines of appropriate risk diversification, ensuring sufficient liquidity and limiting the overall risk. The portfolio is continuously monitored with regard to the applicable allocation, risk parameters and compliance with the environmental and social criteria of the Investment Manager.

- ***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?***

All selected securities must meet the criteria of Schoellerbank Invest AG described. In particular, the exclusion criteria for companies and countries as well as the minimum proportions of sustainable investments must be met. If an issuer falls below the mandatory elements due to changes, the required status is restored by adjusting the portfolio.

Additionally, the Investment Manager will apply specific exclusion criteria defined identifying Companies and/or Countries and/or underlying which should not be invested in or which should be invested in respecting predefined thresholds.

1. Companies that are involved in severe violations of the UN Global Compact
2. Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations.
3. Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses

more than 10% of their consolidated revenues. It's also requested a mandatory phase out by 2028.

4. Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact (a *de minimis* rule can be applied, i.e. companies with a minor involvement are not necessarily excluded, and the internal threshold limit on the Management Company's side will be set at 5%).
5. Companies involved in the tobacco business which derive from these businesses more than 5% of their consolidated revenues.
6. Companies involved in the nuclear energy production which derive from these businesses more than 15% of their consolidated revenues.
7. Companies involved in the weapons business which derive from these businesses more than 10% of their consolidated revenues.
8. Companies involved in the gambling business which derive from these businesses more than 15% of their consolidated revenues.
9. Companies involved in the adult entertainment business which derive from these businesses more than 15% of their consolidated revenues.
10. Bonds issued by Countries that are not compliant with FATF Recommendations (Black and Grey list)
11. Bonds issued by Countries that are not signatories of Paris 2015 Agreement on climate change are excluded.
12. Bonds issued by Countries classified with 'not free'- status according to freedom house index.

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

There is no committed minimum rate for the Sub-Fund.

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

By excluding companies that seriously violate the rules of the UN Global Compact, the procedures of good corporate governance are observed. Issuers that lack processes of good corporate governance or that have committed significant abuses in this area are avoided. These include serious violations of environmental protection, social standards and labor rights, as well as corruption, money laundering, tax evasion and unfair business practices. In addition, the investment fund does not invest in bonds issued by countries that do not comply with minimum standards for the prevention of money laundering or that are susceptible to corruption.

**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?**

**Asset allocation** describes the share of investments in specific assets.

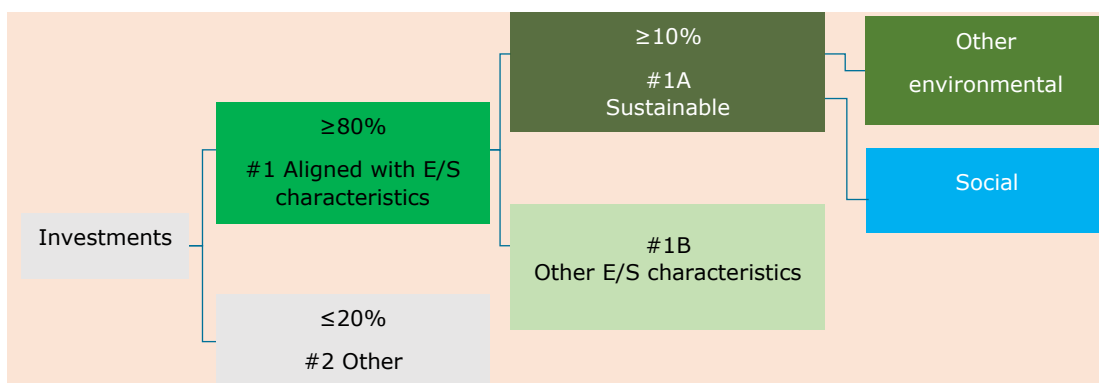
All securities in the Sub-Fund's portfolio must be in accordance with the exclusion criteria referred to above. Only such securities are reported under "#1 Aligned with E/S characteristics". As part of the investment strategy, a portion of the assets may be held in demand deposits. Demand deposits and issuers with missing data regarding exclusion criteria (but positive assessment by management company) are categorized under "#2 Other".

The Sub-Fund 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 10% of sustainable investments, with an environmental and/or with a social objective (#1A Sustainable).

Investments with an environmental objective, such securities are shown under "Other environmental" which, in addition to the exclusion criteria, also meet all of Schoellerbank Invest AG's environmental positive criteria. Social investments must meet the exclusion criteria and all social positive criteria of Schoellerbank Invest AG. If a company can be considered both an environmental and a social investment according to the criteria, the share of this investment is only reported under "Other Environmental" in order to avoid double counting.

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.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

Derivatives are not used to attain the environmental or social characteristics promoted by the Sub-Fund.



**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



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

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

The Sub-Fund has no minimum proportion of investment with an environmental objective aligned with the EU Taxonomy. The Sub-Fund will not make investments aligned with the EU Taxonomy.

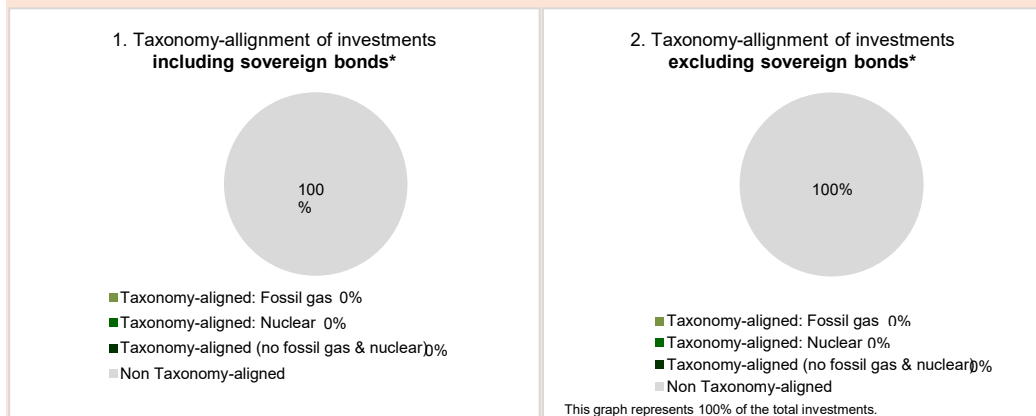
- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

Yes:

In fossil gas  In nuclear energy

No

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

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

The Sub-Fund has no minimum proportion of investment in transitional or enabling activities.



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

The Sub-Fund invests at least 10% of assets in Sustainable Investments according to article 2(17) SFDR, typically across both environmental and social objectives. It does not commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



### **What is the minimum share of socially sustainable investments?**

The Sub-Fund invests at least 10% of assets in Sustainable Investments according to article 2(17) SFDR, typically across both environmental and social objectives. It does not commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



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

Included in “#2 Other” are cash and unrated instruments for the purpose of liquidity and portfolio risk management. Unrated instruments may also include securities for which data needed for the measurement of attainment of environmental or social characteristics is not available.



### **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

There is no specific benchmark defined to assess the alignment with the promoted characteristics.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

N/A

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

N/A

- ***How does the designated index differ from a relevant broad market index?***

N/A

- **Where can the methodology used for the calculation of the designated index be found?**

N/A



### **Where can I find more product specific information online?**

More product-specific information can be found on the website:

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

## 25. onemarkets BlackRock Low Duration Bond Fund

### 1. Investment Objective:

The Sub-Fund's investment objective is to deliver a positive total return over the medium-term. The Sub-Fund invests at least 80% of its total assets in fixed income securities.

### 2. Investment Strategy:

The Sub-Fund is seeking a positive total return over the medium-term. The Sub-Fund invests at least 80% of its net assets in fixed income transferable securities, denominated in various currencies, issued by governments, quasi-sovereigns, agencies, and corporates.

The Sub-Fund will focus on Euro denominated bonds but will retain flexibility to invest in non-Euro denominated bonds. The Sub-Fund may use derivatives for investment purposes and for the purposes of efficient portfolio management.

### 3. Investment Policy:

The Sub-Fund may invest in but is not limited to government bonds, government-related bonds (including supranational, sub-sovereigns and agencies), corporate bonds (including financial and non-financial issuers), covered bonds, municipal bonds, Money Market Instruments, collective investment schemes eligible under article 41(1)e) of the 2010 Law (including fixed income funds, fixed income ETFs, money market funds).

**Up to 100% of the Sub-Fund's net assets can be invested in bonds and Money Market Instruments issued or guaranteed by France, Germany, Belgium, Austria and The Netherlands.**

The Sub-Fund duration is typically +/-2 years with a maximum spread duration of 3 years.

The Sub-Fund may also invest in the following instruments provided that they are eligible in accordance with the 2010 Law:

- Hybrid Securities from investment grade rated issuers: minimum BB- rating,
- non-Hybrid Securities: minimum BBB- rating,
- subordinated bonds including hybrids: maximum 15% of the Sub-Fund's net assets,
- financial issuers: maximum 60% of the Sub-Fund's net assets,
- non-financial issuers: maximum 60% of the Sub-Fund's net assets (industrials or utility),
- unrated securities: maximum 10% of the Sub-Fund's net assets.

The investments of the Sub-Fund will comply with the following overall rating requirements:

- aggregate BBB exposure (BBB- to BBB+): maximum 35% of the Sub-Funds' net assets,
- overall Sub-Fund: rating A- or higher.



The selection process of bonds is based on fundamental analysis. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals and bond evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realization of the same) in the best interest of the investors. The Investment manager will assign an internal rating to unrated securities and will ensure that such unrated securities do not compromise the overall rating of the Sub-Fund (rating A- or higher).

The Sub-Fund may in accordance with the investment policy use derivative instruments such as interest rate futures, interest rate swaps, cross-currency swaps, options, inflation swaps, credit default swaps (single name), credit default swap indices, FX forwards, NDFs.

Such derivative instruments may be used (i) for investment purposes and/or (ii) efficient portfolio management. For example, the Sub-Fund may use derivatives (which will be based only on underlying assets or sectors which are permitted under the investment policy of the Sub-Fund) (ii) as a substitute for taking a position in the underlying asset where the Investment Manager feels that a derivative exposure to the underlying asset represents better value than a direct exposure, (ii) to tailor the Sub-Fund's interest rate exposure to the Investment Manager's outlook for interest rates, and/or (iii) to gain an exposure to the composition and performance of a particular index (provided always that the Sub-Fund may not have an indirect exposure through an index to an instrument, issuer or currency to which it cannot have a direct exposure.

The Sub-Fund will limit its investments in securities and instruments that are economically tied to emerging market countries (excluding China but including Russia, in the latter case subject to the sanctions being lifted) to 20% of its net assets.

The Sub-Fund will invest no more than 10% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law. In case of investments in units of undertakings for collective investment in Transferable Securities or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund's assets.

The Sub-Fund may invest without limitation in instruments eligible under the investment policy denominated in currencies other than the reference currency (EUR).

The Sub-Fund may use strategies to hedge currency risks in relation to currencies different from EUR.

The Sub-Fund's exposure to contingent convertible bonds ("Cocos") is limited to 10% of its net assets.

The Sub-Fund will not gain exposure to ABS/MBS/CDOs, defaulted or distressed securities and ADR's/GDR's and/or REITs.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

For liquidity management purposes, the Sub-Fund may invest, in addition to the liquid assets referred to above, in money market funds and treasury bills.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### **4. Sustainability approach:**

The Sub-Fund qualifies as a financial product under Art. 6 (1) of SFDR. The investments underlying the Sub-fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

#### **5. Use of Securities Financing Transactions:**

The Sub-Fund will not enter into securities lending transactions, Total Return Swap transactions and repurchase transactions. In the event that the Sub-Fund intends to enter into such transactions, this Prospectus shall be amended with the prior approval of the CSSF.

#### **6. Investment Manager and Investment Sub-Managers:**

BlackRock Investment Management (UK) will act as the Investment Manager.

Contact details:

<p><b>BlackRock Investment Management (UK) Limited</b> 12 Throgmorton Avenue London EC2N 2DL United Kingdom Registration number: 02020394</p>
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#### **7. Benchmark used:**

The Sub-Fund does not use any index under the Benchmark Regulation.

#### **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a low volatility of the Sub-Fund and potentially capital losses in order to achieve returns slightly higher than the usual market's interest level. The Sub-Fund is intended for investors with a short-term investment horizon.

#### **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Absolute VaR approach.

The Management Company calculates the level of the leverage of the Sub-Fund using the sum of notional approach and expects that this level will in principle not be higher than 150% (in relation to the total net assets of the Sub-Fund).

The Sub-Fund pursues a safety-oriented investment strategy. The security of the investments has primary importance. Risks are not ruled out completely, but the aim is to minimise them as far as possible. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as low risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## 10. **Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Risk Factors in the general part of the Prospectus.

## 11. **Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. **Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. **Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:**

<b>Business Day</b>	Each day on which banks and financial institutions in Luxembourg, and London, are generally open for business except 24 and 31 December of each year.
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Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## **26. onemarkets BlackRock Global Diversified Balanced Fund**

### **1. Investment Objective:**

The Sub-Fund aims to provide a positive total return, measured in Euro, defined as a mix of capital growth and income.

### **2. Investment Strategy:**

The Sub-Fund adopts a flexible asset allocation policy and will invest in a diversified portfolio of assets across multiple asset classes. The extent to which the Sub-Fund is invested may vary without limit depending on market conditions and other factors at the Investment Manager's discretion, and in a manner consistent with the principles of environmental, social and governance "ESG" focused investing. Investments may include equities, fixed-interest and floating rate securities, non-investment grade securities, units/shares of UCITS and/or UCIs, as well as currencies and cash.

The Sub-Fund will invest in securities issued by corporations, governments and government related issuers, other non-government issuers, located in both developed and emerging markets, and denominated in global currencies. Such issuers will be systematically screened and considered suitable according to the Investment Manager's assessment and ESG criteria analysis and in accordance with the ESG policy described below.

The Sub-Fund may also buy Money Market Instruments (including time deposits and certificates of deposit) up to 10% of its net assets.

The Sub-Fund may use financial derivative instruments for the purpose of investment and risk hedging. The Sub-Fund's exposure to derivatives may include, but is not limited to, exchange traded and over-the-counter instruments such as futures (including equity and bond futures), spot and forward contracts, other listed derivatives, swaps (including but not limited to credit default swaps, interest rate swaps and unfunded Total Return Swaps for which underlying assets may be equities, fixed income, currencies, ETFs and indices on all the aforementioned asset classes), options, swaptions and contracts for difference.

### **3. Investment Policy:**

The Sub-Fund may invest up to 65% of its net assets in equity securities, including depository receipts (such as American depository receipts ("ADRs"), European depository receipts ("EDRs") and global depository receipts ("GDRs")). ADRs, GDRs and EDRs and their related underlying assets, will always comply with the eligibility criteria applicable to the Sub-Fund under the 2010 Law.

The Sub-Fund may invest up to 100% of its net assets in fixed-interest and floating rate fixed income securities while ensuring that the Sub-Fund's portfolio of fixed income securities will have on average an investment grade rating.

The Sub-Fund's exposure to securities issued by entities located in emerging markets (including China as further specified below and Russia, in the latter case subject to the sanctions being lifted) shall not exceed 30% of the Sub-Fund's net assets. For the avoidance of doubt, the limit applies to debt and equities instruments cumulatively.

The Sub-Fund may invest up to 20% of its net assets in non-investment grade debt securities (including unrated securities to a minimum scale). For the avoidance of doubt, non-investment grade debt securities issued by entities based in emerging markets shall be counted towards the 20% limit. Securities will be deemed non-investment grade if, at the time of the purchase, they are rated below "BBB-" (or equivalent) and above or equal to "CCC" (or equivalent); such rating shall be based on the lowest available rating from widely recognized rating agencies or an equivalent measure produced by the Investment Manager based on proprietary models. The Investment Manager will further ensure that unrated debt securities do not compromise the overall rating of the Sub-Fund's portfolio of fixed income securities (i.e., investment grade rating).

The Sub-Fund shall not invest in distressed or defaulted securities. Some "CCC" rated securities may be considered as distressed securities. For a security rated "CCC" to be eligible for the Sub-Fund, the Investment Manager shall perform an analysis in order to determine if such security is a distressed security; if deemed distressed, such security shall not be eligible for investment by the Sub-Fund. In the event of a downgrade (or any other event) leading to qualifying a security of the Sub-Fund as distressed or defaulted, the Investment Manager will evaluate the introduction of corrective actions, balancing value maximization with the pace of liquidation of such exposures. In any case, the Investment Manager shall ensure that securities that have become distressed and/or defaulted securities shall not exceed 10% of the Sub-Fund's net assets.

The Sub-Fund may invest up to 20% (cumulatively) in asset-backed securities ("ABS"), mortgage-backed securities ("MBS"), and commercial mortgage-backed securities ("CMBS"). ABS, MBS and CMBS shall be eligible investments under the 2010 Law.

The Sub-Fund may invest no more than 10% of its net assets directly in contingent convertible securities ("CoCos").

The Sub-Fund may invest up to 10% of its net assets in closed-ended real estate investment trusts ("REITS") or listed closed-end funds.

The Sub-Fund may invest up to 10% of its net assets in China A-Shares via the Shanghai-Hong Kong Stock Connect program and up to 10% in debt securities issued by Mainland China issuers through the Bond Connect program.

The Sub-Fund may invest in initial public offerings ("IPOs"). In this case, there is a risk that the price of the newly floated share may exhibit elevated volatility as a result of factors such as the absence of an existing public market, non-seasonal transactions, the limited number of securities that can be traded and the lack of information about the issuer. Transferable securities of such IPOs which are not yet listed on or dealt in on a Regulated Market, other than transferable securities to which article 41(1)(d) of the 2010 Law applies, are eligible as non-core investments only and must be limited to maximum 10% of the Sub-Fund's net assets in accordance with article 41(2(a)) of the 2010 Law.

The Sub-Fund's exposure to commodities may not exceed 10% of the Sub-Fund's net assets. Exposure to commodities will be achieved through investments in exchange-traded commodities ("ETCs") that are eligible under the 2010 Law.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the reference currency (Euro). The Sub-Fund may use strategies to hedge developed market currency risks in relation to currencies different from the Euro. In aggregate, and accounting for active currency positions as described above, the non-Euro currency exposure will not exceed 70% (on a look through basis) of the Sub-Fund's net assets.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular leverage, is therefore excluded.

The Sub-Fund's exposure to the above-mentioned asset classes may be achieved through direct investments and /or through indirect investments in units/shares of UCITS and/or UCIs eligible under article 41(1)e) of the 2010 Law, including exchange traded funds ("ETFs"). Total investments in units/shares of UCITS and/or UCIs, including ETFs, shall not exceed 10% of the Sub-Fund's net assets. The limit will not apply to the Sub-Fund until such time as the Sub-Fund's net assets value exceeds €225m (for the first time). All such indirect investments shall be in units/shares of UCITS/UCIs eligible under article 41(1)e) of the 2010 Law that promote, among other, environmental or social characteristics, and fall within the scope of article 8 of the Regulation (EU) 2019/2088 ("SFDR").

A minimum of 70% of the Sub-Fund's net assets will be invested in investments that are aligned with the environmental and/or social characteristics outlined below in the SFDR Appendix. Of these investments, a minimum of 20% of the Sub-Fund's net assets will be invested in Sustainable Investments.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

For liquidity management purposes, the Sub-Fund may invest, in addition to the liquid assets referred to above, in money market funds, treasury bills and Money Market Instruments (including time deposits and certificates of deposit).

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### **4. Sustainability approach:**

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR and has been categorised as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social values, which are a binding component for the assets selection and investment decision-making process, and the companies in which the Sub-Fund shall invest are required to follow good governance practices, in accordance with article 8 of SFDR.

The Sub-Fund will apply the BlackRock EMEA Baseline Screens which is available at <https://www.blackrock.com/corporate/literature/publication/blackrock-baseline-screens-in-europe-middleeast-and-africa.pdf>.

The Investment Manager will take into account principles of environmental, social and governance ("ESG") investing when selecting the securities to be directly held by the Sub-Fund (rather than any securities held through units/shares of UCITS and/or UCIs). The Investment Manager is systematically excluding direct investments in securities of issuers:

- a) deriving over 5% of revenue from the production of alcohol related products and issuers deriving over 15% of revenue in aggregate from the production, distribution retail and supply of alcohol-related products;
- b) deriving over 5% of revenue from the ownership or operation of gambling-related business activities and issuers deriving over 15% of revenue from gambling related business activities;
- c) generating over 5% of total electricity from nuclear power in a given year or that have 5% of installed capacity attributed to nuclear sources, in addition to issuers deriving over 15% of revenue of revenue from nuclear power activities;
- d) deriving over 5% of revenue from the production of adult entertainment material and issuers deriving over 15% of revenue from the production, distribution and retail of adult entertainment materials;
- e) which have a MSCI ESG rating that is below BBB.

To undertake this ESG criteria analysis and above binding exclusions, the Investment Manager will use data provided by external ESG research providers and data generated internally by the Investment Manager's proprietary models, and local intelligence. In any case, the costs related to the analysis of the issuers and related ESG criteria will be supported by the Investment Manager. Further information about the ESG research provider(s) and/or ESG proprietary models used by the Investment Manager to manage the Sub-Fund can be obtained on request at the registered office of the Investment Manager.

The Investment Manager will also employ a proprietary methodology to assess investments based on the extent to which they are associated with positive or negative externalities, that is environmental and social benefits or costs as defined by the Investment Manager. The Investment Manager will seek to enhance exposure to investments that are deemed to have associated positive externalities (e.g., lower carbon emitting issuers and issuers with positive ESG credentials) and seek to limit exposure to investments that are deemed to have associated negative externalities.

The assessment of the level of involvement in each activity may be based on percentage of revenue, a defined total revenue threshold, or any connection to a restricted activity regardless of the amount of revenue received.

The remaining issuers (i.e., those issuers which have not yet been excluded from investment by the Sub-Fund) are then evaluated by the Investment Manager based on, among other factors, their ability to manage the risks and opportunities associated with ESG compliant business practices and their ESG risk and opportunity credentials, such as their leadership and governance framework, which is considered essential for sustainable growth, their ability to strategically manage longer-term issues surrounding ESG and the potential impact this may have on an issuer's financials.

The Sub-Fund currently has a medium-low exposure to sustainable investments in accordance with article 2(17) of SFDR. The Sub-Fund may gain limited exposure (through, including but not limited to, derivatives, cash and near cash instruments and shares or units of collective investment schemes and fixed income transferable securities (also known as debt securities) issued by governments and agencies worldwide) to issuers with exposures that do not meet the ESG criteria described above.

The Sub-Fund's investments do not take into account the criteria for environmentally sustainable economic activities, including enabling or transitional activities, within the meaning of the Taxonomy Regulation and the Sub-Fund may only hold such investments on an incidental basis. It is expected that 0% of the Sub-Fund's portfolio will be aligned to taxonomy eligible activities and sectors within the meaning of the Taxonomy Regulation.



## 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a continuous basis:

Securities financing transaction		Permitted	Used	Maximum amount	Estimated amount
Total Return Swaps		Yes	Yes	60%	40%

The Sub-Fund will invest in Total Return Swaps for investment purposes with the objective, among else, of an efficient management of cash flows, substitution for direct investments and better coverage of markets.

In respect to Total Return Swap revenues, the gross income generated by the transactions is credited for 100% to the Sub-Fund and for 0% to the counterparty in these transactions (subject to the funding and trading costs that will be borne by the Sub-Fund). The Sub-Fund will enter into Total Return Swaps with multiple counterparties (the top 10 counterparties will be listed in the annual report of the Fund in accordance with SFTR). The proportion of the assets held by the Sub-Fund that may be subject to Total Return Swap transactions is generally expected to be around 40% of the Sub-Fund's Net Asset Value. This proportion may on an opportunistic and temporary basis be increased up to a maximum of 60% of the Sub-Fund's Net Asset Value.

The Sub-Fund will not enter into securities lending transactions and repurchase transactions.

## 6. Investment Manager and Investment Sub-Managers:

BlackRock Investment Management (UK) Ltd will act as the Investment Manager. BlackRock Financial Management Inc. will act as Sub-Investment Manager.

Contact details:

<p><b>BlackRock Investment Management (UK) Limited</b>            12 Throgmorton Avenue            London EC2N 2DL            United Kingdom            Registration number: 02020394</p>	<p><b>BlackRock Financial Management, Inc.</b>            50 Hudson Yards            New York            NY 10001            United States of America</p>
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## 7. Benchmark used:

The Sub-Fund does not use any index under the Benchmark Regulation.

## 8. Profile of the typical investor:

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept an increased volatility of the Sub-Fund and potentially high capital losses in order to achieve above-average potential investment performances. The Sub-Fund is intended for investors with a medium to long-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes. The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The Sub-Fund's global exposure will be measured and monitored by using the Absolute VaR approach.

The Management Company calculates the level of the leverage of the Sub-Fund using the sum of notional approach and expects that this level will in principle not be higher than 200% (in relation to the total net assets of the Sub-Fund).

The Sub-Fund pursues a growth-oriented investment strategy. In order to take advantage of opportunities for higher investment returns, a higher risk exposure is unavoidable. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, and London, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 26a. onemarkets BlackRock Global Diversified Balanced Fund

### Template pre-contractual disclosure for the 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:**

onemarkets BlackRock Global Diversified  
Balanced Fund

**Legal entity identifier:**

tbd

## Environmental and/or social characteristics

**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, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Does this financial product have a sustainable investment objective?**

**Yes**

**No**

It will make a minimum of **sustainable investments with an environmental objective**: \_\_\_\_%

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 20 % of sustainable investments.

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It will make a minimum of **sustainable investments with a social objective**: \_\_\_\_%

It promotes E/S characteristics, but **will not make any sustainable investments**



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

The Fund invests in Sustainable Investments. BlackRock defines Sustainable Investments as investments in issuers or securities that contribute to an environmental or social objective, do not significantly harm any of those objectives and where investee companies follow good governance practices. BlackRock refers to relevant sustainability frameworks to identify the alignment of the investment to environmental or social objectives. Sustainable Investments should also meet the do no significant harm (DNSH) requirements, as defined by applicable law and regulation. BlackRock has developed a set of criteria to assess whether an issuer or investment does significant harm. This Fund seeks to address key environmental and social issues that are deemed to be relevant to the issuers' businesses using ESG scores as a means of assessing issuers' exposure to and management of those risks and opportunities. The ESG scores recognise that certain environmental and social issues are more material based on the type of activity that the issuer is involved in by weighting the issues differently in the scoring methodology. The following environmental themes are captured in the environmental component of the ESG score: climate change, natural capital, pollution and waste and environmental opportunities. The following social themes are captured in the social component of the ESG score: human capital, product liability, stakeholder opposition and social opportunities. Corporate issuers that have better ESG scores are perceived to have more sustainable business practices.

The Fund seeks to invest a proportion of its assets in securities that promote environmental characteristics including but not limited to "green bonds" (as defined by its proprietary methodology, which is guided by the International Capital Markets Association Green Bond Principles), and themes such as clean energy and energy efficiency. This Fund applies the BlackRock EMEA Baseline Screens. This set of screens avoids exposures that have negative environmental outcomes by excluding direct investment in issuers that have material involvement in thermal coal and tar sands extraction, as well as thermal coal-based power generation. Negative social outcomes are also avoided by excluding direct investment in issuers involved in controversial weapons and nuclear weapons, and material involvement in production and distribution of civilian firearms and tobacco. This Fund also excludes issuers deemed to have failed to comply with the 10 UN Global Compact Principles, which cover human rights, labour standards, the environment, and anti-corruption. Further information on the criteria for BlackRock EMEA Baseline Screens can be found by copying and pasting the following link into your web browser: <https://www.blackrock.com/corporate/literature/publication/blackrock-baseline-screensin-europe-middleeast-and-africa.pdf>

This Fund applies a set of exclusionary screens. The Investment Adviser also intends to limit direct investment in securities of issuers involved in the production, distribution or licensing of alcoholic products; the ownership or operation of gambling-related activities or facilities; production, supply and mining activities related to nuclear power and production of adult entertainment materials. The assessment of the level of involvement in each activity may be based on percentage of revenue, a defined total revenue threshold, or any connection to a restricted activity regardless of the amount of revenue received. The Investment Adviser will exclude any issuer with a MSCI ESG rating below BBB. The Investment Adviser also intends to limit investments in companies within the Global Industry Classification Standard (GICS) Oil & Gas Exploration & Production sector and companies within the Global Industry Classification Standard (GICS) Integrated Oil & Gas sector to below 5% of its total assets.

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

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

The sustainability indicators used to measure the attainment of the environmental or social characteristics promoted by this Fund include:

1. The Fund's holdings in Sustainable Investments, as described above.
2. The Fund's holdings in investments that promote environmental characteristics, as described above.
3. The Fund's consideration of principal adverse impacts (PAIs) on sustainability factors, as described below.
4. The Fund's exclusion of holdings in issuers identified by the exclusion criteria set out in the BlackRock EMEA Baseline Screens and exclusionary screens, as described above.

● ***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?***

This Fund invests at least 20% of its holdings in Sustainable Investments in pursuit of its investment objective. All Sustainable Investments will be assessed by the Investment Adviser to comply with BlackRock's DNSH standard outlined above.

BlackRock invests in Sustainable Investments which contribute to a range of environmental and / or social objectives which may include but are not limited to, alternative and renewable energy, energy efficiency, pollution prevention or mitigation, reuse and recycling, health, nutrition, sanitation and education and the UN Sustainable Development Goals ("Environmental and Social Objectives").

An investment will be assessed as contributing to an Environmental and/or Social Objective where:

- a) minimum proportion of the issuer's business activity contributes to an Environmental and/or Social Objective; or

b) the issuer's business practices contribute to an Environmental and/or Social Objective; or

c) the use of proceeds is assessed as contributing to an Environmental and/or Social Objective such as green bonds, social bonds, and sustainability bonds; or

d) the fixed income securities are aligned with an Environmental and/or Social Objective.

**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.

***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?***

Sustainable Investments meet the DNSH requirements, as defined by applicable law and regulation. BlackRock has developed a set of criteria across all Sustainable Investments to assess whether an issuer or investment does significant harm. Investments considered to be causing significant harm do not qualify as Sustainable Investments. Further information on the above can be found by copying and pasting the following link into your web browser: <https://www.blackrock.com/corporate/literature/publication/blackrock-sfdrsustainable-investments-methodology.pdf>

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

The indicators for adverse impacts on sustainability factors for each type of investment are assessed using BlackRock's Sustainable Investments proprietary methodology. BlackRock uses third-party data and/or fundamental analysis to identify investments which negatively impact sustainability factors and cause significant harm.

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

Sustainable Investments are assessed to consider any detrimental impacts and ensure compliance with international standards of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. Issuers deemed to have violated these conventions are not considered as Sustainable Investments.

*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?

- Yes, The Fund considers PAIs on sustainability factors through the application of the BlackRock EMEA Baseline Screens and the Fund holdings in investments that promote environmental characteristics.

The Fund takes into account the following PAIs:

- GHG emissions
- GHG intensity of investee companies.
- Exposure to companies active in the fossil fuel sector
- Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

In addition, this Fund takes into account the PAIs through BlackRock's DNSH standard for Sustainable Investments. This Fund will provide information on the PAIs in its annual report.

- No



## What investment strategy does this financial product follow?

The Fund invests globally in the full spectrum of permitted investments including equities, fixed income transferable securities (which may include some high yield fixed income transferable securities), units of CIS, cash, deposits and money market instruments. The Fund follows an asset allocation policy that seeks to maximise total return in a manner consistent with the principles of ESG focused investing. The Investment Adviser seeks to invest in Sustainable Investments.

The Investment Adviser applies exclusionary screens to the portfolio. These encompass the BlackRock EMEA Baseline Screens in addition to limits on direct investment in securities of issuers involved in the production, distribution or licensing of alcoholic products; the ownership or operation of gambling-related activities or facilities; production, supply and mining activities related to nuclear power and production of adult entertainment materials.

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



The Investment Adviser also intends to limit investments in companies within the Global Industry Classification Standard (GICS) Oil & Gas Exploration & Production sector and companies within the Global Industry Classification Standard (GICS) Integrated Oil & Gas sector to below 5% of its total assets.

● **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?**

The binding elements of the investment strategy are as follows:

1. Maintain that the Fund holds at least 20% in Sustainable Investments.
2. Apply the BlackRock EMEA Baseline Screens and exclusionary screens.
3. Limit investments in companies within the Global Industry Classification Standard (GICS) Integrated Oil & Gas sector to below 5% of its total assets.

Additionally, the Sub-Fund will apply specific exclusion criteria defined identifying Companies and/or Countries and/or underlying which should not be invested in or which should be invested in respecting predefined thresholds.

1. Companies that are involved in severe violations of the UN Global Compact
2. Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations.
3. Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 10% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
4. Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact (a *de minimis* rule can be applied, i.e. companies with a minor involvement are not necessarily excluded, and the internal threshold limit on the Management Company's side will be set at 5%).
5. Companies involved in the tobacco business which derive from these businesses more than 5% of their consolidated revenues.
6. Companies involved in the nuclear energy production which derive from these businesses more than 15% of their consolidated revenues.
7. Companies involved in the weapons business which derive from these businesses more than 10% of their consolidated revenues.
8. Companies involved in the gambling business which derive from these businesses more than 15% of their consolidated revenues.
9. Companies involved in the adult entertainment business which derive from these businesses more than 15% of their consolidated revenues.
10. Bonds issued by Countries that are not compliant with FATF Recommendations (Black and Grey list)
11. Bonds issued by Countries that are not signatories of Paris 2015 Agreement on climate change are excluded.
12. Bonds issued by Countries classified with 'not free'- status according to freedom house index.

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

Whilst the Fund applies exclusionary screens to avoid investment in the activities listed above, there is no commitment to reduce the scope of investments by a minimum rate.

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

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

BlackRock assesses good governance practices of the investee companies by combining proprietary insights and shareholder engagement by the Investment Adviser, with data from external ESG research providers. BlackRock uses data from external ESG research providers to initially identify issuers which may not have satisfactory governance practices in relation to key performance indicators (KPIs) related to sound management structure, employee relations, remuneration of staff and tax compliance.

Where issuers are identified as potentially having issues with regards to good governance, the issuers are reviewed to ensure that, where the Investment Adviser agrees with this external assessment, the Investment Adviser is satisfied that the issuer has either taken remediation actions or will take remedial actions within a reasonable time frame based on the Investment Adviser’s direct engagement with the issuer. The Investment Adviser may also decide to reduce exposure to such issuers.



**Asset allocation** describes the share of investments in specific assets.

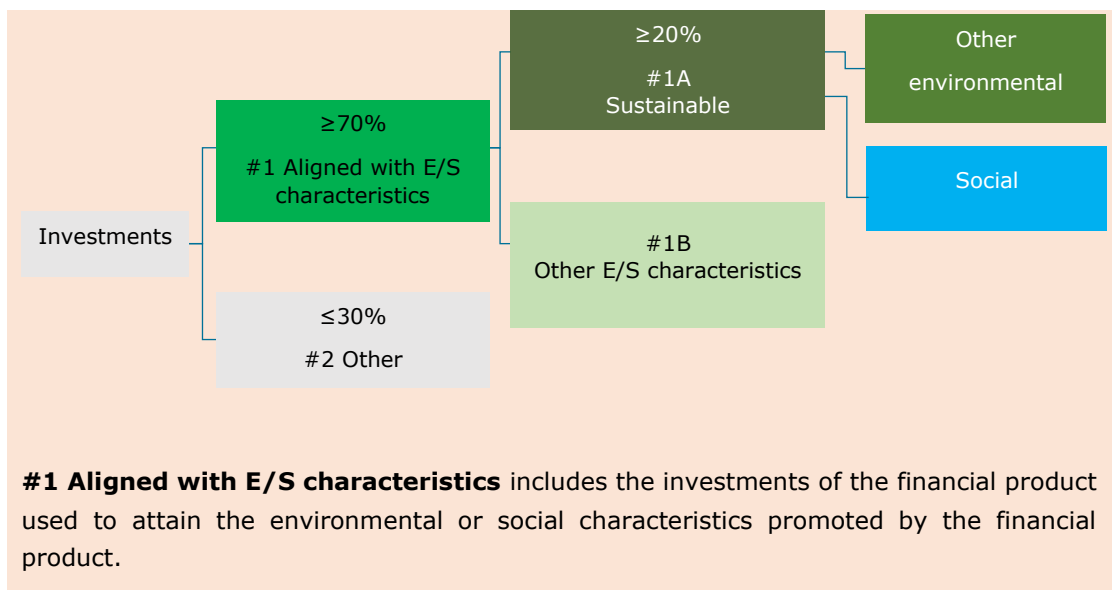
**What is the asset allocation planned for this financial product?**

A minimum of 70% of the Fund’s total assets will be invested in investments that are aligned with the environmental and/or social characteristics described above (#1 Aligned with E/S characteristics). Of these investments, a minimum of 20% of the Fund’s total assets will be invested in Sustainable Investments (#1A Sustainable), and the remainder will be invested in investments aligned with other environmental and/or social characteristics described above (#1B Other E/S characteristics).

The Fund may invest up to 30% of its total assets in other investments (#2 Other investments).

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.



**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

The Fund may use derivatives for investment purposes and for the purposes of efficient portfolio management. For derivatives, any ESG rating or analyses referenced above will apply only to the underlying investment.



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

**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

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

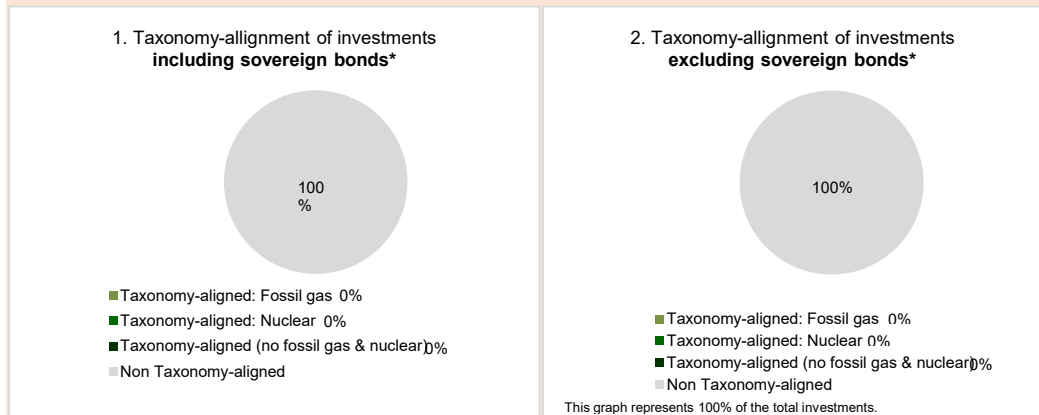
Yes:

In fossil gas  In nuclear energy

No

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.

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



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

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



The Fund does not commit to making investments in transitional and enabling activities, however, these investments may form part of the portfolio.



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

A minimum of 20% of the Fund's total assets will be invested in Sustainable Investments. As noted above, these Sustainable Investments will be a mix of Sustainable Investments with an environmental objective that is not aligned with the EU taxonomy or a social objective or a combination of both, and the exact composition may fluctuate.

The Fund invests in Sustainable Investments that are not aligned with the EU Taxonomy for the following reasons:

- (i) it is part of the investment strategy of the Fund;
- (ii) data to determine EU Taxonomy-alignment may be unavailable; and / or
- (iii) underlying economic activities may not be eligible under the EU Taxonomy's available technical screening criteria or may not comply with all requirements set out in such technical screening criteria.



### **What is the minimum share of socially sustainable investments?**

A minimum of 20% of the Fund's total assets will be invested in Sustainable Investments. As noted above, these Sustainable Investments will be a mix of Sustainable Investments with an environmental objective that is not aligned with the EU taxonomy or a social objective or a combination of both, and the exact composition may fluctuate.

The Fund invests in Sustainable Investments that are not aligned with the EU Taxonomy for the following reasons:

- (i) it is part of the investment strategy of the Fund;
- (ii) data to determine EU Taxonomy-alignment may be unavailable; and / or
- (iii) underlying economic activities may not be eligible under the EU Taxonomy's available technical screening criteria or may not comply with all requirements set out in such technical screening criteria.



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

Other holdings are limited to 30% and may include derivatives, cash and near cash instruments and shares or units of CIS and fixed income transferable securities (also known as debt securities) issued by governments and agencies worldwide. These investments may be used for investment purposes in pursuit of the Fund's (non ESG) investment objective, for the purposes of liquidity management and/or hedging. No other holdings are considered against minimum environmental or social safeguards.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

N/A

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

N/A

- ***How does the designated index differ from a relevant broad market index?***

N/A

- ***Where can the methodology used for the calculation of the designated index be found?***

N/A



**Where can I find more product specific information online?**

More product-specific information can be found on the website:

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

## **27. onemarkets J.P. Morgan Emerging Markets Short Term Bond Fund**

### **1. Investment Objective:**

The investment objective of the Sub-Fund is to provide a combination of income and capital growth over the short to medium term.

### **2. Investment Strategy:**

The Sub-Fund will achieve its investment objective by investing in a diversified portfolio of debt securities, issued or guaranteed by emerging market governments or their agencies; and by companies that are domiciled, or carrying out the main part of their economic activity, in an emerging market country (emerging and less developed markets include any country -including Russia, subject to the sanctions being lifted- or region other than the United States of America, Canada, Japan, Australia, New Zealand and Western Europe, although the Sub-Fund may invest in securities tied to those countries as well), which comply with the eligibility criteria stated in the 2010 law and the Grand-Ducal Regulation of February 8, 2008 relating to certain definitions of the amended law of 20 December 2002 on undertakings for collective investment, as amended from time to time.

The average duration of the Sub-Fund will be typically comprised between 2 and 4 years with a maximum target of 6 years with no specific maximum maturity per instrument and perpetual and callable securities shall use the current market expectations of maturity in calculation of the duration.

### **3. Investment Policy:**

The Sub-Fund's investments will comply at any time with the limits described below:

- investments in emerging markets bonds will represent at least 67% of the Sub-Fund's net assets (the Sub-Fund intends to have exposure in China hard currency offshore bonds only, not in China local currency securities, consistent with the benchmarks' exposure to China as further specified below);
- convertible bonds, including contingent convertible bonds ("CoCos"), may not exceed 10% of the Sub-Fund's net assets;
- investments in equity securities resulting from a corporate action or other conversion (e.g., in the event of a bankruptcy) will not exceed 10% of the Sub-Fund's net assets; and,
- investments in debt securities with rating below the investment grade and unrated may represent (rated BB+/Ba1 or lower based on middle of three, lower of two ratings, S&P, Fitch, Moody's) up to 70% of the Sub-Fund's net (unrated debt securities will not represent more than 20% of the Sub-Fund's net assets);
- the debt securities' portfolio shall have a minimum rating of BB-/Ba3 or equivalent although it may be temporarily lower as result of credit downgrades, rating removals or defaults;
- the average rating of the debt securities' portfolio will be at least BB+.

The selection process of fixed income investments is based on fundamental analysis. In case of downgrade, the Investment Manager carries on an analysis of issuer fundamentals, a relative value analysis and fixed income security evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realisation of the same) in the best interest of the investors. The Investment Manager will further ensure that unrated debt securities do not compromise the overall rating of the Sub-Fund's debt securities' portfolio (i.e., at least BB+).

Investments in closed-ended REITs may not exceed 5% of the Sub-Fund's net assets.

The Sub-Fund may use financial derivative instruments for hedging, in particular the credit risk, the currency exchange risk, if any, and other risks associated with the defined investment policy. It may also use financial derivative instruments either for investment purposes or for efficient portfolio management purposes with the objective of an efficient management of cash flows and better coverage of markets. Such financial derivative instruments may include listed futures and options, forward contracts and other fixed income, currency and credit derivatives.

At inception of the Sub-Fund and for a period of maximum 6 months, the above-described investment policy can be pursued by investing part or all of the Sub-Fund's assets in UCITS ("Target Funds") with similar investment universe and equivalent performance and in accordance with art. 49(1) paragraph 2 of the 2010 Law. Investors should note that for investments in units/shares of Target Funds, costs may generally arise both at the Sub-Fund level and at the level of the Target Funds. The cumulative management fee (excluding performance fees, if applicable) at Sub-Fund and relevant Target Fund level shall not exceed 5%.

After the expiry of such period, the Sub-Fund shall not invest more than 10% of the Sub-Fund's net assets into other UCITS or UCIs eligible under article 41(1)e) of the 2010 Law, including ETFs.

The Sub-Fund may invest without limitation in instruments denominated in other G7 currencies other than the reference currency (EUR). The investments will mainly be in assets denominated in USD.

The Sub-Fund may use strategies to hedge currency risks in relation to currencies different from EUR.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular leverage, is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

For liquidity management purposes, the Sub-Fund may invest, in addition to the liquid assets referred to above, in cash equivalents meaning: time deposits, certificates of deposit, term deposits, notes, commercial paper, short-term government debt such as treasury-bills, bills of exchange and other instruments with a remaining period to maturity not exceeding twelve months and money market funds.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### **4. Sustainability approach:**



The Sub-Fund qualifies as a financial product under Art. 6 of SFDR. The investments underlying the Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

## 5. Use of Securities Financing Transactions:

The Sub-Fund will not enter into securities lending transactions, Total Return Swap transactions and repurchase transactions.

In the event that the Sub-Fund intends to enter into such transactions, this Prospectus shall be amended with the prior approval of the CSSF.

## 6. Investment Manager and Investment Sub-Managers:

JPMorgan Asset Management (UK) Limited will act as the Investment Manager and will sub-delegate investment activities to J.P. Morgan Investment Management Inc. The Investment Manager will remain responsible for oversight of all activities including investment management activities performed by the Sub-Investment Manager.

Contact details:

<p><b>JPMorgan Asset Management (UK) Limited</b> 25 Bank Street, Canary Wharf, London, E14 5JP United Kingdom</p>	<p><b>J.P. Morgan Investment Management Inc.</b> 245 Park Avenue New York, NY 10167 United States of America</p>
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## 7. Benchmark used:

The Sub-Fund is actively managed. The majority of issuers in the Sub-Fund are likely to be represented equally in the JPMorgan EMBI Global Diversified ex CCC 1-3 year and JPMorgan CEMBI Broad Diversified ex CCC 1-3 year indices because the Investment Manager uses them as a basis for portfolio construction, but has some discretion to deviate from their composition and risk characteristics within indicative risk parameters. The Sub-Fund will resemble the composition and risk characteristics of its benchmarks; however, the Investment Manager's discretion may result in performance that differs from the benchmarks. The above indices are not used by the Sub-Fund as benchmarks under the Benchmark Regulation since the indices are not used for the purpose of tracking the return of the indices or defining the asset allocation of the Sub-Fund's portfolio or computing the performance fee.

## 8. Profile of the typical investor:

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a medium volatility of the Sub-Fund and potentially capital losses in order to achieve moderate potential investment performances. The Sub-Fund is intended for investors with a medium-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach. The Sub-Fund pursues a conservative investment strategy. A steady and stable investment performance is the aim in return for a moderate risk appetite. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as reduced risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Risk Factors in the general part of the Prospectus.

## **11. Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## **12. Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## **13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:**



Business Day	Each day on which banks and financial institutions in Luxembourg, and New-York, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## **28. onemarkets Fidelity European Heritage Equity Fund**

### **1. Investment Objective:**

The Sub-Fund aims to achieve long-term capital growth from a portfolio primarily made up of equity securities issued by companies in Europe.

### **2. Investment Strategy:**

The Sub-Fund is actively managed. The Sub-Fund adopts a style agnostic investment approach, thus offering the best opportunities that sit across the style, sector, and market-cap spectrums.

In order to achieve its investment objective, the Sub-Fund seeks to invest in companies where management teams are closely aligned to shareholders through ownership of the business. This may include family companies, which are companies that are owned (either directly or indirectly), controlled and/or managed by a founder, a family, or their descendants. It may also include companies where entrepreneurs or consortiums have bought into the business. It also considers companies that retain and benefit from a strong brand heritage, having been founded or managed as a family business.

The Sub-Fund's benchmark is the MSCI Europe ex UK Index (the "Index"). The Index has been selected as the benchmark because it is representative of the investment universe of the Sub-Fund and it is therefore an appropriate performance comparator. The majority of the Sub-Fund's equity securities may not necessarily be components of or have weightings derived from the Index. The Investment Manager has a wide range of discretion relative to the Index. While the Sub-Fund will hold assets that are components of the Index, it may also invest in companies, countries or sectors that are not included in, and that have different weightings from, the Index in order to take advantage of investment opportunities. It is expected that over long time periods, the Sub-Fund's performance will differ to a significant extent from the Index. However, over short time periods, the Sub-Fund's performance may be close to the Index, depending on market conditions. Investors' attention is also drawn to the fact, that the Index is not an index, which integrates environmental and social considerations.

### **3. Investment Policy:**

The Sub-Fund primarily invests in equity securities. The Sub-Fund will invest at least 70% of its assets in equities of European companies.

The Sub-Fund will integrate sustainability analysis into its investment process and promotes environmental and/or social characteristics. Sustainability factors considered will vary based on the issuer in question. A minimum of 50% of the Sub-Fund's net assets will be invested in securities deemed to maintain sustainable characteristics, defined by reference to measurements such as Environmental, Social and Governance (ESG) ratings provided by external agencies or Fidelity Sustainability Ratings. The Sub-Fund will exclude companies involved in the production and/or distribution of cluster munitions and landmines (Cluster Munitions and Anti-personnel Landmines (CMAPL) Exclusion List) and issuers which the Investment Manager considers having failed to conduct their business in accordance with accepted international norms, including as set out in the United Nations Global Compact (UNGC).

The Sub-Fund will use derivatives, such as index futures, contracts for difference and FX forwards, for efficient portfolio management and hedging purposes only.

The Sub-Fund will invest no more than 20% of its net assets in emerging markets in Europe (including Russia, subject to the sanctions being lifted) and will have no exposure on Chinese securities.

The Sub-Fund will invest no more than 10% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund's assets.

The Sub-Fund may invest without limitation in instruments eligible under the 2010 Law denominated in currencies other than the reference currency (EUR).

The Sub-Fund may use strategies to hedge currency risks in relation to currencies different from EUR.

The Sub-Fund's will not invest in contingent convertible bonds ("Cocos"), ABS/MBS/CDOs and defaulted or distressed securities.

The Sub-Fund will have an exposure via ADRs/GDRs and/or closed-ended REITs up to 10% of its net assets.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular, leverage, is therefore excluded.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

In addition to the bank deposits at sight referred to above and for liquidity management purposes and/or to deal with adverse market conditions, the Sub-Fund may invest up to 10% of its net assets in Money Market Instruments and/or money market funds.

A minimum of 50% of the Sub-Fund's net assets will be invested in securities deemed to maintain favourable ESG characteristics (as further described hereafter). Of these investments, a minimum of 20% of the Sub-Fund's net assets will be invested in Sustainable Investments, of which a minimum of 0% have an environmental objective (which is aligned with the EU Taxonomy), a minimum of 0% have an environmental objective (which is not aligned with the EU Taxonomy) and a minimum of 5% have a social objective.

**It cannot be assured that, the investment policy will achieve the investment objective.**

## 4. Sustainability approach:

The Sub-Fund qualifies as a financial product under Art. 8 (1) of SFDR. The Sub-Fund promotes environmental or social characteristics and qualifies as an equity sub-fund applying Fidelity's Sustainability Framework (as described below), supplemented by additional exclusions as set out in UniCredit's Sustainability framework (as described below), while ensuring that the portfolio companies follow good governance practices. For this Sub-Fund, the identification of the material ESG Factors is based on sector and geographical exposure. The MSCI Europe ex-UK Index is the reference benchmark to this Sub-Fund. It is not an ESG index and not used for the purpose of attaining the material ESG Factors.

### *Fidelity's Sustainability Framework*

The Investment Manager considers a wide range of environmental and social characteristics on an ongoing basis for the Sub-Fund, as set out below and in the section investment strategy above, but the Investment Manager has the discretion to implement enhanced, stricter sustainable characteristics and exclusions from time to time.

A minimum of 50% of the Sub-Fund's net assets are invested in securities deemed to maintain favourable ESG characteristics. ESG characteristics are defined by reference to a combination of different measurements such as ESG ratings provided by external agencies or Fidelity Sustainability Ratings. Further details on the methodology applied are set out at <https://fidelityinternational.com/sustainable-investing-framework/> and may be updated from time to time.

For assets that are not deemed to maintain ESG characteristics in accordance with the above criteria, all will be screened against the Fidelity Sustainability Framework and UniCredit ESG guidelines which includes the use of negative screening as detailed below.

The Sub-Fund excludes companies involved in the production and/or distribution of cluster munitions and landmines ("Cluster Munitions and Anti-personnel Landmines (CMAPL) Exclusion List") and issuers which the Investment Manager considers have failed to conduct their business in accordance with accepted international norms, including as set out in the United Nations Global Compact.

In accordance with its objective and investment policy, the Sub-Fund promotes environmental characteristics within the meaning of article 8 of SFDR but does not have sustainable investment as its objective. The Sub-Fund currently has a medium-low exposure to sustainable investments in accordance with article 2(17) of SFDR. While the Sub-Fund does not commit to invest in investments which are in environmentally sustainable economic activities aligned with the Taxonomy Regulation, the Sub-Fund may have incidental exposure to such investments from time to time. It is expected that 0% of the Sub-Fund's portfolio will be aligned to taxonomy eligible activities and sectors within the meaning of the Taxonomy Regulation.

Because the Sub-Fund qualifies as an article 8 under the SFDR, the Sub-Fund is required by the Taxonomy Regulation to state that 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 the Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities. There is currently a lack of market data available to calculate the portfolio alignment of the Sub-Fund with the Taxonomy Regulation. Therefore, notwithstanding the above disclosure relating to do no significant harm, the Sub-Fund does not currently take into account the EU criteria for environmentally sustainable economic activities. In due course, as such data becomes available to enable accurate assessment of the Sub-Fund’s investments, the calculation of portfolio alignment with the EU criteria for environmentally sustainable economic activities will be made available to investors. A detailed description of the ESG characteristics promoted as well as the methodology and applied criteria is set out in appendix.

## 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a temporary basis:

Securities financing transactions	Permitted	Used	Maximum amount	Estimated amount
Total Return Swaps	Yes	Yes	10%	0%

The Sub-Fund will invest in Total Return Swaps (more specifically contracts for difference) for efficient portfolio management and hedging purposes only.

In respect to Total Return Swap revenues, the gross income generated by the transactions is credited for 100% to the Sub-Fund and for 0% to the counterparty in these transactions (subject to the funding and trading costs that will be borne by the Sub-Fund). The Sub-Fund will enter into Total Return Swaps with multiple counterparties (the top 10 counterparties will be listed in the annual report of the Fund in accordance with SFTR). The proportion of the assets held by the Sub-Fund that may be subject to Total Return Swap transactions is generally expected to around 0% of the Sub-Fund’s Net Asset Value. This proportion may on an opportunistic and temporary basis be increased up to a maximum of 10% of the Sub-Fund’s Net Asset Value.

The Sub-Fund will not enter into securities lending transactions and repurchase transactions.

## 6. Investment Manager and Investment Sub-Managers:

FIL (Luxembourg) S.A. will act as the Investment Manager.

Contact details:

<b>FIL (Luxembourg) S.A.</b> 2a Rue Albert Borschette BP 2174 Luxembourg
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Grand Duchy of Luxembourg
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## **7. Benchmark used:**

The Sub-Fund does not use any index under the Benchmark Regulation.

## **8. Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept an increased volatility of the Sub-Fund and potentially high capital losses in order to achieve above-average potential investment performances. The Sub-Fund is intended for investors with a medium to long-term investment horizon.

## **9. Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Sub-Fund management considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes.

The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues a growth-oriented investment strategy. In order to take advantage of opportunities for higher investment returns, a higher risk exposure is unavoidable. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## **10. Specific Risk factors:**



Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Risk Factors in the general part of the Prospectus.

### 11. **Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

### 12. **Specific liquidity considerations:**

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

### 13. **Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:**

Business Day	Each day on which banks and financial institutions in Luxembourg, and the United Kingdom, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 28a. onemarkets Fidelity European Heritage Equity Fund

### 4a. Template pre-contractual disclosure for the 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:**

onemarkets Fidelity European Heritage Equity Fund

**Legal entity identifier:**

TBC

## Environmental and/or social characteristics

#### 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, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Does this financial product have a sustainable investment objective?**

**Yes**

**X No**

It will make a minimum of **sustainable investments with an environmental objective: \_\_\_\_%**

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 20% of sustainable investments.

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

- It will make a minimum of **sustainable investments with a social objective:** \_\_\_\_\_%
- It promotes E/S characteristics, but **will not make any sustainable investments**



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

The Sub-Fund promotes environmental and/or social characteristics by investing in securities of issuers with favourable ESG characteristics. Favourable ESG characteristics are determined by reference to ESG ratings. ESG ratings consider environmental characteristics including carbon intensity, carbon emissions, energy efficiency, water and waste management and biodiversity, as well as social characteristics including product safety, supply chain, health and safety and human rights.

The Sub-Fund partially intends to make sustainable investments (defined below).

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

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

The Sub-Fund uses the following sustainability indicators in order to measure the attainment of the environmental or social characteristics that it promotes:

- a) the percentage of the Sub-Fund invested in securities of issuers with favourable ESG characteristics in accordance with Fidelity's Sustainable Investing Framework;
- b) in respect of its direct investments in corporate issuers, the percentage of the Sub-Fund invested in securities of issuers with exposure to the Exclusions (defined below);
- c) the percentage of the Sub-Fund invested in sustainable investments; and
- d) the percentage of sustainable investments with a social objective.

The Sub-Fund uses the following sustainability indicator in order to measure the attainment of the sustainable environmental and/or social characteristics that it promotes: the percentage of the Sub-Fund invested in securities of issuers with favourable ESG characteristics in accordance with Fidelity's Sustainable Investing Framework as set out here: <https://fidelityinternational.com/sustainable-investing-framework/>;

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

● **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?**

The Sub-Fund determines a sustainable investment as follows:

- a) issuers that undertake economic activities that contribute to one or more of the environmental objectives set out in the EU Taxonomy and qualify as environmentally sustainable in accordance with EU Taxonomy; or
- b) issuers whereby the majority of their business activities (more than 50% of revenue) contribute to environmental or social objectives aligned with one or more of the United Nations Sustainable Development Goals (“SDGs”); or
- c) issuers which have set a decarbonisation target consistent with a 1.5 degree warming scenario or lower (verified by the Science Based Target Initiative or a Fidelity Proprietary Climate Rating) which would be considered to contribute to environmental objectives;

provided they do no significant harm, meet minimum safeguards and good governance criteria.

● **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?**

Sustainable investments are screened for involvement in activities that cause significant harm and controversies, assessed through a check that the issuer meets minimum safeguards and standards that relate to principal adverse indicators (PAIs) as well as performance on PAI metrics. This includes:

Norms-based screens - the screening out of securities identified under Fidelity’s existing norms-based screens (as set out below);

Activity-based screens - the screening out of issuers based on their participation in activities with significant negative impacts on society or the environment, including issuers that are considered to have a ‘Very Severe’ controversy using controversy screens, covering 1) environmental issues, 2) human rights and communities, 3) labour rights and supply chain, 4) customers, 5) governance; and

PAI indicators: quantitative data (where available) on PAI indicators is used to evaluate whether an issuer is involved in activities that cause significant harm to any environmental or social objective.

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

Fidelity’s proprietary sustainability ratings have been created to explicitly include consideration of PAIs. Importantly, this means that an assessment of the materiality of PAIs for each sector has been undertaken as part of the sustainability rating process, and each covered entity has been scored on relevant PAIs or metrics covering similar issues. As a result, consideration of PAIs is a critical and inseparable part of FIL’s approach to ESG integration and assessment of ESG risk.

**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.

For sustainable investments, as set out above, Fidelity undertakes a quantitative evaluation to identify issuers with challenging performance on PAI indicators where data is available. 12 of the mandatory PAIs are covered by the quantitative screen: Carbon Footprint, GHG intensity of investee companies, Exposure to companies active in the fossil fuel sector, Share of non-renewable energy consumption and production, Activities negatively affecting biodiversity-sensitive areas, Emissions to water, Hazardous waste ratio, Violations of UN Global Compact principals and OECD Guidelines for Multinational Enterprises, Unadjusted gender pay gap, Board gender diversity, Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical and biological weapons). Issuers with a low score will be ineligible to be 'sustainable investments' unless Fidelity's fundamental research determines that the issuer is not breaching "do no significant harm" requirements, or is on the path to mitigate the adverse impacts through effective management or transition. For the 2 mandatory PAIs that are not covered by the quantitative screen (GHG emissions and Energy consumption intensity per high impact climate sector), Fidelity aims to bridge the data gaps through use of the proprietary sustainability ratings to perform the PAI analysis. 10 of the 15 optional environment PAI indicators and 10 of the 17 optional social PAI indicators are also considered in the sustainability rating process.

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

Norms-based screens are applied: Issuers identified as failing to behave in a way which meets their fundamental responsibilities in the areas of human rights, labour, environmental and anti-corruption as aligned with international norms including those set out by the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, UN Global Compact (UNGC), ILO Standards International Labour Organisation (ILO) Conventions, are not considered sustainable investments.



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

- Yes, all 14 mandatory principal adverse impacts on sustainability factors are considered throughout and incorporated into investment decisions through a variety of tools, including:
- (i) *Due Diligence* - analysis of whether principle adverse impacts are material and negative.
  - (ii) *Sustainability Rating* - Fidelity references sustainability ratings which incorporate material principal adverse impacts such as carbon emissions, employee safety and bribery and corruption, water management and, for sovereign issued securities, ratings used incorporate material principal adverse impacts such as carbon emissions, social violations and freedom of expression.
  - (iii) *Exclusions* - the Sub-Fund applies the Exclusions (as defined below) to help mitigate PAI through excluding harmful sectors and prohibiting

investment in issuers that breach international standards, such as the UNGC.

- (iv) *Engagement* - Fidelity uses engagement as a tool to better understand principal adverse impacts on sustainability factors and, in some circumstances, advocate for enhancing principal adverse impacts and sustainability metrics for corporate issuers. Fidelity participates in relevant individual and collaborative engagements that target a number of principal adverse impacts (i.e. Climate Action 100+, Investors Against Slavery and Trafficking APAC).

No



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

### **What investment strategy does this financial product follow?**

The Sub-Fund will integrate sustainability analysis into its investment process and promotes environmental and/or social characteristics. Sustainability factors considered will vary based on the issuer in question. A minimum of 50% of the Sub-Fund's net assets will be invested in securities deemed to have favorable ESG characteristics, defined by reference to measurements such as Environmental, Social and Governance (ESG) ratings provided by external agencies or Fidelity Sustainability Ratings.

In respect of its direct investment in corporate issuers, the Sub-Fund is subject to

- a. firm-wide exclusions list, which includes cluster munitions and anti-personnel landmines, and
- b. norms-based screening of issuers which the Investment Manager considers have failed to conduct their business in accordance with international norms, including as set out in the UNGC; and,
- c. specific ESG restrictions set out in the Structured Invest S.A framework.

The above exclusions and screens (the "Exclusions") may be updated from time to time. Please refer to the website for further information Sustainable investing framework ([fidelityinternational.com](http://fidelityinternational.com)).

The Investment Manager also has discretion to implement enhanced, stricter sustainable requirements and exclusions from time to time.

### ● **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?**

The Sub-Fund will invest:

- (i) a minimum of 50% of its assets in issuers with favourable ESG characteristics;
- (ii) a minimum of 20% in sustainable investments of which a minimum of 0% have an environmental objective (which is aligned with the EU Taxonomy), a minimum of 0% have an environmental objective (which is not aligned with the EU Taxonomy) and a minimum of 5% have a social objective.

In addition, the Sub-Fund will apply the Exclusions, as described above, to all direct investments in corporate issuers.

Additionally, the Sub-Fund will apply specific exclusion criteria identifying Companies and/or Countries and/or underlying which should not be invested in or which should be invested in respecting predefined thresholds as further specified below:

1. Companies that are involved in severe violations of the UN Global Compact
2. Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations.
3. Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 10% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
4. Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact (a *de minimis* rule can be applied, i.e. companies with a minor involvement are not necessarily excluded, and the internal threshold limit on the Management Company's side will be set at 5%).
5. Companies involved in the tobacco business which derive from these businesses more than 5% of their consolidated revenues.
6. Companies involved in the nuclear energy production which derive from these businesses more than 15% of their consolidated revenues.
7. Companies involved in the weapons business which derive from these businesses more than 10% of their consolidated revenues.
8. Companies involved in the gambling business which derive from these businesses more than 15% of their consolidated revenues.
9. Companies involved in the adult entertainment business which derive from these businesses more than 15% of their consolidated revenues.
10. Bonds issued by Countries that are not compliant with FATF Recommendations (Black and Grey list)
11. Bonds issued by Countries that are not signatories of Paris 2015 Agreement on climate change are excluded.
12. Bonds issued by Countries classified with 'not free'- status according to freedom house index

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

This question is not applicable for this Sub-Fund.

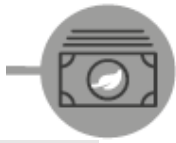
● ***What is the policy to assess good governance practices of the investee companies?***

The governance practices of issuers are assessed using fundamental research, including as part of the ESG ratings provided by external agencies or Fidelity Sustainability Ratings.

Key points that are analysed include track record of capital allocations, financial transparency, related party transactions, board independence and size, executive pay, auditors and internal oversight, minority shareholder rights, amongst other indicators.

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





### Asset allocation

describes the share of investments in specific assets.

## What is the asset allocation planned for this financial product?

The Sub-Fund aims to invest:

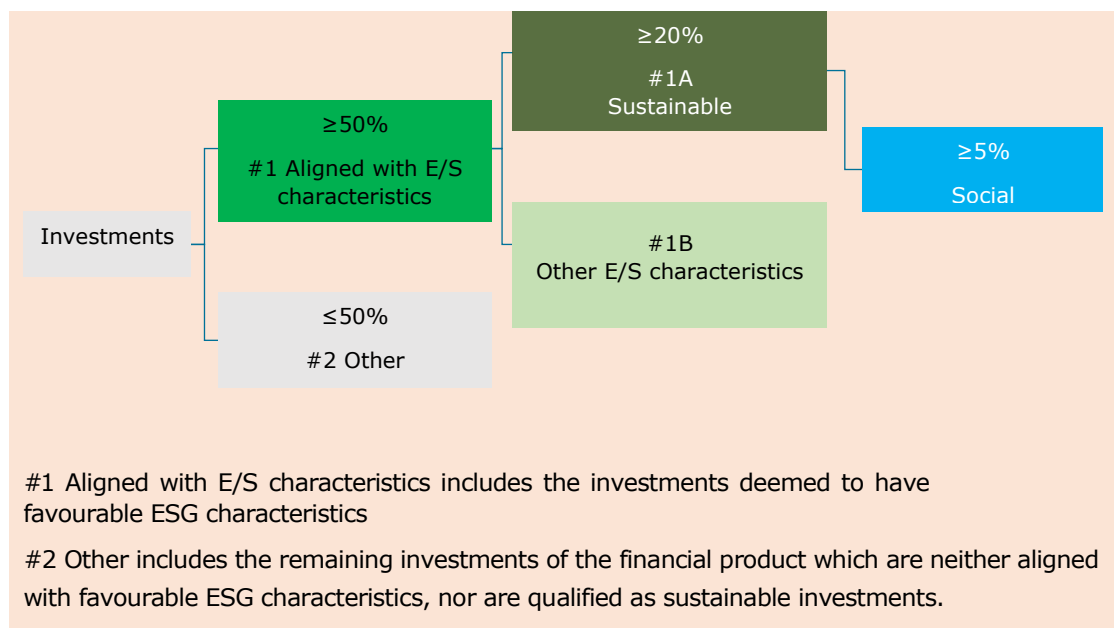
- (i) A minimum of 50% of its net assets in securities of issuers with favourable ESG characteristics,
- (ii) A minimum of 20% of its net assets in sustainable investments (#1A sustainable)\* of which a minimum 0% have an environmental objective (which is aligned with the EU Taxonomy), a minimum of 0% have an environmental objective (which is not aligned with the EU Taxonomy) and a minimum of 5% have a social objective.

(#1B Other E/S characteristics) Includes securities of issuers with favourable ESG characteristics but are not sustainable investments.

\*Fidelity determines the minimum overall percentage of sustainable investments on the basis of including issuers, whereby more than 50% of revenue contributes to a sustainable investment objective.

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?

Where the security underlying a derivative has favourable ESG characteristics in accordance with Fidelity's Sustainable Investing Framework, the derivative may be included in determining the proportion of the Sub-Fund dedicated to the promotion of environmental characteristics.

**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

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

The Sub-Fund does not commit to a minimum extent of alignment with the EU Taxonomy

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

Yes:

In fossil gas  In nuclear energy

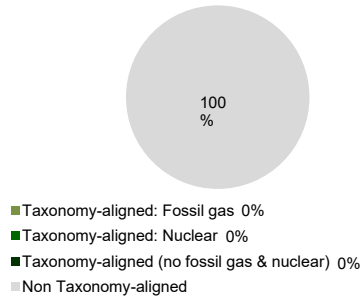
No

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.

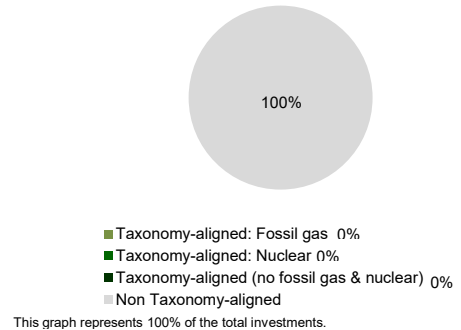


are sustainable investments with an environmental objective that **do not take into account** the criteria for environmentally sustainable economic activities under the EU Taxonomy.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



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

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

The Sub-Fund invests in a minimum of 0% in sustainable investments with an environmental objective aligned with 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 invests a minimum of 0% in sustainable investments with an environmental objective that is not aligned with the EU Taxonomy.

Investments could be aligned with the EU Taxonomy but the investment manager is not currently in a position to specify the exact proportion of the Sub-Fund's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



### **What is the minimum share of socially sustainable investments?**

The Sub-Fund invests a minimum of 5% in sustainable investments with a social objective.



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

The remaining investments of the Sub-Fund will be invested in securities of issuers that are able to demonstrate that they are on an improving trajectory with respect to their ESG characteristics, cash and cash equivalents for liquidity purposes and derivatives which may be used for investment and efficient portfolio management.

As a minimum environmental and social safeguard, the Sub-Fund will adhere to the Exclusions.



### **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No reference benchmark has been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Sub-Fund.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***  
N/A
- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

N/A

- ***How does the designated index differ from a relevant broad market index?***

N/A

- ***Where can the methodology used for the calculation of the designated index be found?***

N/A



### **Where can I find more product specific information online?**

More product- product-specific information can be found on the website:

<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

## **29. onemarkets Rockefeller Global Innovation Equity Fund**

### **1. Investment Objective:**

The Sub-Fund's investment objective is to seek long-term growth of capital.

### **2. Investment Strategy:**

Under normal market conditions, the Sub-Fund invests primarily in equity securities of public companies whose business activities have a growth catalyst tied to underlying global innovation and transitions innovation in technology, health and wellness, demographics, and decarbonization ("Global Innovation & Transition Companies").

The Sub-Fund will invest in Global Innovation & Transition Companies believed to demonstrate strong links to these innovations and transitions, which create societal, economic, medical, and technological changes. Strong links are defined as having a more than 10% gross revenue exposure to the themes outlined above, or spending over 10% of their capital budget to participate in the innovation & transition themes, including research & development expenditures. Under normal circumstances, the Sub-Fund will invest in approximately 50-70 companies, which may be domiciled in any country, including in emerging markets (as further specified below), and may operate in any industry or sector.

### **3. Investment Policy:**

The Sub-Fund invests primarily in equity securities of companies that have been identified on a global basis by the Investment Manager as having exposure to the potential growth related to global innovation & transition themes developed by the Investment Manager. The Sub-Fund invests in long-term global innovation & transitional themes that are exposed to technological innovation, health and wellness, demographic shifts and decarbonization driven by long-term secular trends. The Sub-Fund aims to benefit from global innovation & transitions in, for example, economic, social and environmental and demographic factors.

The Sub-Fund expects to be diversified across sectors.

The Sub-Fund will use the MSCI All Country World Index (ACWI) (the "Index") as the reference benchmark. The Sub-Fund is actively managed with reference to and seeks to outperform (after applicable fees) the Index over the recommended holding period. The Investment Manager has broad discretion with respect to individual equity selection. The number of individual equities held by the Sub-Fund including the weightings of those equities may deviate materially versus the composition of the Index in order to seek to achieve the Sub-Fund's investment objective. The Sub-Fund is mainly exposed to the issuers of the Index, however, the management of the Sub-Fund is discretionary, and the Sub-Fund may invest in issuers not included in the Index. The Index is used as a representative of the broad market for financial purpose and does not intend to be consistent with the "Global Innovation & Transition" themes promoted by the Sub-Fund.

Furthermore, the Sub-Fund may invest in financial derivative instruments eligible under the 2010 Law (including by applying the look through eligibility test to their respective underlying) for hedging purposes. The use of financial derivative instruments (e.g. futures, options, CFDs and swaps) is subject to the statutory provisions and restrictions according to section 3.7 of the general part of the Prospectus.

The Sub-Fund will primarily invest in companies that, at the time of purchase, fall within the market capitalization range of companies in the Index.

The Sub-Fund will invest no more than 10% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will benefit to the Sub-Fund. Investments in other collective investment schemes will be utilised primarily for efficient portfolio management purposes but may also be utilised for investment purposes. Factors considered by the Investment Manager when selecting collective investment schemes include, but are not limited to, expected return profile, transactions costs and liquidity.

The Sub-Fund will, under no circumstances, use outside (borrowed) capital as leverage for investment purposes. A decline of the Sub-Fund's assets due to the employment of borrowed capital, in particular leverage, is therefore excluded.

The Sub-Fund will invest no more than 30% in preferred equities, closed-ended REITS and depository receipts such as American Depository Receipt (ADR) and Global Depository Receipt (GDR).

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the reference currency (EUR).

The Sub-Fund may use strategies to hedge currency risks in relation to currencies different from EUR.

The Sub-Fund may also invest up to 30% of its total assets in emerging markets companies (including Russian companies, subject to the sanctions being lifted) as defined in the Index (subject to annual reconstitution of the Index) as well as Hong Kong listed shares (at the exclusion of China A Shares) .

The Sub-Fund will not invest in contingent convertible bonds ("CoCos"), ABS/MBS/CDOs and defaulted or distressed securities.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

For liquidity management purposes, the Sub-Fund may invest up to 20% of its net assets and in addition to the liquid assets referred to above, in cash equivalents meaning: time deposits, certificates of deposit, term deposits, notes, commercial paper, short-term government debt such as treasury-bills, bills of exchange and other instruments with a remaining period to maturity not exceeding twelve months and money market funds.

A minimum of 50% of the Sub-Fund's securities and instruments will be used to meet the promoted environmental or social characteristics. Furthermore, the Sub-Fund commits to have a minimum of 5% of Sustainable Investments according to article 2(17) SFDR which are part of the 50% mentioned above.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### **4. Sustainability approach:**

The Sub-Fund promotes environmental and social characteristics, while also investing in companies with good governance practices, pursuant to article 8 of SFDR. The Sub-Fund does not have sustainable investments as its objective.

The Investment Manager's team is comprised of three core ESG-integrated functions: fundamental research, quantitative research, and shareholder engagement. The Investment Manager's fully integrated and diverse team of fundamental research analysts spearhead the equity selection process. The sector analysts are not constrained by a particular style. They can pursue any security that they perceive to be undervalued within the global innovation & transitions universe, whether it be based on valuation metrics or growth potential. Idea generation can be sourced through fundamental insights, quantitative sources, Rockefeller network (e.g., The Ocean Foundation, World Resources Institute) or through company engagement insights.

The Investment Manager has constructed a proprietary global innovation & transitions universe of approximately 1,000 companies that are mapped to four different themes. This universe helps in identifying relevant companies that can meet thresholds of having greater than 10% revenue exposure to global innovation & transition themes.

As part of the responsible approach in the investment strategy of the Sub-Fund, the Investment Manager excludes controversial activities which are deemed to have a significant negative impact on the achievement of social and environmental objectives during the screening process such as, but not limited to coal, tobacco and non-conventional weapons. The Investment Manager systematically includes non-financial considerations in the fundamental analysis of companies.

The Sub-Fund currently has a low exposure to sustainable investments in accordance with article 2(17) of SFDR.

The Sub-Fund's investments do not take into account the criteria for environmentally sustainable economic activities, including enabling or innovation activities, within the meaning of the Taxonomy Regulation and the Sub-Fund may only hold such investments on an incidental basis. It is expected that 0% of the Sub-Fund's portfolio will be aligned to taxonomy eligible activities and sectors within the meaning of the Taxonomy Regulation.

#### **5. Use of Securities Financing Transactions:**

The Sub-Fund will not enter into securities lending transactions, Total Return Swap transactions and repurchase transactions.

In the event that the Sub-Fund intends to enter into such transactions, this Prospectus shall be amended with the prior approval of the CSSF.

#### **6. Investment Manager and Investment Sub-Managers:**

Rockefeller & Co. LLC will act as the Investment Manager.

Contact details:

**Rockefeller & Co. LLC**

45 Rockefeller Plaza, Fifth Floor, New York,  
NY 10111, United States of America

## 7. **Benchmark used:**

The Index is not used by the Sub-Fund as a benchmark under the Benchmark Regulation since the Index is not used for the purpose of tracking the return of the Index or defining the asset allocation of the Sub-Fund's portfolio or computing the performance fee.

## 8. **Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept a significant volatility of the Sub-Fund and potentially high capital losses in order to achieve high potential investment performances. The Sub-Fund is intended for investors with a long-term investment horizon.

## 9. **Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund management integrates risks stemming from sustainability and in particular ESG aspects into their investment decisions to the extent that they represent potential or actual material risks and/or opportunities to maximising the long-term risk-adjusted returns. ESG refers to environmental and social aspects as well as corporate governance. Besides common financial metrics and other portfolio specific risks, the Investment Manager considers sustainability risks and their likely impacts on the returns of the Sub-Fund in its investment process. This consideration applies to the entire investment process, both for the fundamental analysis of investments as well as for the decision-making processes.

The risk indicators used to assess sustainability risks can correspond to quantitative or qualitative factors and are based on environmental, social and corporate governance aspects and measure the risks in relation to the aspects under consideration.

The Sub-Fund's global exposure will be measured and monitored by using the Commitment Approach.

The Sub-Fund pursues an opportunity-oriented investment strategy. The focus is on maximising the potential return to investors, rather than minimising risks. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as increased risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.



## 10. Specific Risk factors:

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Risk Factors in the general part of the Prospectus.

## 11. Sub-Fund Currency:

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg, and the New York Stock Exchange, are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.

## 29a. onemarkets Rockefeller Global Innovation Equity Fund

### Template pre-contractual disclosure for the 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:**

onemarkets Rockefeller Global Innovation Equity Fund

**Legal entity identifier:**

tbd

## Environmental and/or social characteristics

#### 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, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Does this financial product have a sustainable investment objective?**

**Yes**

**No**

It will make a minimum of **sustainable investments with an environmental objective:** \_\_\_%

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 5% of sustainable investments.

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It will make a minimum of **sustainable investments with a social objective:** \_\_\_%

It promotes E/S characteristics, but **will not make any sustainable investments**



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

The environmental and social characteristics promoted by the Sub-Fund consist of investing in companies that meet the environmental, social and governance criteria of the Investment Manager. The Sub-Fund primarily invests in equity securities of public companies whose business activities have a growth catalyst tied to underlying global innovation & transitions in Technology, Health and Wellness, Demographics, and Decarbonization ("Global Innovation & Transition Companies").

The Sub-Fund does not have a reference benchmark that has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

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

A combination of proprietary quantitative screens and data from third party data providers is utilised to measure the attainment of the Sub-Fund's environmental and social characteristics. The Investment Manager uses a "Materiality Map" which identifies ESG issues that are material to the risk and return profile of companies across Sustainable Industry Classification System (SICS®) industries. Also as part of its investment selection process, the Investment Manager will assess potential companies using a proprietary scoring methodology called REIS™ and bottom-up, fundamental analysis of ESG performance and traditional investment factors. REIS™ ranks a company's improvement in performance on material ESG issues relative to industry peers and is further detailed below. The Investment Manager conducts an ESG assessment, screens against their risk exclusion policy, restriction, and sanctions lists, as well as the UniCredit Group's exclusion policy.

The Investment Manager utilises data from third party data providers to validate its view on environmental and social characteristics of the Sub-Fund's investments. This includes reviewing a company to determine the minimum contribution to at least one UN Sustainable Development Goal (SDG) based on net sales, and whether the company has targets for greenhouse gas ("GHG") emissions reduction. If determined that a further review is necessary (for example where data is not available), a qualitative process is carried out based on the Investment Manager's proprietary framework.

#### ● ***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?***

Similar to the approach mentioned above, a quantitative review is carried out on a company to determine the minimum contribution to at least one UN Sustainable Development Goal (SDG) based on net sales, and whether the company has targets for greenhouse gas ("GHG") emissions reduction. If it is determined that further review is necessary (for example, when data is not available), a qualitative process is carried out based on the Investment Manager's proprietary framework. This may include analysis around the following material issues:

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

- the environmental objectives of the sustainable investments in which the Sub-Fund partially invests include improved air quality, sustainable impact on ecosystem services, mitigation of climate change and climate physical risk exposure, mitigation of climate transition risk exposure, sustainable energy management, reduction of GHG emissions, mitigation of environmental lending risk, sustainable packaging and waste, environmental product innovation, sustainable waste and hazardous materials management and sustainable use and protection of water and marine resources;
- the social objectives of the sustainable investments in which the Sub-Fund partially invests include increased access to healthcare and medicine, access to finance, access to utilities, access to communications, customer privacy and data security, opportunities in health and nutrition, diversity and inclusion, community relations, labor rights and workplace safety, mitigation of raw material risk exposure, increased product quality and safety, chemical safety, talent attraction and retention, responsible finance, responsible product marketing and advertising and supply chain management.

**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.

***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 sustainable investments are screened against the mandatory Principal Adverse Impact ("PAI") indicators. Some results are binary, yielding a true or false value. Those metrics are listed here:

- Fossil Fuel Involvement (PAI 4)
- Negative Effect on Biosensitive Areas (PAI 7)
- UNGC OECD Guidelines Violations (PAI 10)
- Lack of Processes Around UNGC OECD Guidelines (PAI 11)
- Involvement in Controversial Weapons (PAI 14)

On the other hand, other metrics are non-binary, yielding quantitative values rather than true/false results. In order to make a judgment on these non-binary metrics, the Investment Manager has established a framework for acceptable thresholds which the Investment Manager has determined do not result in significant harm. The framework uses a combination of peer relative as well as absolute number rules. These non-binary metrics include:

- GHG Emissions – Scope 1 (PAI 1)
- GHG Emissions – Scope 2 (PAI 1)
- GHG Emissions – Scope 3 (PAI 1)
- GHG Emissions – Scope 1 & 2 (PAI 1 and PAI 2)
- GHG Emissions – Scope 1, 2, & 3 (PAI 1 and PAI 2)
- GHG Emissions – Emissions Intensity - Total Emissions Scope 1 & 2 (PAI 3)
- GHG Emissions – Emissions Intensity - Scope 1, 2, & 3 Emissions (PAI 3)
- Non-renewable Energy Consumption (PAI 6)
- Non-renewable Energy Production (PAI 5)
- CR Raw – Energy Use - Coal (PAI 5)
- CR Raw – Energy Use - Natural Gas (PAI 5)
- Energy Consumption Intensity (PAI 6)
- COD Emissions – Chemical Oxygen Demand (PAI 8)
- Hazardous Waste (PAI 9)
- Unadjusted Gender Pay Gap (mean) (PAI 12)
- Women on Board (%) (PAI 13)

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

The Investment Manager's framework to ascertain whether an investment company qualifies as a "sustainable investment" and satisfies "do no significant harm" test includes a systematic screening on metrics related to all mandatory PAI indicators using third party data provided by ISS.

**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 Investment Manager utilizes metrics that screen for investee companies that have been involved in violations of the UN Global Compact principles or OECD Guidelines for Multinational Enterprises. Additionally, the Investment Manager seeks to identify a lack of processes and compliance mechanisms to monitor compliance with the aforementioned UN Global Compact principles and OECD Guidelines for Multinational Enterprises, and avoid investment in such investee entities.

*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?**

- Yes, the Investment Manager's framework to ascertain whether an investment company qualifies as a "sustainable investment" and satisfies the "do no significant harm" test includes a systematic screening on metrics related to all mandatory Principal Adverse Indicators (PAIs) using third party data provided by ISS. Further information on consideration of PAI may be found in the periodic reporting that will be appended to the annual reports of the Fund.
- No



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

## What investment strategy does this financial product follow?

Under normal market conditions, the Sub-Fund primarily invests in equity securities of public companies whose business activities have a growth catalyst tied to underlying global innovation & transitions in Technology, Health and Wellness, Demographics, and Decarbonization ("Global Innovation & Transition Companies").

The Sub-Fund will invest in Global Innovation & Transition Companies believed to demonstrate strong links to these innovations and transitions, which create societal, economic, medical, and technological changes. Strong links are defined as having a more than 10% revenue exposure to the themes outlined above, spending over 10% of their capital budget to participate in the innovation & transition themes, or include research & development expenditures. Under normal circumstances, the Sub-Fund will invest in approximately 50-70 companies, which may be domiciled in any country, including in emerging markets, and may operate in any industry or sector.

The Sub-Fund expects to be well-diversified across sectors and geographies.

### ● **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 attain the environmental and social characteristics promoted by the Sub-Fund, the Investment Manager combines an assessment of proprietary ESG scores with exclusion criteria to act as the binding elements considered as part of the Sub-Fund's investment strategy. These binding elements are further detailed below. In addition, the Sub-Fund has committed to hold a minimum proportion of its assets in sustainable investments which involves the application of PAI analysis as detailed above.

1. Risk Exclusion Policy: The Investment Manager's Risk Exclusion Policy seeks to avoid companies involved in certain business activities that may not thrive in a sustainable future and are unwilling to change. Examples include companies that:
  - Lack compatibility with international conventions, as defined by the Investment Manager and the data providers it subscribes to;
  - Derive revenues from certain business activities, such as but not limited to tobacco production, controversial and/or nuclear weapons, among others, above the Investment Manager's acceptable thresholds; and/or
  - Are engaged in certain business activities while not abiding by operational best practices, as defined by the Investment Manager.
  
2. Rockefeller ESG Improvers Score (REIS)<sup>™</sup>: As part of its investment selection process, the Investment Manager will assess potential companies using REIS<sup>™</sup> and bottom-up, fundamental analysis of ESG performance and traditional investment factors. REIS<sup>™</sup> ranks a company's improvement in performance on material ESG issues relative to industry peers. These material ESG issues include, but are not limited to, air quality, climate physical risk, climate transition risk, customer privacy and data security, diversity and inclusion, labour rights management, talent attraction and retention and board independence. Under normal circumstances, the Investment Manager typically considers underweighting companies relative to the Benchmark with bottom third REIS<sup>™</sup> rankings operating in industries where the Investment Manager determines that ESG information is material to the risk and return profile.

Additionally, the Sub-Fund will apply specific exclusion criteria defined identifying Companies and/or Countries and/or underlying which should not be invested in or which should be invested in respecting predefined thresholds.

1. Companies that are involved in severe violations of the UN Global Compact.
2. Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations.
3. Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 10% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
4. Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact (a *de minimis* rule can be applied, i.e. companies with a minor involvement are not necessarily excluded, and the internal threshold limit on the Management Company's side will be set at 5%).
5. Companies involved in the tobacco business which derive from these businesses more than 5% of their consolidated revenues.
6. Companies involved in the nuclear energy production which derive from these businesses more than 15% of their consolidated revenues.
7. Companies involved in the weapons business which derive from these businesses more than 10% of their consolidated revenues.
8. Companies involved in the gambling business which derive from these businesses more than 15% of their consolidated revenues.
9. Companies involved in the adult entertainment business which derive from these businesses more than 15% of their consolidated revenues.
10. Bonds issued by Countries that are not compliant with FATF Recommendations (Black and Grey list).
11. Bonds issued by Countries that are not signatories of Paris 2015 Agreement on climate change are excluded.
12. Bonds issued by Countries classified with 'not free'- status according to freedom house index.

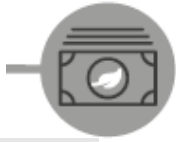
● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

There is no commitment to a minimum reduction in the scope of investments prior to the application of the investment strategy.

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

The Investment Manager utilizes negative screens, using data from third party providers, to rule out corporate involvement in certain thematic areas, including bribery, accounting, anti-competitive behavior, money laundering, child labor, forced labor, workplace discrimination, labor standards, and taxes. Additionally, the Investment Manager systematically screens against breach of international standards and failure to respect established norms.

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



**Asset allocation** describes the share of investments in specific assets.

## What is the asset allocation planned for this financial product?

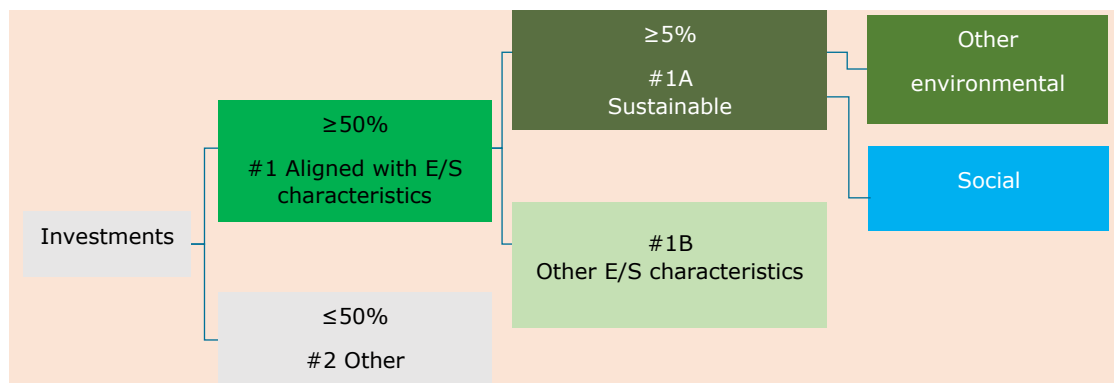
The Investment Manager employs a binding proprietary ESG methodology, as described in detail above, which determines the proportion of the Sub-Fund's Net Asset Value which is aligned with the promoted characteristics. At least 50% of the Sub-Fund's Net Asset Value will be invested in securities which will be aligned with the environmental and/or social characteristics promoted by the Sub-Fund, meaning that a maximum of 50% of the Sub-Fund's Net Asset Value will be invested in assets which will be categorised as "Other" in the chart below. The Sub-Fund undertakes a further commitment to invest a minimum of 5% of its Net Asset Value in sustainable investments.

Please refer to the sections "What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?" and "What is the minimum share of socially sustainable investments?" for further information on the flexible allocation between "other environmental" and "social" categories shown in the chart.

The asset allocation may change over time and percentages should be seen as an average over an extended period of time.

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.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.



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

N/A. The Sub-Fund does not utilize derivatives.



**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

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

The Sub-Fund does not commit that its sustainable investments with an environmental objective will be aligned to any minimum extent with the EU Taxonomy.

As such, the Investment Manager discloses for the purposes of the SFDR and the EU Taxonomy that, at the date of this document, the Sub-Fund has a 0% minimum alignment with the EU Taxonomy and this is shown in the graphs below.

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

Yes:

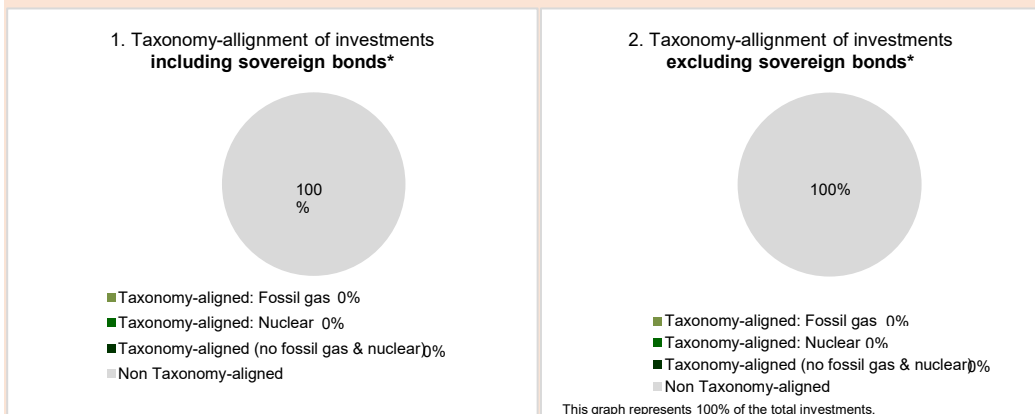
In fossil gas  In nuclear energy

No

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.



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



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

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

As the Sub-Fund does not commit to make investments which are aligned with the EU Taxonomy, the minimum share of investments in transitional and enabling activities within the meaning of the EU Taxonomy is 0%.



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

The Sub-Fund commits to investing a minimum of 5% of Net Asset Value in sustainable investments with both environmental and social objectives.

This minimum can be achieved through any mix of such environmental and / or social sustainable investments and there is no prioritization of one category over the other. Investment in these assets is based on materiality which is unique to each individual investment. The investment process accommodates the combination of environmental and social objectives by allowing the Investment Manager the flexibility to allocate between these based on availability and attractiveness of investment opportunities. As such, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0% of Net Asset Value (in which case, this would be accompanied by at least 5% in socially sustainable investments).



**What is the minimum share of socially sustainable investments?**

The Sub-Fund commits to investing a minimum of 5% of Net Asset Value in sustainable investments with both environmental and social objectives.

This minimum can be achieved through any mix of such environmental and / or social sustainable investments and there is no prioritization of one category over the other. Investment in these assets is based on materiality which is unique to each individual investment. The investment process accommodates the combination of environmental and social objectives by allowing the Investment Manager the flexibility to allocate between these based on availability and attractiveness of investment opportunities. As such, the minimum share of socially sustainable investments is 0% of Net Asset Value (in which case, this would be accompanied by at least 5% in sustainable investments with an environmental objective).



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

The “#2 Other” investments include cash and other cash equivalents that may be held as ancillary liquidity or for risk balancing purposes, in addition to investments that do not align with the environmental or social characteristics mentioned above. These investments may be used for diversification purposes or in order to achieve the investment objective of the Sub-Fund (which is not a sustainable investment objective). This category may also include securities for which relevant data is not available. There are no minimum environmental or social safeguards applied to these investments.



## Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

No.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

N/A

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

N/A

- ***How does the designated index differ from a relevant broad market index?***

N/A

- ***Where can the methodology used for the calculation of the designated index be found?***

N/A



## Where can I find more product specific information online?

More product-specific information can be found on the website:  
<https://www.structuredinvest.lu/de/en/fund-platform/esg.html>

## **30. onemarkets Capital Group US Balanced Fund**

### **1. Investment Objective:**

The Sub-Fund seeks the balanced accomplishment of three objectives: conservation of capital, current income and long-term growth of capital and income.

### **2. Investment Strategy:**

The Sub-Fund is actively managed and uses a balanced approach to invest in a broad range of securities primarily domiciled in the United States, including equities and investment grade bonds. The remaining part of the Sub-Fund's portfolio can be invested in both developed and emerging markets.

### **3. Investment Policy:**

In general, the Sub-Fund will seek to invest, without being constrained in terms of sector or size of issuers, at least:

- 50% of its net assets in equities (including convertibles, preferred shares, locally listed shares and ADRs & GDRs); and,
- 25% of its net assets in debt securities (including Money Market Instruments and money market funds) generally rated Baa3 or better or BBB- or better by a nationally recognized statistical rating organization ("NRSRO") designated by the Sub-Fund's Investment Manager, or in unrated securities determined by the Investment Manager to be of equivalent quality. The Sub-Fund currently intends to look to the ratings from Moody's Investors Service, Standard & Poor's Ratings Services and Fitch Ratings. If rating agencies differ, securities will be considered to have received the highest of these ratings, consistent with the Sub-Fund's investment policy.

The selection process of debt securities is based on fundamental analysis. In case of downgrade below BBB-, the Investment Manager carries on an analysis of issuer fundamentals, a relative value analysis and fixed income security evaluation and determines the course of action (e.g., keeping the downgraded investment in the Sub-Fund's portfolio versus realisation of the same) in the best interest of the investors.

The Sub-Fund may invest in ABS/MBS which will not exceed in aggregate 20% of the Sub-Fund's net assets.

The Sub-Fund may use financial derivative instruments for investment, hedging and/or efficient portfolio management purposes. Instruments permitted are interest rate swaps, CDXs, CDS, forward contracts, FX options, futures and options on futures.

Up to 5% of the net assets of the Sub-Fund may be subject to Total Return Swaps.

The Sub-Fund may invest up to 20% of its assets in securities of issuers domiciled outside the United States which may include up to 5% in emerging markets (including China as further described below and Russia, in the latter case subject to the sanctions being lifted). In determining the domicile of an issuer, the Sub-Fund's Investment Manager will generally look to the domicile determination of a leading provider of global indexes, such as Morgan Stanley Capital International. However, the Investment Manager in its sole discretion also may take into account such factors as where the issuer's securities are listed and where the issuer is legally organized, maintains principal corporate offices, conducts its principal operations generates revenues and/or has credit risk exposure.

The Sub-Fund may invest, either directly via the Shanghai-Hong Kong Stock Connect and Shenzhen-Hong Kong Stock Connect and/or indirectly such as by way of access warrants and/or other access products, up to 5% of the net assets of the Sub-Fund into China A-shares.

The Sub-Fund may invest on the China Interbank Bond Market up to 5% of its net assets, either directly or via Bond Connect.

The Sub-Fund may not invest in distressed or defaulted securities or contingent convertible bonds ("Cocos").

The Sub-Fund will invest no more than 10% of its net assets in shares or units of other UCITS or other UCIs eligible under article 41(1)e) of the 2010 Law, including in money market funds. In case of investments in units of UCITS or UCITS exchange traded funds (UCITS-ETFs), potential retrocessions will be for the benefit of the Sub-Fund's assets.

The Sub-Fund may invest without limitation in instruments denominated in currencies other than the reference currency (EUR).

The Sub-Fund may use strategies to hedge currency risks in relation to currencies different from EUR.

The Sub-Fund may invest up to 10% of its net assets in aggregate in ADR's, GDRs and closed-ended REITs.

The Investment Manager shall not borrow on the Sub-Fund's behalf. However, this limitation shall not prohibit short-term overdrafts, which may be required from time to time due to operational difficulties such as "trade fails", "limit orders" or discrepancies in security settlement dates.

The Sub-Fund may also invest on an ancillary basis (i.e., up to 20% of the net assets of the Sub-Fund) in liquid assets (i.e., bank deposits at sight) in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets under the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions.

For liquidity management purposes, the Sub-Fund may invest, in addition to the liquid assets referred to above, in cash equivalents meaning: time deposits, certificates of deposit, term deposits, notes, commercial paper, short-term government debt such as treasury-bills, bills of exchange and other instruments with a remaining period to maturity not exceeding twelve months and Money Market Instruments.

**It cannot be assured that, the investment policy will achieve the investment objective.**

#### **4. Sustainability approach:**

The Sub-Fund qualifies as a financial product under Art. 6 of SFDR. The investments underlying the Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Investment Manager does not take into account for the Sub-Fund the principal adverse impacts ("PAI's") of investment decisions on sustainability factors as defined in Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector as this is not part of the strategy or investment restrictions of the Sub-Fund.

## 5. Use of Securities Financing Transactions:

The following overview describes the securities financing transactions as defined under the SFTR that are used on a continuous basis:

Securities financing transaction	Permitted	Used	Maximum amount	Estimated amount
Total Return Swaps	Yes	Yes	5%	<5%

The Sub-Fund will invest in Total Return Swaps for investment purposes with the objective, among else, of an efficient management of cash flows, substitution for direct investments and better coverage of markets.

Total Return Swap transactions may be used to gain an efficient exposure to specific segments of the equity and fixed income markets and benefit from the returns on a reference asset without purchasing the asset directly.

In respect to Total Return Swap revenues, the gross income generated by the transactions is credited for 100% to the Sub-Fund and for 0% to the counterparty in these transactions (subject to the funding and trading costs that will be borne by the Sub-Fund). The Sub-Fund will enter into Total Return Swaps with multiple counterparties (the top 10 counterparties will be listed in the annual report of the Fund in accordance with SFTR). The proportion of the assets held by the Sub-Fund that may be subject to Total Return Swap transactions is generally expected to be at the maximum amount of around 5% of the Sub-Fund's Net Asset Value. That proportion will fluctuate subject to different factors, including but limited to the defined asset allocation, valuation, liquidity, efficiency and pricing considerations.

The Sub-Fund will not enter into securities lending transactions and repurchase transactions.

## 6. Investment Manager and Investment Sub-Managers:

Capital International Management Company S.à r.l. will act as the Investment Manager and will sub-delegate investment activities/portfolio management services to Capital International S.à r.l. The Investment Manager will remain responsible for providing discretionary investment management services with respect to the Sub-Fund's assets including investment management activities performed by the investment management sub-delegates.

Contact details:

<b>Capital International Management Company Sàrl</b> 37 Avenue John F Kennedy L-1855 Luxembourg Grand Duchy of Luxembourg	<b>Capital International Sàrl</b> 3, Place des Bergues 1201 Geneva Switzerland
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## 7. **Benchmark used:**

The Sub-Fund does not use any index under the Benchmark Regulation.

## 8. **Profile of the typical investor:**

An investment in this Sub-Fund is suitable only for investors who are able to appraise the risks and economic value of the investment. The investor must be prepared to accept an increased volatility of the Sub-Fund and potentially high capital losses in order to achieve above-average potential investment performances. The Sub-Fund is intended for investors with a medium to long-term investment horizon.

## 9. **Risk Management procedure:**

The Management Company will introduce a risk management procedure in compliance with the Law of 17 December 2010 and other applicable regulations for the Sub-Fund, in particular the CSSF circular 11/512 (as amended by CSSF circular 18/698). Within the risk management procedure, the Management Company will record and measure the market risk, liquidity risk, counterparty risk, sustainability risk and all other risks, including operational risks, which are intrinsic to the Sub-Fund.

The Sub-Fund's global exposure will be measured monitored by using the Commitment Approach.

The Sub-Fund pursues a growth-oriented investment strategy. In order to take advantage of opportunities for higher investment returns, a higher risk exposure is unavoidable. Based on the Investment Policy and the expected level of risk, the Sub-Fund is classified as risk tolerant.

For further information on the global exposure methodology, investors shall also read the section 4.4 Global Exposure Approach in the general part of the Prospectus.

## 10. **Specific Risk factors:**

Investors shall examine the relevant risk factors as listed in the Appendix 5 Sub-Funds Risk Factors in the general part of the Prospectus.

## 11. **Sub-Fund Currency:**

The reference currency of the Sub-Fund is the Euro. Investors may consider warnings in respect to currency risks in the general section of the Prospectus.

## 12. Specific liquidity considerations:

Investors' attention shall be drawn on liquidity management measures that may be applied to protect the interest of all investors when exposed to exceptional market or transactional circumstances as further described in the section 11 of the general part of the Prospectus.

## 13. Valuation Day, Dealing Day, Cut-Off time, Payment, Periods of Subscriptions, Redemptions, Conversions:

Business Day	Each day on which banks and financial institutions in Luxembourg and New-York are generally open for business except 24 and 31 December of each year.
Dealing Day	Every Business Day
NAV Valuation Day	T (each Business Day)
NAV Calculation Day	T + 1
Cut-Off Time	Not later than 2.00 pm (Central European Time)
Authorised Payment Currencies	Euro
Settlement (subscriptions and redemptions)	Two (2) Business Days after the NAV Valuation Day.