

**Sales prospectus  
(including management regulations)  
1. May 2023**

**GREIFF “special situations” fund  
commun de placement as per Part I of the Amended Luxembourg Law of 17  
December 2010 on Undertakings for Collective Investment)**

**HANSA**INVEST  
**HANSAINVEST**

**Hanseatische Investment-GmbH, Hamburg  
(Management Company)**

in cooperation with

**GREIFF capital management AG (Sales Company)**

# Contents

<b>INTRODUCTION</b> .....	<b>5</b>
<b>AN OVERVIEW OF THE PARTICIPATING PARTIES</b> .....	<b>7</b>
<b>SALES PROSPECTUS</b> .....	<b>10</b>
<b>1. THE FUND</b> .....	<b>10</b>
<b>2. THE MANAGEMENT COMPANY</b> .....	<b>10</b>
<b>3. THE PORTFOLIO MANAGER</b> .....	<b>14</b>
<b>4. THE CUSTODIAN</b> .....	<b>14</b>
<b>5. THE REGISTRAR AND THE TRANSFER AGENT</b> .....	<b>16</b>
<b>6. THE CENTRAL ADMINISTRATION AGENT</b> .....	<b>16</b>
<b>7. SPECIAL NOTES</b> .....	<b>16</b>
7.1. <b>LEGAL STATUS OF THE INVESTORS</b> .....	<b>16</b>
7.2. <b>NOTE ON ENFORCEMENT OF RIGHTS</b> .....	<b>17</b>
7.3. <b>GENERAL NOTES ON FUND UNIT TRADING</b> .....	<b>17</b>
7.4. <b>GENERAL GUIDELINES FOR INVESTMENT POLICY</b> .....	<b>17</b>
7.5. <b>GENERAL NOTES ON DERIVATIVES</b> .....	<b>18</b>
7.6. <b>UNITS</b> .....	<b>20</b>
7.7. <b>ALLOCATE OF INCOME</b> .....	<b>23</b>
7.8. <b>PRICE PUBLICATIONS</b> .....	<b>23</b>
7.9. <b>COSTS</b> .....	<b>23</b>
7.10. <b>TAXES</b> .....	<b>23</b>
7.11. <b>FUND RISK PROFILE</b> .....	<b>24</b>
7.12. <b>RISK MANAGEMENT PROCEDURE</b> .....	<b>25</b>
7.13. <b>LEVERAGE</b> .....	<b>26</b>
7.14. <b>INVESTOR INFORMATION</b> .....	<b>26</b>
<b>RISK WARNINGS</b> .....	<b>33</b>
<b>Risk of investing in a fund</b> .....	<b>33</b>
<b>Fluctuations in fund unit value</b> .....	<b>33</b>
<b>Influence of tax aspects on individual performance</b> .....	<b>33</b>
<b>Change of investment policy or investment terms</b> .....	<b>33</b>
<b>Suspension of unit redemption</b> .....	<b>34</b>
<b>Possible investment spectrum</b> .....	<b>34</b>
<b>Transfer of all Fund assets to another investment fund (merger)</b> .....	<b>34</b>
<b>Transfer of the Fund to another capital management company</b> .....	<b>35</b>
<b>Profitability and fulfilment of the investor's investment goals</b> .....	<b>35</b>
<b>Risks of negative fund performance (market risk)</b> .....	<b>35</b>
<b>Risk of change in value</b> .....	<b>35</b>

Capital market risk .....	35
Risk of changes in share prices .....	35
Risk of interest rate changes .....	36
Risk of negative interest on deposits .....	36
Risk of changes in rates for convertible and option bonds.....	36
Risks associated with derivative transactions .....	37
Risks associated with the provision of collateral .....	38
Risk of securitization exposures without retention .....	38
Inflation risk .....	38
Currency risk .....	38
Risk of cancellation of monetary unions or the withdrawal of individual countries from such unions .....	38
Concentration risk.....	39
Risks associated with investment in investment units.....	39
Risks associated with the investment spectrum .....	39
Emerging markets .....	39
Particular sector risks .....	39
Special Risks of Investing in Securities of smaller companies .....	40
Risk of restricted or increased fund liquidity and risks associated with increased subscriptions or redemptions (liquidity risk) .....	40
Risk associated with investment in assets .....	40
Risk associated with borrowing .....	40
Risks associated with increased redemptions or subscriptions .....	41
Risk associated with public holidays in specific regions/countries .....	41
Sustainability risks.....	41
<b>Physical risks can also have indirect consequences (examples: Finally, polluters or companies that have contributed to climate change could be held liable by the state (e.g. Ontario Bill 21, Liability for Climate-Related Harms Act, 2018) or in court for the consequences. ....</b>	<b>42</b>
Transition risks exist in connection with the transition to a low-carbon economy: .....	42
<b>Interdependence between physical risks and transition risks.....</b>	<b>42</b>
<b>Issuer-specific risk related to sustainability .....</b>	<b>42</b>
<b>Operational risks related to sustainability.....</b>	<b>43</b>
<b>Counterparty risk, including credit risk and risk of default.....</b>	<b>44</b>
<b>Counterparty default risk / Counterparty risks (excluding central counterparties)</b>	<b>44</b>
<b>Central counterparty risk .....</b>	<b>44</b>
<b>Operational and other risks associated with the fund.....</b>	<b>44</b>
<b>Risk resulting from criminal activities, irregularities or natural catastrophes .....</b>	<b>44</b>
<b>Country or transfer risk .....</b>	<b>45</b>
<b>Regulatory and political risks .....</b>	<b>45</b>
<b>Changes to the tax framework, tax risk.....</b>	<b>45</b>

Key individual risk.....	45
Custody risk.....	46
Risks arising from trading and clearing mechanisms (settlement risk).....	46
<b>FURTHER INVESTMENT FUNDS MANAGED BY THE MANAGEMENT COMPANY .....</b>	<b>50</b>
<b>AN OVERVIEW OF THE FUND .....</b>	<b>62</b>
Investment goal and investment strategy .....	62
Investment policy .....	62
Fund risk profile .....	65
Risk management profile.....	65
Typical investor profile .....	66
Characteristics of the fund's unit classes .....	67
<b>MANAGEMENT REGULATIONS.....</b>	<b>72</b>
<b>SPECIFIC INFORMATION FOR INVESTORS IN THE EUROPEAN UNION (EU) AND THE EUROPEAN ECONOMIC AREA (EEA).....</b>	<b>98</b>

## INTRODUCTION

The purpose of this sales prospectus, issued by HANSAINVEST Hanseatische Investment-GmbH (hereinafter "HANSAINVEST" or the "Management Company") is to provide interested readers and potential investors with information concerning the GREIFF "special situations" UCITS special investment fund (hereinafter the "Fund"). It reports on the companies which assume responsibility and states specific information which the investor should know when purchasing units in the above-mentioned fund.

The Fund is a Luxembourg-based investment fund (fonds commun de placement) which has been established for an indefinite period in the form of a common fund as per Part I of the Luxembourg Law of 17 December 2010 on Undertakings for Collective Investment in its current valid version ("Law of 17 December 2010").

This sales prospectus is only valid in conjunction with the most recently published annual report, which may not be more than 16 months old. Should more than eight months have elapsed since the date of the annual report, then the purchaser must also be provided with the six-monthly report. The legal basis for the purchase of units in the Fund is the current valid sales prospectus and the "key information document" (PRIIP). By purchasing a unit in the Fund the investor recognises the sales prospectus, the „key information document“ (PRIIP) and all approved and published amendments thereof.

The investor will be provided with the „key information document“ (PRIIP) in good time and free of charge before purchasing units.

**No information or declarations which deviate from the sales prospectus may be issued. The Management Company is not liable if, and insofar as, information or declarations are issued which deviate from the current sales prospectus or the key information sheet (PRIIP).**

### **Investment restrictions for US citizens**

**HANSAINVEST and/or the Fund are not, and will not be, registered in accordance with the United States Investment Company Act of 1940 in its current version. Units in the Fund are not, and will not be, registered in accordance with the United States Securities Act of 1933 in its current version or in accordance with the securities legislations of any member state of the United States of America. Units in the Fund may not be offered or sold in the United States or offered or sold to a US person or for their account. Parties who are interested in purchasing units must, where applicable, provide proof that they are not US persons; are not purchasing units on behalf of US persons and will not sell on units to US persons. US persons include natural persons who are resident in the United States. US persons may also be private companies or stock corporations which, for example, have been founded in accordance with the laws of the USA or of a US federal state, territory or of a possession of the USA.**

This prospectus and the information it contains represent the current status at the time the prospectus was finalised. This prospectus will be updated should any material changes occur.

The information which must be provided in the sales prospectus has been amalgamated with the management regulations approved by the Luxembourg financial supervisory authority *Commission de Surveillance du Secteur Financier* (CSSF). This has resulted in repetitive statements which could not

be avoided in the amalgamated document (made up of the sales prospectus and the management regulations).

HANSAINVEST

Hanseatische Investment-GmbH

# **AN OVERVIEW OF THE PARTICIPATING PARTIES**

## **Management Company**

HANSAINVEST  
Hanseatische Investment-GmbH  
P.O. Box 60 09 45,  
22209 Hamburg/ Germany

Office address:  
Kapstadtring 8  
22297 Hamburg/ Germany

Commercial Register B 12891  
Hamburg District Court

Telephone: (040) 300 57- 0  
Fax: (040) 300 57- 61 42  
E-Mail: [service@hansainvest.de](mailto:service@hansainvest.de)  
Internet: [vvvvv.hansainvest.de](http://vvvvv.hansainvest.de)

Subscribed and paid-in capital:  
EUR 10 500 000

## **Partners**

SIGNAL IDUNA Allgemeine Versicherung AG, Dortmund / Germany  
SIGNAL IDUNA Lebensversicherung a. G., Hamburg / Germany  
SIGNAL IDUNA Krankenversicherung a.G., Dortmund / Germany

## **Management board**

Dr. Jörg W. Stotz (spokesman)  
(simultaneously chairman of the supervisory board of HANSAINVEST LUX S.A., member of the management board of HANSAINVEST Real Assets GmbH as well as member of the supervisory board of Aramea Asset Management AG)

Nicholas Brinckmann  
(Simultaneously spokesman of the supervisory board of HANSAINVEST Real Assets GmbH)

Ludger Wibbeke  
(Simultaneously deputy chairman of the supervisory board of HANSAINVEST LUX S.A. and chairman of the supervisory board of WohnSelect Kapitalverwaltungsgesellschaft mbH)

## **Supervisory board**

Martin Berger (chairman),  
Member of the board of SIGNAL IDUNA group, Hamburg / Germany  
(simultaneously chairman of the supervisory board of SIGNAL IDUNA Asset Management GmbH)

Dr. Karl-Josef Bierth  
Member of the board of SIGNAL IDUNA group, Hamburg / Germany  
(Simultaneously deputy chairman of the supervisory board of DONNER & REUSCHEL  
Aktiengesellschaft, Hamburg / Germany)

Markus Barth  
Chairman of the board of Aramea Asset Management AG, Hamburg / Germany

Dr. Thomas A. Lange  
Chairman of the board of National-Bank AG, Essen / Germany

Prof. Dr. Stephan Schüller  
Tradesman

Prof. Dr. Harald Stützer  
Managing partner of STUETZER Real Estate Consulting GmbH, Gerolsbach / Germany

## **CUSTODIAN and PAYING AGENT**

Hauck Aufhäuser Lampe Privatbank AG, Luxembourg branch  
1c, rue Gabriel Lippmann  
L-5365 Munsbach, Luxembourg  
Commercial Register Luxembourg: R.C.S. Luxembourg B 175937

## **REGISTRAR AND TRANSFER AGENT**

Hauck & Aufhäuser Fund Services S.A.  
1c, rue Gabriel Lippmann  
L-5365 Munsbach, Luxembourg  
Commercial Register Luxembourg: R.C.S. Luxembourg B 28878

## **FUND MANAGER and SALES COMPANY (Initiator)**

GREIFF capital management AG (Sales Company)  
Munzinger Strasse 5a  
79111 Freiburg / Germany  
Commercial Register B 7575 Freiburg i.Br. District Court

## **Auditor of the Management Company**

KPMG AG  
Wirtschaftsprüfungsgesellschaft  
Ludwig-Erhard-Strasse 11-17  
20459 Hamburg / Germany

## **Auditor of the Fund**

KPMG Luxembourg, Société coopérative  
39, Avenue John F. Kennedy  
L-1855 Luxembourg



# SALES PROSPECTUS

## 1. The Fund

The investment fund described in this sales prospectus is a special investment fund (fonds commun de placement) established under Luxembourg law which holds securities and other assets. It was established as per Part I of the Luxembourg Law of 17 December 2010 on Undertakings for Collective Investment in its current valid version (“Law of 17 December 2010”) and fulfils the requirements of the Council of the European Community Directive 2009/65/EC of 13 July 2009, amended most recently by Directive 2014/91/EU of the European Parliament and of the Council of 23 July 2014 (“Directive 2009/65/EC”).

The following management regulations, which came into force on 1 July 2018 and whose filing with the Commercial and Companies Register of Luxembourg (“Commercial and Companies Register”) was disclosed in the Recueil électronique des Sociétés et Associations (“RESA”), are an integral element of the GREIFF “special situations” Fund (“Fund”). The management regulations were last amended on 1st May 2023 and notification of this filing was published in the RESA.

Participation in the Fund is based on this sales prospectus and the subsequently printed management regulations. Both documents form an integrated whole and thus supplement each other.

Various unit classes may be issued for the Fund and may, for example, differ with regard to allocation of earnings or other criteria.

The sales prospectus, the „key information document“ (PRIIP) and the Fund’s annual and six-monthly reports are available free of charge from the Management Company’s registered offices; the custodian, the paying agents and the sales agency on a durable data medium. The sales prospectus and the „key information document“ (PRIIP) may also be downloaded from the Management Company’s website at [www.hansainvest.com](http://www.hansainvest.com). At the investor’s request the above-mentioned documents will also be provided as hard copies. For further information please see the “Investor information” section.

## 2. The Management Company

The Fund’s management company is HANSAINVEST Hanseatische Investment-GmbH, established on 2 January 1969 as a ‘Gesellschaft mit beschränkter Haftung’ (limited liability company) under German law for an indefinite period. Its registered offices are located at Kapstadtring 8, 22297 Hamburg/ Germany and it is entered in the Commercial Register of Hamburg District Court under registration number HRB 12891. The Management Company’s partnership agreement is filed with the Commercial Register of Hamburg District Court. Interim amendments to the partnership agreement are also filed with the Commercial Register.

The Management Company’s financial year ends on 31 December of each year. The Management Company has equity capital of EUR 10 500 000.

The Management Company is a capital management company within the sense of the German Capital Investment Code (KAGB). The Management Company notified the financial supervisory authority competent for it, the *German Federal Financial Supervisory Authority* (“BaFin”), of its intention to carry out collective capital management of UCITS special funds in the Grand Duchy of Luxembourg.

On 26 January 2018 the BaFin informed the Management Company that it had forwarded the Management Company's notification of intent to the Luxembourg financial supervisory authority, the *Commission de Surveillance du Secteur Financier* ("CSSF").

The Management Company has a licence to conduct business as an UCITS capital management company and as an external AIF capital management company in accordance with the KAGB. It may thus - in addition to undertakings for collective investment in transferrable securities (UCITS) as per Sect. 1 Para. 2 in conjunction with Sect. 192 ff. KAGB - manage the following investment funds under German law:

- Mixed investment funds as per Sect. 218 ff. KAGB,
- Other investment funds as per Sect. 220 ff. KAGB,
- Funds of hedge funds as per Sect. 225 ff. KAGB,
- Real estate special funds as per Sect. 230 ff. KAGB,
- Closed-end German public AIFs as per Sect. 261 ff. KAGB, which invest in the following assets:
  - Real estate, including woods, forests and arable land,
  - Ships, ship superstructures, ship components and spare parts for ships,
  - Aircraft, aircraft components and spare parts for aircraft,
  - Systems for the generation, transport and storage of electricity, gas or heat generated by renewable energy sources,
  - Rail vehicles, rail vehicle components and spare parts for rail vehicles,
  - Infrastructure used for assets within the meaning of Sect. 261 Para. 2 No. 2, 4 and 5 KAGB,
  - Assets as per Sect. 261 Para. 1 No. 2 to 6 KAGB,
  - Securities as per Sect. 193 KAGB,
  - Money market instruments as per Sect. 194 KAGB,
  - Bank deposits as per Sect. 195 KAGB,
  - Loans as per Sect. 261 Para. 1 No. 8, 285 Para. 3 Sentence 1 and 3 KAGB to companies in which the closed-end public AIF already holds an equity interest,
- Closed-end German special AIFs as per Sect. 285 ff. KAGB - including AIFs which gain control over non-listed companies and issuers as per Sect. 287 ff. KAGB - which invest in the following assets:
  - Real estate, including woods, forests and arable land,
  - Ships, ship superstructures, ship components and spare parts for ships,
  - Aircraft, aircraft components and spare parts for aircraft,
  - Systems for the generation, transport and storage of electricity, gas or heat generated by renewable energy sources,
  - Rail vehicles, rail vehicle components and spare parts for rail vehicles,
  - Infrastructure used for assets within the meaning of Sect. 261 Para. 2 No. 2, 4 and 5 KAGB,
  - Assets as per Sect. 261 Para. 1 No. 2 to 6 KAGB,
  - Securities as per Sect. 193 KAGB,

Page 8 of 91 ○ Money market instruments as per Sect. 194 KAGB,

- Bank deposits as per Sect. 195 KAGB,
- Loans as per Sect. 285 Para. 2 KAGB,
- Loans as per Sect. 285 Para. 3 KAGB to companies in which the closed-end special AIF already holds an equity interest,
- Open-ended German special AIFs with fixed investment terms as per Sect. 284 KAGB which invest in the following assets: The assets stated in Sect. 284 Para. 1 and Para. 2 KAGB and loans as per Sect. 284 Para. 5, 285 Para. 3 KAGB to companies in which the special AIF already holds an equity interest,
- General open-ended German special AIFs as per Sect. 282 KAGB - including hedge funds as per Sect. 283 KAGB - which invest in the following assets:
  - The assets stated in Sect. 284 Para. 1 and Para. 2 KAGB,
  - Hedge funds as per Sect. 283 KAGB,
    - Closed-end German public AIFs as per Sect. 261 ff. KAGB, which invest in the following assets:
      - Real estate, including woods, forests and arable land,
      - Ships, ship superstructures, ship components and spare parts for ships,
      - Aircraft, aircraft components and spare parts for aircraft,
      - Systems for the generation, transport and storage of electricity, gas or heat generated by renewable energy sources,
      - Rail vehicles, rail vehicle components and spare parts for rail vehicles,
      - Infrastructure used for assets within the meaning of Sect. 261 Para. 2 No. 2, 4 and 5 KAGB,
      - Assets as per Sect. 261 Para. 1 No. 2 to 6 KAGB,
      - Securities as per Sect. 193 KAGB,
      - Money market instruments as per Sect. 194 KAGB,
      - Bank deposits as per Sect. 195 KAGB,
      - Loans as per Sect. 261 Para. 1 No. 8, 285 Para. 3 Sentence 1 and 3 KAGB to companies in which the closed-end public AIF already holds an equity interest,
  - Closed-end German special AIFs as per Sect. 285 ff. KAGB - including AIFs which gain control over non-listed companies and issuers as per Sect. 287 ff. KAGB - which invest in the following assets:
    - Real estate, including woods, forests and arable land,
    - Ships, ship superstructures, ship components and spare parts for ships,
    - Aircraft, aircraft components and spare parts for aircraft,
    - Systems for the generation, transport and storage of electricity, gas or heat generated by renewable energy sources,
    - Rail vehicles, rail vehicle components and spare parts for rail vehicles,
    - Infrastructure used for assets within the meaning of Sect. 261 Para. 2 No. 2, 4 and 5 KAGB,
    - Assets as per Sect. 261 Para. 1 No. 2 to 6 KAGB,
    - Securities as per Sect. 193 KAGB,

- Money market instruments as per Sect. 194 KAGB,
- Bank deposits as per Sect. 195 KAGB,
- Loans as per Sect. 285 Para. 2 KAGB,
- Loans as per Sect. 285 Para. 3 KAGB to companies in which the closed-end special AIF already holds an equity interest,

The Management Company may undertake all actions which are necessary or conducive to promoting the sale of shares and/or units in UCITS in Luxembourg and Germany and to launching and managing UCITS. Management of Luxembourgian and German UCITS includes in particular investment management (portfolio management and/or risk management) and/or additional activities concerning administration and/or sales and/or activities relating to UCITS assets.

The Management Company fulfils the requirements of amended Directive 2009/65/EC of the Council on the Coordination of Laws, Regulations and Administrative Provisions Relating to Undertakings for Collective Investment in Transferable Securities and, in accordance with the German KAGB and administrative provisions of the BaFin which are applicable to it, has adequate and appropriate organisational structures and internal control mechanisms.

The Management Company is responsible for the administration and management of the Fund. It may carry out all management and administrative measures for the account of the Fund and exercise all rights which are directly or indirectly associated with the Fund's assets.

When carrying out its duties the Management Company acts honestly, with probity, professionally and independently of the custodian and solely in the interests of the investors. The Management Company meets its obligations with the care of a paid representative.

When managing the Fund's assets the Management Company may, under its own responsibility and control, appoint or consult a portfolio manager and/or investment adviser and entrust them with daily investment policy. The portfolio manager and/or investment consultant will be remunerated for the services which they perform either from the Management Company's management remuneration or directly from the Fund's assets. The sales prospectus provides information on the percentage amount, calculation and payment of this remuneration.

Investment decisions, order placement and selection of brokers are the sole preserve of the Management Company insofar as no portfolio manager has been appointed to manage the Fund's assets.

The Management Company is, while preserving its own responsibility and control, entitled to delegate its activities to third parties respectively to transfer tasks to third parties. The delegation of activities and transfer of tasks may in no way impair the efficacy of supervision by the Management Company. The delegation of activities and transfer of tasks may not, in particular, prevent the Management Company from acting in the interests of the investors.

HANSAINVEST has outsourced portfolio management, so it is the portfolio manager and not HANSAINVEST who takes the investment decisions. In the context of the principal adverse impacts of investment decisions on sustainability factors ("PAI"), HANSAINVEST does not currently oblige the portfolio managers of the individual mutual funds or investment funds with their respective sub-funds to take these factors fully into account. In this context, we understand sustainability factors to mean environmental, social and employee concerns, respect for human rights and the fight against corruption

and bribery. The regulatory requirements to consider the PAI are new and very detailed. Their careful implementation requires considerable effort, which we are currently unable to adequately provide.

However, HANSAINVEST manages individual mutual funds or investment funds with their respective sub-funds for which the portfolio manager and the company have made the consideration of the PAI a binding part of the investment strategy and thus the most important adverse effects of investment decisions on sustainability factors are at least taken into account there.

### **3. The portfolio manager**

The Management Company has appointed GREIFF capital management AG, a stock company under German law with registered offices in Freiburg i. Br. (the "Portfolio Manager") as the Fund's portfolio manager and transferred portfolio management to it.

The Portfolio Manager is a securities institution under German law and has, among other things, a licence to manage individual assets invested in financial instruments for others with scope for decision-making (financial portfolio management). It is subject to supervision by the German Federal Financial Supervisory Authority (BaFin).

The Portfolio Manager's task is, in particular, independent daily implementation of the Fund's investment policy and management of day-to-day capital management operations as well as the performance of other associated services under the supervision, responsibility and control of the Management Company. The fulfilment of these tasks is carried out in compliance with the principles of the Fund's investment policy and investment limits as described in the sales prospectus and the principles of legal investment limits.

The Portfolio Manager is authorised to select agents and brokers to conduct transactions involving the Fund's assets. In addition to this, it is responsible for making investment decisions and placing orders.

The Portfolio Manager has the right to obtain advice from third parties at its cost and responsibility, in particular from multiple investment consultants.

It is, with the approval of the Management Company, permitted to transfer its principal tasks in full or in part to third parties and, when doing so, must bear the cost of remunerating these parties itself. In such cases the sales prospectus will be amended accordingly.

The Portfolio Manager bears all expenses which it incurs in conjunction with the services it performs, if and insofar as this sales prospectus and the management regulations do not provide otherwise. Broker commissions, transaction fees and other business expenses incurred in connection with the acquisition and sale of assets will be borne by the Fund.

### **4. The custodian**

Hauck Aufhäuser Lampe Privatbank AG, Luxembourg branch with registered offices at 1c, rue Gabriel Lippmann, L-5365 Munsbach, Grand Duchy of Luxembourg, registered in the Commercial and Companies Register of Luxembourg under Number B 175937, has been appointed the Fund's custodian by means of a written agreement. The custodian is a branch of Hauck Aufhäuser Lampe Privatbank AG, Kaiserstr. 24, 60311 Frankfurt am Main / Germany, a German credit institution with a full banking licence within the meaning of the German Banking Act (KWG) and within the meaning of the Luxembourg Law of 5 April 1993 on the Financial Sector (in its most current version). The parent company is entered in the Commercial Register of Frankfurt am Main District Court under registration number HRB 108617.

Both Hauck Aufhäuser Lampe Privatbank AG and also its branch in Luxembourg are supervised by the German Federal Financial Supervisory Authority (“BaFin”). In addition to this, Hauck Aufhäuser Lampe Privatbank AG, Luxembourg branch is subject to supervision by the Commission de Surveillance du Secteur Financier (“CSSF”) with regard to liquidity, money laundering and market transparency.

All tasks and obligations of the custodian are carried out by the branch. Its function is, in particular, governed by the Law of 2010, Circular CSSF 16/644, the custodian agreement and the sales prospectus. As the paying agent it has been commissioned to fulfil the obligation of paying out any dividends as well as the redemption price for redeemed units and any other payments.

The custodian may, as per Section 3 of the management regulations, transfer carrying out of its task of holding financial instruments and other assets in custody to another company (“Sub-custodian”). A corresponding overview of any appointed sub-custodians is provided on the custodian’s website ([https://www.hal-privatbank.com/fileadmin/HAL/Rechtliche\\_Hinweise/List\\_of\\_Sub-Custodians\\_Hauck\\_Aufhaeuser\\_Lampe.pdf](https://www.hal-privatbank.com/fileadmin/HAL/Rechtliche_Hinweise/List_of_Sub-Custodians_Hauck_Aufhaeuser_Lampe.pdf))

When carrying out its tasks the custodian acts independently, honestly, with probity and professionally and in the interests of the Fund and its investors. In this context the custodian has implemented appropriate measures and processes to avoid conflicts of interest, such as measures for hierarchical and functional separation as well as measures for managing outsourcing. Conflicts of interest which, despite these measures, cannot be avoided will be disclosed to the Fund’s investors. The custodian does not carry out any tasks relating to investment management or risk management of the Fund.

The function of custodian may be carried out by a company which is affiliated to the Management Company. Insofar as there a link exists between the Management Company and the custodian, then both have implemented appropriate structures and processes to avoid possible conflicts of interest arising from the link. Where it is not possible to avoid conflicts of interest, such conflicts will be regulated, monitored and disclosed by the Management Company and the custodian to prevent any negative impact on the interests of the Fund and its investors.

The Management Company will, upon request, provide the investors with up-to-date information regarding the identity of the Fund’s custodian; descriptions of the custodian’s obligations and conflicts of interest which may arise. These descriptions will include information on all custodian functions which have been transferred to the custodian; a list of the sub-custodians and/or custody locations and information on all conflicts of interest which may arise from transfer of these tasks.

## **Custodian’s liability**

The custodian is liable to the Fund and its investors for the loss of a financial instrument held in custody by the custodian or a third party who has been appointed to hold financial instruments in custody.

Should a financial instrument held in custody be lost, then the custodian will return a financial instrument of the same type to the Fund or to the management company acting for the Fund without delay or will reimburse a corresponding sum. In accordance with the Law of 17 December 2010 as well as with applicable regulations, the custodian is not liable if it can prove that the loss was due to external circumstances which, based on prudent judgement, could not be controlled and that the consequences of these circumstances could, despite all reasonable efforts, not have been avoided.

The custodian is also liable to the Fund and its investors for all other losses which the latter suffer due to the custodian's failure, either through negligence or with intent, to meet its legal obligations.

The custodian's liability will, taking legal derogations into consideration, remain unaffected by any transfer of tasks to sub-custodians.

Fund investors may assert their rights under the custodian's liability directly or indirectly via the Management Company, subject to the condition that this does not result in any duplication of claims for compensation or to any unequal treatment of the Fund's investors.

## **5. The registrar and the transfer agent**

The Fund's registrar and transfer agent is Hauck & Aufhäuser Fund Services S.A., Luxembourg. The tasks of the registrar and transfer agent consist of carrying out orders and/or applications for subscription, redemption, exchanging and transfer of units as well as maintaining the unit register.

Hauck & Aufhäuser Fund Services S.A. is a subsidiary of Hauck Aufhäuser Lampe Privatbank AG. Due to the interrelationships, there is a de facto bundling of the tasks of the depositary and the registrar and transfer agent. This de facto bundling of tasks both as depositary and as registrar and transfer agent (Annex II, 2 indent of the Act of 17 December 2010) can potentially lead to conflicts of interest. Currently, the depositary has not identified any conflicts of interest, as the tasks as depositary are functionally and hierarchically strictly separated from those as registrar and transfer agent.

## **6. The central administration agent**

The Fund's central administration agent is the Management Company.

## **7. Special notes**

### **7.1. Legal status of the investors**

The Management Company invests the capital deposited in the Fund in its own name for the collective account of the investors. This investment is made in accordance with the principle of risk diversification and in securities and other assets permitted under Article 41 Para. 1 Law of 17 December 2010. The invested capital and assets acquired with it form the Fund's assets, which are held separately from the Management Company's own assets. Fund assets will not be included in the Management Company's insolvency assets.

By purchasing units the investor becomes a co-owner of the assets held by the Fund in proportion to the number of units he holds. He cannot dispose of the assets. No voting rights are associated with the units.

Fund units will be issued as per the type of securitisation and denomination stated in the sales prospectus. Insofar as registered shares are issued, these will be entered by the registrar and transfer agent into the unit register it maintains for the Fund. In this context confirmations regarding entry into the unit register will be sent to the investors at the address stated in the unit register. There will be no claim to the supply of individual unit certificates.

As a matter of principle, all Fund units will have the same rights unless, in accordance with Section 5 of the management regulations, the Management Company decides to issue varying unit classes within the Fund.

## **7.2. Note on enforcement of rights**

The Management Company makes known to the investors that any investor may only directly exercise their investor rights as a whole against the Fund if they entered into the Fund's unit holder register themselves and under their own name. In cases in which an investor has invested in the Fund via an intermediary which has made the investment in its own name but on behalf of the investor, the investor may not necessarily be able to directly exercise all investor rights against the Fund. Investors are advised to inform themselves regarding their rights.

## **7.3. General notes on fund unit trading**

Investment in the Fund is intended to be a long-term undertaking. "*Market timing*" is understood as the method of arbitrage in which investors systematically subscribe for, exchange or redeem Fund units within a short period of time, taking advantage of time differences and/or imperfections or weaknesses in the valuation system for the Fund's net asset value. The Management Company takes corresponding protective or control measures to prevent such practices. It also reserves the right to reject, revoke or suspend an investor's application for subscription or exchange if there are grounds for believing that the investor is carrying out "*market timing*".

The Management Company strictly rejects the purchase and/or sale of units after the close of trading at a closing price which has already been fixed or is foreseeable – so-called "*late trading*". The Management Company will, in all cases, ensure that the issue and redemption of units are carried out on the basis of a unit value of which the investor has no prior knowledge. Should, nevertheless, there be ground for believing that an investor is carrying out "*late trading*", then the Management Company may refuse to accept the application for subscription or redemption for as long as it takes for the applicant to allay all doubts regarding his application.

The possibility cannot be excluded that Fund units are traded on an official stock exchange or other markets. The market price on which exchange or other market trading is based is not determined solely by the value of the Fund's assets but also by supply and demand. The market price may thus deviate from the unit value calculated.

## **7.4. General guidelines for investment policy**

The Fund's capital is invested in accordance with the principles of risk distribution within the meaning of the regulations of Part I of the Law of 17 December 2010 and the General Guidelines for Investment Policy described in Section 4 of the management regulations. In addition to this, the Fund's specific guidelines for investment policy are described in the "An overview of the Fund" section of the sales prospectus.

Section 4 of the management regulations furthermore includes a description of the other assets which are permitted by law as well as of the investment forms which involve higher risks. The latter applies in particular to options and financial futures transactions. The use of financial derivative instruments ("derivatives") may also be foreseen as a means to achieve investment goals. When using derivatives the Fund will not deviate from the investment goals stated in the sales prospectus and the management regulations. On a general note, it should be pointed out that performance of the Fund's units is primarily determined by the price changes which occur on each trading day for the assets held by the Fund and their proceeds.

**The investor should be aware that no conclusions can be drawn from performance in the past as to future performance, which can better or worse. No assurance can be given that the goals which are pursued within the scope of the investment policies will be achieved.**

## 7.5. General notes on derivatives

In accordance with the General Regulations for Investment Policy described in Section 4 of the management regulations, the Management Company may, within the scope of efficient portfolio management, make use of derivatives to achieve its investment goals for the Fund.

Derivatives are associated with significant opportunities but also with high risks. Although capital investment may be relatively low, the leverage effect of these products can result in high losses for the Fund. The following is an exemplary, non-exhaustive list of the derivatives which the Fund may use:

- *Futures contracts*

Futures contracts are unconditional agreements which are binding for both parties. Their object is the agreement to buy or sell a specific amount of a specific underlying instrument on a specific date, the due date, or within a specific period of time at a pre-determined price. The Management Company may, within the scope of the Fund's investment principles, conclude futures contracts for the Fund's account whose objects are securities and money market instruments which may be acquired for the Fund; interest rates; exchange rates or currency; or relate to qualified financial indices.

- *Options transactions*

Options transactions involve the granting of the right to a third party for a certain period of time or at the end of certain period of time and against payment of a fee (option premium) to request the delivery or acceptance of assets or the payment of a differential amount or to acquire a corresponding option right.

The Management Company may, within the scope of the Fund's investment principles, participate in options trading for the Fund's account if and insofar as the Fund is, under the terms of its investment policy, permitted to invest in the underlying instruments.

- *Swaps*

The Management Company may, within the scope of the Fund's investment principles, conclude the following transactions for the Fund's account among others: interest rate swaps, currency swaps and interest/currency swaps, inflation swaps, variance swaps and volatility swaps. Swaps are exchange contracts within the scope of which the parties exchange underlying cash flows or risks.

- *Swaptions*

Swaptions are options on swaps. A swaption is the right, but not the obligation, to carry out a swap at a certain point in time or within a certain period at precisely specified terms. For the rest, the principles described for options transactions will apply. The Management Company may only agree swaptions for the account of the Fund which are a combination of the above-mentioned options and swaps.

- *Credit Default Swaps*

Credit default swaps are credit derivatives which allow potential credit defaults to be transferred to others. The risk seller pays a premium to the contractual partner in return for the latter taking on the credit default risk. The Management Company may only conclude simple, standardised credit default swaps for the account of the Fund. These swaps must be used to hedge specific Fund credit risks. For the rest, the information provided for swaps will apply correspondingly.

- *Derivatives embedded in financial instruments*

Financial instruments with embedded derivatives may be acquired for the Fund insofar as the underlyings are instruments within the meaning of Article 41 Para. (1) Law of 17 December 2010 or are, for example, financial indices, interest rates, exchange rates or currency. Financial instruments with embedded derivatives may, for example, be structured products (certificates, reverse convertible bonds, option bonds, credit linked notes, etc.) or option certificates. Products designed under the concept of derivatives embedded in financial instruments are generally distinguished by the fact that the embedded derivative components influence the cash flows for the entire product. In addition to the risk characteristics of securities, the risk characteristics of derivatives and other techniques and instruments play a key role.

Structured products may be used on the condition that they are securities within the meaning of Article 2 of the Grand Duchy Regulation of 8 February 2008.

- *OTC derivative transactions*

The Management Company may carry out derivatives transactions for the account of the Fund which are listed for trading on an exchange or listed on another regulated market or included on these institutions as well as carry out non-exchange transactions, so-called *over-the-counter* (OTC) transactions. The Company may only carry out derivatives transactions for the account of the Fund which are not listed for trading on an exchange or not listed on another regulated market or not included on these institutions with suitable credit institutions or financial services institutions on the basis of standardised framework contracts. In the case of OTC transactions the counterparty risk regarding a contractual partner will be limited to 5 percent of the Fund's value. Should the contractual partner be a credit institute with a registered office in a member state of the EU or in another signatory state to the EEA agreement or a third-party state with a comparable level of supervision, then the counterparty risk may amount to 10 percent of the Fund's value. OTC derivatives transactions which are carried out with a central clearing institution of an exchange or another regulated market as a contractual partner will not be included in these limits if the derivatives are subject to a daily valuation at market prices with a daily margin offset. Claims of the Fund against intermediaries must, however, be included in the limits, even if the derivative is traded on an exchange or another regulated market.

- *Collateral strategy*

Within the scope of derivatives agreement transactions the Management Company accepts collateral for the account of the Fund insofar as its function in the transactions does not oblige it to provide collateral (e.g. for certain derivatives transactions, such as CFDs, for which the Company must, where applicable, provide a so-called "margin"). Collateral serves to either fully or partially reduce the risk of default on the part of the contractual partner to these transactions.

*Types of permissible collateral*

In the case of derivatives transactions agreements the Management Company currently only accepts cash collateral.

The cash collateral received from counterparties within the scope of OTC transactions will only be fully invested in one or a combination of the following assets:

- High-quality government bonds;
- Money market funds with a short life as per the definition in the CESR's guidelines concerning a joint definition for European money market funds (CESR 10-049);
- As demand deposits with legal entities as per Article 50 Para. 1 (f) of Directive 2009/65/EC

Should non-cash collateral also be accepted in the future, then the Management Company will apply a risk-oriented security markdown (haircut). Only non-cash collateral comprising assets which may be acquired for the investment fund in accordance with the KAGB and fulfil the additional conditions of Art. 27 Para. 7 German Derivatives Regulation (DerivateV) respectively Sect. 200 Para. 2 KAGB will be accepted.

- *Notes*

The above-mentioned techniques and instruments may, where applicable, be extended by the Management Company if the market offers new instruments corresponding to the investment goal and supervisory and legal regulations permit the Fund to use them.

The use of techniques and instruments for efficient portfolio management may result in direct / indirect costs which will be charged to the Fund and/or which may diminish the Fund's capital. These costs may be incurred for services provided by third parties or by parties which are affiliated to the Management Company or custodian.

## **7.6. Units**

### **7.6.1. Unit value calculation**

The Fund's net fund assets are denominated in euros ("reference currency").

The value of a unit ("unit value") is denominated in the reference currency insofar as no deviating currency is stated for any other unit classes ("unit class currency") in the "*An overview of the Fund*" section.

Unit value will be calculated by the Management Company or a third party commissioned by it under the supervision of the custodian every bank working day which is also a trading day in Luxembourg, Frankfurt am Main and Hamburg, with the exception of 24 and 31 December of each year ("valuation date"). In order to calculate the unit value, the value of the Fund's assets minus its liabilities ("net fund assets") will be calculated on each valuation date and divided by the number of Fund units which are in circulation on the valuation before being rounded off to two decimal places. Further details regarding calculation of unit value are determined in Article 6 of the management regulations.

### **7.6.2. Issue of units**

- a) Units are issued on each valuation date at an issue price. The issue price is the unit value as per Article 6 No. 4 of the management regulations plus an issue surcharge. The maximum amount of the surcharge is stated in the "*An overview of the Fund*" section. The issue price may be subject to additional fees or other charges which are levied in the relevant country of sale.

- b) Insofar as the Fund issues registered units, then subscription applications for the purchase of registered units may be submitted to the Management Company and the sales agent. These receiving bodies are obliged to transfer the subscription applications to the registrar and transfer agent without delay. The date of receipt by the registrar and transfer agent will be definitive. It will accept subscription applications on behalf of the Management Company.

Subscription applications for the purchase of units which are securitised in the form of global certificates (“bearer units”) will be forwarded to the registrar and transfer agent (“definitive body”) by the body with whom the subscriber holds a securities account. The date of receipt by the registrar and transfer agent will be definitive.

Complete subscription applications which are received by the definitive body at the latest by 16.00 on a valuation date will be carried out at the latest on the next valuation date insofar as payment for the subscribed units has been received. The Management Company will, in all cases, ensure that the issue of units is carried out on the basis of a unit value of which the investor has no prior knowledge. Should, nevertheless, there be ground for believing that an investor is carrying out “*late trading*”, then the Management Company may refuse to accept the application for subscription for as long as it takes for the applicant to allay all doubts regarding his application for subscription. Complete subscription applications which are received by the definitive body after 16.00 on a valuation date will be carried out at the latest on the next but one valuation date.

Should payment for the subscribed registered units not have been received at the time the complete subscription application is received by the registrar and transfer agent or the subscription application be incorrect or incomplete, the subscription application will be deemed to have been received by the registrar and transfer agent on the date on which payment for the subscribed units has been received or the correct subscription application is on hand.

Upon receipt of the issue price by the registrar and transfer agent respectively by the custodian on behalf of the Management Company, the bearer shares will be transferred by the registrar and transfer agent respectively by the custodian on behalf of the Management Company by crediting them to the body with whom the subscriber holds his securities account.

- c) The issue price is payable to the custodian in Luxembourg in the Fund currency respectively in the case of multiple unit classes in the relevant unit class currency within the number of bank working days stated in the “An overview of the Fund” section following the relevant valuation date.
- d) The circumstances in which issuing of units will be discontinued are described in Article 9 in conjunction with Article 7 of the management regulations.

### **7.6.3. Redemption and conversion of units**

- a) The investors are entitled at any time to request the redemption of their units at the unit value as per Article 6 No. 4 of the management regulations, where applicable minus any redemption surcharge (“redemption price”). This redemption will only take place on valuation dates. Should a redemption surcharge be levied, then the maximum amount of the surcharge is stated in the “*An overview of the Fund*” section.

In some countries the redemption price will be minus the taxes and other liabilities levied in the relevant country. Units will expire upon payment of the corresponding redemption price.

- b) Payment of the redemption price and any other payments to the investors will be made via the custodian and the paying agents. The custodian is only obliged to make payment insofar as no statutory provisions, such as foreign exchange regulations, or other circumstances which cannot be influenced by the custodian forbid the transfer of the redemption price to the applicant's country.

The Management Company may unilaterally repurchase units against payment of the redemption price insofar as this is in the interests of all investors or appears necessary for the protection of the investors or the Fund.

- c) If different unit classes are offered within the Fund, units of one unit class may be exchanged for units of another unit class within the Fund, unless otherwise specified in the section "an overview of the fund". In such cases, no conversion commission will be charged.

The Management Company may reject a conversion application for the respective Fund if this appears to be in the interest of the Fund or in the interest of the investors.

- d) Complete redemption orders or conversion requests may be submitted to the Management Company, the/any sales agent, the Registrar and Transfer Agent and the paying agents. These receiving bodies are obliged to transfer the redemption orders to the registrar and transfer agent without delay.

A redemption order or an exchange application for the redemption or exchange of registered shares will be complete when it states the investor's name and address as well as the number respectively the countervalue of the units to be redeemed or exchanged and the Fund's name and has been signed by the relevant investor.

Complete redemption orders will be forwarded to the registrar and transfer agent by the body with whom the subscriber holds his securities account.

Complete redemption orders or complete conversation requests which are received at the latest by 16.00 on a valuation date will be carried out at the latest on the next valuation date minus any redemption surcharge respectively taking the exchange commission into account. The Management Company will, in all cases, ensure that the redemption or exchange of units are carried out on the basis of a unit value of which the investor has no prior knowledge. Complete redemption orders which are received after 16.00 on a valuation date will be carried out at the latest on the next but one valuation date minus any redemption surcharge.

The date of receipt by the registrar and transfer agent will be definitive for receipt of the redemption order or the conversation request.

The redemption price will be made in the Fund currency respectively in the case of multiple unit classes in the relevant unit class currency within the number of bank working days stated in the "*An overview of the Fund*" section following the relevant valuation date. Payment for registered units will be made to an account to be stated by the investor.

Fractional amounts resulting from the exchange of units will be credited to the investor.

- e) The Management Company will be obliged to temporarily suspend the redemption or the exchange of units if calculation of the unit value is discontinued.

- f) Following prior approval by the custodian and taking the investors' interests into account the Management Company will be entitled not to carry out significant redemptions until the corresponding Fund assets have been sold without delay. In such cases redemption will be carried out at the redemption price valid at that time. The same will apply for applications to exchange units. The Management Company will, however, ensure that the Fund has sufficient liquid assets to carry out redemption or exchange of units at the request of investors without delay under normal circumstances.

## **7.7. Allocate of income**

Allocation of income is determined in the management regulations and the Fund-specific “*An overview of the Fund*” section of the sales prospectus. Within the scope of the provisions of Article 11 of the management regulations, ordinary net income and realised gains on Fund capital and other Fund assets may be paid out as dividends.

## **7.8. Price publications**

The relevant valid unit value, issue and redemption prices as well as all other information for investors may be requested at any time from the registered offices of the Management Company, the custodian, the payment agents and any sales agents. In addition to this, issue and redemption prices are published on each valuation date on the Management Company's website at [www.hansainvest.com](http://www.hansainvest.com).

## **7.9. Costs**

The Management Company is entitled to receive reasonable remuneration for management of the Fund as well as to pay remuneration arising from the commissioning of third parties to provide services to the Fund.

For further details see the management regulations and the Fund-specific “*An overview of the Fund*” section of the sales prospectus.

## **7.10. Taxes**

### **7.10.1. Taxation of the Fund**

The Fund's assets are subject to the so-called *taxe d'abonnement* in the Grand Duchy of Luxembourg. This tax is currently equivalent to 0.05% p.a. respectively 0.01% p.a. for the Fund or unit classes which are issued exclusively to institutional investors. The *taxe d'abonnement* is payable on a quarterly basis and levied on the net fund assets reported at the end of each quarter. The amount of the *taxe d'abonnement* for the Fund respectively for the relevant unit classes is stated in the “*An overview of the Fund*” section of the sales prospectus. Insofar as the Fund invests in other Luxembourg-based investment funds which are themselves subject to the *taxe d'abonnement*, this tax will be waived for the portion of the Fund's assets which is invested in such Luxembourg-based investment funds.

Fund income generated by investment of its capital is not taxed in the Grand Duchy of Luxembourg. This income may, however, be subject to withholding tax in the countries in which the Fund's capital is invested. In such cases neither the custodian nor the Management Company are obliged to obtain tax certificates.

Parties who are interested in investing in the Fund and investors are recommended to inform themselves regarding the laws and regulations which apply to taxation of the Fund's capital and the purchase, ownership and redemption of units and, where applicable, to obtain advice.

#### **7.10.2. Taxation of Fund income for investors**

Investors who are not resident in the Grand Duchy of Luxembourg respectively who do not maintain business premises there do not have to pay income, inheritance or wealth tax on their units or income generated by units in the Grand Duchy of Luxembourg. These investors are subject to the relevant national tax regulations.

Under the terms of the Luxembourg Law for the Implementation of the Directive, since 1 January 2006 natural persons domiciled in the Grand Duchy of Luxembourg who are not resident in another state for tax purposes have been required to pay a compensating withholding tax of 10% on interest earned. This withholding tax may, under certain circumstances, also apply to interest earned from an investment fund. Parallel to this, the Grand Duchy of Luxembourg abolished wealth tax.

Parties who are interested in investing in the Fund and investors are recommended to inform themselves regarding the laws and regulations which apply to the purchase, ownership and redemption of units and, where applicable, to obtain advice.

### **7.11. Fund risk profile**

The Luxembourg-based investment funds managed by the Management Company are classified into one of five risk profiles. The transitions between the risk profiles are fluid. As a matter of principle it can be assumed that Risk Profile 1 presents the lowest risk while Risk Profile 5 presents the highest risk. For information on the Fund's risk profile see the "An overview of the Fund" section. The descriptions of the following profiles were compiled under the prerequisite that markets function normally. In unforeseen market situations or where there are market disruptions due to non-functioning markets additional risks to those stated in the risk profile may arise.

**The Management Company explicitly advises that by providing an assessment regarding the Fund's risk profile it is not making any statement regarding losses or gains in value which may actually occur.**

The following are basic definitions of the various profiles:

#### ***Risk Profile 1 – Preservation of capital***

The investment fund is subject to negligible fluctuations and thus runs low risks. Typical investment instruments are primarily short-term fixed-income securities such as money market instruments or cash reserves. Derivatives may only be acquired for the purposes of hedging.

#### ***Risk Profile 2 – Focused on safety***

The investment fund is subject to minimal fluctuations and thus runs few risks. Typical investment instruments are primarily safe fixed-income securities with variable lives such as government bonds and comparable securities. Derivatives may only be acquired for the purposes of hedging.

### ***Risk Profile 3 – Growth oriented***

The investment fund is subject to moderate fluctuations and thus runs moderate risks. Typical investment instruments are often a mix of various investment classes such as pensions, target funds and shares. Moderate use of derivatives may also be made for investment purposes.

### ***Risk Profile 4 – Risk oriented***

The investment fund may experience strong fluctuations. It thus takes higher risks. Typical investment instruments include high-risk instruments such as shares, target funds or high-yield bonds. Derivatives may potentially also be used for investment purposes.

### ***Risk Profile 5 – Highly speculative***

The investment fund is expected to experience strong fluctuations. It thus takes high risks. Typical investment instruments and/or strategies are highly volatile instrument such as highly volatile share or raw materials exposures as well as hedge fund strategies or high-risk derivative strategies. Derivatives will also be used for investment purposes.

## **7.12. Risk management procedure**

The Management Company uses a risk management procedure which allows it to monitor and measure the risk associated with investment positions as well as their share in the overall risk profile of the investment portfolio of the funds which it manages. In accordance with the Law of 17 December 2010 and the applicable supervisory requirements of the CSSF the Management Company regularly reports to the CSSF on the risk management procedure it uses. Within the scope of its risk management procedure the Management Company uses expedient, appropriate methods to ensure that the overall risk associated with derivatives for the managed funds does not exceed the overall net value of their portfolios. To this end the Management Company uses the following methods:

### ***Commitment approach:***

In the “commitment approach” the positions from derivative financial instruments are converted into their corresponding (where applicable, delta-weighted) equivalent underlying positions or nominals. When doing so netting and hedging effects between derivative financial instruments and their underlyings are taken into account. The total of these equivalent underlying positions may not exceed the total net value of the fund portfolio.

### ***VaR approach:***

The “value at risk” figure (VaR) is a mathematical/statistical concept which is used as a standard measure of risk in the financial sector. The VaR expresses the possible portfolio losses over a certain period of time (the so-called holding period) which, with a certain degree of probability (the so-called confidence level), will not be exceeded.

### ***Relative VaR approach:***

In the relative VaR approach a fund’s VaR may not exceed the VaR of a derivative-free reference portfolio by more than a factor which is dependent on the fund’s risk profile. The maximum permissible factor under supervisory regulations is 200%. In this context the reference portfolio is, as a matter of principle, a correct reflection of the fund’s investment policy.

### ***Absolute VaR approach:***

In the absolute VaR approach a fund's VaR (99% confidence level, 20 days' holding period) may not exceed a certain percentage of the Fund's assets which is dependent on its risk profile. The maximum permissible limit under supervisory regulations is 20% of the fund's assets. The Management Company may shift the parameters for calculation of the VaR within the range permitted under supervisory regulations.

In cases in which the overall risk for a fund is calculated using the VaR approaches the Management Company estimates the expected degree of leverage. This degree of leverage may, depending on corresponding market conditions, deviate from the actual figure and be exceeded or undercut. The investor should be aware that no conclusions can be drawn from this information as to the Fund's risk content. In addition to this, it is explicitly advised that the published expected degree of leverage cannot be understood as an investment limit. The methods used to identify overall risk and, insofar as applicable, disclosure of the reference portfolio and the expected degree of leverage and the methods used to calculate it are stated in the "*An overview of the Fund*" section.

## **7.13. Leverage**

Leverage describes the relationship between the Fund's risk and its net asset value. All techniques employed by the Company to increase the level of investment of the Special Fund which it manages (leverage) will influence leverage. This may increase through the acquisition of derivatives with embedded leverage (insofar as derivatives may be acquired for the Fund). The option of using derivatives is described in the "*An overview of the Fund*" section as part of the explanation of the Fund's investment policy. The option of taking out loans and the corresponding limits are explained in Article 4 of the management regulations.

When using the commitment approach the Management Company may use leverage up to a maximum sum equivalent to the market risk limit.

When using the VaR approach the Fund's market risk resulting from the use of derivatives may not be more than double the prior risk. The Fund's leverage will be calculated using a gross method. It describes the total absolute values of all Fund assets, which are valued as per legal requirements. When doing so, it is not permissible to offset individual derivatives transactions or securities positions against each other (i.e. no taking into consideration of so-called netting and hedging agreements). When calculating leverage, short-term borrowing which, as per the Fund's investment strategy, is the only permissible borrowing may be disregarded. The Management Company expects that Fund leverage calculated using the gross method will not be more than 5 times the Fund's net asset value.

Depending on market conditions leverage may, however, fluctuate causing the stated maximum limit to be exceeded despite the company's continuous monitoring.

## **7.14. Investor information**

### **7.14.1. General information for all investors**

Information, in particular communications to the investors, will be published on the Management Company's website at [www.hansainvest.com](http://www.hansainvest.com). In addition to this, in cases prescribed by law for the Grand Duchy of Luxembourg communications will also be published in the "RESA" and at least two national daily newspapers, of which one must be a Luxembourg newspaper.

The following documents are available for inspection free of charge during normal business hours on valuation dates at the Management Company's registered offices in Hamburg / Germany:

- The Management Company's articles of association
- The custodian agreement
- The central administration agent agreement (if there is one)
- The registrar and transfer agent agreement
- The payment agent agreement
- The portfolio management agreement (if there is one)
- The investment consulting agreement (if there is one)

The current sales prospectus, the „key information document“ (PRIIP) and the Fund's annual and six-monthly reports can be retrieved free of charge at the Management Company's website [www.hansainvest.com](http://www.hansainvest.com). The current sales prospectus, the „key information document“ (PRIIP) and the Fund's annual and six-monthly reports are available free of charge from the Management Company's registered offices; the custodian, the paying agents and any sales agents as hard copies.

Investors can obtain information on the Management Company's principles and strategies for the exercising of voting rights originating from assets held for the Fund free of charge at the Management Company's website <https://www.hansainvest.com/deutsch/ueber-uns/compliance>.

When making decisions on the acquisition or sale of assets the Management Company acts in the best interests of the Fund and its investors. For information on the corresponding principles established by the Management Company, visit the website <https://www.hansainvest.com/deutsch/ueber-uns/compliance>.

Investors with questions, comments and complaints should contact the Management Company in writing or electronically. Information on the complaints procedure can be retrieved free of charge at the Management Company's website <https://www.hansainvest.com/deutsch/ueber-uns/compliance>.

Information on remuneration which the Management Company receives from third parties or pays to third parties can be requested from the Management Company free of charge at any time.

The Management Company has established and implemented a remuneration policy and practices which correspond to the legal regulations which are applicable for it. This is compatible with the risk management procedure established by the Management Company; is beneficial for this procedure and does not encourage either risk-taking which is inconsistent with the risk profiles and management regulations of the funds managed by the Management Company or prevent the Management Company from complying with its obligation to act in the best interests of the Fund.

The remuneration policy and practices include fixed and variable elements of salaries and voluntary old age pension benefits.

The remuneration policy and practice apply to categories of employees, including executives, risk bearers, employees with control functions and employees who, due to their overall remuneration, have the same income as company executives, and risk bearers whose activities have a key influence on the Management Company's risk profiles or on those of the funds which it manages.

The Management Company's remuneration policy is compatible with solid, effective risk management and is consistent with the business strategy, goals, values and interests of the Management Company and the UCITS which it manages and their investors. Compliance with remuneration principles including

their implementation is inspected once a year. Total remuneration will be made up of a reasonable balance of fixed and variable elements, whereby the proportion of the fixed element in the total remuneration will be high enough to offer completely flexibility with regard to the variable remuneration components, including the option of dispensing with any payment of a variable component. Performance-related remuneration will be based on the qualifications and abilities of the relevant employee as well as on the responsibility and value creation contribution of the position for the Management Company. Insofar as applicable, assessment of performance will take place within the framework of a period of several years which is appropriate for the holding period recommended to investors in the UCITS fund managed by the Management Company. This should ensure that the assessment is based on the longer-term performance of the UCITS and its investment risks and that actual payment of the performance-related remuneration components is spread across the same period of time. Provisions for old-age pensions will be in line with the business strategy, goals, values and long-term interests of the Management Company and the UCITS funds which it manages.

Details on current remuneration policy, including a description of how remuneration and other expenses are calculated, and the identity of the individuals responsible for allocation of remuneration and other expenses, including the composition of the remuneration committee should there be such a committee, may be retrieved free of charge at the Management Company's website [www.hansainvest.de](http://www.hansainvest.de). Investors will be provided free of charge with a hard copy on request.

Should the loss of a financial instrument be determined, than the Management Company will inform the investor of this without delay using a durable data medium.

#### **7.14.2. Notes for investors with regard to the United States of America**

in accordance with the United States Securities Act of 1933 (the "Securities Act") in its current version or in accordance with the securities legislations of any member state or regional authority of the United States of America or its territories or other territories which are in the possession or subject to the laws of the United States of America including the Commonwealth of Puerto Rico (the "United States"), units in the Fund have not, are not, and will not be, authorised, registered or, directly or indirectly transferred, offered or sold to a US person or in favour of a US person (as per the definition in the Securities Act).

In accordance with the United States Investment Company Act of 1940 in its current version (the "Investment Company Act") or in accordance with the securities legislations of any member state of the United States of America, the Fund is not, and will not be, licenced or registered and investors have no claim to the benefit of registration as per the Investment Company Act.

In addition to any further requirements contained in the prospectus, the management regulations respectively the articles of association or the subscription certificate, investors (a) may not be "US persons" within the meaning of Regulation S of the Securities Act; (b) may not be "specified US persons" within the meaning of the definition of the Foreign Account Tax Compliance Act ("FATCA"); (c) must be "non-US persons" within the meaning of the Commodity Exchange Act and (d) may not be "US persons" within the meaning of the US Internal Revenue Code of 1986 in its current version (the "Code") and in accordance with the complementary provisions issued by the Treasury Department of the United States of America ("Treasury Regulations"). For further information please contact the Management Company.

Individuals wishing to purchase units must confirm in writing that they meet the requirements of the preceding paragraph.

The FATCA was adopted as law in the USA within the scope of the Hiring Incentive to Restore Employment Act of March 2010. The FATCA obliges financial institutions outside of the United States

of America (“foreign financial institutions” or “FFIs”) to annually forward information regarding financial accounts which are directly or indirectly held by specified US persons to the US tax authorities (“Internal Revenue Service” or “IRS”). A withholding tax of 30% is levied on certain US earnings of FFIs which fail to comply with this obligation.

On 28 March 2014 the Grand Duchy of Luxembourg entered into an inter-governmental agreement (“IGA”) as per Model 1 with the United States of America and signed a corresponding memorandum of understanding.

The Management Company and the Fund comply with FATCA regulations. The Fund’s unit classes may be subscribed to either

- By an FATCA-compliant independent intermediary (Nominee) for investors, or
- Directly or indirectly by investors via a sales agent (who only acts for brokering purposes and not as a Nominee) with the exception of
  - *Specified US persons*

This group of investors includes those US persons whom the government of the United States deems to be at risk as regards tax avoidance and tax evasion practices. This does not, however, apply among others to listed companies, tax-exempt organisations, real estate investment trusts (REIT), trust companies, US securities traders or other similar persons.

- *Passive non-financial foreign entities (or “passive NFFE”) where substantial ownership shares are held by US person*

Unter dieser Anlegergruppe versteht man generell solche NFFE, (i) welche sich nicht als aktive NFFE qualifizieren, oder (ii) bei denen es sich nicht um eine einbehaltende ausländische Personengesellschaft oder einen einbehaltenden ausländischen Trust nach den einschlägigen Ausführungsbestimmungen des Finanzministeriums der Vereinigten Staaten (Treasury Regulations) handelt.

- *Non-participating financial institutions*

The United States of America assigns this status on the grounds of a financial institution’s failure to comply with specified provisions issued as result of infringement of conditions of the relevant country-specific IGA within 18 months of first being notified.

Should, due to an investor’s non-conformity with the FATCA, the Fund be obliged to pay a withholding tax or to provide reporting or experience any other damages, then the Fund reserves the right, irrespective of other rights, to assert claims for damages against the investor concerned.

Investors or potential investors with questions regarding the FATCA or the Fund’s FATCA status are recommended to contact their financial, tax and/or legal adviser.

### **7.14.3. Notes for investors regarding the automated exchange of information**

Council Directive 2014/107/EU of 9 December 2014 regarding Mandatory Automatic Exchange of Information regarding (Tax) Matters and the Common Reporting Standard (“CRS”), a reporting and due diligence standard developed by the OECD for the international automatic exchange of information regarding financial accounts, represent the implementation of the automatic exchange of information as per inter-governmental agreements and Luxembourgian regulations (Law on the automatic exchange of information regarding tax matters and financial accounts of 18 December 2015). The automatic exchange of information In Luxembourg was carried out for the first time in the 2016 financial year.

Within the scope of this, financial institutions with a reporting obligation provide information on applicants and the register to the Luxembourgian tax authorities (“Administration des Contributions Directes in Luxemburg”) on an annual basis. The Luxembourgian tax authorities in turn forward this information to the countries in which the applicant is/ applicants are domiciled for tax purposes.

The information which is reported is, in particular:

- The name, address; tax identification number; country of residence and date and place of birth of every person required to provide a report,
- The register number,
- The register balance or value,
- Credited capital income including proceeds of sales.

Information required in accordance with the reporting obligation for a specific tax year which must be provided to the Luxembourgian tax authorities by 30 June of the following year is exchanged by the relevant financial authorities by 30 September of that year. This procedure commenced in September 2017 and was based on data for 2016.

#### **7.14.4. The fight against money laundering**

In accordance with international regulations and Luxembourgian laws and regulations, including but not limited to the Law of 12 November 2004 on the Fight Against Money Laundering and Terrorist Financing in its amended version; the Grand-Ducal Regulation of 1 February 2010; CSSF Regulation No. 12-02 of 14 December 2012 and CSSF Circulars CSSF 13/556, CSSF 15/609 and CSSF 17/650 on the fight against money laundering and terrorist financing as well as all related amendments or successor regulations, it is the duty of all financial services providers to prevent undertakings for collective investment being misused for the purpose of money laundering or terrorist financing. The Management Company or a third party commissioned by it may demand that an applicant produces any document which the former considers necessary to verify the latter’s identity. In addition to this, the Management Company (or a third party commissioned by it) may demand all other information which it requires to comply with applicable legal and regulatory provisions including, but not limited to, the CRS standard and the FATCA.

In the event of the delay or failure by the applicant to produce the requested documents, then the subscription application will be rejected. In the case of redemptions, incomplete documentation may result in delayed payment of the redemption price. The Management Company will not be responsible for delayed processing of or failure to complete a transaction in the event that the applicant fails to produce documents or only produces incomplete documents.

From time to time the Management Company (or a third party commissioned by it) may, in accordance with the applicable laws and regulations regarding their obligations to continuously monitor and check their customers, request investors to produce additional or updated documents regarding their identity.

Should these documents not be produced without delay, then the Management Company will be obliged and entitled to freeze the relevant investor's Fund units.

#### **7.14.5. Data protection / Privacy**

Personal data will be processed in accordance with European Union data protection standards and the data protection/ privacy laws which are applicable for the Management Company.

Personal data which is provided within the scope of investment in the Fund may thus be stored on a computer and processed by the Management Company for the account of the Fund as well as by the custodian, both of which will, in the individual case, be responsible for the data processing.

Personal data will be processed for the purpose of processing subscription and redemption applications; to maintain the unit register and to carry out the above-mentioned parties' tasks and comply with applicable laws or regulations in Luxembourg and other legal systems, including but not limited to applicable company law; laws and regulations regarding the fight against money laundering and terrorist financing and tax law such as the FATCA (Foreign Account Tax Compliance Act), CRS (Common Reporting Standard) or similar laws and regulations (for example at OECD level).

Personal data will only be made accessible to third parties if this is necessary within the scope of legitimate business interests or to exercise or defend legal claims in court or laws or regulations make its forwarding compulsory. This may include disclosure to third parties, such as state or supervisory authorities, including tax authorities and auditors in Luxembourg and Germany as well as in other legal systems.

With the exception of the above-mentioned cases, personal data will, as a matter of principle, not be transmitted to countries outside the European Union or the European Economic Area.

By subscribing for and/or receiving units, investors are – at least tacitly – consenting to the above-mentioned processing of their personal data and, in particular, to the disclosure of such data to, and the processing of this data by, the above-mentioned parties, including affiliated companies in countries outside the European Union, which may possibly not offer the same level of data protection as Luxembourgian data protection law.

The investors herewith recognise and accept that failure to provide the Management Company with personal data requested within the scope of their relationship with the Fund may prevent their continued participation in the Fund and result in the Management Company making a corresponding notification to the competent authorities.

The investors herewith recognise and accept that the Management Company will report all relevant information relating to their investment in the Fund to the Luxembourgian tax authorities, who, with the scope of an automated procedure, will share this information with the competent authorities in the relevant countries respectively with other approved legal systems as per the CRS standard or corresponding European and Luxembourgian legislation.

Insofar as personal data which is provided in association with investment in the Fund includes the personal data of proxies, representatives, authorised signatories or beneficial owners of the investors, then it will be assumed that the investors have obtained the consent of the individuals concerned to the above-mentioned processing of their personal data and, in particular, to disclosure of their data to, and the processing of this data by, the above-mentioned parties, including parties in countries outside the

European Union which may possibly not offer the same level of data protection as Luxembourgian data protection law.

Investors may, in accordance with applicable data protection law, apply for access to or rectification or deletion of their personal data. Such applications must be made in writing to the Management Company. It is assumed that the investors will inform proxies, representatives, authorised signatories or beneficial owners whose personal data is processed regarding these rights.

Although the above-mentioned parties have implemented appropriate measures to ensure the confidentiality of personal data, due to the fact that such data is transmitted electronically and is available outside Luxembourg, while the personal data is abroad it is not possible to ensure the same degree of confidentiality and protection as is provided under the data protection laws which are currently applicable in Luxembourg.

Personal data will only be stored until the purpose of data processing has been fulfilled, whereby applicable statutory minimum archiving periods must, however, be taken into consideration.

## **RISK WARNINGS**

*Prior to any decision regarding the purchase of fund units, investors should carefully read the following risk warnings in conjunction with other information contained within this sales prospectus and consider this information when making their investment decision. The occurrence of one or more of these risks may, in itself or together with other circumstances, adversely affect the performance of the fund or the assets held in the fund and consequently also have a negative impact on the unit value.*

*If the investor sells fund units at a time when the prices of assets held by the fund are lower than at the time of purchase, the investor will not or will not fully recover the capital they invested in the fund. The investor may lose some or, in individual cases, even all of the capital they invested in the fund. Increases in value cannot be guaranteed. The investor's risk is limited to the amount invested. There is no obligation to make additional contributions beyond the capital invested by the investor.*

*In addition to the risks and uncertainties set out below and in other sections of the sales prospectus, performance of the fund may also be affected by other additional risks and uncertainties not currently known. The order in which the following risks are listed does not amount to any statement on the likelihood of occurrence or the extent or significance of individual risks in the event of occurrence.*

### **Risk of investing in a fund**

The following sets out the risks typically associated with investing in a UCITS. These risks may impact negatively on the unit value, the capital invested by the investor and the period of investment in the fund planned by the investor.

#### **Fluctuations in fund unit value**

The fund unit value is calculated by dividing the value of the fund by the number of units in circulation. The fund value equates to the total market value of all fund assets less the total market value of all fund liabilities. As a result, the fund unit value is dependent on the value of the assets held by the fund and the level of fund liabilities. A reduction in the value of these assets or increase in the level of liabilities will see the fund unit value fall accordingly.

#### **Influence of tax aspects on individual performance**

The tax treatment of investment income depends on the individual circumstances of the respective investor and may be subject to changes in the future. For additional information – particularly in relation to their individual tax position – the investor should contact their personal tax advisor. The investor's non-tax circumstances should also be considered when making an investment decision.

#### **Change of investment policy or investment terms**

The management company may partially or completely amend the management regulations with the approval of the custodian and CSSF. This may also affect the rights of the investor. For example, the management company may alter the fund investment policy through a change to the management regulations or increase the costs charged to the fund. The management company may also change the investment policy within the legal and contractually permissible investment spectrum; consequently

without any amendment to the management regulations and commensurate CSSF approval of such. Such changes can alter the risk associated with the fund.

### **Suspension of unit redemption**

Investors may principally request the redemption of their units from the management company on any given valuation day. The management company may, however, temporarily suspend unit redemption in the event of exceptional circumstances in which suspension appears necessary in due consideration of the interests of investors. Such exceptional circumstances may be, for example; economic or political crises, redemption requests on an exceptional scale, the closure of stock exchanges or markets, trading restrictions or other factors adversely affecting determination of the unit value. In addition, the CSSF can require the company to suspend unit redemption where such is considered necessary in the interests of the investors or the public. Investors cannot redeem their units during such periods. The unit value may also fall during a suspension of unit redemption; an example being where the management company is forced to sell assets below their market value during the unit redemption suspension period. The management company reserves the right to redeem the units only after resumption of unit redemption at the then applicable redemption price. The unit value following resumption of unit redemption may be lower than the value prior to the suspension of redemption. Suspension may be directly followed by dissolution of the investment fund without renewed resumption of unit redemption, for example, if the management company terminates fund management in order to subsequently dissolve the fund. In such cases the investor is exposed to the risk of being unable to realise their planned holding period and having a significant proportion of their invested capital unavailable for an indefinite period or suffering the loss of such altogether.

### **Possible investment spectrum**

In compliance with the investment standards and limits prescribed under the Law of 17 December 2010 and the management regulations, which afford the fund an extremely broad scope, the actual investment policy can also be primarily targeted to the acquisition of assets in, for example, only a small number of sectors, markets or regions/countries. Such concentration on a few specific investment sectors can present particular opportunities that are nevertheless countered by corresponding risks (e.g. narrow market, high level of fluctuation within certain economic cycles). The annual report provides retrospective information on investment policy content for the previous reporting year.

### **Transfer of all Fund assets to another investment fund (merger)**

The management company can transfer all fund assets to another investment fund. In such cases the investor may (i) redeem their units, (ii) retain the units and consequently become an investor in the acquiring investment fund, or (iii) exchange the units for units in an investment fund with a comparable investment horizon, insofar as the company or one of its associate companies manages such an investment fund with a comparable investment horizon. The same shall apply in equal measure where the management company transfers all the assets of another investment fund to the fund. As a result, the investor will be required to make a new investment decision ahead of time within the context of the transfer.

Income tax may be payable on units redeemed. The exchange of units for units in an investment fund with a comparable investment horizon may generate a tax liability for the investor if, for example, the value of the units received is higher than the value of the formerly held units at the time of acquisition.

### **Transfer of the Fund to another capital management company**

The management company can transfer the fund to another management company. In such cases, the fund and the position of the investor remain unchanged; however, the investor will need to decide in the context of the transfer whether they consider the new management company to be as suitable as the previous one. Should they not wish to invest in the fund under new management, the investor will be required to redeem the commensurate units. This may incur a liability for income tax.

### **Profitability and fulfilment of the investor's investment goals**

Achievement of the investor's desired investment performance cannot be guaranteed. The unit value of the fund may fall and result in losses for the investor. The management company or third parties do not guarantee any specific minimum payment commitment on redemption or any specific investment performance of the fund. Accordingly, investors may receive a lower amount than originally invested. An issuing premium paid on the purchase of units or a redemption fee paid on the sale of units can also reduce or even eliminate the economic performance target of an investment, particularly where the investment period is short.

### **Risks of negative fund performance (market risk)**

Market risk is the risk of loss to an investment fund resulting from fluctuations in the market value of positions in the investment fund portfolio due to changes in market variables such as interest rates, exchange rates, share and commodity prices, or in an issuer's credit rating.

The risks associated with investment by the fund in individual assets are set out below. These risks can impair the performance of the fund or assets held by the fund and may consequently have an adverse affect on the unit value and the capital invested by the investor. If the investor sells units in the fund at a time when the price of assets held by the investment fund is lower than at the time of purchase, the investor will not or will not fully recover the capital invested in the fund.

#### **Risk of change in value**

Assets in which the management company invests for the account of the fund are subject to risks. Losses may occur, for example, if the market value of assets falls in comparison to the purchase price or where spot or forward prices develop divergently.

#### **Capital market risk**

The price or market value performance of financial products is particularly dependent upon the development of the capital markets, which in turn are influenced by the general global economy and the economic and political framework conditions in the respective countries. Irrational factors such as moods, opinions and rumours can also impact on the general price trend, especially on a stock exchange. Fluctuations in price and market values can also result from changes in interest rates, exchange rates or the creditworthiness of an issuer.

#### **Risk of changes in share prices**

Experience shows that shares are subject to major price fluctuations and consequently also to the risk of price declines. In particular, such price fluctuations are influenced by the profit performance of the issuing company as well as developments in the sector in question and the general economic trend. Confidence of market participants in the respective company can similarly impact upon price

development. This is particularly the case with companies whose shares have only been listed on the stock exchange or other organised market for a short period of time, where even small changes in forecasts can lead to sharp price movements. If the proportion of freely tradable shares owned by many shareholders (so-called free float) is low for a share, even small buy and sell orders can have a major impact on the market price and consequently lead to higher price fluctuations.

The share value does not always reflect the actual asset value of the underlying business. Sizeable and rapid fluctuations in these values may therefore occur if market conditions or the expectations of market participants with regard to the value of these investments change. An additional factor is that the rights from shares will always be subordinate to the claims of all other creditors of the issuer in terms of satisfaction. Consequently, shares are generally subject to greater fluctuations in value than, for example, interest-bearing securities.

Given the risk of greater and more frequent fluctuations in share values and in light of the shares held by the fund, commensurately greater and more frequent changes in the fund value may occur.

### **Risk of interest rate changes**

Investment in fixed-interest securities is associated with the potential for the level of market interest rates prevailing at the time the security is issued to change. If market interest rates increase compared to interest rates at the time of issue, the price of fixed-interest securities will generally fall. By contrast, if the market interest rate falls, the price of fixed-interest securities will rise. The result of this price development is that the current yield of a fixed-interest security will generally reflect the current market interest rate. These price fluctuations will vary depending on the (residual) term of the fixed-interest security. Fixed-interest securities with shorter maturities have lower price risks than fixed-interest securities with longer maturities. On the other hand, fixed-interest securities with shorter maturities generally produce lower yields than fixed-interest securities with longer maturities. As a rule, money market instruments tend to have lower price risks due to their shorter maturity of a maximum of 397 days. Moreover, the interest rates of different interest-related financial instruments denominated in the same currency with comparable residual terms may develop differently.

### **Risk of negative interest on deposits**

The management company deposits fund liquid assets with the custodian or other banks for the account of the fund. In some cases an interest rate is agreed in respect of these bank balances, which equates to the European Interbank Offered Rate (Euribor) less a certain margin. If the Euribor falls below the agreed margin, negative interest on the corresponding account will result. To the extent that other processes with a similar modus operandi have been agreed, these may also generate negative interest on the respective account. Depending on the development of the European Central Bank's interest rate policy, short-, medium- and long-term bank deposits may generate negative interest.

### **Risk of changes in rates for convertible and option bonds**

Convertible and option bonds secure the right to convert bonds into shares or acquire shares. Development of the value of convertible and option bonds consequently depends on the price performance of the share as the underlying instrument. Risks impacting on performance of the underlying shares can therefore also impact on performance of the convertible or option bonds in question. Option bonds that grant the issuer the right to offer the investor a predetermined number of shares instead of repaying a nominal amount (reverse convertibles) are even more dependent on the corresponding share price.

## **Risks associated with derivative transactions**

The company may conclude derivative transactions on behalf of the fund. Derivative refers to financial instruments the price or rate of which derives from a respective underlying market object as the underlying asset. The purchase and sale of options and conclusion of forward contracts or swaps are associated with the following risks:

- The use of derivatives may generate unforeseeable losses that can even exceed the amounts assigned to the derivative transaction.
- Changes in the price of the underlying asset can reduce the value of an option right or forward contract. Where the value decreases, rendering the derivative worthless, the company may be forced to allow the acquired rights to lapse without recovering the capital invested. Changes in the value of an asset underlying a swap can similarly generate losses for the fund.
- The lack of a liquid secondary market for a particular instrument at a given time may mean that, under certain circumstances, the derivative position in question cannot be economically neutralised (closed out).
- Owing to the leverage effect of options, the value of fund assets may be influenced more heavily than would be the case with direct acquisition of the underlying assets. The risk of loss cannot be determined upon conclusion of the transaction.
- The purchase of options entails a risk of the option not being exercised due to the price of underlying assets not developing as expected, with the result that the option premium paid by the fund is forfeited. The sale of options entails a risk of the fund being obliged to take delivery of assets at a price above that of the current market level or to deliver assets at a price below that of the current market level. In such cases the fund will suffer a loss equating to the difference in price minus the option premium collected.
- In the case of forward contracts, there is a risk that on behalf of the fund the management company will be obliged to bear the difference between the price on which the contract was concluded and the market price at the time the transaction is closed out or matures, meaning the fund would suffer losses. The risk of loss cannot be determined upon conclusion of the forward contract.
- The conclusion of any necessary offsetting transaction (closing out) is associated with costs.
- Projections of the management company regarding the future performance of underlying assets, interest rates, prices and futures markets can retrospectively prove to be mistaken, meaning that, with hindsight, the derivative transaction in question turns out to be economically unfavourable.
- It may not be possible to purchase or sell derivative underlying assets at a favourable time, or such assets may have to be purchased or sold at an unfavourable time.

So-called over-the-counter (OTC) transactions are associated with the following risks:

- The lack of an organised market may mean that the management company cannot sell financial instruments acquired on behalf of the fund on the OTC market or can only do so with difficulty.
- The conclusion of an offsetting transaction (closing out) may be difficult, impossible, or involve considerable costs owing to the individual agreement.

### **Risks associated with the provision of collateral**

The management company receives collateral for derivative agreements. Derivatives agreements may increase in value. Accordingly, collateral received may no longer be sufficient to fully cover the company's delivery or re-transfer claim against the counterparty. The management company may invest cash collateral in blocked accounts, high-quality government bonds or in money market funds with a short maturity structure.

However, the financial institution in which the bank deposits are held could default. Government bonds and money market funds may develop negatively. Upon termination of the transaction, the collateral provided may no longer be available in full, although the originally granted amount will nonetheless need to be returned to the fund by the management company. In such cases, the fund will necessarily bear any losses suffered in relation to the collateral.

### **Risk of securitization exposures without retention**

The fund may only acquire securities that securitize receivables (securitization positions) and which were issued after 1 January 2011 where the debtor retains at least 5 percent of the securitization volume as a so-called deductible and also complies with additional requirements. The management company will therefore be obliged to instigate remedial action in the interest of investors if the fund contains securitizations that do not meet these EU standards. Within the scope of these remedies the management company may be forced to sell such securitization positions. On account of the legal requirements for banks, fund management companies and insurers, the risk arises of the company not being able to sell such securitization positions, or of only being able to do so at significantly reduced prices or after a major period of delay.

### **Inflation risk**

Inflation represents a devaluation risk for all assets, including for assets held by the fund. The rate of inflation may outstrip the growth in fund value.

### **Currency risk**

Fund assets may be invested in a currency other than that of the fund. The fund receives income, redemptions and proceeds from such investments in the other currency. If the value of this currency falls against the fund currency, the value of such investments and therefore also the value of the fund assets will decline accordingly.

### **Risk of cancellation of monetary unions or the withdrawal of individual countries from such unions**

If the fund invests in assets denominated in a currency issued by a currency union, in the event of dissolution of the currency union the risk arises of the original currency being replaced by a substitute currency, thus potentially leading to a devaluation of the asset in question.

Moreover, in the event of withdrawal of a country from a currency union, there is a risk of devaluation of the union currency and therefore also of the assets denominated in the union currency.

## **Concentration risk**

Where investment is concentrated in specific assets or markets, the fund will be particularly dependent upon the development of such assets or markets.

## **Risks associated with investment in investment units**

The risks of holding shares in other investment funds acquired for the fund (so-called 'target funds') are closely related to the risks for assets held in these target funds and the investment strategies pursued by such. Given that managers of individual target funds trade independently of each other, several target funds may in fact be pursuing the same or conflicting investment strategies.

Accordingly, existing risks may accumulate or potential opportunities may cancel each other out. The management company will generally have no control over the management of target funds. Moreover, the target fund investment decisions will not necessarily be in line with the assumptions or expectations of the management company. Frequently, the management company will not have up-to-the-minute knowledge of the target fund's current composition. Should this composition not meet management company assumptions or expectations, a decisive response by the management company in the form of redeeming the target fund units may well be significantly delayed.

Open investment funds in which the fund acquires units may also temporarily suspend the redemption of units. In such cases the management company will be prevented from selling the units in the target fund by returning such to the target fund management company or depository against payment of the redemption price.

## **Risks associated with the investment spectrum**

In compliance with the investment standards and limits prescribed under the pertinent law and investment terms, which afford the fund an extremely broad scope, the actual investment policy can also be primarily targeted to the acquisition of assets in, for example, only a small number of sectors, markets or regions/countries. Such concentration on a few specialised investment sectors may incur risks (e.g. narrow market, high level of fluctuation within certain economic cycles). The annual report provides retrospective information on investment policy content for the previous reporting year.

## **Emerging markets**

The fund may also invest in so-called emerging markets. Classed as emerging markets are all those countries that, at the time of investment, are not considered as developed industrial nations by the International Monetary Fund, the World Bank or International Finance Corporation (IFC). Investment in these markets can be particularly risky owing to the fact that assets traded on the stock exchanges in these countries can be particularly prone to fluctuations in value; for example, as a result of market narrowness, transfer difficulties, weaker regulation, potentially higher counterparty default and other factors.

## **Particular sector risks**

Investments in securities with a focus on a specific sector may also mean that the particular risks of that industry are more strongly reflected in the value of the fund.

Specifically with regard to investments in sectors with a heavy dependence on research and development (e.g. the biotech industry, pharmaceutical sector, chemical industry etc.), or which are comparatively new, developments affecting the sector as a whole can lead to overly rash reactions by

investors, in turn causing significant price fluctuations. The success of these sectors is often driven by speculation and expectations in relation to future products. However, if these products fail to meet the respective expectations or suffer setbacks, the result may be sharp declines in value throughout the entire sector.

Dependencies in other branches too can cause the entire industry to suffer considerable fluctuations in value as a result of unfavourable developments, such as delivery bottlenecks, scarcity of raw materials, tightening of statutory requirements etc.

### **Special Risks of Investing in Securities of smaller companies**

The investment in securities of smaller companies or companies in special situations has certain risks which differ from investments in highly capitalised securities. Typical characteristics of such companies include, in particular, lower capitalisation, greater dependence on the market success of only a few products or services, and often greater sensitivity to economic developments. In addition, the lower public availability of data, analyses and information on smaller companies as well as the limited trading volume in sometimes narrow market segments can often lead to considerable price volatility

### **Risk of restricted or increased fund liquidity and risks associated with increased subscriptions or redemptions (liquidity risk)**

Liquidity risk is the risk that a position in the investment fund portfolio cannot be sold, liquidated or closed at limited cost within a sufficiently short period and therefore adversely affects the investment fund's ability to comply with the requirements to fulfil redemption requests as per the Law of 17 December 2010 or other payment obligations.

Risks that may adversely affect fund liquidity are set out below. Such a situation may mean that the fund is temporarily or permanently unable to meet its payment obligations or that the management company is temporarily or permanently unable to fulfil the redemption requests of investors. Investors may find they are unable to realise their planned holding period or cannot access their invested capital or parts thereof for an indefinite period. The materialisation of liquidity risks can also reduce the fund value and therefore also the unit value; an example being where the management company is forced to sell fund assets below the market value, insofar as this is legally permissible. A situation where the management company is unable to fulfil the redemption requests of investors can also lead to the suspension of redemption and, in extreme cases, to the subsequent dissolution of the fund.

### **Risk associated with investment in assets**

The fund may also acquire assets that are not listed or incorporated on a stock exchange or other organised market. It may be the case that these assets can only be resold at significantly reduced prices or following a period of delay, or cannot be sold at all. Depending on the market conditions, volume, timescale and planned costs, disposal of assets listed on a stock exchange may also be impossible or only possible at significantly reduced prices. Despite the fact that the fund can primarily only acquire assets capable of liquidation at any time, a situation where such assets can temporarily or permanently only be sold at a loss cannot be ruled out.

### **Risk associated with borrowing**

The management company may borrow on behalf of the fund. Variable interest loans may have a negative impact on the fund if interest rates increase. Should the management company be required to

repay a loan which it is unable to offset through subsequent financing or liquidity available in the fund, it may be forced to sell assets prematurely or on terms less favourable than planned.

### **Risks associated with increased redemptions or subscriptions**

Liquidity flows into and out of the fund in line with investor's buy and sell orders. The respective inflows and outflows may result in a net inflow or outflow of fund liquid assets following netting. These net inflows or outflows may give the management company cause to acquire or sell assets, which in turn generate transaction costs. This will be the case particularly where a liquid asset ratio provided for the fund by the management company is exceeded or undershot as a result of the inflows or outflows. The resulting transaction costs will be charged to the fund and may adversely affect fund performance. Inflows causing increased fund liquidity can impact negatively on fund performance if the management company cannot or cannot promptly invest the funds in question at suitable terms.

### **Risk associated with public holidays in specific regions/countries**

The fund may be structured to focus on the acquisition of assets from only a small number of regions/countries. Local public holidays in the regions/countries in question may lead to differences between stock exchange trading days in these regions/countries and fund valuation days. For instance, the fund may not be able to react on the same day to market developments in the regions/countries if the day is not a valuation day, or may not be able to trade on the local market on a valuation day that is not a trading day in these regions/countries. As a result, the fund may be prevented from selling assets within the requisite period. In turn, this may adversely affect the fund's ability to fulfil redemption requests or other payment obligations.

### **Sustainability risks**

Sustainability risks are events or conditions in regard to environmental, social or corporate governance factors. The occurrence of which could have an actual or potential material adverse effect on the value of the Fund's assets. Sustainability risks can also affect other types of risk and contribute as a factor to their materiality.

Examples of ESG are:

#### **Environmental/Environmental**

- Climate change mitigation
- Adaptation to climate change
- Protection of biodiversity
- Sustainable use and protection of water and marine resources
- Transition to a circular economy, waste prevention and recycling
- Pollution prevention and control
- Protection of healthy ecosystems
- Sustainable land use

#### **Social**

- Compliance with recognised labour standards (no child or forced labour, no discrimination)
- Compliance with occupational safety and health protection
- Adequate remuneration, fair conditions at the workplace, diversity and opportunities for training and further education
- Freedom of trade union and assembly
- Ensuring adequate product safety, including health protection

- Equal requirements for companies in the supply chain
- Inclusive projects or consideration for the needs of communities and social minorities

### **Corporate Governance**

- Tax honesty
- Measures to prevent corruption
- Sustainability management by board of directors
- Board remuneration linked to sustainability
- Enabling whistle blowing
- Ensuring employee rights
- Ensuring data protection
- Disclosure of information

Sustainability risks in the areas of climate and environment are divided into physical risks and transition risks:

Physical risks arise both regarding individual extreme weather events and their consequences (examples: Heat and drought periods, floods, storms, hail, forest fires, avalanches) as well as in relation to long-term changes in climatic and ecological conditions (examples: Precipitation frequency and amounts, weather instability, sea level rise, changes in ocean and air currents, ocean acidification, increase in average temperatures with regional extremes).

Physical risks can also have indirect consequences (examples: Finally, polluters or companies that have contributed to climate change could be held liable by the state (e.g. Ontario Bill 21, Liability for Climate-Related Harms Act, 2018) or in court for the consequences).

Transition risks exist in connection with the transition to a low-carbon economy:

Political measures can lead to an increase in the price and/or shortage of fossil fuels or emission certificates (examples: coal phase-out, CO2 tax) or to high investment costs due to necessary renovations of buildings and plants. New technologies can displace known ones (example: electromobility), changing preferences of contractual partners and societal expectations can endanger non-adapted companies.

### **Interdependence between physical risks and transition risks**

A sharp increase in physical risks would require a more abrupt change in the economy, which in turn leads to higher transition risks. If the necessary reduction in greenhouse gas emissions is not made in time, physical risks and the pressure to act will increase.

### **Issuer-specific risk related to sustainability**

The risks associated with ESG aspects, can have a negative impact on the market price of an investment of an asset.

The market value of financial instruments issued by companies that do not comply with ESG standards and/or (also) do not commit to implementing ESG standards in the future may be negatively impacted by materialising sustainability risks.

Such influences on the market value can be caused, for example, by reputational damage and/or sanctions; other examples are physical risks and transition risks caused, for example, by climate change.

### **Operational risks related to sustainability**

The Fund or the Management Company may suffer losses due to environmental disasters, socially-induced aspects relating to employees or third parties, as well as failures in corporate governance. corporate governance, suffer losses. These events can be caused or exacerbated by a lack of attention to sustainability aspects.

The Appendix "Environmental and/or Social Characteristics" of the Prospectus sets out how the Portfolio Manager aligns the Fund's investment strategy with ESG characteristics (so-called dedicated ESG investment strategy) by investing at least 51% of the Fund's value in securities that are positively rated according to sustainability criteria (taking into account the so-called parent approach, if applicable). The portfolio management also takes into account the principal adverse impact on sustainability factors ("PAI") by means of exclusion criteria based on sustainability factors listed in the Appendix "Environmental and/or Social Characteristics". These exclusion criteria prevent, among other things, the Fund from investing in securities whose issuers (or, where applicable, their parent companies) are involved in controversial business areas.

The dedicated investment strategy outlined in the Appendix Environmental and/or Social Characteristics and the application of exclusion criteria reduce the sustainability risks inherent in the Fund's assets, thus also reducing the risk for the Fund as a whole.

The Company has outsourced the portfolio management. The portfolio manager takes the investment decisions and, pursuant to Art. 6 (1) Regulation (EU) 2019/2088, is obliged to assess any sustainability risks of its investment decisions and to report the corresponding consequences of the sustainability risks on the return of the Fund to the Company. Currently, the Portfolio Manager assumes that the impact of sustainability risks on the Fund's return is expected to be low.

In order to support the Portfolio Manager in particular with regard to environmental sustainability risks, the Company sends the Portfolio Manager a corresponding report at the end of each month, which defines environmental sustainability risks and is made available by a data provider recognised by the Company.

In addition, the company determines indicators that it considers relevant for the assessment of sustainability risks. These indicators are taken from the TCFD Report and additional social and corporate governance metrics provided by MSCI ESG Research LLC. The portfolios managed by the Company will be monitored on a quarterly basis against the relevant indicators and the indicators will be compared with the results of the MSCI World ESG Universal Index (USD). The investment funds that show a significant deviation from the benchmark will be considered separately by the Company and reported to the portfolio manager on a case-by-case basis.

The above description only represents the general framework for the consideration of sustainability risks. The concrete process and the way in which the indicators are selected and assessed are available on the company's homepage at <https://www.hansainvest.de/unternehmen/compliance/informationen-zur-nachhaltigkeit>.

## **Counterparty risk, including credit risk and risk of default**

Counterparty risk is the risk of loss to an investment fund resulting from a situation where the counterparty to a transaction potentially cannot meet its obligations in terms of the settlement of performance claims.

Set out below are the risks to which the fund may be exposed through business relations with another party (so-called counterparty). Such relations incur the risk that the counterparty can no longer fulfil its agreed obligations. This can impair fund performance and may consequently also adversely affect the unit value and the capital invested by the investor.

### **Counterparty default risk / Counterparty risks (excluding central counterparties)**

The fund may suffer losses owing to default on the part of an originator (hereinafter 'issuer') or a contracting party (hereinafter 'counterparty') against whom the fund has claims. The issuer risk describes the impact of specific developments relating to the issuer that, in addition to general capital market trends, impact on the value of a security. Even following the meticulous selection of securities, the occurrence of losses owing to asset default on the part of issuers cannot be ruled out. The party to a contract concluded on account of the fund may partially or fully default (counterparty risk). This applies with respect to all contracts concluded on account of the fund.

### **Central counterparty risk**

A central counterparty (CCP) enters into certain transactions for the fund as an intermediary institution, particularly transactions pertaining to financial derivative instruments. In such cases the CCP acts as the purchaser vis-à-vis the seller and as the seller vis-à-vis the purchaser. A CCP protects itself against the risk of its counterparties being unable to render the agreed performance through a series of safeguards, which allow it to offset losses from the transactions entered into at any time (e.g. through collateral). Despite these safeguards, a CCP itself becoming over-indebted and defaulting cannot be ruled out, which in turn could affect claims of the management company in relation to the fund. Such a situation could result in losses for the fund.

## **Operational and other risks associated with the fund**

Operational risk is the risk of loss to an investment fund resulting from inadequate internal processes and from human or system failure at the management company or from external events and including legal, documentation and reputational risks as well as risks resulting from the trading, settlement and valuation procedures operated for an investment fund.

The following section describes risks that may arise, for example, from inadequate internal processes and from human or system failure at the management company or at external third parties. These risks can impair the performance of the fund and thus also have a negative impact on the unit value and on the capital invested by the investor.

### **Risk resulting from criminal activities, irregularities or natural catastrophes**

The fund may fall victim to fraud or other criminal acts. It may suffer losses due to errors by employees of the management company or external third parties or be damaged by external events such as natural disasters or pandemics.

### **Country or transfer risk**

There is a risk that a foreign debtor, despite being solvent, may not be able to make payments on time, at all, or only in another currency due to the lack of transferability of the currency, the lack of willingness to transfer on the part of its country of domicile or for similar reasons. For example, payments to which the management company is entitled on the account of the fund may not be made, may be made in a currency that is not (or no longer) convertible due to foreign exchange restrictions, or may be made in another currency. If the debtor pays in another currency, this position is subject to the currency risk described above.

### **Regulatory and political risks**

Investments may be made for the fund in jurisdictions where German or Luxembourg law is not applicable or, in the event of legal disputes, the responsible court of law is situated outside Germany or Luxembourg. The resulting rights and obligations of the management company for the account of the fund may differ from those in Germany or Luxembourg to the detriment of the fund or of the investor. Political or legal developments, including changes to the legal framework in these jurisdictions, may not be recognised by the management company, or may be recognised too late, or may lead to restrictions with regard to assets that can be acquired or have already been acquired. These consequences may also arise if the legal framework for the management company and/or the management of the fund in Germany and/or Luxembourg changes.

The legal treatment of funds may change in unforeseeable and uncontrollable ways. This may result in the fund no longer being able to be managed as before and in accordance with the investment strategy. This may result in economic losses; the same applies to assets in which the fund is or may be invested and which become subject to legal changes.

### **Changes to the tax framework, tax risk**

The brief information on tax regulations given in this sales prospectus is based on the currently known legal situation. It is intended for persons subject to unlimited income tax liability or unlimited corporate income tax liability in Germany. However, no guarantee can be given that the tax assessment will not change as a result of legislation, court rulings or decrees of the tax authorities.

In the case of a correction that is fundamentally disadvantageous for investors from a tax point of view, a change in incorrectly determined tax bases of the fund for previous financial years (e.g. due to external tax audits) may result in the investor having to bear the tax burden from the correction for previous financial years, although in certain circumstances he may not have been invested in the fund at the time. Conversely, the investor may no longer benefit from a correction that is generally advantageous for tax purposes for the current and previous financial years in which he was invested in the fund because he redeemed or disposed of his shares before the correction was implemented.

In addition, a correction of tax data can lead to taxable income or tax advantages being recorded for tax purposes in a different assessment period than the one that is actually applicable, and this can have negative consequences for the individual investor.

### **Key individual risk**

If the investment result of the fund is very positive over a certain period of time, this success may also depend on the suitability of the acting persons and thus on correct decisions being taken by the management. However, the personnel composition of the fund management can change. New decision-makers may then be in a position to act less successfully.

## **Custody risk**

The safekeeping of assets, especially abroad, involves a risk of loss that may result from insolvency or breaches of due diligence on the part of the custodian or else from force majeure.

In particular, the following custody risks may exist:

- Legal risks (e.g. no ownership status comparable to Luxembourg law, no legislation, application of law or jurisdiction in line with Luxembourg standards);
- Execution and counterparty risk (e.g. restriction of depositories, poor creditworthiness of depositories and counterparties leading to the default of the other party) without an equivalent replacement being found);
- Risk of insolvency on the part of the depository or a sub-custodian of the depository: in such a case, the return of the fund's assets may be very difficult or delayed, or may even become impossible; credit balances with the depository may become worthless in the event of the depository's insolvency);
- Financial market and currency risks (e.g. national insolvency, currency restrictions etc.);
- Political and economic risks (e.g. nationalisation / expropriation of assets, damaging regulations affecting the financial sector);
- The audit system may not meet international standards;
- Market and settlement risks (e.g. delay in the registration of securities, deficiencies in the organisation of the markets, lack of reliable price sources).

## **Risks arising from trading and clearing mechanisms (settlement risk)**

In the settlement of securities transactions, there is a risk that one of the contracting parties may delay payment or fail to pay as agreed or fail to deliver the securities on time. This settlement risk thus also exists for the fund when trading in other assets.

## **Conflicts of interest**

The management company always checks for potential conflicts of interest before taking on a new activity for a fund or awarding an activity to a service provider. Changes to areas of activity or to the remuneration for activities can also give rise to conflicts of interest and are examined accordingly. For example, the following conflicts of interest may arise for the management company:

- The interests of the investor may conflict for example with the following interests:
  - o interests of the management company and its affiliated companies,
  - o interests of the employees of the management company,
  - o interests of other investors in this or other funds, or
  - o interests of the customers of the management company.

- Circumstances or relationships that may give rise to conflicts of interest with the management company and/or its appointed outsourcing companies include in particular the following:
  - o incentive schemes for employees of the management company,
  - o employee deals,
  - o benefits paid to employees of the management company,
  - o reallocations in the fund,
  - o key-date-related enhancement of the fund's performance ('window dressing'),
  - o transactions between the management company and the investment assets or individual portfolios it manages and/or
  - o transactions between investment assets and/or individual portfolios managed by the management company,
  - o the amalgamation of several orders ('block trades'),
  - o commissioning of closely related companies and persons,
  - o individual investments of considerable magnitude,
  - o if, following an oversubscription in the context of the issue of shares, the management company has subscribed to the securities for several investment funds or individual portfolios ('IPO allocations'),
  - o transactions after the close of trading at the already known closing price of the current day, so-called 'late trading',
  - o the exercise of voting rights.

The management company may receive cash equivalent benefits in connection with transactions on the account of the fund (broker research, financial analyses, market and price information systems), which will be used in the interest of the investors when making investment decisions.

The management company does not receive any reimbursements of the fees and expense refunds paid from the fund to the depositary and to third parties.

The management company pays intermediaries, e.g. credit institutions, recurring – usually annual – brokerage fees as so-called 'trail commissions' from its management fee. When purchasing fund units, an initial sales charge may also be levied by the management company; details about this can be found in the section 'An Overview of the Fund'. Up to 100 per cent of this may be passed on to the management company's sales partners as remuneration for sales expenses.

In order to deal with conflicts of interest, the management company implements the following organisational measures among others in order to identify, prevent, manage, monitor and disclose conflicts of interest:

- Existence of a compliance department that works to ensure adherence to laws and regulations and to which conflicts of interest must be reported.
- Obligations of disclosure
- Organisational measures such as the following:
  - o the establishment of confidentiality areas for individual departments, so as to prevent the misuse of confidential information,
  - o assignment of responsibilities to prevent the exercise of improper influence,
- Rules of conduct for employees with regard to employee transactions, obligations to comply with insider law, training courses and continuing education measures
- Establishment of appropriate remuneration systems,
- Principles for the consideration of client interests,
- Best practice principles for the acquisition and sale of financial instruments,
- Principles for the breakdown of partial implementations,
- Establishment of order acceptance times (cut-off times),
- Principles for the exercise of voting rights,
- Forward Pricing,
- Participation in the Compliance Committee of the SIGNAL IDUNA Group.

Third parties commissioned to provide investment advice or investment brokerage may receive monetary or non-monetary benefits (collectively referred to as 'benefits') from their issuers and/or sellers from their fees, including sales fees (e.g. issue surcharges, premiums, commissions, fees included in the price) in connection with the advice given or brokerage of assets. The amount of such benefits cannot be determined in advance as it depends on the nature of the asset and the circumstances of the acquisition. According to current market practice, a maximum of 1.5 per cent of the price of an asset is paid as a benefit. This amount may be higher in individual cases. Further details will be provided to the investor upon request.

Insofar as the third party commissioned with investment advice or investment brokerage does not allocate these benefits to the fund, their retention is designed to improve the quality of the service and does not prevent the management company or the third party commissioned with investment advice or investment brokerage from acting dutifully in the best interests of the fund and its investors. The management company expressly draws the investors' attention to the fact that, with the practice outlined above, it deviates from the rules of conduct under Sections 11.3 and 11.4 of the German BVI (Bundesverband Investment und Asset Management e.V. - Federal Association of Investment and Asset Management) in accordance with the current legal situation.

No unavoidable conflicts of interest were identified in connection with the outsourcing of portfolio management.

Excerpts from our conflicts of interest policy can be found on the management company's website at <https://www.hansainvest.com/deutsch/ueber-uns/compliance>. The complete policy can also be requested from the management company and will be made available free of charge in electronic or paper form.

## **Remuneration policy of the management company**

The management company has established and applies a remuneration policy and practice that complies with the legal requirements applicable to it. This policy is consistent with and promotes the risk management process established by the management company and does not encourage risk-taking that is incompatible with the risk profiles, disclosures in the relevant sales prospectus and management regulations or that prevent the management company from acting dutifully in the best interests of the fund and the investors.

The remuneration policy is consistent with the business strategy, objectives, values and interests of the management company and the funds it manages and the interests of the investors in such funds, and includes measures to avoid conflicts of interest.

Performance evaluation is carried out in a multi-year framework appropriate to the holding period recommended to the investors of the fund administered by the management company in order to ensure that the evaluation is based on the longer-term performance of the fund and its investment risks, and that the actual payment of performance-based remuneration components is spread over the same period of time.

Remuneration policy and practice include fixed and variable components of salaries and voluntary retirement benefits.

The fixed and variable components of the total remuneration are proportionate to each other, with the fixed component accounting for a high enough share of the total remuneration to offer complete flexibility with regard to the variable remuneration components, including the possibility of waiving payment of a variable component. The pension scheme is in line with the business strategy, objectives, values and long-term interests of the management company and the funds it manages.

A description of the composition of the remuneration policy and practice of the management company, its handling of fixed and variable remuneration, including the composition of the remuneration committee, if such a committee exists, is available in excerpts at the link <https://www.hansainvest.com/deutsch/ueber-uns/compliance> and will be made available to the investor free of charge in electronic or paper form on request.

## FURTHER INVESTMENT FUNDS MANAGED BY THE MANAGEMENT COMPANY

The investment assets managed by the company can be inspected on a daily basis at the following internet address: <https://www.hansainvest.com/deutsch/fondswelt/fondsuebersicht/>

### Investment assets under the UCITS Directive

	aufgelegt am
HANSArenta	02.01.1970
HANSAs secur	02.01.1970
HANSAINternational	01.09.1981
HANSAZins	02.05.1985
HANSAINVEST LUX UMBRELLA mit dem Teilfonds: HANSAINVEST LUX UMBRELLA - Interbond	03.04.1989
HANSAEuropa	02.01.1992
HANSAdefensive	02.11.1994
NB Stiftungsfonds 2	08.12.1995
TBF GLOBAL VALUE	01.02.1997
HANSAertrag	19.03.1997
IPAM AktienSpezial	01.10.1997
TBF GLOBAL INCOME	30.01.1998
TBF EUROPEAN OPPORTUNITIES EUR	31.01.1998
Aramea Hippokrat	22.10.1998
HANSAbalance	01.07.1999
D&R Strategie (Umbrella) mit dem Teilfonds: D&R Strategie - Select	23.12.1999
Inovesta Classic	26.05.2000
Inovesta Opportunitiy	26.05.2000
HANSACentro	03.07.2000
HANSAdynamic	03.07.2000
HI Topselect D	17.05.2001
HI Topselect W	17.05.2001
Bankhaus Neelmeyer Aktienstrategie	15.10.2001
Millennium Global (Umbrella) mit dem Teilfonds: Millennium Global Opportunities	18.12.2001
HANSAaccura	02.01.2002
HAC Quant (Umbrella) mit dem Teilfonds: HAC Quant DIVIDENDENSTARS global	09.04.2003
TBF GLOBAL TECHNOLOGY	06.05.2005
IPAM RentenWachstum	04.10.2005
efv-Perspektive-Fonds I	15.11.2005
CH Global	02.10.2006
PTAM Weltportfolio Ausgewogen	15.10.2007
AES Rendite Selekt	03.12.2007
AES Selekt A1	03.12.2007
WI SELEKT C	03.12.2007
WI SELEKT D	03.12.2007
Strategie Welt Select	06.12.2007
WALLRICH (Umbrella) mit dem Teilfonds: WALLRICH Prämienstrategie	06.12.2007
SI BestSelect	14.12.2007
D&R Best-of-Two Classic	20.12.2007
SI SafeInvest	02.01.2008
IAC-Aktien Global	15.02.2008
MuP Vermögensverwaltung Horizont 10	29.02.2008
MuP Vermögensverwaltung Horizont 5	29.02.2008
TOP-Investors Global	03.03.2008
AVBV 2020	03.03.2008
GLOBAL MARKETS DEFENDER	01.04.2008

GLOBAL MARKETS GROWTH	01.04.2008
GLOBAL MARKETS TRENDS	01.04.2008
AEQUO GLOBAL	15.04.2008
EICHLER & MEHLERT Balanced Strategie	13.05.2008
Aramea Balanced Convertible	15.05.2008
Varios Flex Fonds	20.05.2008
OLB Invest Solide	01.08.2008
GFS Aktien Anlage Global	01.09.2008
Münsterländische Bank Strategieportfolio I	01.09.2008
Münsterländische Bank Strategieportfolio II	01.09.2008
GF Global Select HI	15.09.2008
Aramea Strategie I	10.11.2008
NIELSEN (Umbrella) mit dem Teilfonds:	04.12.2008
NIELSEN - GLOBAL VALUE	
Aramea Rendite Plus	09.12.2008
EQUINOX Aktien Euroland	19.10.2009
TBF SMART POWER	07.12.2009
Aramea Aktien Select	16.08.2010
TOP Defensiv Plus	19.10.2010
C-QUADRAT ARTS Total Return Flexible	08.11.2010
All Asset Allocation Fund - HI	01.12.2010
HANSAwerte	30.12.2010
<b>KB Vermögensverwaltungsfonds</b>	01.04.2011
NB Stiftungsfonds 1	15.09.2011
HANSAsmart Select E	04.10.2011
PTAM Global Allocation	06.10.2011
Apus Capital Revalue Fonds	19.10.2011
3ik-Strategiefonds I	01.12.2011
GUH Vermögen	01.12.2011
3ik-Strategiefonds III	01.12.2011
HAC Quant MEGATRENDS dynamisch global	28.12.2011
SMS Ars multiplex	27.03.2012
D&R Konservative Strategie Europa	01.06.2012
H1 Flexible Top Select	01.06.2012
Rücklagenfonds	06.06.2012
M3 Opportunitas	02.07.2012
OLB Zinsstrategie	01.08.2012
TBF SPECIAL INCOME	17.08.2012
Bankhaus Neelmeyer Rentenstrategie	03.10.2012
K&S Flex	03.12.2012
BremenKapital Aktien	14.12.2012
BremenKapital Ertrag	14.12.2012
BremenKapital Renten Offensiv	14.12.2012
BremenKapital Zertifikate	14.12.2012
BremenKapital Renten Standard	17.12.2012
NIXDORF Stiftungsfonds	06.05.2013
BRW Balanced Return	15.07.2013
PSM Dynamik	18.07.2013
PSM Konzept	18.07.2013
apano HI Strategie 1	19.07.2013
TBF JAPAN	18.11.2013
HANSAdividende	16.12.2013
Sauren Dynamic Absolute Return	27.12.2013
P&K Balance	30.12.2013
D&R Wachstum Global TAA	03.02.2014
Münsterländische Bank Stiftungsfonds	14.04.2014
TBF ATTILA GLOBAL OPPORTUNITY	22.04.2014
Portikus International Opportunities Fonds	16.05.2014
BRW Balanced Return Plus	01.07.2014
AIRC BEST OF U.S.	15.09.2014
Aristoteles Fonds	01.10.2014

QCP PremiumIncome	03.11.2014
AES Strategie Defensiv	03.11.2014
avesco Sustainable Hidden Champions Equity	05.01.2015
Vermögensmandat Select	19.01.2015
green benefit (Umrella) mit dem Teilfonds: Green Benefit Global Impact Fund	25.02.2015
KIRIX Substitution Plus	16.03.2015
KIRIX Dynamic Plus	18.03.2015
HANSAsmart Select G	15.04.2015
TBF US CORPORATE BONDS	24.04.2015
QUANTIVE Absolute Return	01.07.2015
PECULIUM GLOBAL SELECT	03.08.2015
FAM Renten Spezial	15.09.2015
MF INVEST Best Select	15.09.2015
global online retail	01.10.2015
Vermögenspooling Fonds Nr. 1	02.11.2015
Vermögenspooling Fonds Nr. 2	02.11.2015
Value Aktiv Plus	21.12.2015
apano Global Systematik	30.12.2015
D&R Best-of (Umbrella) mit dem Teilfonds: D&R Best-of - Multiple Opportunities	30.12.2015
HAC Quant STIFTUNGSFONDS flexibel global	30.12.2015
Aramea Global Convertible	04.01.2016
Vermögenspooling Fonds Nr. 3	11.01.2016
A.IX-Faktor-Fonds	01.02.2016
ALPORA Global Innovation	11.07.2016
KIRIX Herkules-Portfolio	04.10.2016
HANSArnten Spezial	01.12.2016
PENSION.INVEST PLUS ®	16.01.2017
Perspektive OVID Equity ESG Fonds	15.02.2017
Dreisam Income	03.04.2017
D&R Globalance Zukunftbeweger Aktien	31.05.2017
PSV KONSERVATIV ESG	15.08.2017
QUANTIVE Vega	15.08.2017
FRAM Capital Skandinavien	02.10.2017
Apus Capital Marathon Fonds	16.10.2017
ARISTOCRATS OPPORTUNITY	26.10.2017
Der Zukunftsfonds	01.11.2017
Aramea Rendite Plus Nachhaltig	30.11.2017
HAC Quant RENDITEPLUS defensiv global	01.12.2017
Wallrich AI Libero	01.12.2017
Themis Special Situations Fund	15.02.2018
BRW Stable Return	01.03.2018
<b>TBF OFFENSIV</b>	15.03.2018
Vivace Multi-Strategy	28.03.2018
PSV WACHSTUM ESG	15.05.2018
EFD Global Invest	01.06.2018
KANON Strategiekonzept Defensiv	01.06.2018
Essener Stiftungsfonds	01.06.2018
Gehlen Braeutigam Value HI	02.07.2018
AI US Dynamic	31.07.2018
<b>Covesto Patient Capital</b>	01.08.2018
MLB-Basismandat	01.08.2018
MLB-Wachstumsmandat	01.08.2018
Barius European Opportunities	03.09.2018
Chainberry Equity	03.09.2018
EVO SPECIAL SITUATIONS	03.09.2018
KSAM-Value <sup>2</sup>	03.09.2018
ABSOLUTE Volatility	01.11.2018
Fortezza Valuerwerk Plus	01.11.2018
Multi Flex+	01.11.2018

Greiff Systematic Allocation Fund	02.11.2018
Aktienfonds für Beteiligungsunternehmen	02.01.2019
D&R Aktien Strategie	02.01.2019
D&R Zins Strategie	02.01.2019
BIT Global Internet Leaders 30	02.01.2019
Mainberg Special Situations Fund HI	02.01.2019
NB Anleihen Euro	02.01.2019
proud@work	02.01.2019
CA Familienstrategie	10.01.2019
BRW Global Bond	14.01.2019
Wallrich AI Peloton	01.02.2019
terra.point	25.02.2019
<b>INVIOS Vermögenbildungsfonds</b>	01.03.2019
<b>SMS Ars multizins</b>	01.03.2019
<b>Effecten-Spiegel Aktien-Fonds</b>	15.04.2019
<b>Trend Kairos European Opportunities</b>	15.04.2019
<b>IPAM EURO Anleihen</b>	15.04.2019
<b>confido Fund</b>	02.05.2019
<b>Kapitalertrag Plus</b>	02.05.2019
<b>ARES</b>	03.06.2019
<b>Immobilien Werte Deutschland</b>	28.06.2019
<b>avant-garde capital Opportunities Fund</b>	01.07.2019
Entrepreneur AS Select	01.07.2019
G&W - DYNAMIC ALLOCATION	01.07.2019
WEALTHGATE Multi Asset Chance	01.08.2019
TBF BALANCED	01.08.2019
Werte & Sicherheit - Nachhaltiger Stiftungsfonds	08.08.2019
Better Future Aktien Global	02.09.2019
ELM Global TICO	02.09.2019
G&G ValueInvesting-DLS	16.09.2019
Focus Fund Growth Equities HI	01.10.2019
HANSEATISCHER Stiftungsfonds	15.10.2019
NB Aktien Europa	02.12.2019
NB Aktien Global	02.12.2019
NB Anleihen Global	02.12.2019
RSA WeltWerte Fonds	02.01.2020
ficon Green Dividends-INVEST	03.02.2020
Zindstein Vermögens-Mandat	02.03.2020
Empowerment Fonds	15.04.2020
ECie Fair Future Fund	15.04.2020
WEALTHGATE Biotech Aggressive Fund	15.04.2020
Sparfonds Aktien	24.04.2020
Assella Alpha Family	28.05.2020
Assella Value Invest	28.05.2020
Gamma Plus	15.06.2020
ALAP	01.07.2020
Kompass Strategie Fokus Nachhaltig	15.07.2020
KOEHLER Equities	15.07.2020
D&R Aktien	03.08.2020
AVENTOS Global Real Estate Securities Fund	01.10.2020
LOHRE Investment Fund	01.10.2020
LUNIS Biotech Growth Opportunities Fund	01.10.2020
LUNIS Biotech Growth Opportunities Fund	01.10.2020
NB Smart Premia	01.10.2020
NB Real Asset Securities	02.11.2020
BIT Global Leaders	02.11.2020
D&R Zinsen	02.11.2020
Aramea Tango #1	16.11.2020
WEALTHGATE Multi Asset	01.12.2020
GG Wasserstoff	15.12.2020

ÖKOBASIS SDG - Investments for Future	18.12.2020
BRW Return	18.12.2020
MIDAS Global Growth	04.01.2021
Sustainable Smaller Companies ESG Fund	04.01.2021
AW Strategie Global Ausgewogen	04.01.2021
Barbarossa Europäischer Stiftungsfonds	15.01.2021
Premium Bonds Select	01.02.2021
HANSAperspektive	15.02.2021
SVM Strategie Nr. 1	15.02.2021
SAM Strategic Solution Fund	01.03.2021
Global Favourites	01.03.2021
HANSAglobal Structure	01.04.2021
ActiveAllocationAssets	01.04.2021
BIT Global Fintech Leaders	03.05.2021
Greiff Foundation Income	03.05.2021
Tigris Small & Micro Cap Growth Fund	03.05.2021
ELM KONZEPT	25.05.2021
Global Balanced Opportunity Fund	01.06.2021
Wertewerk	01.06.2021
The Original Platform Fund	01.07.2021
Human Intelligence	02.08.2021
ISM Rendite Plus Alpha	02.08.2021
Aaapollo 11 Global	01.09.2021
Aramea Rendite Global Nachhaltig	01.09.2021
BIT Global Crypto Leaders	01.09.2021
D&R Convexity Alpha	01.09.2021
SAENTIS Global Invest	01.09.2021
ROCKCAP GLOBAL EQUITY	15.10.2021
Globale Trends innovativ	01.11.2021
Werte & Sicherheit - Deutsche Aktien Plus	01.11.2021
QUINT Global Opportunities	01.11.2021
Value Stars Plus	01.12.2021
STAREN ÖkoStars	01.02.2022
ARAMEA METAWORLD	01.04.2022
SMAVESTO - RoboFlex ESG Ausgewogen	01.07.2022
SMAVESTO - RoboFlex ESG Ertrag	01.07.2022
SMAVESTO - RoboFlex ESG Dynamik	01.07.2022
H+ Top Select Opportunities	01.08.2022
BC Biotech	01.09.2022
Qualitas Alta Value Fund	01.09.2022
DNH Fonds	04.10.2022
MTS Fonds	04.10.2022
Top 25 Equities Fund	04.10.2022
BC Energy & Technology	01.11.2022
AI ESG Leaders	15.11.2022
CvR Vermögensstrategie dynamisch	01.12.2022
D&R Aktien Nachhaltigkeit	01.12.2022
D&R Zinsen Nachhaltigkeit	01.12.2022
TBF FIXED INCOME	15.12.2022
Habona Basic Needs	28.12.2022
Lotus Asia Selection	28.12.2022
LeanVal Klimazielfonds	23.01.2023
A&M Experts Momentum World	01.02.2023
Global Value Leaders Fund	01.02.2023
NAM Future Wealth Fund	15.02.2023
NAM Global Wealth Fund	15.02.2023
NAM Protected Wealth Fund	15.02.2023
Aramea Laufzeitenfonds 04/2028	15.03.2023

#### **Alternative Investmentfonds (AIF)**

## Gemischte Sondervermögen

	aufgelegt am
FondsSecure Systematik	28.12.2005
efv-Perspektive-Fonds II	02.10.2006
efv-Perspektive-Fonds III	04.07.2007
RM Select Invest Global	01.08.2007
ALPHA TOP SELECT dynamic	15.10.2007
fortune alpha ausgewogen	03.12.2007
fortune alpha dynamisch	03.12.2007
DBC Basic Return	17.12.2007
VAB Strategie SELECT	11.01.2008
VAB Strategie BASIS	15.01.2008

## Sonstige Sondervermögen

	aufgelegt am
Leistner Capital Partners Fund	18.12.2007
Vermögensverwaltung Systematic Return	18.12.2007
Primus Inter Pares Strategie Ertrag	22.02.2008
Primus Inter Pares Strategie Wachstum	22.02.2008
DBC Opportunity	10.12.2008
Vermögensverwaltung Global Dynamic	17.12.2008
HANSAGold	02.01.2009
IIV Mikrofinanzfonds	10.10.2011
BremenKapital Dynamik	14.12.2012
BremenKapital Ertrag Plus	14.12.2012
BremenKapital Wachstum	14.12.2012
NB Multi Asset Global	19.01.2015
VoBaFlex30	02.02.2015
VoBaFlex50	02.02.2015
Wallrich Marathon Balance	15.09.2015
SOLIT Wertefonds	02.01.2017
Manganina Multi Asset	03.01.2017
Vis Bonum Defensus	01.09.2017
Vis Bonum Ratio	01.09.2017
WBS Hünicke Multi Asset Strategy	01.08.2018
Speerbridge Fund	01.04.2019
Global Quality Top 15	01.10.2019
FYDALE Growth Plus	14.08.2020
EMI Fonds	01.09.2021
Best of Green & Common Good	01.12.2022

## Investmentaktiengesellschaften

	aufgelegt am
antea (TGV der antea InvAG mVK und TGV)	29.08.2014
antea Strategie II (TGV der antea InvAG mVK und TGV)	29.08.2014
antea Einkommen Global (TGV der antea InvAG mVK und TGV)	07.05.2018

Die Gesellschaft verwaltet 65 Wertpapier-Spezial-Sondervermögen sowie 82 Immobilien-Spezial-Sondervermögen (einschließlich 16 geschlossene Spezial-AIF). Zudem verwaltet sie 6 geschlossene Publikums-AIF.

Stand: 31.03.2023

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**Established on**

HANSArenta	02.01.1970
HANSAs Secur	02.01.1970
HANSainternational	01.09.1981
HANSAzins	02.05.1985
HANSAINVEST LUX UMBRELLA mit dem Teilfonds:	03.04.1989
HANSAINVEST LUX UMBRELLA - Interbond	
HANSAeuropa	02.01.1992
HANSAdefensive	02.11.1994
NB Stiftungsfonds 2	08.12.1995
TBF GLOBAL VALUE	01.02.1997
HANSAertrag	19.03.1997
IPAM AktienSpezial	01.10.1997
TBF GLOBAL INCOME	30.01.1998
TBF EUROPEAN OPPORTUNITIES EUR	31.01.1998
Aramea Hippokrat	22.10.1998
HANSAbalance	01.07.1999
D&R Strategie (Umbrella) mit dem Teilfonds:	23.12.1999
D&R Strategie - Select	
Inovesta Classic	26.05.2000
Inovesta Opportunity	26.05.2000
HANSACentro	03.07.2000
HANSAdynamic	03.07.2000
HI Topselect D	17.05.2001
HI Topselect W	17.05.2001
Bankhaus Neelmeyer Aktienstrategie	15.10.2001
Millennium Global (Umbrella) mit dem Teilfonds:	18.12.2001
Millennium Global Opportunities	
HANSAaccura	02.01.2002
HAC Quant (Umbrella) mit dem Teilfonds:	09.04.2003
HAC Quant DIVIDENDENSTARS global	
TBF GLOBAL TECHNOLOGY	06.05.2005
IPAM RentenWachstum	04.10.2005
efv-Perspektive-Fonds I	15.11.2005
CH Global	02.10.2006
PTAM Weltportfolio Ausgewogen	15.10.2007
AES Rendite Selekt	03.12.2007
AES Selekt A1	03.12.2007
WI SELEKT C	03.12.2007
WI SELEKT D	03.12.2007
Strategie Welt Select	06.12.2007
WALLRICH (Umbrella) mit dem Teilfonds:	06.12.2007
WALLRICH Prämienstrategie	
SI BestSelect	14.12.2007
D&R Best-of-Two Classic	20.12.2007
SI SafeInvest	02.01.2008
IAC-Aktien Global	15.02.2008
MuP Vermögensverwaltung Horizont 10	29.02.2008
MuP Vermögensverwaltung Horizont 5	29.02.2008
TOP-Investors Global	03.03.2008
AVBV 2020	03.03.2008
GLOBAL MARKETS DEFENDER	01.04.2008
GLOBAL MARKETS GROWTH	01.04.2008
GLOBAL MARKETS TRENDS	01.04.2008
AEQUO GLOBAL	15.04.2008
EICHLER & MEHLERT Balanced Strategie	13.05.2008
Aramea Balanced Convertible	15.05.2008
Varios Flex Fonds	20.05.2008
OLB Invest Solide	01.08.2008

GFS Aktien Anlage Global	01.09.2008
Münsterländische Bank Strategieportfolio I	01.09.2008
Münsterländische Bank Strategieportfolio II	01.09.2008
GF Global Select HI	15.09.2008
Aramea Strategie I	10.11.2008
NIELSEN (Umbrella) mit dem Teilfonds: NIELSEN - GLOBAL VALUE	04.12.2008
Aramea Rendite Plus	09.12.2008
EQUINOX Aktien Euroland	19.10.2009
TBF SMART POWER	07.12.2009
Aramea Aktien Select	16.08.2010
TOP Defensiv Plus	19.10.2010
C-QUADRAT ARTS Total Return Flexible	08.11.2010
All Asset Allocation Fund – HI	01.12.2010
HANSAwerte	30.12.2010
KB Vermögensverwaltungsfonds	01.04.2011
NB Stiftungsfonds 1	15.09.2011
HANSAsmart Select E	04.10.2011
PTAM Global Allocation	06.10.2011
Apus Capital Revalue Fonds	19.10.2011
3ik-Strategiefonds I	01.12.2011
GUH Vermögen	01.12.2011
3ik-Strategiefonds III	01.12.2011
HAC Quant MEGATRENDS dynamisch global	28.12.2011
SMS Ars multiplex	27.03.2012
D&R Konservative Strategie Europa	01.06.2012
H1 Flexible Top Select	01.06.2012
Rücklagenfonds	06.06.2012
M3 Opportunitas	02.07.2012
OLB Zinsstrategie	01.08.2012
TBF SPECIAL INCOME	17.08.2012
Bankhaus Neelmeyer Rentenstrategie	03.10.2012
K&S Flex	03.12.2012
BremenKapital Aktien	14.12.2012
BremenKapital Ertrag	14.12.2012
BremenKapital Renten Offensiv	14.12.2012
BremenKapital Zertifikate	14.12.2012
BremenKapital Renten Standard	17.12.2012
NIXDORF Stiftungsfonds	06.05.2013
BRW Balanced Return	15.07.2013
PSM Dynamik	18.07.2013
PSM Konzept	18.07.2013
apano HI Strategie 1	19.07.2013
TBF JAPAN	18.11.2013
HANSAdividende	16.12.2013
Sauren Dynamic Absolute Return	27.12.2013
P&K Balance	30.12.2013
D&R Wachstum Global TAA	03.02.2014
Münsterländische Bank Stiftungsfonds	14.04.2014
TBF ATTILA GLOBAL OPPORTUNITY	22.04.2014
Portikus International Opportunities Fonds	16.05.2014
BRW Balanced Return Plus	01.07.2014
AIRC BEST OF U.S.	15.09.2014
Aristoteles Fonds	01.10.2014
QCP PremiumIncome	03.11.2014
AES Strategie Defensiv	03.11.2014
avesco Sustainable Hidden Champions Equity	05.01.2015
Vermögensmandat Select	19.01.2015
green benefit (Umbrella) mit dem Teilfonds: Green Benefit Global Impact Fund	25.02.2015

KIRIX Substitution Plus	16.03.2015
KIRIX Dynamic Plus	18.03.2015
HANSAsmart Select G	15.04.2015
TBF US CORPORATE BONDS	24.04.2015
QUANTIVE Absolute Return	01.07.2015
PECULIUM GLOBAL SELECT	03.08.2015
FAM Renten Spezial	15.09.2015
MF INVEST Best Select	15.09.2015
global online retail	01.10.2015
Vermögenspooling Fonds Nr. 1	02.11.2015
Vermögenspooling Fonds Nr. 2	02.11.2015
Value Aktiv Plus	21.12.2015
apano Global Systematik	30.12.2015
D&R Best-of (Umbrella) mit dem Teilfonds:	30.12.2015
D&R Best-of – Multiple Opportunities	
HAC Quant STIFTUNGSFONDS flexibel global	30.12.2015
Aramea Global Convertible	04.01.2016
Vermögenspooling Fonds Nr. 3	11.01.2016
A.IX-Faktor-Fonds	01.02.2016
ALPORA Global Innovation	11.07.2016
KIRIX Herkules-Portfolio	04.10.2016
HANSArnten Spezial	01.12.2016
PENSION.INVEST PLUS ®	16.01.2017
Perspektive OVID Equity ESG Fonds	15.02.2017
Dreisam Income	03.04.2017
D&R Globalance Zukunftbeweger Aktien	31.05.2017
PSV KONSERVATIV ESG	15.08.2017
QUANTIVE Vega	15.08.2017
FRAM Capital Skandinavien	02.10.2017
Apus Capital Marathon Fonds	16.10.2017
ARISTOCRATS OPPORTUNITY	26.10.2017
Der Zukunftsfonds	01.11.2017
Aramea Rendite Plus Nachhaltig	30.11.2017
HAC Quant RENDITEPLUS defensiv global	01.12.2017
Wallrich AI Libero	01.12.2017
Themis Special Situations Fund	15.02.2018
BRW Stable Return	01.03.2018
TBF OFFENSIV	15.03.2018
Vivace Multi-Strategy	28.03.2018
PSV WACHSTUM ESG	15.05.2018
EFD Global Invest	01.06.2018
KANON Strategiekonzept Defensiv	01.06.2018
Essener Stiftungsfonds	01.06.2018
Gehlen Braeutigam Value HI	02.07.2018
AI US Dynamic	31.07.2018
Covesto Patient Capital	01.08.2018
MLB-Basismandat	01.08.2018
MLB-Wachstumsmandat	01.08.2018
Barius European Opportunities	03.09.2018
Chainberry Equity	03.09.2018
EVO SPECIAL SITUATIONS	03.09.2018
KSAM-Value²	03.09.2018
ABSOLUTE Volatility	01.11.2018
Fortezza Valuewerk Plus	01.11.2018
Multi Flex+	01.11.2018
Greiff Systematic Allocation Fund	02.11.2018
Aktienfonds für Beteiligungsunternehmen	02.01.2019
D&R Aktien Strategie	02.01.2019
D&R Zins Strategie	02.01.2019
BIT Global Internet Leaders 30	02.01.2019

Mainberg Special Situations Fund HI	02.01.2019
NB Anleihen Euro	02.01.2019
proud@work	02.01.2019
CA Familienstrategie	10.01.2019
BRW Global Bond	14.01.2019
Wallrich AI Peloton	01.02.2019
terra.point	25.02.2019
INVIOS Vermögenbildungsfonds	01.03.2019
SMS Ars multizins	01.03.2019
Effecten-Spiegel Aktien-Fonds	15.04.2019
Trend Kairos European Opportunities	15.04.2019
IPAM EURO Anleihen	15.04.2019
confido Fund	02.05.2019
Kapitalertrag Plus	02.05.2019
ARES	03.06.2019
Immobilien Werte Deutschland	28.06.2019
avant-garde capital Opportunities Fund	01.07.2019
Entrepreneur AS Select	01.07.2019
G&W - DYNAMIC ALLOCATION	01.07.2019
WEALTHGATE Multi Asset Chance	01.08.2019
TBF BALANCED	01.08.2019
Werte & Sicherheit - Nachhaltiger Stiftungsfonds	08.08.2019
Better Future Aktien Global	02.09.2019
ELM Global TICO	02.09.2019
G&G ValueInvesting-DLS	16.09.2019
Focus Fund Growth Equities HI	01.10.2019
HANSEATISCHER Stiftungsfonds	15.10.2019
NB Aktien Europa	02.12.2019
NB Aktien Global	02.12.2019
NB Anleihen Global	02.12.2019
RSA WeltWerte Fonds	02.01.2020
ficon Green Dividends-INVEST	03.02.2020
Zindstein Vermögens-Mandat	02.03.2020
Empowerment Fonds	15.04.2020
ECie Fair Future Fund	15.04.2020
WEALTHGATE Biotech Aggressive Fund	15.04.2020
Sparfonds Aktien	24.04.2020
Assella Alpha Family	28.05.2020
Assella Value Invest	28.05.2020
Gamma Plus	15.06.2020
ALAP	01.07.2020
Kompass Strategie Fokus Nachhaltig	15.07.2020
KOEHLER Equities	15.07.2020
D&R Aktien	03.08.2020
AVENTOS Global Real Estate Securities Fund	01.10.2020
LOHRE Investment Fund	01.10.2020
LUNIS Biotech Growth Opportunities Fund	01.10.2020
LUNIS Biotech Growth Opportunities Fund	01.10.2020
NB Smart Premia	01.10.2020
NB Real Asset Securities	02.11.2020
BIT Global Leaders	02.11.2020
D&R Zinsen	02.11.2020
Aramea Tango #1	16.11.2020
WEALTHGATE Multi Asset	01.12.2020
GG Wasserstoff	15.12.2020
ÖKOBASIS SDG - Investments for Future	18.12.2020
BRW Return	18.12.2020
MIDAS Global Growth	04.01.2021
Sustainable Smaller Companies ESG Fund	04.01.2021
AW Strategie Global Ausgewogen	04.01.2021

Barbarossa Europäischer Stiftungsfonds	15.01.2021
Premium Bonds Select	01.02.2021
HANSAperspektive	15.02.2021
SVM Strategie Nr. 1	15.02.2021
SAM Strategic Solution Fund	01.03.2021
Global Favourites	01.03.2021
HANSAglobal Structure	01.04.2021
ActiveAllocationAssets	01.04.2021
BIT Global Fintech Leaders	03.05.2021
Greiff Foundation Income	03.05.2021
Tigris Small & Micro Cap Growth Fund	03.05.2021
ELM KONZEPT	25.05.2021
Global Balanced Opportunity Fund	01.06.2021
Wertewerk	01.06.2021
The Original Platform Fund	01.07.2021
Human Intelligence	02.08.2021
ISM Rendite Plus Alpha	02.08.2021
Aaapollo 11 Global	01.09.2021
Aramea Rendite Global Nachhaltig	01.09.2021
BIT Global Crypto Leaders	01.09.2021
D&R Convexity Alpha	01.09.2021
SAENTIS Global Invest	01.09.2021
ROCKCAP GLOBAL EQUITY	15.10.2021
Globale Trends innovativ	01.11.2021
Werte & Sicherheit – Deutsche Aktien Plus	01.11.2021
QUINT Global Opportunities	01.11.2021
Value Stars Plus	01.12.2021
STAREN ÖkoStars	01.02.2022
ARAMEA METAWORLD	01.04.2022
SMAVESTO - RoboFlex ESG Ausgewogen	01.07.2022
SMAVESTO - RoboFlex ESG Ertrag	01.07.2022
SMAVESTO - RoboFlex ESG Dynamik	01.07.2022
H+ Top Select Opportunities	01.08.2022
BC Biotech	01.09.2022
Qualitas Alta Value Fund	01.09.2022
DNH Fonds	04.10.2022
MTS Fonds	04.10.2022
Top 25 Equities Fund	04.10.2022
BC Energy & Technology	01.11.2022
AI ESG Leaders	15.11.2022
CvR Vermögensstrategie dynamisch	01.12.2022
D&R Aktien Nachhaltigkeit	01.12.2022
D&R Zinsen Nachhaltigkeit	01.12.2022
TBF FIXED INCOME	15.12.2022
Habona Basic Needs	28.12.2022
Lotus Asia Selection	28.12.2022
LeanVal Klimazielfonds	23.01.2023
A&M Experts Momentum World	01.02.2023
Global Value Leaders Fund	01.02.2023
NAM Future Wealth Fund	15.02.2023
NAM Global Wealth Fund	15.02.2023
NAM Protected Wealth Fund	15.02.2023
Aramea Laufzeitenfonds 04/2028	15.03.2023

### **Alternative investment funds (AIF)**

#### **Mixed special assets**

#### **Established on**

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FondsSecure Systematik	28.12.2005
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efv-Perspektive-Fonds II	02.10.2006
efv-Perspektive-Fonds III	04.07.2007
RM Select Invest Global	01.08.2007
ALPHA TOP SELECT dynamic	15.10.2007
fortune alpha ausgewogen	03.12.2007
fortune alpha dynamisch	03.12.2007
DBC Basic Return	17.12.2007
VAB Strategie SELECT	11.01.2008
VAB Strategie BASIS	15.01.2008

#### other special assets

	<b>Established on</b>
Leistner Capital Partners Fund	18.12.2007
Vermögensverwaltung Systematic Return	18.12.2007
Primus Inter Pares Strategie Ertrag	22.02.2008
Primus Inter Pares Strategie Wachstum	22.02.2008
DBC Opportunity	10.12.2008
Vermögensverwaltung Global Dynamic	17.12.2008
HANSAgold	02.01.2009
IIV Mikrofinanzfonds	10.10.2011
BremenKapital Dynamik	14.12.2012
BremenKapital Ertrag Plus	14.12.2012
BremenKapital Wachstum	14.12.2012
NB Multi Asset Global	19.01.2015
VoBaFlex30	02.02.2015
VoBaFlex50	02.02.2015
Wallrich Marathon Balance	15.09.2015
SOLIT Wertefonds	02.01.2017
Manganina Multi Asset	03.01.2017
Vis Bonum Defensus	01.09.2017
Vis Bonum Ratio	01.09.2017
WBS Hünicke Multi Asset Strategy	01.08.2018
Speerbridge Fund	01.04.2019
Global Quality Top 15	01.10.2019
FYDALE Growth Plus	14.08.2020
EMI Fonds	01.09.2021
Best of Green & Common Good	01.12.2022

#### Investmentstock corporations

	<b>Established on</b>
antea (TGV der antea InvAG mVK und TGV)	29.08.2014
antea Strategie II (TGV der antea InvAG mVK und TGV)	29.08.2014
antea Einkommen Global (TGV der antea InvAG mVK und TGV)	07.05.2018

The company manages 65 special securities funds and 82 special real estate funds (including 16 closed-end special AIFs). In addition, it manages 6 closed-end mutual AIFs.

Status as at 31.03.2023

## **AN OVERVIEW OF THE FUND**

### **Investment goal and investment strategy**

The objective of the investment policy of the GREIFF 'special situations' fund is to achieve attractive long-term capital growth in euros. The performance of the respective unit class of the fund is stated in the corresponding „key information document“ (PRIIP) . As a general rule, past performance is not a guide to future performance.

**NO ASSURANCE CAN BE GIVEN THAT THE OBJECTIVES OF THE INVESTMENT POLICY WILL ACTUALLY BE ACHIEVED.**

### **Investment policy**

#### **I. General investment strategy**

In order to achieve this investment objective, the fund assets are invested according to the principle of risk diversification. Another essential part of the investment objectives is the identification of 'special situations' where the acquisition of shares in a company can be expected to be a worthwhile investment. These are basically shares in companies that are admitted to official trading on international stock exchanges. Depending on the market assessment, decisions are made daily on the optimal weighting of the asset classes.

However, no assurance can be given that the aforementioned investment policy objectives will be achieved.

The investment objectives of the Fund are to acquire shares in companies in particular situations which may have low market capitalisation. Due to the low market capitalisation, the shares of these companies may be less liquid and therefore in certain circumstances more difficult to sell.

#### **II. Investment policy**

For tax purposes, the fund is an equity fund. In order to achieve its investment objective, the fund will invest at least 51% of its value in equity investments worldwide.

Equity investments in this sense are the following:

- Shares in stock corporations admitted to official trading on a stock exchange or admitted to or included in another kind of organised market;
- Shares in stock corporations which are domiciled in a member state of the European Union or in another state party to the Agreement on the European Economic Area and which are subject to income taxation for corporations in this country and are not exempt from it;
- Shares in corporations domiciled in a third country and subject to, and not exempt from, corporate income taxation there of at least 15%;
- Shares in other investment funds either in the amount of the quota of their value as published on each valuation day which is actually invested in the aforementioned shares in stock corporations, or in the amount of the minimum quota stipulated in the investment conditions of the other investment fund.

For the purposes of this investment policy, an organised market is a market which is recognised and open to the public and which operates regularly, unless otherwise expressly provided. Such an organised market shall also comply with the criteria laid down in Article 50 of the UCITS Directive.

In addition to and taking into account Article 4 of the Management Regulations, the fund may, in accordance with the principle of risk diversification, acquire shares, REITS, bonds, participation certificates, convertible bonds, bonds with options and zero bonds denominated in the currencies of OECD member states, units of investment funds (UCITS and UCI), as well as certificates which include financial indices, shares, interest rates and foreign currencies as underlying assets, as well as certificates on other permitted base values (which reflect the performance of a base value 1:1 and which are officially listed or traded on stock exchanges, on other regulated markets which are recognised, open to the public and which operate in an orderly manner – i.e. as 'regulated markets').

Up to 10% of the fund's net assets may be invested in units of investment funds in accordance with Article 4 of the Management Regulations below. The fund is therefore target fund eligible.

The Fund may temporarily invest entirely in liquid assets as permissible assets pursuant to Article 41 (1) lit. f), which may be held in aggregate at several banks<sup>1</sup>.

Under normal market conditions, a maximum of 20% of the Fund's net assets may be invested in other liquid assets, such as bank deposits at sight, e.g. cash in current accounts at a bank that is accessible at all times and that are not already regarded as permissible assets pursuant to Article 41 (1) f), which may be disposed of at any time<sup>2</sup>, are held to cover current or extraordinary payments or for the period necessary for reinvestment in eligible assets in accordance with Article 41(1) of the 2010 Law or for such period as may be strictly necessary in the event of adverse market conditions. The aforementioned 20% limit may only be exceeded temporarily for a strictly necessary period if circumstances so require due to exceptionally unfavourable market conditions and if such an excess is justified taking into account the interests of the investors, for example in very serious circumstances such as the attacks of 11 September or the bankruptcy of Lehman Brothers in 2008.

In addition, the fund may not invest in any assets apart from liquid assets in accordance with Article 4 of the Management Regulations below.

In the implementation of the investment policy, no security lending or pension transactions are used. Furthermore, no total return swaps or other assets with similar characteristics will be acquired for the subfund. In the event of a change in the investment policy with regard to the aforementioned instruments, the sales prospectus will be amended accordingly in compliance with Directive 2015/2635/EU of the European Parliament and Council of 25 November 2015.

For hedging purposes and efficient portfolio management, the Fund may use derivatives, certificates with embedded derivative components (discount, bonus, leverage, knock-out certificates etc.) as well as other techniques and instruments in accordance with Article 4 of the Management Regulations. If these techniques and instruments relate to the use of derivatives within the meaning of Article 4 of the

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<sup>1</sup> These are deposits with credit institutions which are repayable on demand or have the right to be withdrawn, and maturing in no more than twelve months, provided that the head office of the credit institution is situated in a Member State or, if the head office of the credit institution is situated in a third country, provided that it is subject to prudential rules considered by the CSSF as equivalent to those laid down in Union law.

<sup>2</sup> These are bank balances, such as sight bank balances, e.g. cash in current accounts at a bank that is accessible at all times, which are not made as investments pursuant to Art. 41 (1) lit. f) of the 2010 Act, but are only used to settle liabilities/receivables from transactions for the Fund. This also includes collateral received or provided for transactions carried out for the Fund (e.g. in the case of derivative transactions).

Management Regulations, the investment restrictions set out therein must be taken into account. Furthermore, the provisions of Article 4 concerning risk management procedures for derivatives must be observed.

Within the framework of OTC transactions, the management company may accept collateral in the form of bank deposits made available to reduce the degree of counterparty risk. For each counterparty, certain currencies are defined for this purpose, which are exchanged. Non-cash collateral is not accepted.

The collateral may be realised at any time without reference to or approval from the counterparty. The cash collateral received is valued without risk discount.

The extent of the collateralisation will be 100%, taking into account the minimum transfer amount.

Cash collateral received from the counterparty under OTC transactions is only fully invested in one or a combination of the following assets:

- High quality government bonds;
- Money market funds with a short maturity structure as defined in CESR's Guidelines on a Common Definition for European Money Market Funds (CESR 10-049);
- Demand deposits with legal entities in accordance with Article 50 (1) (f) of Directive 2009/65/EC.

The issuer and counterparty limits set out in Article 4 of the Management Regulations shall apply analogously to the investment of cash collateral. Through the investment of the cash collateral, the fund may be exposed to counterparty default risk, interest rate risk, market risk or the like.

The counterparty of the OTC transactions does not have any influence on the portfolio management, i.e. the selection is solely at the discretion of the management company.

Explanation of how certificates work<sup>2</sup>

Certificates are mostly listed debt instruments. The price development of certificates depends on the development of the underlying base value and the terms of the contract. The price of the certificate can develop more strongly, less strongly, equally strongly or completely independently of the price of the underlying asset. Depending on the contractual arrangements, a total loss of value may occur.

Detailed information on the investment limits is contained in Article 4 of the Management Regulations below.

The fund is set up for an indefinite period.

### **III. Classification pursuant to the Disclosure and Taxonomy Regulation**

The Fund promotes, inter alia, environmental or social factors or a combination of these and thus qualifies as a fund pursuant to Art 8(1) of Regulation (EU) 2019/2088.

The Fund does not contribute to one or more environmental objectives pursuant to Art. 9 of Regulation (EU) 2020/852 ("Taxonomy Regulation").

Further information can be found in the Annex pursuant to Art. 14 (1) Delegated Regulation (EU) 2022/1288 on environmental and social characteristics attached to this Prospectus (see below), "Annex "Environmental and/or Social Characteristics").

#### **IV. Active management**

The fund is actively managed and is not based on a benchmark in the form of a share index. For investors, the absence of a benchmark in the form of a share index means that they cannot compare the performance of the fund 1:1 with a share index. The stock selection is based on the selection of individual stocks independent of stock indices. Therefore, no benchmark index can be used.

### **Fund risk profile**

Risk-oriented

Strong fluctuations can occur in the investment fund. As a result, it assumes increased risks. Typical investment instruments include high-risk instruments such as shares, target funds or high-yield bonds. Derivatives are also potentially used for investment purposes.

Increased volatility

**Due to its composition and the possible use of derivatives, the fund has an increased volatility, i.e. the unit prices may be subject to considerable upward and downward fluctuations even within short periods of time.<sup>3</sup>**

### **Risk management profile**

Relative VaR is used to monitor and measure the fund's overall risk associated with derivatives.

Under the relative VaR approach, the VaR of the Fund may not exceed the VaR of a derivative-free reference portfolio by a factor dependent on the level of the fund's risk profile.

Benchmark assets:

A combination of 2 indices is used as benchmark assets. These two indices are composed as follows:

- 1.) 80% of the benchmark assets are constituted by a share index with the following profile:
  - The index reflects the performance of 50 medium-sized German companies or companies operating predominantly in Germany that follow the DAX values in terms of free float market capitalisation and stock exchange turnover.
  - The share index is broadly diversified in terms of sectors and market capitalisation of the securities it contains.
- 2.) 20% of the benchmark assets are constituted by a share index with the following profile:
  - The share index is broadly diversified in terms of sectors and market capitalisation of the securities it contains.
  - Leading German large-cap companies are included.
  - The companies included are weighted according to their market capitalisation.
  - The index is calculated in euros.

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<sup>3</sup> It should be noted that this assessment, which is based on possible future developments, does not necessarily correspond to the information on the risk indicator in the key investor information, as in view of legal requirements the risk indicator is based on past data.

**Leverage:**

It is expected that the leverage generated by the use of derivatives and other financial products with derivative components will amount to up to 200% of the fund volume. Depending on the market situation, however, the leverage value is subject to fluctuations, so that the expected value may be exceeded in the short term. The leverage value is monitored daily by the management company.

**Note on leverage calculation:**

The calculation is based on the sum of the nominal values as set out in Boxes 24 and 25 of ESMA Guideline 10-788.

**Typical investor profile<sup>4</sup>**

The following assessment by the company in this prospectus does not constitute investment advice, as the personal circumstances of the client are not taken into account, but is only intended to give the investor or potential investor an initial indication as to whether the fund might suit his investment experience, risk tolerance and investment horizon.

The fund is aimed at all types of investors who pursue the goal of asset accumulation or asset optimisation. Investors should be able to bear considerable fluctuations in value and significant losses, and should not require any guarantee regarding the preservation of their investment sum.

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<sup>4</sup> The typical investor's profile is based on a forecast of how the fund will perform in the future, taking into account its investment objectives. There is no guarantee that the fund will achieve its investment objectives. The indication of increased volatility, on the other hand, is based on past data (in line with the fund-related risk indicator shown in the "key information document" (PRIIP)). In this respect, there may be not inconsiderable deviations between the indication of increased volatility based on historical development and the profile of the typical investor.

## Characteristics of the fund's unit classes

<b>Fund formation:</b>	3 November 2005
<b>Initial issue price (plus sales commission):</b>	
Unit class R	EUR 52.50
Unit class I	EUR 50.00
<b>First day of issue:</b>	
Unit class R	3 November 2005
Unit class I	4 December 2015
<b>Sales commission:</b>	
<b>(as a % of the unit value in favour of the respective broker or the fund)</b>	
Unit class R	Up to 5%
Unit class I	Up to 5%
<b>Redemption commission:</b>	None
<b>Minimum investment<sup>5</sup>:</b>	
Unit class R	None
Unit class I	EUR 10,000,000
<b>Savings plans:</b>	None provided by the management company. Additional Consult your custodian institute for further information.
<b>Withdrawal plans:</b>	None provided by the management company. Additional Consult your custodian institute for further information.
<b>Administration fee (as a % of net fund assets):</b>	
Unit class R	Up to 0.80% pa
Unit class I	Up to 0.15% pa
The administration fee is calculated daily on the net fund assets of the respective unit class on the previous valuation day and paid monthly in arrears. The administration fee does not include any VAT that may be incurred.	
<b>Depositary fee (as a % of net fund assets):</b>	
Unit class R	Up to 0.04% pa
Unit class I	Up to 0.04% pa
The depositary fee is calculated daily on the net fund assets of the respective unit class on the previous valuation day and paid monthly in arrears. The depositary fee does not include any VAT that may be incurred.	
<b>Fund management fee (as a % of net fund assets):</b>	

<sup>5</sup> In exceptional cases, the management company may permit subscriptions that deviate from the specified minimum investment without stating reasons.

<b>Unit class R</b>	Up to 1.2% pa
<b>Unit class I</b>	Up to 0.74% pa

The fund management fee is calculated daily on the net fund assets of the respective unit class on the previous valuation day and paid monthly in arrears. The fund management fee does not include any VAT that may be incurred.

**The management and fund management fees in unit class I are limited to a maximum of 0.80% pa.**

<b>Performance fee (in favour of the fund manager):</b>	15% pa (see also presentation below this table)
<b>Performance:</b>	As shown in the key information document (PRIIP)
<b>Fund currency:</b>	EUR
<b>Share class currency:</b>	
<b>Unit class R</b>	EUR
<b>Unit class I</b>	EUR

<b>Bank working day:</b>	Days that are both bank working days and stock exchange days in Hamburg, Luxembourg and Frankfurt am Main.
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<b>Valuation day:</b>	Every banking day
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<b>End of fiscal year:</b>	30 June
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<b>Short end of fiscal year (one-time)</b>	<b>31 October 2021</b>
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<b>Semi-annual report:</b>	31 December
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<b>Annual report:</b>	30 June
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<b>Acceptance and redemption deadlines for subscriptions and redemptions:</b>	12 o'clock on the preceding day
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**Use of income:**

<b>Unit class R</b>	Distribution
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<b>Unit class I</b>	Distribution
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<b>Stock exchange listing:</b>	Not envisaged
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**Security identification number/ISIN:**

<b>Unit class R</b>	A0F699 / LU0228348941
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<b>Unit class I</b>	A14ZX7 / LU1287772450
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**Performance fee**

15% (maximum) of the amount by which the unit value at the end of an accounting period exceeds the maximum level of the unit value at the end of the five preceding accounting periods ("high water mark"),

but only insofar as the unit value<sup>6</sup> also exceeds the unit value at the beginning of the accounting period by 2% ("hurdle rate") at the end of the accounting period, however limited to a maximum of 15% of the average net asset value<sup>7</sup> of the fund in the accounting period, as calculated from the net asset values determined on each trading day. If less than five prior accounting periods are available for the fund, all previous accounting periods are taken into consideration in calculating the remuneration entitlement. In the first accounting period after the fund's launch, the unit value at the beginning of the first accounting period serves as the high water mark.

The performance fee is calculated after deduction of all costs (e.g. management or administration fees)

a) Definition of the accounting period:

The accounting period begins on July the 1st and ends on June the 30th of each calendar year.

b) Calculation of unit value performance:

The unit value performance is to be calculated by way of the BVI method. The performance calculation according to the BVI method is based on the "time weighted rate of return" method.

Further information on the "time weighted rate of return" method can be found at BVI Bundesverband Investment und Asset Management e.V. ([https://www.bvi.de/uploads/tx\\_bvibcenter/BVI\\_2015\\_01\\_BVI\\_Methode.pdf](https://www.bvi.de/uploads/tx_bvibcenter/BVI_2015_01_BVI_Methode.pdf)).

c) Provision and payment of the performance-related remuneration:

The result of a daily calculation yields an arithmetically accrued performance-related fee that is deferred in the fund for each unit issued, or a previously formed provision is released accordingly. Reversed provisions accrue to the fund assets. Performance-related fee may only be withdrawn if the corresponding provisions were previously formed.

The payment of the performance-related remuneration for an accounting period is made directly after the end of the respective accounting period.

The remuneration is stated exclusive of any VAT that may be incurred.

Calculation examples:

The mathematical formula for calculating the performance fee is as follows:

$$\left( \left( \frac{\text{Fund price} - \text{high water mark}}{\text{high water mark}} \right) - (0.02 * \text{number of days since the fee was calculated} / 365) \right) * \text{average net fund volume} * 0.50$$

**Scenario 1: Performance in the first year of 100 to 105 and to 107.1 in the following year, on to 110 in the third year.**

Year 1: Unit price level of 105

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<sup>6</sup> The unit value results from the net asset value divided by the number of units issued

<sup>7</sup> The net asset value is calculated by subtracting the costs incurred such as management fees, costs for auditing, etc as well as any loans taken out and other liabilities, as well deferred performance-based remuneration from the total value of the assets (eg shares, interest-bearing securities, bank balances etc. and income such as interest and dividends etc).

First of all, the hurdle of 2% must be taken into account in calculating the performance fee. In this specific case, the performance fee is only paid for any amount exceeding 102. This translates to a performance fee of 15% for a value of 3 in the present case, since the average net asset value rose from 100 to 105. This corresponds to an amount of 0.45 based on a fund unit with a value of 105.

Year 1: Unit price level of 105

Due to the existing high water mark, an amount of 105 is used as the new fund performance benchmark. In doing so, the hurdle of a performance (now based on a share value of 105) of 2% must be deducted again. Based on a share value of 105, 2% translates to an absolute increase in share value from 105 to 107.1. Since the value only rose to 107.1 in the second year, the hurdle is not met, so that no performance fee would be paid in the second year.

Year 3: Unit price level of 110

In the third year, a maximum value of 107.1 is used for the calculation. The 2% hurdle requires an absolute performance of 2.142. In this case, any amount exceeding a rate of 107.1 plus 2.142 = 109.242 would be considered in calculating the performance fee. In the third year, a 15% performance fee would be incurred for an amount of 0.758, so that a total of 0.113 would be deducted as a performance fee.

**Scenario 2: Performance in the first year of 100 to 95 and to 95 in the following year, on to 101 in the third year.**

Year 1

Due to the negative performance, no performance fee is paid.

Year 2

No performance fee is paid in the second year either. The price has recovered from 95 to 101, which means a percentage price increase of 6.31%. However, due to the high water mark, the price losses from the first year to the amount of 5 must first be made up, and a water mark of 2% based on a share value of 100 must be overcome; a price increase of more than 7 of 95 to a value of at least 102 in absolute terms would be required for payment of a performance fee in the second year.

The performance fee is calculated and accrued on each valuation day. This value is thus not only relevant for the net asset value at the end of a financial year, but also during the course of the year. The calculation of the performance fee has a direct impact on the price of a unit at the time of issue and redemption.

**Specification of a total expense ratio**

The annual report discloses the management costs incurred by the fund during the financial year; they are shown as a ratio of the average fund volume ("total expense ratio"). The management costs comprise the remuneration for the management of the fund, including a performance-related remuneration if applicable, the remuneration of the depositary, as well as any expenses due for charge to the fund. If the fund invests a significant part of its assets in other investment funds, the total expense ratio of the relevant target funds is also taken into account. The total expense ratio does not cover ancillary costs and costs incurred in the acquisition and sale of assets (transaction costs). The total expense ratio is published under the item "ongoing charges" in the key information document (PRIIP).

## **Note on the cost statement**

If the investor is advised on the acquisition of units by third parties or if they mediate the purchase, they may indicate costs or expense ratios that are not congruent with the cost information in this sales prospectus and in the key information document (PRIIP) and that may exceed the total expense ratio described here. This may be due to the fact that the third party also takes into account the costs of their own activities (e.g. brokerage, advice or custody account management). Furthermore, they may also include one-off costs such as issue surcharges and generally employs other accounting or estimation methods for the costs incurred at fund level, particularly when it comes to the fund's transaction costs.

Deviations in the cost statement may arise both in the case of information received prior to the conclusion of contract and in the case of regular cost information for an existing fund investment as part of a long-term customer relationship.

### Use of income

The use of income for the respective unit classes of the fund is shown in the overview above.

Where income is distributed, the distribution will take place from time to time at the intervals determined by the management company. The holders of registered shares are taken into account for the distribution amount corresponding to their number of shares in the fund as stated in the share register. Upon express request, distributions will also be transferred to an account specified by the investor. If the issue price was originally collected by direct debit, the distribution will be paid out to the same account.

Detailed information on the use of income is generally published on the management company's website at [www.hansainvest.com](http://www.hansainvest.com).

## MANAGEMENT REGULATIONS

The contractual rights and obligations of the management company, the depositary and the investor with regard to the fund are set out in the following management regulations. The management regulations first came into force on July 1, 2018. The regulations are on deposit with the Trade and Companies Register in Luxembourg and a reference to this deposit is published on the information platform *Recueil électronique des sociétés et associations* ("RESA") of the Register of Commerce and Companies in Luxembourg.

The present management regulations set out general principles for the management company in accordance with Part I of the Luxembourg law of December 17, 2010 on undertakings for collective investment ("law of December 17, 2010"), established and managed in the form of a *fonds commun de placement*, a GREIFF "special situations" fund (the "fund"). The fund is subject to the supervision of the CSSF.

### Article 1 - The Fund

1. The GREIFF "special situations" fund (the "fund") is a legally dependent special fund (*fonds commun de placement*) comprising securities and other assets ("fund assets") that are administered by the management company for the joint account of the holders of units ("investors") under consideration of the principles of risk diversification.
2. The contractual rights and obligations of the investors, the management company and the custodian are regulated in the present management regulations; the most recent version thereof is on deposit with the commercial and companies register in Luxembourg and published in the RESA. By purchasing a unit, the investor accepts the management regulations as well as all approved amendments to the same that have been published by means of a deposit note.
3. The management company also prepares a sales prospectus for the fund in accordance with the provisions of the Grand Duchy of Luxembourg.
4. The net fund assets (i.e. the sum of all assets minus all liabilities of the fund) must reach a minimum of EUR 1,250,000 within six months of approval of the fund.

### Article 2 - The management company

1. The management company of the fund is HANSAINVEST Hanseatische Investment-GmbH, a limited liability company under German law with registered office at Kapstadtring 8, D-22297 Hamburg. It was founded on April 2, 1969 and is entered in the commercial register of Hamburg District Court under registration number HRB 12891.
2. The management company administers the fund in its own name, however exclusively in the interests and for the joint account of the unitholders. In its management of the fund, it acts independently of the custodian. The management authority extends to the exercise of all rights which are directly or indirectly related to the assets of the fund.
3. The management company formulates the fund's investment policy under consideration of the legal and contractual investment restrictions. The management company is authorised to invest the fund assets as per the provisions set out in the present management regulations and in the sales prospectus, and otherwise to carry out all transactions that are necessary for the management of the fund.

4. The management company may call in a portfolio manager and/or an investment advisor or consult an investment committee to the detriment of the fund's assets.

The portfolio management may only be delegated to a company with a license or rather approval for asset management. The transfer of portfolio management tasks must comply with the investment guidelines as set out by the management company.

5. In the fulfilment of their tasks, the portfolio manager and/or investment advisor may consult third parties in the form of natural or legal persons as well as sub-investment advisers at their own expense and on their own responsibility with the prior consent of the management company.
6. The management company is obliged to employ a risk management process permitting it to monitor and measure the risk associated with the investment positions and their respective share in the overall risk profile of the investment portfolio at all times. It must also use a procedure that allows for the precise and independent assessment of the value of OTC derivatives. The company is further obliged to inform the Luxembourg supervisory authority of the types of derivatives in the portfolio, the risks associated with the respective underlying assets, the investment limits, as well as the methods used to determine the risks associated with the derivative transactions in accordance with the procedures in place for the fund regularly.

### **Article 3 - The depositary**

1. The management company has appointed a single custodian for the fund, Hauck Aufhäuser Lampe Privatbank AG, Luxembourg branch with registered office at 1c, rue Gabriel Lippmann, L5365 Munsbach, Grand Duchy of Luxembourg, entered in the commercial and company register under number B 175937. The depositary is a branch of Hauck Aufhäuser Lampe Privatbank AG, Kaiserstraße 24, D-60311 Frankfurt am Main, a German credit institution with a full banking license within the meaning of the German law on the banking sector (KWG) and the Luxembourg law on the financial sector dated April 5, 1993 (as amended). The latter is entered in the commercial register of Frankfurt am Main district court under the number HRB 108617. Both Hauck Aufhäuser Lampe Privatbank AG and its Luxembourg branch are subject to supervision by the German Federal Financial Supervisory Authority (BaFin). The Luxembourg branch of Hauck Aufhäuser Lampe Privatbank AG is also subject to the Luxembourg Commission de Surveillance du Secteur Financier (CSSF) with regard to liquidity, money laundering and market transparency.
2. All rights and obligations of the depositary are exercised through the Luxembourg branch, and are governed by the relevant law dated December 17, 2010, the respective circulars and administrative requirements of the CSSF, the depositary agreement, as well as the present sales prospectus and management regulations.
  - a) The custodian specifically assumes the following tasks as per the legal requirements:
    - Ensuring that the sale, issue, redemption and cancellation of units carried out for account of the fund are in compliance with the applicable Luxembourg regulations and the relevant investment conditions;
    - Ensuring that the calculation of the value of the fund's units is carried out in accordance with the applicable Luxembourg regulations and the fund's investment conditions;

- Execution of the instructions of the management company or a third party to whom portfolio management has been outsourced, provided these do not violate the relevant statutory provisions or the fund's investment conditions;
  - Ensuring that the equivalent value is transferred within the usual time limits for any transactions involving the fund's assets;
  - Ensuring that the fund's income is used in accordance with the applicable Luxembourg regulations and the relevant investment conditions;
- b) The custodian ensures that the fund's cash flows are properly monitored and, in particular, that all payments made by or on behalf of investors when subscribing for shares in the fund have been received, and that all financial means held by the fund are posted to cash accounts that
- i. were established in the name of the fund, in the name of the management company or depositary acting on behalf of the fund;
  - ii. were established under Article 18 (1) letters a), b) and c) of Directive 2006/73/EC of the European Parliament and of the Council with regard to the organizational requirements for investment firms and the conditions for the performance of their activities as well as with regard to the definition of certain terms for the purposes of the body referred to in said directive ("Directive 2006/73/EC"); and
  - iii. are managed in accordance with the principles set out in Article 16 of Directive 2006/73/EC.

Insofar as cash accounts were established in the name of the custodian acting on behalf of the fund, neither funds owned by the aforementioned companies nor funds held by the custodian itself are to be posted to such accounts.

- c) The custody of the fund's assets is to be carried out by the custodian as follows:
- i. For financial instruments taken into custody, the depositary must ensure
    - that all financial instruments are held in a custody account for financial instruments and those suitable for physical transfer to the depositary are kept in safe custody;
    - that financial instruments to be held in the custody account for financial instruments are registered in separate accounts of the depositary as per the principles set out in Article 16 of Directive 2006/73/EC, which were established in the name of the management company acting on behalf of the investment fund so as to ensure that the relevant financial instruments are clearly identifiable as property of the fund in accordance with applicable law at all times;
  - ii. For any other assets, the custodian must
    - establish whether the fund or the fund's management company are the proprietors of relevant assets on the basis of the information or documents submitted by the management company and external evidence where available;
    - maintain records of the assets for which it is satisfied that the fund or the fund's management company are the proprietors, and keep such records up to date.

- d) The custodian is to furnish the management company with a comprehensive list of all fund assets on a regular basis.
- e) The assets held in custody are not to be reused by the custodian or a third party to whom the custodial function has been delegated for their own account. Reuse refers to any transaction of assets in custody, including, without limitation, the transferring, pledging, selling and lending thereof.

The fund's assets held in custody by the depository may only be reused if and to the extent that

- i. such reuse takes place for the account of the fund;
- ii. the depository does so at the instruction of the management company on behalf of the fund;
- iii. such reuse benefits the fund and is in the interests of the investors; and
- iv. the relevant transaction is backed by high quality liquid collateral received by the fund under a title transfer agreement.

The market value of the collateral must be at least as high as the market value of the reused assets plus a surcharge at all times.

- 3. In the event of insolvency of the custodian and/or a third party in the European Union to whom the custody of the fund's assets has been delegated, the custody of the fund's assets must not be distributed to the creditors of the custodian and/or the aforementioned third party or used for their benefit.
- 4. The custodian may transfer the custody tasks according to the aforementioned section 2 lit. c) of the present article to a third company (sub-custodian or depository) taking into account the legal requirements. The sub-custodians or depositories may in turn transfer the custody tasks assigned to them, taking into account the legal conditions. The custodian must not delegate the functions described under section 2 lit. a) and b) of this article to third parties.

A corresponding overview of any appointed sub-custodians is available on the custodian's website at

[https://www.hal-privatbank.com/fileadmin/HAL/Rechtliche\\_Hinweise/List\\_of\\_Sub-Custodians\\_Hauck\\_Aufhaeuser\\_Lampe.pdf](https://www.hal-privatbank.com/fileadmin/HAL/Rechtliche_Hinweise/List_of_Sub-Custodians_Hauck_Aufhaeuser_Lampe.pdf) The list of sub-custodians is subject to change at any time. Updated information regarding the custodian, any sub-custodians and all conflicts of interest of the custodian resulting from the transfer of the custodian function are published on the aforementioned website and communicated by the management company or the custodian upon request.

- 5. Insofar the law of a third country prescribes that certain financial instruments must be kept retained custody locally, which fails to meet the aforementioned monitoring requirement ("local depository"), the depository may nevertheless instruct this local depository under the following legal conditions.

- On the one hand, there must be no local depository that meets the aforementioned monitoring requirements.
  - Furthermore, the transfer of the safekeeping of financial instruments to a local depository must only take place at the express instruction of the management company.
  - In addition, the management company is to duly inform the investors before commissioning such a local depository.
6. In performing its duties, the depository is to act independently, honestly, in good faith, professionally and in the interests of the fund and its investors.

This obligation is reflected in particular in the obligation to carry out and organize its activities as depository in such a way that potential conflicts of interest are minimized where possible. In relation to the fund or the management company acting on behalf of the fund, the depository must not perform any tasks that may result in conflicts of interest between the fund, its investors, the management company and itself, unless there is a functional and hierarchical separation of the execution of its duties as depository from such potentially conflicting tasks, and the potential conflicts of interest are properly identified, controlled, monitored and disclosed to the fund's investors.

The tasks of the management company and the depository must not be performed by one and the same company. Conflicts of interest may arise, for instance, from the fact that there is a group connection between the management company and the custodian. Insofar the depository performs the depository function, it is obliged to safeguard the interests of the fund and its investors.

Potential conflicts of interest can arise if the custodian transfers individual custody tasks or sub-custody to another outsourcing company. If this additional outsourcing company is a company affiliated with the management company or the custodian (eg parent company), this could result in potential conflicts of interest in the interaction between this outsourcing company and the management company or the custodian (eg if the management company or the custodian a company affiliated with it is given preference over other equivalent providers when assigning custody tasks or in selecting a particular sub-custodian). If such a conflict of interest or any other conflict of interest in relation with sub-custody is identified in the future, the custodian is to disclose the details of the circumstances and the measures taken to prevent or minimize the conflict of interest in the document on its website mentioned above.

Conflicts of interest may also arise if the depository performs administrative tasks on behalf of the management company, ie tasks of the registrar and transfer agent or the fund accounting. In order to manage such potential conflicts of interest, the respective area of responsibility must be divisionally separated from the depository function.

The management company and the custodian must institute appropriate and effective measures (eg procedural instructions and organizational measures) to ensure that potential conflicts of interest are minimized where possible. If such conflicts of interest cannot be prevented, the management company and the custodian will identify, control, monitor and disclose the relevant conflicts in order to prevent harm to the interests of the shareholders. Adherence to these measures must be monitored by an independent compliance function.

7. The depositary's liability is based on Art. 19 of the Law of 2010. It is not affected by the transfer, in whole or in part, of the assets under its responsibility to third parties.

#### **Article 4 – General Guidelines for investment policy**

The investment objectives and the specific investment policy of the fund are determined on the basis of the following General Guidelines. These General Guidelines apply to the entire fund unless and to the extent that the prospectus contains supplements or deviations in this respect.

Only such assets may be acquired and sold for the fund whose price complies with the evaluation criteria of Article 6 of these Management Regulations.

The fund's assets will be invested in compliance with the principle of risk diversification within the meaning of the rules of Part I of the Law of 17 December 2010 and in accordance with the investment policy principles described below in this article and within the investment restrictions. A distinction is made here between regulatory investment restrictions under supervisory law and those under tax law. If the tax law restrictions are applied to the fund, these shall always apply in addition to and in consideration of the regulatory investment restrictions.

#### **A. Regulatory investment restrictions**

##### 1. Definitions:

##### a) 'Regulated market'

A regulated market is a market for financial instruments within the meaning of Article 4, no. 21 of Directive 2014/65/EU of the European Parliament and Council of 15 May 2014 on markets in financial instruments and in amendment of Directives 2002/92/EC and 2011/61/EU.

##### b) 'Securities'

Securities are considered to be

- Shares and other securities equivalent to shares ('shares'),
- Debt securities and other securitised debt instruments ('debt securities'),
- Any other negotiable securities giving the right to acquire securities by subscription or exchange.

In this context, techniques and instruments within the meaning of Article 42 of the Law of 17 December 2010 are not considered securities.

##### c) 'Money market instruments'

'Money market instruments' are instruments which are normally traded on the money market, are liquid and whose value can be accurately determined at any time.

##### d) 'UCI'

A 'UCI' means an Undertaking for Collective Investment.

e) 'UCITS'

A 'UCITS' is an Undertaking for Collective Investment in Transferable Securities which is subject to Directive 2009/65/EC.

For each UCITS composed of several sub-funds, for the purpose of applying the investment limits each sub-fund shall be considered as a separate UCITS.

2. Only

- a) transferable securities and money market instruments will be acquired that are admitted to or traded on a regulated market within the meaning of Directive 2014/65/EU;
- b) transferable securities and money market instruments will be acquired that are traded on another regulated market in a Member State of the European Union ('Member State') which is recognised, open to the public and operates in a proper manner;
- c) transferable securities and money market instruments will be acquired that are officially listed on a stock exchange of a country not belonging to the European Union or traded on another regulated market of a country not belonging to the European Union which is recognised, open to the public and operates in an orderly manner;
- d) securities and money market instruments will be acquired from new issuances, when
  - 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 which is recognised, open to the public and operates in a proper manner; and
  - admission is obtained at the latest before the expiry of one year after the issue.

The securities and money market instruments referred to in this Section 2 c) and d) may only be acquired if they are officially listed or traded in North America, South America, Australia (including Oceania), Africa, Asia and/or Europe.

- e) units in a UCITS will be acquired that are authorised in accordance with Directive 2009/65/EC and/or other UCIs as understood under letters (a) and (b) of Article 1, section (2) of Directive 2009/65/EC, whether or not domiciled in a Member State, when
  - such UCIs have been authorised in accordance with laws which provide that they are subject to supervision considered by the CSSF [the Luxembourg Financial Services Supervisory Authority] to be equivalent to that laid down in Community law and cooperation between authorities is sufficiently ensured;
  - the level of protection of the investors of such UCIs is equivalent to the level of protection of the investors of a UCITS and in particular the rules on asset segregation, borrowing, lending and short selling of transferable securities and money market instruments are equivalent to the requirements of Directive 2009/65/EC;
  - the business activities of the UCI are the subject of half-yearly and annual reports which enable an assessment to be made of the assets and liabilities, income and transactions during the reporting period;

- the UCITs or other UCIs whose units are to be acquired may, according to its management regulations or its instruments of incorporation, invest in total no more than 10% of its assets in units of other UCITs or UCIs.
- f) demand deposits or deposits redeemable at notice with a term of no more than 12 months will be made with credit institutions, provided that the credit institution concerned has its registered office in a Member State of the EU or, if the registered office of the credit institution is situated in a third country, it is subject to supervisory provisions considered by the CSSF as equivalent to those laid down in Community law.
- g) derivative financial instruments ('derivatives'), including equivalent cash-settled instruments, will be acquired which are traded on one of the regulated markets referred to in this section 2 letters a), b) or c) and/or derivative financial instruments which are not traded on an exchange ('OTC derivatives'), when
- the underlying assets are instruments within the meaning of Article 41, section 1 of the Law of 17 December 2010, or else financial indices, interest rates, exchange rates or currencies in which the fund may invest in accordance with the investment objectives set out in these Management Regulations;
  - the counterparties to OTC derivative transactions are institutions subject to official supervision and belonging to the categories authorised by the CSSF; and
  - the OTC derivatives are subject to reliable and verifiable valuation on a daily basis and can be sold, liquidated or closed out by a transaction at any time at fair value on the fund's initiative.
- h) money market instruments will be acquired which are not traded on a regulated market and which fall within the definition of Article 1 of the Law of 17 December 2010 when the issuer or issuer of such instruments is itself subject to regulations on deposit and investor protection, provided that these instruments
- are issued or guaranteed by a national, regional or local authority or the central bank of a Member State, by the European Central Bank, the European Union or the European Investment Bank, by a third country or, in the case of a federal state, by one of the members of the federation, or by an international body under public law to which at least one Member State belongs, or
  - are issued by a company whose securities are traded on the regulated markets referred to in this section 2, letters a), b) or c) of this article, or
  - are issued or guaranteed by an institution subject to prudential supervision in accordance with the criteria laid down in Community law or by an institution which is subject to and complies with supervisory regulations considered by the CSSF to be at least as stringent as those laid down in Community law, or
  - are issued by other issuers belonging to a category approved by the CSSF, provided that investments in these instruments are subject to investor protection rules equivalent to those laid down in the first, second or third indent of this section 2, letter h) and provided that the issuer is either a company with equity capital of at least EUR 10 million which prepares and publishes its annual financial statements in accordance with the provisions of the Fourth

Directive 78/660/EEC or a legal entity which, within a group of companies comprising one or more listed companies, is responsible for the financing of this group or a legal entity which is to finance the securitisation of liabilities by using a credit line granted by a bank.

3. The fund may invest up to 10% of its assets in transferable securities and money market instruments other than those referred to in section 2 of this article.
4. Techniques and instruments
  - a) The fund may, subject to the conditions and limits laid down by the CSSF, use the techniques and instruments referred to in the sales prospectus provided that such use is made with a view to the efficient management of the fund. Where these transactions relate to the use of derivatives, the conditions and limits must comply with the provisions of the Law of 17 December 2010.

Furthermore, when using such techniques and instruments the fund is not permitted to deviate from its investment policy as described in the sales prospectus.

- b) The management company must, in accordance with Article 42, section 1 of the Law of 17 December 2010, employ a risk management process which enables it to monitor and measure at any time the risk associated with the investment positions and their respective contribution to the overall risk profile of the investment portfolio. In doing so, the management company shall ensure that the overall risk associated with derivatives of the managed funds does not exceed the total net value of their portfolios. In particular, it shall not rely exclusively and automatically on credit ratings issued by credit rating agencies within the meaning of Article 3, section 1, letter b of Regulation 1060/2009/EC of the European Parliament and Council of 16 September 2009 on credit rating agencies when assessing the credit quality of the assets. The risk measurement procedure applied to the fund is set out in the sales prospectus, along with any more specific information. The fund may, as part of its investment policy and within the limits of Article 43, section 5 of the Law of 17 December 2010, invest in derivatives provided that the global exposure of the underlying assets does not exceed the investment limits laid down in Article 43 of the said law. If the fund invests in index-based derivatives, these investments shall not be taken into account for the investment limits of Article 43 of the Law of 17 December 2010. When a derivative is embedded in a security or a money market instrument, it must be taken into account for compliance with the provisions of Article 42 of the Law of 17 December 2010.

The management company may make appropriate dispositions and, with the consent of the depositary, include such further investment restrictions as may be necessary to comply with the conditions in those countries where shares are to be marketed.

5. Risk diversification
  - a) No more than 10% of the fund's net assets may be invested in transferable securities or money market instruments issued by the same body. The fund may not invest more than 20% of its net assets in deposits with one and the same institution.

The counterparty default risk for transactions of the fund with OTC derivatives may not exceed the following rates:

- 10% of the net fund assets if the counterparty is a credit institution within the meaning of Article 41, section 1, letter f) of the Law of 17 December 2010; and
  - 5% of the net fund assets in all other cases.
- b) The total value of the transferable securities and money market instruments of issuers in each of which the fund has invested more than 5% of its assets may not exceed 40% of the value of its net assets. This limit does not apply to deposits and OTC derivative transactions made with financial institutions subject to official supervision.

Notwithstanding each of the limits set out in letter (a) of this section 5, the fund may not invest more than 20% of its assets in any one institution in a combination of

- securities or money market instruments issued by that institution and/or
  - OTC derivatives acquired by this institution.
- c) The investment limit of 10% of the fund's net assets referred to in the first sentence of this section 5(a) shall be increased to 35% of the fund's net assets in cases where the transferable securities or money market instruments to be acquired are issued or guaranteed by a Member State, by its local authorities, by a third country or by international bodies under public law to which at least one Member State belongs.
- d) The investment limit of 10% of the fund's net assets referred to in the first sentence of this section 5, letter a) shall be increased to 25% of the fund's net assets in cases where the debentures to be acquired are issued by a credit institution which has its registered office in a Member State and which is subject by law to special public supervision designed to protect the holders of such debentures. In particular, the proceeds from the issue of such debentures must be invested in accordance with the law in assets which, during the whole period of their validity, are capable of covering claims attaching to them and which, in the event of default by the issuer, would be available on a priority basis for the reimbursement of the principal and payment of the accrued interest.

If the fund invests more than 5% of its net assets in debentures within the meaning of the preceding paragraph which are issued by one and the same issuer, the total value of this investment may not exceed 80% of the value of the net assets of the fund.

- e) The limitation of the total value to 40% of the net assets of the fund referred to in the first sentence of this section 5, letter b), shall not apply in the cases of letters c) and d).
- f) The investment limits of 10%, 25% and 35% of the fund's net assets described in this section 5, letters a) to d), may not be considered cumulatively, but only a maximum of 35% of the fund's net assets in total may be invested in securities and money market instruments of one and the same institution or in deposits or derivatives with the same institution.

Companies which, for the purpose of drawing up consolidated accounts within the meaning of Council Directive 83/349/EEC of 13 June 1983 based on Article 54, section 3, letter (g) of the Treaty on Consolidated Accounts (OJ L 193, 18 July 1983, p.1) or according to recognised international accounting rules, belong to the same group of companies shall be regarded as a single entity for the purpose of calculating the investment limits provided for in this section 5 (a) to (f).

The fund may invest 20% of its net assets in transferable securities and money market instruments issued by the same group of companies.

g) Without prejudice to the investment limits laid down in Article 48 of the Law of 17 December 2010, the management company may increase the limits for the fund laid down in Article 43 of the Law of 17 December 2010 for investments in shares and/or debt securities of the same issuer to a maximum of 20% of the fund's net assets, if the objective of the fund's investment policy is to replicate an index of shares or debt securities recognised by the CSSF. However, this shall be subject to the condition that:

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

The aforementioned investment limit shall be increased to 35% of the fund's net assets in cases where it is justified by exceptional market conditions, in particular on regulated markets where certain securities or money market instruments are highly dominant. This investment limit only applies to investments with a single issuer.

**h) Without prejudice to what is stated in Article 43 of the Law of 17 December 2010, up to 100% of the net assets of the fund may be invested in transferable securities and money market instruments issued or guaranteed by a Member State, by its local authorities, by a Member State of the OECD or by international bodies under public law of which one or more Member States are members, in accordance with the principle of risk diversification. The net assets of the fund must include securities issued in the context of at least six different issues, although the securities from a single issue may not exceed 30% of the net assets of the fund in question.**

i) In accordance with Article 41, section 1, letter (e) of the Law of 17 December 2010, no more than 20% of the net assets of the fund may be invested in units of one and the same UCITS or one and the same other UCI.

For the purpose of the application of this investment limit, each sub-fund of a UCI with multiple sub-funds shall be considered as a single issuer, provided that the principle of segregation of the liabilities of the individual sub-funds vis-à-vis third parties is ensured.

j) No more than 30% of the fund's net assets may be invested for the fund in UCIs other than UCITSs.

If the fund acquires units of a UCITS and/or other UCI, the investment assets of the UCITS or other UCI concerned shall not be taken into account in relation to the limits referred to in section 5, letters (a) to (f) above.

k) If the fund acquires units of other UCITSs and/or other UCIs which are managed, directly or by delegation, by the same management company or by a company with which the fund's management company is linked by common management or control, or by a substantial direct or indirect holding, the management company or the other company may not charge any fees (including issue or redemption charges) for the fund's subscription or redemption of units of these other UCITSs and/or UCIs.

In general, when acquiring units in target funds, a management fee may be charged at the level of the target fund and, where applicable, the respective issue surcharge and/or any redemption fees must be taken into account. The fund will therefore not invest in target funds which are subject to a management fee of more than 3%. The annual report of the fund will contain information on the maximum proportion of the management fee to be borne by the fund and the target funds.

l) The management company is not permitted to use the UCITS it manages under Part I of the Law of 17 December 2010 to acquire a number of shares carrying voting rights which would enable it to exercise significant influence over the executive management of an issuer.

m) Furthermore the fund may not acquire more than

- 10% of the non-voting shares of one and the same issuer,
- 10% of the debentures issued by one and the same issuer,
- 25% of the issued units of one and the same UCITS and/or UCI, or
- 10% of the money market instruments of one and the same issuer.

n) The investment limits mentioned under section 5, letters n) and o) shall not apply insofar as any of the following are concerned:

- Transferable securities and money market instruments issued or guaranteed by a Member State or its local authorities, or by a state which is not a Member State of the European Union;
- Transferable securities and money market Instruments issued by an international body under public law to which one or more Member States belong;
- Shares held by the fund in the capital of a company of a third state which invests its assets mainly in the securities of issuing bodies having their registered office in that third state, where under the legislation of that state such a holding represents the only way in which the fund can invest in the securities of issuing bodies of that state. However, this exception shall only apply on condition that the company of the third state complies in its investment policy with the limits laid down in Articles 43, 46 and 48, sections 1 and 2 of the Law of 17 December 2010. If the limits laid down in Articles 43 and 46 of the Law of 17 December 2010 are exceeded, Article 49 of the Law of 17 December 2010 shall apply analogously.
- Shares held by one or more investment companies in the capital of subsidiary companies carrying on exclusively for the investment company or companies the business of management, consultancy or marketing in the state where the subsidiary is located, with a view to the redemption of units at the request of unit holders.

## 6. Liquid assets

The fund may in principle hold liquid assets in the form of investment accounts (current accounts) and day-to-day money, but these may only be of an accessory nature.

## 7. Subscription rights

When exercising subscription rights attaching to transferable securities or money market instruments which form part of its assets, the fund need not necessarily comply with the investment limits laid down in this article.

If the investment restrictions referred to in this article are exceeded unintentionally or as a result of the exercise of subscription rights, the management company shall, in its sales, aim as a priority objective to normalise the situation, taking the interests of the investors into account.

Without prejudice to their obligation to observe the principle of risk diversification, newly authorised UCITSs may deviate from the investment limits laid down in section 5, a) to l) of this article for a period of six months following their authorisation.

#### 8. Loans and bans on encumbrances

- a) The fund's assets may not be pledged or otherwise encumbered, transferred by way of security or assigned by way of security, except in the case of borrowings within the meaning of letter b) below or in the case of collateral security in the context of the settlement of transactions with financial instruments.
- b) Loans to the debit of the fund assets may only be taken out on a short-term basis and up to an amount of 10% of the net fund assets.

An exception to this is the acquisition of foreign currencies through 'back-to-back' loans.

- c) No loans may be granted to the debit of the fund's assets and no guarantee obligations may be entered into for third parties, although this shall not prevent the acquisition of securities, money market instruments or other financial instruments that are not yet fully paid up in accordance with Article 41, section 1, letters e), g) and h) of the Law of 17 December 2010.

#### 9. Further investment guidelines

- a) Short selling of transferable securities, money market instruments or other financial instruments referred to in Article 41, section 1, letters (e), (g) and (h) is not permitted.
- b) The fund may not be invested in real estate, precious metals or certificates representing such precious metals, precious metal contracts, commodities or commodity contracts.

10. The investment restrictions referred to in this article relate to the time of acquisition of the securities. If the percentages are subsequently exceeded due to price developments or for reasons other than purchases, the management company shall immediately seek to restore the prescribed framework, taking into account the interests of the investors.

#### **B. Investment limits under tax law**

If the fund-specific investment policy in the sales prospectus states that the fund is an equity fund or mixed fund, the following conditions apply in conjunction with the above-listed regulatory investment restrictions:

- An equity fund is a fund that continuously invests at least 51% of its assets in equity investments.

- A mixed fund is a fund that continuously invests at least 25% of its assets in equity investments.

Equity investments are:

1. Shares in a corporation admitted to official trading on a stock exchange or listed on another organised market;
2. Shares in a corporation that is not a real estate company and which
  - is domiciled in a Member State or in another contracting state to the Agreement on the European Economic Area and is subject to income taxation for corporations in that country and is not exempt therefrom, or
  - is domiciled in a third country and is subject to, and not exempt from, corporate income taxation in that country at a rate of at least 15%;
3. Investment units in equity funds amounting to 51% of the value of the investment unit;
4. Investment units in mixed funds amounting to 25% of the value of the investment unit, or
5. units in other investment funds in the amount of the quota of their value, published on each valuation day, at which they actually invest in the aforementioned shares in corporations; if no actual quota is published, in the amount of the minimum quota specified in the investment conditions (foundation documents or sales prospectus) of the other investment fund.

Except in the cases referred to in points 3, 4 or 5 of this section, investment units shall not be considered as equity investments.

#### **Article 5 — Units**

1. Units are shares in the fund. The units in the fund shall be issued in the type of securitisation and denomination specified in the sales prospectus. If registered units are issued, they shall be entered by the registrar and transfer office in the unit register kept for the fund. In this connection, confirmations concerning the entry in the unit register shall be sent to the investors at the address stated in the unit register. Investors have no claim to delivery of effective items, either in the case of the issue of bearer units or in the case of the issue of registered units.
2. All units in the fund shall in principle have the same rights unless the management company decides, in accordance with section 3 of this article, to issue different classes of units within the fund.
3. The management company may decide to provide for two or more unit classes within the fund from time to time. The unit classes may differ in their characteristics and rights according to the way in which their income is used, according to the fee structure, with regard to the investors (group of investors) who may acquire and hold units or other specific characteristics and rights. All units participate equally in the income, price gains and liquidation proceeds of their respective unit class from the date of issue. If unit classes are formed for the fund, this shall be mentioned in the sales prospectus, the specific features or rights being stated.
4. By resolution of the management company's executive board, unit classes of the fund may be subject to a unit split.

5. By resolution of the management company's executive board, unit classes may be merged within the fund.

#### **Article 6 — Calculation of unit value**

1. The net assets of the fund shall be denominated in euros (EUR) ('reference currency').
2. The value of a unit ('unit value') shall be denominated in the currency specified in the sales prospectus ('fund currency'), unless a currency other than the fund currency is specified in the prospectus for any further unit classes ('unit class currency').
3. The unit value shall be calculated by the management company or one of its agents under the supervision of the depositary on each banking day that is also an exchange trading day in Luxembourg, Frankfurt am Main and Hamburg, with the exception of 24 and 31 December of each year ('valuation day'), and rounded to two decimal places. In the case of an umbrella fund, the management company may make a different arrangement for individual sub-funds, taking into account that the unit value must be calculated at least twice a month.

The management company may however decide to determine the unit value on 24 and 31 December of a year without these valuations being calculations of the unit value on a valuation day within the meaning of the preceding sentence 1 of this section 3. Consequently, investors may not request the issue, redemption and/or conversion of units on the basis of a unit value determined on 24 December and/or 31 December of a year.

4. The unit value shall be calculated by determining the value of the fund's assets less the fund's liabilities ('net fund assets') on each valuation day and dividing it by the number of units of the fund in circulation on the valuation day.
5. Insofar as information on the situation of the fund's assets as a whole and other financial statistics on the basis of statutory regulations or in accordance with the provisions of these Management Regulations must be provided in annual and semi-annual reports, the assets of the fund shall be converted into the reference currency. The net fund assets are calculated according to the following principles:

- a) Securities, money market instruments, derived financial instruments (derivatives) as well as other investments that are officially listed on a securities exchange are valued at the last available price ensuring a reliable valuation of the trading day preceding the valuation date.

The management company may determine for the fund that securities, money market instruments, derivative financial instruments and other investments that are officially listed on a securities exchange shall be valued at the last available closing price that ensures a reliable valuation. This will be mentioned in the sales prospectus.

If securities, money market instruments, derivative financial instruments and other investments are officially listed on several stock exchanges, the stock exchange with the highest liquidity shall be definitive.

- b) Securities, money market instruments, derived financial instruments (derivatives) as well as other investments that are not officially listed on a stock exchange (or whose stock exchange price is not considered representative e.g. on grounds of a lack of liquidity) but which are traded on a regulated market, shall be valued at a price which

may not be lower than the bid price and not higher than the ask price on the trading day preceding the valuation day and which the management company considers in good faith to be the best possible price at which the securities, money market instruments, financial derivative instruments (derivatives) and other investments can be sold.

The management company may determine for the fund that securities, money market instruments, financial derivative instruments (derivatives) as well as other investments which are not officially listed on a securities exchange (or whose stock exchange prices are not considered representative, e.g. on grounds of a lack of liquidity), but which are traded on a regulated market, shall be valued at the last available price on that market which the management company considers in good faith to be the best possible price at which the securities, money market instruments, financial derivative instruments (derivatives) as well as other investments can be sold. This shall be mentioned in the sales prospectus.

- c) OTC derivatives shall be valued daily on a verifiable basis to be determined by the management company.
- d) Shares in UCITs or UCIs shall in principle be valued at the last redemption price determined prior to the valuation day or at the last available price that ensures a reliable valuation. If the redemption of investment units is suspended or no redemption prices are set, these units and all other assets are valued at the respective market value as determined by the management company in good faith and in accordance with generally recognised and verifiable rules of valuation.
- e) If the respective prices are not in line with the market, if the financial instruments mentioned under b) are not traded on a regulated market and if no prices have been determined for financial instruments other than those mentioned under letters a) to d), these financial instruments shall be valued in the same way as the other legally permissible assets at the respective market value as determined by the management company in good faith, in accordance with generally recognised and verifiable rules of valuation (e.g. suitable valuation models taking into account the current market conditions).
- f) Liquid assets are valued at their nominal value plus interest.
- g) Receivables, e.g. accrued interest claims and liabilities, are fundamentally recognised at nominal value.
- h) The market value of securities, money market instruments, derived financial instruments (derivatives) and other investments denominated in a currency other than the fund currency shall be converted into the corresponding fund currency at the exchange rate determined on the basis of the WM/Reuters fixing at 5 pm (4 pm London time) on the trading day preceding the valuation date.

The management company may determine for the fund that securities, money market instruments, derivative financial instruments and other investments denominated in a currency other than the fund currency shall be converted into the fund currency at the exchange rate determined on the valuation date. Gains and losses from foreign exchange transactions are added or deducted in each case. This shall be mentioned in the sales prospectus.

The net assets of the fund shall be reduced by the dividends, if any, paid to the investors in the fund.

6. The unit value is calculated in accordance with the above criteria separately for each fund. However, insofar as different unit classes have been formed within the fund, the resulting unit value calculation within the fund shall be carried out separately for each unit class in accordance with the criteria listed above.

#### **Article 7 — Suspension of the calculation of the unit value**

1. The management company shall be entitled to temporarily suspend the calculation of the unit value if and as long as circumstances exist which make such suspension necessary and if the suspension is justified taking into account the interests of the investors. This shall be the case in particular:
  - a) during a period when any stock exchange or other regulated market on which a substantial portion of the assets are listed or traded is closed, or trading on such a stock exchange or on such a market is suspended or restricted for any reason other than a legal or bank holiday;
  - b) in emergency situations, if the management company cannot dispose of fund investments or it is impossible for it to freely transfer the countervalue of the investment purchases or sales or to carry out the calculation of the unit value properly;
  - c) in the event of an interruption in the communication link or if for any reason the value of an asset cannot be determined quickly or accurately enough.

As long as the calculation of the net asset value per unit is temporarily suspended, the issue, redemption and conversion of units will also be suspended.

2. Investors who have submitted a subscription application or redemption order or a conversion application shall be notified immediately of any suspension of the unit value calculation, and shall be informed immediately after the unit value calculation has been resumed.
3. Subscription, redemption or conversion applications shall automatically lapse in the event of a suspension of the calculation of the net asset value. The investor or potential investor will be informed that after the resumption of the calculation of the net asset value, the subscription, redemption or conversion applications must be resubmitted.

#### **Article 8 — Issue of units**

1. Units shall be issued on each valuation day at the issue price. The issue price is the unit value in accordance with article 6, section 4 of these Management Regulations, plus an issue premium, the maximum amount of which is specified for the fund in the sales prospectus. The issue price may be increased by fees or other charges incurred in the respective countries of distribution.
2. If the fund issues registered units, subscription applications for the purchase of registered units may be submitted to the management company or to any distributor. These receiving agents are obliged to forward the subscription applications to the registrar and transfer agent without delay. Receipt of the subscription applications by the registrar and transfer agent shall be definitive. The

registrar and transfer agent shall accept the subscription applications on behalf of the management company.

Subscription applications for the acquisition of bearer units shall be forwarded to the registrar and transfer agent by the office where the subscriber maintains his securities account. The date of receipt by the registrar and transfer agent shall be definitive.

3. Complete subscription applications received by the relevant office by the time specified in the sales prospectus on a valuation day shall be settled at the issue price of the following valuation day. The management company shall in any case ensure that the issue of units is settled on the basis of a unit value unknown to the investor beforehand. Should there nevertheless be any suspicion that an investor is engaging in *late trading*, the management company may refuse to accept the subscription application until such time as the applicant has dispelled any doubts with regard to his subscription application. Subscription applications received by the relevant office after the time specified in the sales prospectus on a valuation day will be settled at the issue price of the next but one valuation day.
4. If the countervalue of the registered units subscribed for is not available at the time of receipt of the complete subscription application by the registrar and transfer agent, or if the application for subscription is incorrect or incomplete, the application for subscription shall be deemed to have been received by the registrar and transfer agent on the date on which the countervalue of the units subscribed for becomes available or on which the application for subscription is properly submitted.
5. Bearer units shall be transferred by the depositary or the registrar and transfer agent on behalf of the management company upon receipt of the issue price by the depositary or the registrar and transfer agent, by crediting them to the office where the subscriber maintains his depositary account.
6. The issue price is payable in the fund currency or, in the case of several unit classes, in the respective unit class currency at the depositary in Luxembourg within the number of banking days after the relevant valuation day as specified in the sales prospectus.
7. If the countervalue is withdrawn from the fund's assets, in particular due to a revocation, the non-redemption of a direct debit or for other reasons, the management company shall redeem the respective units in the interest of the fund. Any differences resulting from the redemption of units that have a negative effect on the fund's assets shall be borne by the applicant.

#### **Article 9 — Restriction and suspension of the issue of units**

1. The management company may at any time, at its own discretion and without giving reasons, reject a subscription application or temporarily restrict, suspend or finally discontinue the issue of units or repurchase units against payment of the redemption price if this appears necessary in the interests of the investors, in the public interest or for the protection of the fund, in particular if:
  - a) there is reason to suspect that the respective unit holder is engaging in '*market timing*', '*late trading*' or other market techniques in the acquisition of the units, which may be detrimental to the investors as a whole,
  - b) the investor does not fulfil the condition for an acquisition of the units, or

- c) the units are acquired by a person with indications of a US connection, or the units have been distributed in a state or have been acquired in such a state by a person (e.g. US citizen) in which the fund is not permitted for distribution or the acquisition of units to or by such persons.
2. In such a case, the registrar and transfer agent or the depositary shall promptly refund without interest any payments received in respect of subscription applications not already executed.

#### **Article 10 — Redemption and Conversion of units**

1. Investors are entitled to request the redemption of their units at any time at the unit value in accordance with Article 6, section 4 of these Management Regulations, less any redemption charges ('redemption price'). This redemption shall only take place on a valuation day. If a redemption fee is charged, its maximum amount for the fund is specified in the sales prospectus. The payment of the redemption price will be reduced in certain countries by taxes and other charges applicable there. Upon payment of the redemption price, the corresponding unit expires.
2. Payment of the redemption price and any other payments to the investors shall be made via the depositary and the payment agents. The depositary shall only be obliged to make payment to the extent that no statutory provisions, e.g. foreign exchange regulations or other circumstances beyond the depositary's control, prohibit the remittance of the redemption price to the country of the applicant.

The management company may unilaterally redeem units against payment of the redemption price insofar as this appears necessary in the interest of the investors as a whole or for the protection of the investors or the fund, in particular if:

- a) there is reason to suspect that the respective unit holder is engaging in '*market timing*', '*late trading*' or other market techniques in the acquisition of the units, which may be detrimental to the investors as a whole,
  - b) the investor does not fulfil the conditions for an acquisition of the units, or
  - c) the units are acquired by a person with indications of a US connection, or the units have been distributed in a state or have been acquired in such a state by a person (e.g. US citizen) in which the fund is not permitted for distribution or the acquisition of units to or by such persons.
3. If different unit classes are offered within a fund, units of one unit class may also be exchanged for units of another unit class within the fund, unless otherwise specified in the sales prospectus and if the investor fulfils the conditions for a direct investment in this unit class specified in the sales prospectus. In such cases, no conversion commission shall be charged.

The Management Company may reject a conversion application on behalf of the Fund if this appears to be in the interest of the Fund or in the interest of the investors, in particular if:

- a) there is a suspicion that the investor in question is engaging in "market timing", "late trading" or other market techniques with the acquisition of units which may be detrimental to the investors as a whole,
  - b) the investor does not fulfil the conditions for the acquisition of the units, or

- c) the units were acquired by a person with indications of a US connection, indications of a US connection were ascertained in the case of the investor after the acquisition, the units are distributed in a country in which the fund or the unit class is not authorised for distribution or were acquired by a person (e.g. US citizen) for whom the acquisition of the units is not permitted.
4. Complete redemption orders may be submitted to the management company, the distributor and the payment agents. These receiving agents are obliged to forward the redemption orders to the registrar and transfer agent without delay. The date of receipt by the registrar and transfer agent shall be decisive. Complete redemption orders shall be forwarded to the registrar and transfer agent by the office with which the investor maintains his deposit account. The date of receipt by the registrar and transfer agent shall be decisive.

A redemption order or conversion request for the redemption or conversion of registered units is complete if it states the name and address of the investor, the number or equivalent value of units to be redeemed or converted and the name of the Fund and if it is signed by the relevant investor.

Complete redemption orders or conversion orders for the redemption or conversion of bearer units shall be forwarded to the Registrar and Transfer Agent by the office where the investor maintains his securities account. The date of receipt by the Registrar and Transfer Agent shall be decisive.

Complete redemption orders received by the time specified in the sales prospectus on a valuation day shall be settled at the unit value of the following valuation day, less any redemption fee or considering the conversation commission. The management company shall in any case ensure that the redemption or the conversation commission of the units is settled based on a unit value unknown to the investor beforehand. Complete redemption orders or conversation requests received after the time specified in the sales prospectus on a valuation day shall be settled at the unit value of the next but one valuation day, less any redemption charges or conversation commission.

The receipt of the redemption order or conversion request by the Registrar and Transfer Agent shall be decisive.

Payment of the redemption price shall be made in the fund currency (or, in the case of several unit classes, in the respective unit class currency) within the number of bank working days specified in the sales prospectus after the relevant valuation day. In the case of registered units, payment shall be made to an account to be specified by the investor.

5. The management company shall be obliged to temporarily suspend the redemption or conversation of units due to a suspension of the calculation of the unit value.
6. The management company shall be entitled, with the prior approval of the depositary and in the best interests of the investors, to make substantial redemptions only after corresponding assets of the fund have been sold without delay. In this case, the redemption shall be effected at the then applicable redemption price. The same applies to applications for the exchange of units. The management company shall, however, ensure that sufficient liquid assets are fundamentally available to the fund so that a redemption can be effected without delay at the request of investors under normal circumstances.

## **Article 11 — Costs**

The fund shall bear the following costs insofar as they arise in connection with its assets:

1. For the management of the fund, the management company shall receive a fee from the relevant fund assets, the amount, calculation and payment of which are set out in the sales prospectus. This remuneration is to be understood with the addition of any value added tax.

Besides this, the management company or, if applicable, the investment consultant or consultants / fund manager or fund managers may receive a performance-based additional fee ('performance fee') from the assets of the fund. The percentage amount, calculation and payment of the performance fee are listed for the fund in the sales prospectus.

2. The investment consultant may receive a fee from the fund's assets or from the management company's fee, the maximum amount, calculation and payment of which are specified for the fund in the sales prospectus. This remuneration is to be understood with the addition of any value added tax.
3. The portfolio manager may receive out of the assets of the fund or out of the remuneration of the management company a fee, the maximum amount, calculation and payment of which are set out for the fund in the sales prospectus. This remuneration is to be understood with the addition of any value added tax.
4. The depositary shall receive from the fund's assets a remuneration customary in banking in the Grand Duchy of Luxembourg for the performance of its duties under the depositary agreement. The amount of the calculation and payment is listed in the sales prospectus. This remuneration is to be understood with the addition of any value added tax.
5. The registrar and transfer agent shall receive from the fund assets for the performance of its duties a remuneration customary in banking in the Grand Duchy of Luxembourg, which may consist of a fixed basic remuneration and a fixed amount per entry in the register. The amount of the remuneration and the payment are listed in the sales prospectus. These remunerations are to be understood with the addition of any value added tax.
6. The distributor may receive a fee from the fund's assets, the maximum amount, calculation and payment of which for the fund are set out in the sales prospectus. This remuneration is to be understood with the addition of any value added tax.
7. In addition to the aforementioned costs, the fund shall also bear the following costs insofar as they arise in connection with its assets:
  - a) costs incurred in connection with the acquisition, holding and disposal of assets, in particular customary bank charges for transactions in securities and other assets and rights of the fund and their safekeeping as well as customary bank charges for the safekeeping of foreign investment units abroad;
  - b) all third-party management and custody fees charged by other correspondent banks and/or clearing houses (e.g. Clearstream Banking S.A.) for the fund's assets, as well as all third-party handling, shipping and insurance charges incurred in connection with the fund's securities transactions in fund units;
  - c) the transaction costs of the issue and redemption of fund units;

- d) In addition, the management company, the depositary, the central administration agent and the registrar and transfer agent shall be reimbursed for their own expenses and other costs incurred in connection with the fund assets as well as for the expenses and other costs incurred through the necessary use of third parties, in particular for the selection, development and use of any depositories / sub-depositories. The depositary shall also receive customary bank charges.
- e) taxes levied on the assets of the fund, its income and expenses debited to the fund;
- f) costs for legal and tax advice incurred by the management company or the depositary when acting in the interest of the investors of the fund;
- g) auditor's costs;
- h) the costs of preparing, filing, publishing, printing and dispatching all documents relating to the fund, in particular any unit certificates, the sales prospectus, the 'key information document (PRIIP)', the annual and semi-annual reports, the statements of assets and liabilities, the notices to investors, the convening notices, the notices of distribution or applications for authorisation in the countries in which the units of the fund are to be distributed, as well as the correspondence with the relevant supervisory authorities;
- i) the management fees payable to public authorities on behalf of the fund, in particular the management fees of the CSSF and other Luxembourg supervisory authorities as well as the supervisory authorities of other countries and the fees for the filing of the fund's documents;
- j) costs in connection with any listing on the stock exchange;
- k) costs of advertising and those directly incurred in connection with the offering and sale of units;
- l) insurance costs;
- m) remuneration, expenses and other costs of the payment agents, distributors and other agencies to be set up abroad which are incurred in connection with the fund;
- n) interest accruing under loans which may be taken out in accordance with Article 4 of the Management Regulations;
- o) expenses of any investment committee;
- p) expenses of the Supervisory Board;
- q) costs for the establishment of the fund and the initial issue of units;
- r) other costs of administration including costs for interest groups;
- s) costs of performance attribution;
- t) costs for the credit rating of the fund by nationally and internationally recognised rating agencies as well as costs for the rating of assets, in particular the issuer rating of interest-bearing securities as well as ratings and data supplies by providers of sustainability research recognised by the Management Company;

- u) costs for the valuation of assets by third parties, in particular the valuation by sustainability research providers recognised by the Management Company;
- v) costs for the provision of analytical material or services by third parties in relation to one or more financial instruments or other assets or in relation to the issuers or potential issuers of financial instruments or closely related to a specific industry or market;
- w) appropriate costs for risk controlling.

All aforementioned costs, fees and expenses are to be understood with the addition of any value added tax.

All costs are first charged to ordinary income and capital gains and finally to the fund assets.

The costs of setting up the fund and the initial issue of units shall be amortised over the first five financial years at the expense of the fund's assets.

#### **Article 12 — Use of income**

1. The management company may distribute the income generated in the fund to the investors in the fund, or reinvest this income in the fund. This shall be mentioned for the fund in the sales prospectus.
2. The ordinary net income and realised gains may be distributed. Furthermore, unrealised gains and other assets may also be distributed, provided that the total net assets of the fund do not fall below EUR 1,250,000.00 as a result of the distribution.
3. Distributions shall be paid on the units issued on the distribution date. Distributions may be made in whole or in part in the form of bonus units. Any remaining fractions may be paid in cash. Income not claimed five years after the publication of a distribution announcement shall be forfeited in favour of the fund.
4. Distributions to holders of registered units shall generally be made by reinvesting the distribution amount in favour of the holder of registered units. If this is not desired, the holder of registered units may apply to the registrar and transfer agent for payment to an account specified by him within 10 days from receipt of the notification of the distribution. Distributions to holders of bearer units shall be made in the same manner as the payment of the redemption price to the holders of bearer units.

#### **Article 13 — Financial year and audit of the financial statement**

1. The accounting year of the fund shall begin on 1 July of each year and end on 30 June of the following year.

The financial statements of the fund shall be audited by an auditor appointed by the management company.

2. No later than four months after the end of each financial year, the management company shall publish an audited annual report in accordance with the provisions of the Grand Duchy of Luxembourg.

3. Two months after the end of the first half of the financial year, the management company shall publish an unaudited semi-annual report. If required for authorisation for distribution in other countries, audited and unaudited interim reports may additionally be prepared.

#### **Article 14 — Publications**

1. Unit values, issue and redemption prices and all other information may be obtained from the management company, the depositary, any payment agent and the distributor. They will also be published in the respective media required in each country of distribution.
2. The current sales prospectus, the 'key information document (PRIIP)' as well as the annual and semi-annual reports of the fund can be accessed free of charge on the website of the management company at [www.hansainvest.com](http://www.hansainvest.com). The current sales prospectus, the 'key information document (PRIIP)' and the annual and semi-annual reports of the fund are also available free of charge in paper form at the registered office of the management company, the depositary, the payment agents and the distributor.
3. The currently valid depositary agreement, the management company's articles of association and the register and transfer agency agreements may be inspected at the management company's registered office.

#### **Article 15 — Merger of the fund**

1. The board of directors of the management company may decide, by resolution in accordance with the following conditions, to merge the fund into another UCITS managed by the same management company or managed by another management company. The merger may be decided in particular in the following cases:
  - if the net assets of the fund on a valuation day have fallen below an amount which appears to be the minimum amount required to manage the fund in an economically reasonable manner. The management company has set this amount at EUR 5 million.
  - insofar as it does not appear to make economic sense to manage the fund due to significant changes in the economic or political environment or for reasons of economic viability.
2. The board of directors of the management company may also decide to include in the fund another fund or sub-fund managed by the same or by another management company.
3. Mergers are possible both between two Luxembourg funds or sub-funds (domestic merger) as well as between funds or sub-funds established in two different Member States of the European Union (cross-border merger).
4. Such a merger shall only be executable to the extent that the investment policy of the merging fund or sub-fund does not conflict with the investment policy of the receiving fund.
5. The execution of the merger shall take the form of a dissolution of the contributing fund or sub-fund and a simultaneous takeover of all assets by the receiving fund or sub-fund. The investors of the contributing fund or sub-fund shall receive units of the receiving fund or sub-fund, the number of which shall be calculated on the basis of the unit value ratio of the funds or sub-funds concerned at the time of the amalgamation and, if applicable, a fractional adjustment.

6. Both the receiving fund or sub-fund and the transferring fund or sub-fund shall inform the investors about the planned merger in an appropriate form and in accordance with the regulations of the respective distribution countries of the receiving or transferring fund or sub-fund.
7. The investors of the receiving and of the merging fund or sub-fund shall have the right for thirty days to request, without additional charge, the redemption of all or part of their units at the relevant unit value or, to the extent possible, the conversion into units of another fund or sub-fund with a similar investment policy managed by the same management company or by another company with which the management company is linked by common management or control or by a substantial direct or indirect holding. The right shall take effect from the date on which the unit holders of the transferring and the receiving fund or sub-fund are notified of the proposed merger and shall expire five banking days before the date on which the exchange ratio is calculated.
8. In the event of a merger between two or more funds or sub-funds, the funds or sub-funds concerned may temporarily suspend subscriptions and redemption of units if such suspension is justified for the protection of unit holders.
9. The execution of the merger shall be audited and confirmed by an independent auditor. A copy of the auditor's report shall be made available free of charge to the investors of the transferring and the acquiring fund or sub-fund as well as to the respective competent supervisory authority upon request.

#### **Article 16 — Dissolution of the fund**

1. The fund is established for an indefinite period. Notwithstanding this provision, the fund may be dissolved at any time by the management company, in particular if significant economic and/or political changes have occurred since the date of its establishment.
2. The dissolution of the Fund shall be mandatory in the following cases:
  - a) if the depositary appointment is terminated without a new depositary being appointed within two months;
  - b) if insolvency proceedings are opened against the management company and no other management company declares its willingness to take over the fund or if the management company is liquidated;
  - c) if the fund assets remain below an amount of EUR 312,500.00 for longer than six months;
  - d) in other cases provided for by the Law of 17 December 2010.
3. If a state of affairs occurs that leads to the dissolution of the Fund, the issue of units shall be discontinued. The redemption of units shall still be possible provided that equal treatment of investors is ensured. The depositary will distribute the liquidation proceeds, subject to deduction of liquidation costs and fees, among the investors in the fund in accordance with their entitlement, on the instructions of the management company or, as the case may be, the liquidators appointed by the management company or by the depositary in agreement with the supervisory authority. Net liquidation proceeds which have not been claimed by investors by the end of the liquidation procedure shall be lodged by the depositary after the end of the liquidation procedure, for the account of the investors entitled thereto, with the Caisse des Consignations in the Grand Duchy of Luxembourg, where such sums shall be forfeited if claims thereon are not made within the statutory time limit.

4. The investors, their heirs, creditors or legal successors may not request the premature dissolution or division of the fund.
5. The dissolution of the fund in accordance with this article shall be published by the management company in the RESA and in at least two national daily newspapers, including at least one Luxembourg daily newspaper, in compliance with the provisions of the law.

#### **Article 17 — Statute of limitations**

Claims of investors against the management company or the depositary may no longer be asserted in court after the expiry of 5 years from the date on which the claim arose; this shall not affect the provision contained in Article 16, section 3 of these Management Regulations.

#### **Article 18 — Applicable law, court of law and contractual language**

1. The Management Regulations of the fund shall be governed by the law of the Grand Duchy of Luxembourg. The same applies to the legal relationships between the investors, the management company and the depositary, unless another legal system independently subjects these legal relationships to special regulations. In particular, the provisions of the Law of 17 December 2010 shall apply in addition to the provisions of these Management Regulations. The Management Regulations are deposited with the Commercial and Companies Register in Luxembourg. Any dispute between investors, the management company and the depositary shall be subject to the jurisdiction of the competent court in the judicial district of Luxembourg in the Grand Duchy of Luxembourg. The management company and the depositary are entitled to submit themselves and the fund to the jurisdiction and law of any country of distribution, insofar as claims of investors resident in the given country and in respect of matters relating to the Fund are concerned.
2. In the event of a dispute, the German text of these Management Regulations shall be definitive.

The management company and the depositary may, with respect to units of the fund sold to investors in a non-German speaking country, declare translations in the relevant languages of such countries in which such units are authorised for public distribution to be binding on themselves and the fund.

3. Where terms not defined in the Management Regulations require interpretation, the provisions of the Law of 17 December 2010 shall apply. This applies in particular to the terms defined in Article 1 of the Law of 17 December 2010.

#### **Article 19 — Changes to the Management Regulations**

1. The management company may, with the approval of the depositary, amend these Management Regulations in whole or in part at any time.
2. Changes to these Management Regulations shall be deposited with the Commercial and Companies Register in Luxembourg and shall enter into force on the date of signature, unless otherwise specified. The Management Regulations shall be published in the RESA.

#### **Article 20 — Legal effect**

These Management Regulations come into legal effect on 1st May 2023.

## **SPECIFIC INFORMATION FOR INVESTORS IN THE EUROPEAN UNION (EU) AND THE EUROPEAN ECONOMIC AREA (EEA)**

### **Contact and information agent**

HANSAINVEST has commissioned Zeidler Legal Process Outsourcing Ltd., SouthPoint, Herbert House, Harmony Row, Grand Canal Dock, Dublin 2, Ireland, e-mail: facilities\_agent@zeidlerlegalservices.com (“**Zeidler**”) to act as the contact and information agent pursuant to Article 92 (1) b) - f) of EU Directive 2009/65 (amended through Article 1 of EU Directive 2019/1160) in return for payment of normal market fees. This means that Zeidler will perform the following tasks:

1. Notification of investors of how subscription, repurchase and redemption orders may be submitted and further payments may be made to the unitholders for units in the Fund and how repurchase and redemption proceeds will be paid out;
2. Facilitating the handling of information and access to procedures and arrangements relating to the safeguarding of the rights of investors resulting from units in the Fund in the respective EU/EEA country;
3. Enabling the investors to view and make copies of the Prospectus, the corporate articles, the Basic Information Sheet (“**KIIDs**”) and the annual and semi-annual report;
4. Providing the investors with relevant information relating to the tasks fulfilled by the contact and information agent, on a permanent data storage medium; and
5. Serving as the contact for communication with the respective financial market supervisory authority in the EU/EEA distribution country in question.

### **Transfer agent**

The following shall apply in respect of the activities pursuant to Article 92 (1) a) of EU Directive 2009/65 (amended through Article 1 of EU Directive 2019/1160):

Units may be purchased from HANSAINVEST, the depositary or via a third party. Investors must submit redemption orders to the paying agent, the depositary, any distributor, the registrar and transfer agent or to HANSAINVEST itself. Units in the Fund may be transferred to custody accounts at credit institutions. In such cases, the credit institution in question will handle custody and management of these units. The custodian is responsible for the specific details of the procedure.

## Appendix Environmental and/or Social Characteristics

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:** GREIFF “special situations” Fund  
**Legal entity identifier (LEI-Code):** 549300OQFQDN72ZTDE11

### 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

**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.



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

The financial product invests at least 51% of the value of the special fund in securities selected according to the sustainability-related criteria (hereinafter referred to as the “dedicated ESG investment strategy”). In this sense, the financial product promotes investment of the above-mentioned minimum quota in companies whose long-term and industry-relevant environmental and social risks have average resilience. Furthermore, this Fund takes into account certain exclusion criteria in order to ensure that the Fund does not invest in controversial business practices or to a large extent in controversial business fields.

Accordingly, both environmental and social features are promoted.

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

#### I. Sustainability indicators relating to the dedicated ESG investment strategy

In order to measure the achievement of the individual environmental or social features, criteria derived from the fields of environment, social affairs and responsible corporate governance are used and summarized in the context of an ESG rating.

Within the scope of the above-mentioned minimum quota amounting to 51%, only securities which have an ESG rating of at least BB may be acquired.

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

The ESG rating is provided by the data provider MSCI ESG Research LLC.

Insofar as **this data provider** does not provide the rating data, in particular for the shares and/or bonds of companies with a low level of market capitalization, then the management company may use an ESG rating of the issuer's parent company (insofar as this rating has been provided by the data provider in line with the so-called parent approach) under the following conditions:

A control and profit and loss transfer agreement has been made between the parent and the issuer and/or the parent must have a direct or indirect interest of more than 50% in the issuer's company

**and**

the parent company must operate in the same or a similar industrial segment as the issuer.

In such cases, the parent company must comply with the minimum rating level before it may consider making an investment for less than 51% of the ESG in accordance with the above-mentioned conditions.

Furthermore, following this, the exclusion criteria listed below must be taken into consideration for the parent company.

In order to avoid any doubt, once an issuer has an ESG rating, the parent approach may no longer be applied. In other words, only the issuer's rating will be of significance, while the rating of the parent company involved may then no longer be applied.

In order to produce an increase of the rating coverage, the management company and/or the portfolio manager may also assess issuers themselves; have them advised by a third-party service provider or obtain a rating which has already been attributed by a third-party data provider. In such cases, the scope as well as the nature of the rating criteria must be sufficiently comparable to the data provider's ESG rating. This approach may be applied if the parent company does not have an ESG rating attributed by the data provider or in the event the above-mentioned conditions for a parent approach are not complied with.

The portfolio manager must continuously monitor whether the requirements for the application of the parent approach are (still) valid. In this context, the portfolio manager must notify the management company of any changes relating to this aspect without delay.

Titles with a minimum rating of BB which seriously breach the 10 principles of the UN Global Compact network or of the OECD Guidelines for the Multinational Enterprises but have prospects for improvement (for example due to commitments) (see "Sustainability indicators for relating to exclusion criteria" below, exclusion criteria under Item (8), Paragraph 2), may still be purchased. They will not, however, be considered within the rating of 51%.

## **II. Sustainability indicators relating to exclusion criteria**

The Fund will not purchase shares or bonds of companies which

- (1) Generate more than 10% of their turnover from the production and/ or distribution of armaments;
- (2) Generate their turnover from the production and/or distribution of controversial weapons in accordance with the Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction (hereinafter referred to as the "Ottawa Convention"); the Convention on the Prohibition of Cluster Munitions (hereinafter referred to as the "Oslo Convention"); and B and C weapons according to the respective UN Conventions (hereinafter referred to as UN BWC and UN CWC);

- (3) Generate more than 5% of their turnover from the production of tobacco products;
- (4) Generate more than 10% of their turnover from the generation of power based on coal;
- (5) Generate more than 10% of their turnover from the generation of power based on petroleum;
- (6) Generate more than 10% of their turnover from nuclear power;
- (7) Generate more than 30% of their turnover from the mining and sales of coal for power plants;
- (8) Seriously breach the 10 principles of the UN Global Compact network or the OECD Guidelines for the Multinational Enterprises and, in the opinion of the Fund manager, have no prospects for improvement;

Insofar as the titles breach the 10 principles of the UN Global Compact network or the OECD Guidelines for the Multinational Enterprises as indicated by data obtained from the data provider MSCI ESG Research in the event of any serious breach, then the Fund manager or the company will establish contact with the issuers and cooperate with them to achieve an improvement, so that the Fund manager may assume a positive perspective and, consequently, can start from the assumption that an improvement will be achieved and, in doing so, that it will continue to be possible to purchase the title.

In this context, the Fund manager will provide the management company with evidence of this within a term of 10 days starting from the date on which a corresponding controversy concerning a title included in the portfolio occurs. A previous commitment to purchase a new title which is subject to a corresponding controversy must be proven at the time of purchase. A commitment which has already been made for a (previously) existing title may also be used as proof for further acquisitions of the same title within a period of time amounting to 12 months.

Furthermore, investment in government bonds

- (9) which are classified as “non-free” in accordance with the Freedom House index
- (10) which have not ratified the Paris Agreement

will be excluded.

Data relating to the exclusion criteria will be provided by the data provider MSCI ESG Research LLC.

Insofar as the data provider MSCI ESG Research LLC cannot (yet) provide data relating to the said exclusion criteria for an issuer, then the portfolio manager may use the data concerning the issuer’s parent company. However, this option will only be possible under the conditions described above (insofar as the said data is made available by the data provider in line with the so-called parent approach). In order to avoid any doubt, reference is made to the following: Any application of the parent approach should be discontinued as soon as data are available to guarantee that an issuer complies with the exclusion criteria. Alternatively, a third-party service provider may also provide data regarding compliance with exclusion criteria.

The Fund may invest in equities and bonds for which the data provider MSCI ESG Research LLC cannot (yet) provide data. This is feasible even if the parent approach is applied. Consequently, it will not be possible to establish whether the above-mentioned exclusion criteria have currently been breached or not.

However, as soon as data are available for such shares and bonds (either directly or according to the parent approach), then the above-mentioned exclusion criteria must be

complied with. They will therefore apply in full to all stocks and bonds which may be screened accordingly.

- **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to Does this financial product have a sustainable investment objective?**

The financial product is not intended to make sustainable investments.

- **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 fo 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, PAI are considered within the framework of the investment decisions made on the basis of the above-mentioned exclusion criteria.

#### **For shares or bonds of companies**

<b>Sustainability factor/PAI</b>	<b>Considered by</b>	<b>Justification</b>
1. GHG emissions 2. Carbon footprint 3. GHG intensity of investee companies	Exclusion criteria under Items (4), (5), (7) and (8)*	The turnover threshold referred to in the exclusion criteria under Items (4), (5) and (7) in respect of companies which generate power based on fossil fuels and the exclusion of companies which seriously breach the UN Global Compact and as a consequence also Principles 7 to 9 of the UN Global Compact*, can be applied to start from the assumption that there is an indirect lower emission 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

4. Exposure to companies active in the fossil fuel sector	Exclusion criteria under Items (4) and (7)	Fund investments in fossil fuel activities are limited due to the turnover thresholds included in the exclusion criteria. This partially avoids the respective exposure.
5. Share of non-renewable energy consumption and production	Exclusion criteria under Items (4) – (6)	The turnover thresholds included in the exclusion criteria result in a restriction of investment in energy sources which are classified as particularly problematic. In this regard, the non-renewable energy share of energy consumption is considered indirectly, as it can be assumed that the restriction of investments will result in a reduced supply of non-renewable energy.
6. Energy consumption intensity per high impact climate sector	Exclusion criterion under Item (8)*	Principles 7 to 9 of the UN Global Compact* require companies to protect the environment as a precautionary measure by acting in an innovating and purposeful way in the context of their activities. In particular, the approach pursued by Principle 9 of the UN Global Compact concerning the development of innovative technologies may contribute to a reduction in terms of energy intensity. Correspondingly, companies which do not seriously breach the principles of the UN Global Compact are expected to have limited negative impacts as regards energy consumption intensity per industry.
7. Activities negatively affecting biodiversity-sensitive areas 8. Emissions to water 9. Hazardous waste	Exclusion criterion under Item (8)*	In particular, Principle 7 of the UN Global Compact* promotes the precautionary approach. In this context, the starting point should be the assumption that companies which do not seriously breach the principles of the UN Global Compact have only limited negative impacts on protected areas and on species residing in those areas, and demonstrate only limited negative impacts elsewhere caused by polluted wastewater as well as by hazardous waste.
10. Violations of UNGC and OECD Guidelines for MNE	Exclusion criterion under Item (8)*	The exclusion criterion under Item 8 provides the means to monitor serious breaches of the UN Global Compact as well as of the OECD Guidelines for the Multinational Enterprises*.
11. Lack of processes and compliance mechanisms to monitor compliance with	Exclusion criterion under Item (8)*	Companies which seriously breach the above-mentioned agreements* have clearly not

UNGC and OECD Guidelines		created adequate structures to ensure compliance with the applicable standards. The starting point must therefore be the assumption that exclusion will result in a limitation of the negative effects.
12. Unadjusted gender pay gap 13. Board gender diversity	Exclusion criterion under Item (8)*	Since Principle 6 of the UN Global Compact* aims to eliminate all forms of discrimination in the workplace and also refers to ILO core labour standards* within the framework of Principles 3 to 6, the starting point can be the assumption that the exclusion of serious breaches will result in a limitation of the negative effects.
14. Exposure to controversial weapons	Exclusion criterion under Item (2)	The exclusion criterion under Item (2) expressly excludes investment in companies which generate their turnover with controversial weapons, for example antipersonnel mines.

*\* Insofar as the above-mentioned commitment (see the item "What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?" in Section II and the exclusion criterion under Item (8)) is applied, then this may result in this Special Fund holding shares and/or bonds at any one time whose issuers are subject to individual or multiple controversies concerning the principles stated in the UN Global Compact, in the OECD Guidelines for the Multinational Enterprises or in ILO core labour standards.*

#### For government bonds

Sustainability factor/PAI	Considered by	Justification
Greenhouse Gas Intensity (GHG Intensity)	Exclusion criterion under Item (10)	Since the portfolio manager will apply the terms stated under exclusion criterion (10), investments will only be made in bonds of countries which have ratified the Paris Agreement. It can thus be guaranteed that investments will be made exclusively in countries taking appropriate measures to minimise greenhouse gas intensity. The starting point can thus be the assumption that there will be an indirect limitation of negative effects on the greenhouse gas intensity of the said countries.
Investee countries subject to social violations	Exclusion criterion under Item (9)	Since the portfolio manager will apply the terms stated under exclusion criterion (9), no investments will be made for the Special Fund in government bonds which are classified as "non-free" on the basis of existing information, analyses as well as expert interviews. [This classification is divided into the

		categories “free,” “partially free,” and “non-free.”] This method will ensure that, at minimum, the portfolio manager does not invest in bonds of countries which are clearly exposed to social violations. Accordingly, the PAI will be considered to the extent that there is a negative limitation.
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**For investment shares**

The Fund manager aims to only invest for the special Fund in investment shares of funds which take the above-mentioned PAI into consideration within the framework of their respective investment strategy.

Currently, the portfolio manager does not yet have any concrete data at their disposal. Accordingly, assessment of the PAI-related compliance of any investment shares is not feasible at the present time.

As soon as the portfolio manager has appropriate data at their disposal, then they will take this data into consideration when making investment decisions.

The annual report of the Special Fund will provide concrete information concerning the actual adverse impacts on the declared PAI.

No

**What investment strategy does this financial product follow?**

The objective of the investment policy of the GREIFF “special situations” Fund is to generate an attractive long-term increase in value in euros.

In order to achieve the said investment objective, the Fund’s assets will be invested in compliance with the principle of risk diversification. A fundamental element of the investment objectives will also be to identify so-called “special situations”, within the scope of which the acquisition of shares in a company can be expected to be a worthwhile investment. As a matter of principle, shares of such companies will be admitted to official trading on international stock exchanges. Depending on the relevant market assessment, ideal weighting of the asset categories will be carried out on a daily basis. It cannot, however, be guaranteed that the above-mentioned investment policy goals will be attained.

Detailed information on the investment objective as well as the investment strategy can be found in the prospectus under the item “see investment strategy” of the present prospectus.

The ESG criteria described below, which represent the binding elements of the investment strategy, are located upstream of the general investment process. As a consequence, the investment universe will initially be correspondingly reduced, before the selection described above is made at a later date. The financial product invests at least 51% of the value of the Special Fund in securities selected according to the sustainability-related criteria (hereinafter referred to as the “dedicated ESG investment strategy”). Furthermore, the Fund takes certain exclusion criteria into consideration for the assets for which the data is available

● ***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 lie in the application of the dedicated ESG investment strategy as well as in the various exclusion criteria.

Accordingly, at least 51% of the value of the Special Fund must be invested in securities with a minimum ESG rating of BB.

Furthermore, the 10 different exclusion criteria described above will be applied when selecting shares and bonds.



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

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

The relevant data will be provided by the data provider MSCI ESG Research LLC

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

There is no set minimum rate resulting in the reduction of the scope of investments considered prior to the application of the present investment strategy.

Instead, the above-mentioned minimum quota of at least 51% of the value of the Special Fund will be used for investment purposes.

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

“Good governance practices” are ensured, in particular, by avoiding the purchase of shares or bonds of companies which breach the 10 principles of the UN Global Compact network; ILO core labour standards or the OECD Guidelines for Multinational Enterprises without any prospect of improvement.

The starting point for this is the assumption that there is a prospect of improvement, particularly if the fund manager or the management company establishes contact with the corresponding issuers to discuss and cooperate towards an improvement.

Furthermore, “good governance practices” in the context of the ESG rating are considered as one aspect of many factors



**What is the asset allocation for this financial product?**

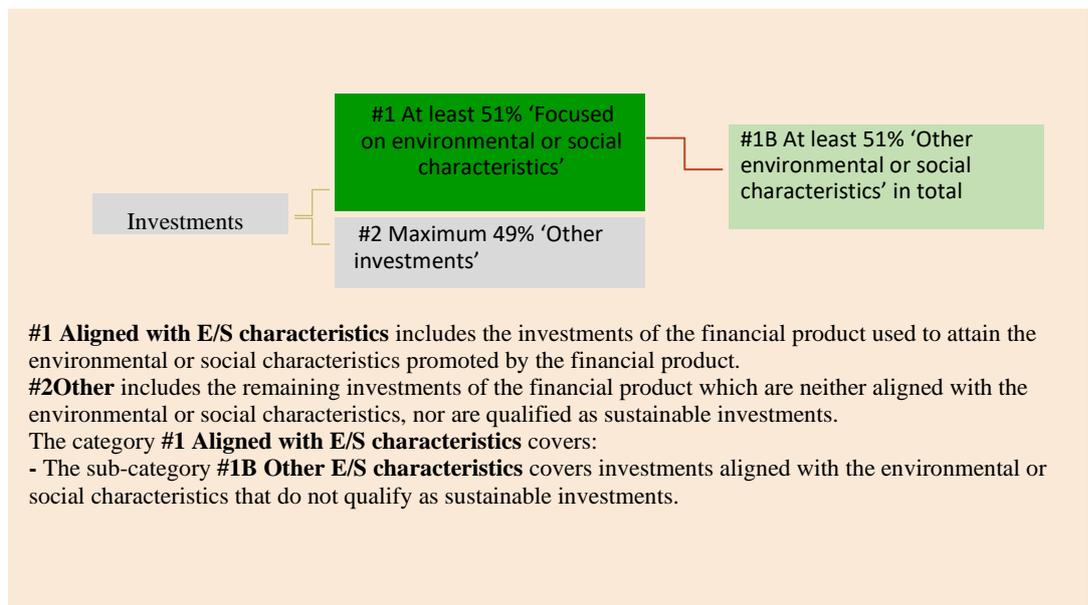
The minimum share of investments made for the financial product to meet the environmental and/or social features promoted by it is 51% of the value of the Special Fund. Furthermore, the Special Fund does not invest in shares and bonds of companies and/or in bonds of states which are proven to be involved in controversial business areas or business practices. The management company may use the “parenting approach” mentioned above if corresponding data are available (see the item “Whatsustainability indicators are used to measure the attainment of each of the environmental or social features promoted by this financial product?”). Under the terms of category “#2 Other investments” investments can be made in shares and securities which are equivalent to shares; securities which are not shares and securities equivalent to shares (for example certificates and bonds); money market instruments; bank balances; investment shares; derivatives and other investment instruments.

In this context, the environmental or social minimum level of protection is included within the framework of the exclusion criteria. These criteria will also be applied to all investments, insofar as adequate data is available on the market

**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.

**#2Other** 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 **#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?**

Derivates do not contribute to the attainment of the promoted environmental or social characteristics and are only used for hedging and investment purposes.



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

The Fund does not contribute to one or more of the environmental objectives included in Article 9 of (EU) Regulation 2020/852 (hereinafter the “Taxonomy Regulation”).

The investments on which the Fund is do not, i.e. to 0%, focus on economic activities which, in accordance with Article 3 (EU) Regulation 2020/852 (hereinafter the “Taxonomy Regulation”) are classified as environmentally sustainable economic activities.

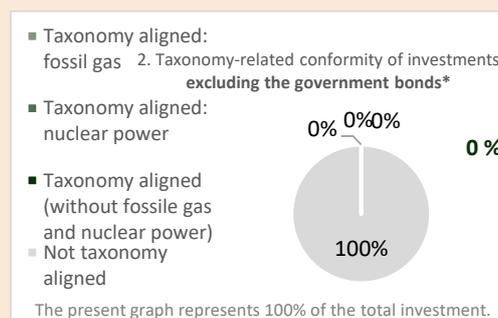
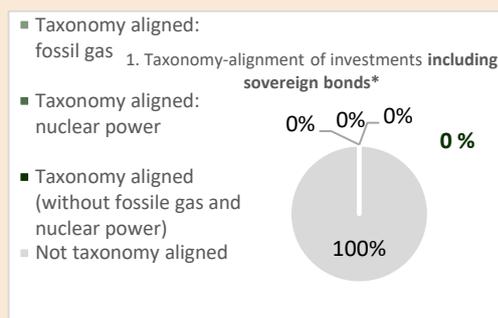
● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>8</sup>?**

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?**

There is no minimum share of investments in transitional and enabling activities.

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

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

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

<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.



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

N/A



**What is the minimum share of socially sustainable investments?**

N/A



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

Under the terms of category “#2 Other investments” investments can be made in shares and securities which are equivalent to shares; securities which are not shares and securities equivalent to shares (for example certificates and bonds); money market instruments; bank balances; investment shares; derivatives and other investment instruments.

Minimum environmental or social safeguards are included within the framework of the exclusion criteria, which are applied to all investments, insofar as suitable data is available on the market.



**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 index has been determined to identify whether this financial product is aligned with the advertised environmental and/or social 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://fondswelt.hansainvest.com/de/downloads-und-formulare/download-center>

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

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.