

1 May 2025

**SALES PROSPECTUS**

(including annex and Articles of Association)  
Only for Qualified Investors in Switzerland

# Flossbach von Storch SICAV

Société Anonyme (S.A.)

Société d'investissement à capital variable (SICAV)

Sub-fund:

Flossbach von Storch SICAV - Multiple Opportunities

*Management Company and Alternative Investment Fund Manager ("AIFM"):  
Flossbach von Storch Invest S.A.*

The document issued in German is legally binding.  
This English translation is only for the purpose of convenience.



Flossbach von Storch

## **Combating money laundering**

The obliged entities under international provisions and Luxembourg laws and regulations, including, but not exclusively, the Law of 12 November 2004 on the fight against money laundering and terrorist financing, the Grand Ducal Regulation of 1 February 2010, CSSF Regulation 12-02 of 14 December 2012 and CSSF Circulars CSSF 13/556, CSSF 15/609, CSSF 17/650 and CSSF 17/661 on the fight against money laundering and terrorist financing and all amendments and subsequent provisions in this regard are responsible for preventing undertakings for collective investment being misused for the purposes of money laundering or terrorist financing. The Investment Company, Management Company or its agent can request any document from applicants that it considers necessary for determining their identity. The Investment Company, Management Company (or its agent) can also request any other information that it requires to fulfil applicable statutory and regulatory provisions, including, but not limited to the CRS and FATCA laws.

If the applicant does not provide the requested documents or does not provide them in full or in timely fashion, the subscription order will be rejected. In the case of redemptions, incomplete documentation can cause a delay in payment of the redemption price. The Management Company is not responsible for delayed processing or failure of a transaction if the applicant does not provide the documents, or does not provide them in full, or in timely fashion.

The Investment Company, Management Company (or its agent) can request that shareholders provide additional or updated documents concerning their identity from time to time in accordance with applicable laws and provisions concerning its duties to continuously monitor and control its clients. If these documents are not provided without delay, the Company is obligated and entitled to block assets.

In addition, the Management Company will take appropriate measures to identify, assess and manage the risks of money laundering and terrorist financing as part of its due diligence obligations in relation to the assets of the UCIs it manages.

Under the Law of 13 January 2019 on establishing a register of beneficial owners (implementation of Article 30 of Directive (EU) 2015/849 of the European Parliament and of the Council, the so-called Fourth EU Money Laundering Directive), registered legal entities are required to report their beneficial owners to the register established for this purpose.

Investment companies are legally included in the definition of “registered legal entities” in Luxembourg.

Within the meaning of the Law of 13 January 2019 in conjunction with the Law of 12 November 2004, beneficial owners are, for example, generally those natural persons who hold a total of more than 25% of the shares or units of a legal entity or control it in some other way.

Depending on the specific situation, this might also require the names and other personal data of the end investors in an investment company to be reported to the register of beneficial owners. The following data on beneficial owners can be seen by anyone free of charge on the internet website of the “Luxembourg Business Register”: Family name, first name(s), citizenship(s), date and place of birth, country of residence and the nature and extent of the beneficial interest. Public access can only be restricted under extraordinary circumstances after a case-by-case examination subject to a fee.

## **Information on data protection**

Investor personal data can be collected, stored and processed in accordance with Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“General Data Protection Regulation”) and data protection law applicable in Luxembourg (including, but not limited to the amended Law of 2 August 2002 on the protection of persons with regard to the processing of personal data) in connection with an investment in the Fund by the parties indicated in this Sales Prospectus. This occurs, in particular,

for processing subscription and redemption orders, managing the share register, performing the tasks of the parties mentioned below and for compliance with applicable laws or regulations, in Luxembourg and in other jurisdictions, including, but not limited to, applicable corporate law, laws and regulations with regard to combating money laundering and terrorist financing, as well as tax law, such as the Foreign Account Tax Compliance Act (FATCA), Common Reporting Standard (CRS) or similar laws or regulations (such as at OECD level).

Personal data will only be disclosed to third parties if this is necessary either due to justified business interests or in order to exercise or defend legal claims, or if laws or regulations call for mandatory disclosure. This may include disclosure to third parties, such as government or supervisory authorities, including tax authorities and auditors in Luxembourg, as well as in other jurisdictions.

Except in the cases mentioned above, no personal data is transferred to countries outside the European Union or the European Economic Area, in principle.

By subscribing and/or holding units, investors give their consent – implicitly, at least – for their personal data to be processed in the aforementioned manner, and in particular for such data to be disclosed to and processed by the below parties, including affiliates in countries outside the European Union that may not offer the same protection as Luxembourg data protection law.

The investors hereby acknowledge and accept that the failure to provide the personal data requested by the Management Company within the scope of their existing relationship with the fund may prevent the continued existence of their holding in the fund and may result in a corresponding notification to the relevant Luxembourg authorities by the Management Company.

The investors hereby acknowledge and accept that the Management Company will report all relevant information in connection with their investment in the fund to the Luxembourg tax authorities, who will share this information in an automated procedure with the competent authorities of the relevant countries or other approved jurisdictions in accordance with CRS law or in accordance with relevant European and Luxembourg legislation.

If the personal data provided in connection with an investment in the fund also includes personal data of the investor's representatives (deputies), authorised signatories or beneficial owners, it is assumed that the investor has obtained the consent of the persons concerned for their personal data to be processed in the aforementioned manner, and in particular for such data to be disclosed to and processed by the below parties, including parties in countries outside the European Union that may not offer the same protection as Luxembourg data protection law.

In accordance with applicable data protection law, investors may apply to access, correct or delete their personal data free of charge at any time. Any such applications should be sent in writing to the Management Company. It is assumed that investors shall inform any representatives (deputies), authorised signatories or beneficial owners whose personal data is processed of these rights.

Although the parties indicated in this Sales Prospectus have taken suitable measures to ensure the confidentiality of personal data, the same level of confidentiality and protection as currently provided by Luxembourg data protection law cannot be guaranteed if the personal data is located in another country, as such data is transferred electronically and is accessible outside of Luxembourg.

The above-mentioned parties assume no responsibility for any unauthorised third party becoming aware of or obtaining access to the personal data, except in cases of deliberate or gross negligence on the part of the above-mentioned parties.

Personal data is only retained until it has fulfilled data processing purposes. However, the applicable legal minimum retention periods are always taken into account.

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## MANAGEMENT, DISTRIBUTION AND ADVISORY SERVICES

### INVESTMENT COMPANY

#### Flossbach von Storch SICAV

2, rue Jean Monnet

L-2180 Luxembourg, Luxembourg

Investment company with variable capital under Luxembourg law

Equity capital as at 30 September 2024: EUR 25,215,712,799.96

### BOARD OF DIRECTORS OF THE INVESTMENT COMPANY

#### Chairman of the Board of Directors

Kurt von Storch

Chairman of the Board of Directors

Flossbach von Storch SE

#### Member of the Board of Directors

Matthias Frisch

Independent Member of the Board of Directors

#### Member of the Board of Directors

Carmen Lehr

Independent Member of the Board of Directors

### AUDITOR OF THE INVESTMENT COMPANY

#### PricewaterhouseCoopers, société coopérative

2, rue Gerhard Mercator, B.P.1443

L-1014 Luxembourg, Luxembourg

### MANAGEMENT COMPANY AND AIFM

#### Flossbach von Storch Invest S.A. (société anonyme)

2, rue Jean Monnet

L-2180 Luxembourg, Luxembourg

Equity capital (share capital or registered capital less outstanding deposits plus reserves) as at 31 December 2023:

EUR 17,929,250.00

## SUPERVISORY BOARD OF THE MANAGEMENT COMPANY

### Chairman of the Supervisory Board

Kurt von Storch

Member of the Executive Board

Flossbach von Storch SE, Cologne, Germany

### Member of the Supervisory Board

Matthias Frisch

Independent Member of the Supervisory Board

### Member of the Supervisory Board

Carmen Lehr

Independent Member of the Supervisory Board

## Executive Board of the Management Company (management body)

Markus Müller

Christian Schlosser

Christoph Adamy

## Auditor of the Management Company

KPMG Audit S.à r.l.

39, avenue John F. Kennedy

L-1855 Luxembourg, Luxembourg

## DEPOSITARY

### BNP PARIBAS, Succursale de Luxembourg

60, avenue J.F. Kennedy

L-1855 Luxembourg, Luxembourg

## UCI ADMINISTRATOR

### BNP PARIBAS, Succursale de Luxembourg

60, avenue J.F. Kennedy

L-1855 Luxembourg, Luxembourg

## Flossbach von Storch Invest S.A. (société anonyme)

2, rue Jean Monnet

L-2180 Luxembourg, Luxembourg

## FUND MANAGER

### Flossbach von Storch SE (European Company)

Ottoplatz 1

D-50679 Cologne, Germany

SALES AGENT AND REPRESENTATIVE

*Federal Republic of Germany*

Flossbach von Storch SE

Ottoplatz 1

D-50679 Cologne, Germany

Equity capital (share capital or registered capital less outstanding deposits plus reserves) as at 31 December 2023:  
EUR 918,661,450.40

PAYING AGENT

*Grand Duchy of Luxembourg*

BNP PARIBAS, Succursale de Luxembourg

60, avenue J.F. Kennedy

L-1855 Luxembourg, Luxembourg

*Federal Republic of Germany*

BNP Paribas S.A., German branch

Senckenberganlage 19

D-60325 Frankfurt/Main, Germany



The investment company (*société d'investissement à capital variable*) described in this document (consisting of the sales prospectus, articles of association and annexes, collectively referred to as the "Sales Prospectus"), Flossbach von Storch SICAV (the "Investment Company" or "Fund"), is an alternative investment fund ("AIF") established for an indefinite period in the form of an umbrella fund with one or more sub-funds ("sub-funds") in accordance with Part II of the Luxembourg Law of 17 December 2010 on undertakings for collective investment, as amended ("Law of 17 December 2010").

The Sales Prospectus (including annexes) is only valid in conjunction with the most recently published annual report, if available, which must not be more than 18 months old. If more than eight months have elapsed since the date of the annual report, the purchaser must also be provided with the semi-annual report. The annual and semi-annual reports are prepared in accordance with the Lux GAAP accounting standard. The current Sales Prospectus and the "Key Information Document" shall form the legal basis for the purchase of shares. When purchasing a share, the shareholder acknowledges the Sales Prospectus, the Key Information Document ("Key Investor Information"), and all approved and published changes thereto.

No information or statements that deviate from the Sales Prospectus (including annexes) may be provided. Both the Management Company and the Investment Company shall not be liable if any information or statements deviating from the terms of the current Sales Prospectus are given.

The Sales Prospectus (including annexes), the Articles of Association, the Key Information Document and the relevant annual and semi-annual reports of the Investment Company or the sub-funds are available free of charge from the registered office of the Investment Company, the Management Company and the Depositary, and from the Paying Agents and Sales Agents by post or email. The aforementioned documents and any amendments thereto can also be downloaded from the website [www.fvsinvest.lu](http://www.fvsinvest.lu). For more information, please refer to the "Information for shareholders" section.

The shares of the Investment Company may not be distributed outside the Grand Duchy of Luxembourg and Federal Republic of Germany by means of a public offer, public advertising or in similar manner.

Apart from this, shares may only be offered for purchase or sold in jurisdictions in which such offer or sale is permitted. This includes the distribution of shares to professional investors in accordance with EU Directive 2011/61/EU on alternative investment fund managers in the countries in which distribution in accordance with this Directive has been reported.

Please note that the Sales Agent is not entitled to own or possess investors' funds or securities.

## SALES PROSPECTUS

The Investment Company was set up on the initiative of Flossbach von Storch SE and is managed by Flossbach von Storch Invest S.A. (the “Management Company”).

Enclosed with this Sales Prospectus is at least one annex relating to a sub-fund, as well as the Articles of Association of the Investment Company. The Sales Prospectus, Articles of Association and annexes constitute an integrated whole in terms of their substance and thus supplement each other.

### The Investment Company

The Investment Company is a public limited company with variable capital (*société d'investissement à capital variable in the form of a société anonyme*) under the laws of the Grand Duchy of Luxembourg law with its registered office at 2, rue Jean Monnet, L-2180 Luxembourg, Grand Duchy of Luxembourg (Tel.: +352 275 607 30, Fax: +352 275 607 39, Email: info@fvsinvest.lu). It was founded on 19 October 2007 for an indefinite period in the form of an umbrella fund with multiple sub-funds. Its articles of association were published for the first time on 29 November 2007 in Mémorial, Recueil des Sociétés et Associations, the official Journal of the Grand Duchy of Luxembourg (“Mémorial”), and last amended and published on 16 December 2020 in Recueil électronique des sociétés et associations (“RESA”). The Investment Company is registered in the Luxembourg Trade and Companies Register under registration number R.C.S. Luxembourg B-133073. The Investment Company had net fund assets of EUR 25,215,712,799.96 on 30 September 2024.

The Investment Company's financial year ends on 30 September of each year. Under the Law of 17 December 2010, the Investment Company must have minimum capital of at least EUR 1,250,000.00.

The sole purpose of the Investment Company is investment in permitted assets in accordance with the principle of risk diversification pursuant to Part II of the Law of 17 December 2010, with the objective of achieving a reasonable performance for the benefit of the shareholders by pursuing a specific investment policy.

The Board of Directors of the Investment Company is authorised to carry out all transactions that are necessary or beneficial for the fulfilment of the company's purpose. The Board of Directors is responsible for all the affairs of the Investment Company, unless they are specified in accordance with the Law of 10 August 1915 on commercial companies (including amendments) or the Articles of Association of the Investment Company as being reserved for the shareholders' meeting. The Board of Directors of the Investment Company has tasked the Management Company with the daily management of the Investment Company pursuant to a contract dated 1 January 2013.

The Investment Company and the Management Company may both terminate this contract with the notice period contained therein by giving the other party written notice. The Investment Company is, however, only permitted to terminate the Management Company if a new management company assumes the functions and responsibilities set down for a management company in the Articles of Association, Sales Prospectus, management agreement and applicable laws. After the dismissal of the Management Company, it shall continue to fulfil its tasks for as long as is required to transfer all tasks and responsibilities to the new management company.

### The Management Company and AIFM

The Management Company of the Fund is Flossbach von Storch Invest S.A. (the “Management Company”), a public limited company under the law of the Grand Duchy of Luxembourg with its registered office located at 2, rue Jean Monnet, L-2180 Luxembourg. The Management Company was incorporated for an indefinite period on 13 September 2012. Its Articles of Association were published on 5 October 2012 in Mémorial and were last amended and published on 15 November 2019 in Recueil électronique des sociétés et associations (“RESA”), the trade and companies register of Luxembourg. The Management Company is registered in the Commercial Register of Luxembourg District Court under registration number R.C.S. Luxembourg B-171513. The Management Company's financial year ends on 31 December of each year. The equity capital of the Management Company on 31 December 2023 was EUR 17,929,250.00.

The purpose of the Management Company is

- collective portfolio management (incl. all of the responsibilities indicated in Annex II of the Law of 17 December 2010 on undertakings for collective investment, as amended (the “Law of 2010”) of one or more Luxembourg and/or foreign undertakings for collective investment in transferable securities (“UCITS”) in the interests of the shareholders and in accordance with the provisions of Chapter 15 of the Law of 2010;
- collective portfolio management of other Luxembourg or foreign undertakings for collective investment that do not fall under the above-mentioned law (“UCIs”) and are not considered alternative investment funds (“AIFs”) within the meaning of the Law of 12 July 2013 on alternative investment fund managers, as amended (the “Law of 2013”), including the management, administration and distribution of specialised investment funds in accordance with the Law of 13 February 2007, and of Luxembourg investment companies in risk capital within the meaning of the Law of 15 June 2004 on investment companies in risk capital;
- the management of Luxembourg or foreign AIFs (incl. all of the responsibilities indicated in Annex I of the Law of 2013);
- individualised management of individual portfolios in accordance with Article 101 (3) (a) of the Law of 2010 and Article 5 (4) (a) of the Law of 2013. It can also provide the ancillary services listed in indent two of Article 101 (3) (b) of the Law of 2010 and in Article 5 (4) (b) (ii) and (iii) of the Law of 2013;
- management of its own assets. For this purpose it can perform its activities domestically and abroad, establish branch offices and conduct all other business that is conducive to the attainment of its purpose and remains within the scope of statutory provisions, in particular those of the Law of 10 August 1915 on commercial companies, the Law of 2010 and the Law of 2013.

The Management Company satisfies 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 (UCITS) and Directive 2011/61/EU on alternative investment fund managers.

The Management Company acts as an external manager of the Fund (AIFM) and as a valuation agent within the meaning of the Law of 12 July 2013.

The Management Company is responsible for the management and administration of the Investment Company and its sub-funds. On behalf of the Investment Company and/or its sub-funds, it may take all management and administrative measures and exercise all rights directly or indirectly connected with the assets of the company or sub-funds.

When carrying out its tasks, the Management Company acts honestly, fairly, professionally and independently of the Depositary and solely in the interests of shareholders.

The Supervisory Board of the Management Company has appointed Messrs Markus Müller, Christian Schlosser and Christoph Adamy as members of the Executive Board and transferred the management of business operations to them.

The Management Company carries out its duties with the care of a paid authorised agent (*mandataire salarié*).

In addition to the investment fund described in this Sales Prospectus, the Management Company currently manages the following investment funds: Flossbach von Storch, Flossbach von Storch II, Flossbach von Storch III SICAV, Flossbach von Storch IV, Flossbach von Storch - Fundament and Flossbach von Storch ONE.

The Management Company is entitled, subject to the agreement of the Board of Directors of the Investment Company, at its own responsibility and control, to delegate the activities transferred to it by the Investment Company to third parties. Such delegation must not impair the effectiveness of supervision by the Management Company in any way. In particular, the delegation of tasks must not obstruct the Management Company from acting in the interests of shareholders and ensuring that the Investment Company is managed in the best interests of shareholders.

The Management Company uses a fund manager under its own responsibility and control and at its own expense to manage sub-fund assets.

The Management Company has adequate capital in accordance with the requirements of the Law of 12 July 2013.

### **The Depositary and Luxembourg Paying Agent**

The Law of 17 December 2010 stipulates that the management and the custody of fund assets are conducted separately.

The Depositary and Paying Agent of the Fund appointed by the Management Company is BNP PARIBAS, Succursale de Luxembourg, with its registered office at 60, avenue J.F. Kennedy, L-1855 Luxembourg ("Depositary", "Paying Agent").

The Depositary holds assets in separate blocked custody or cash accounts. It must particularly ensure that shares are issued and redeemed and the value of shares is calculated in accordance with statutory regulations and the terms of the contract. It shall also ensure that the consideration for transactions conducted for fund assets is deposited in its custody within the customary period and that income from those assets is only used in accordance with statutory regulations and the terms of the contract. In addition, it must follow the instructions of the Management Company, unless such violate statutory regulations or the terms of the contract. It must also verify whether depositing assets in blocked accounts with another bank is compatible with the statutory regulations and terms of the contract. If this is the case, it shall give its consent to the deposit.

The value of fund assets and the value of the shares are calculated by the Management Company or the Central Administration Agent, if necessary by delegation to another institution monitored by the Depositary.

The Depositary is a public limited company incorporated for an indefinite period under the laws of the Grand Duchy of Luxembourg and conducts banking business. The rights and obligations of the Depositary are governed by the Law of 17 December 2010, the Law of 12 July 2013, applicable regulations, the Depositary Agreement, the articles of association and this Sales Prospectus (including annexes). It acts honestly, fairly, professionally and independently of the Management Company and solely in the interest of the investors.

Subject to the conditions defined in Article 39, point 3 of the Articles of Association, the Depositary may delegate its tasks to another company ("sub-depositary"). An up-to-date overview of the sub-depositaries is provided on the Management Company's website ([www.fvsinvest.lu](http://www.fvsinvest.lu)) and can be requested free of charge from the Management Company.

The Investment Company and the Depositary may terminate the depositary agreement in writing in accordance with the time limits set out in the depositary agreement. However, the Investment Company may relieve the Depositary of its tasks only if a new depositary that will assume the tasks and responsibilities of a depositary is appointed within two months. After the dismissal of the Depositary, it shall continue to fulfil its tasks and responsibilities until the transfer of all the sub-fund assets to the new depositary has been completed.

**No more than 20% of the value of the relevant sub-fund's assets can be held in the form of bank balances with the Depositary or any other credit institution. Bank balances held with the Depositary or another credit institution are not protected by a deposit guarantee scheme.**

## **Specialised companies for the safekeeping of physical precious metals**

Physical precious metals may also be stored by entities other than the Depositary or any sub-custodians. A current overview of the companies commissioned to store physical precious metal holdings can be found on the Management Company's website ([www.fvsinvest.lu](http://www.fvsinvest.lu)) or requested free of charge from the Management Company.

### **The UCI Administrator**

UCI administration comprises a variety of tasks that can be divided into three main areas: acting as Registrar, calculating the net asset value (NAV) and carrying out fund accounting, and the client communication function.

The tasks of the Registrar include technically processing and implementing applications or orders for the subscription, redemption, exchange and transfer of registered shares subject to the supervision of the Depositary, verifying compliance with the applicable anti-money laundering legislation in accepting subscription applications, and keeping the share register.

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

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

The formal function as UCI manager is performed by BNP PARIBAS, Succursale de Luxembourg, with its registered office at 60, avenue J.F. Kennedy, L-1855 Luxembourg.

Among other tasks, BNP PARIBAS, Succursale de Luxembourg, is mainly responsible for the tasks of the registrar and sub-tasks of fund accounting and NAV calculation. Remaining activities are performed directly by the management company. The management company is supported by BNP PARIBAS, Succursale de Luxembourg, in the tasks associated with client communication.

The appointment may give rise to conflicts of interest, which are described in more detail in the section "Risk warnings".

### **The Fund Manager**

With the consent of the Board of Directors of the Investment Company and by contract dated 13 December 2012, the Management Company has appointed Flossbach von Storch SE, a European Company with its registered office at Ottoplatz 1, 50679 Cologne, Germany, as the Fund Manager of the Investment Company and its sub-funds ("Fund Manager"). The Fund Manager is licensed by its country of incorporation to manage assets and is subject to supervision by the German Federal Financial Supervisory Agency (BaFin).

The Fund Manager is particularly tasked with the independent day-to-day implementation of the investment policy of the various sub-funds and the management of day-to-day asset management transactions, as well as other related services under the supervision, responsibility and control of the Management Company. The Fund Manager must execute these tasks while obeying the principles of the investment policy and investment restrictions of the respective sub-fund, as described in this Sales Prospectus, as well as the statutory investment restrictions.

The Fund Manager is authorised to select agents and brokers to process transactions relating to the assets of the various sub-funds. The Fund Manager is responsible for investment decisions and the issuing of orders.

The Fund Manager has the right to obtain advice from third parties, particularly from various investment advisers, at its own expense and on its own responsibility.

With the approval of the Investment Company's Board of Directors, the Fund Manager, under its own responsibility and control, is permitted to transfer one or more of its duties to third parties, the remuneration of which is entirely at its own expense. In this event, this Sales Prospectus (including annex) shall be amended accordingly. The Fund Manager may conclude advisory agreements for the sub-funds with investment advisers specialising in the respective investment policy. Such advisers shall be specified in the annex for the relevant sub-fund.

The Fund Manager may waive its fees in full or in part.

The Fund Manager bears all costs and expenses that it incurs in connection with the provision of its services. Commission for brokers, transaction fees and other transaction costs arising in connection with the purchase and sale of assets are borne by the relevant sub-fund.

The Management Company may appoint an investment committee for the individual sub-funds that is subject to the supervision and control of the Management Company, to which the directors of the Investment Company may belong, and which advises the Management Company and the Fund Manager. If an investment committee is established for an individual sub-fund, this shall be specified in the relevant annex to this Sales Prospectus pertaining to the sub-fund. In this event, the investment committee shall meet at regular intervals, receive the Fund Manager's report on the last reporting period and obtain information about the future investment strategy of the respective sub-fund. The investment committee may make recommendations regarding the general principles of the investment policy, but these are not binding for the Fund Manager.

### **The Sales Agent in Germany**

The Sales Agent for the Fund in Germany is Flossbach von Storch SE, a European Company with its registered office at Ottoplatz 1, D-50679 Cologne. The Sales Agent is authorised to accept applications to subscribe, redeem and exchange shares in the individual sub-funds and will pass these on to the Registrar.

The Sales Agent will only distribute shares of the sub-funds in Germany.

### **The Auditor**

The general meeting of the Investment Company has appointed PricewaterhouseCoopers, société coopérative, with its registered office at 2, rue Gerhard Mercator, L-1014 Luxembourg, as the Fund's auditor. The auditor audits the financial statements in accordance with the international audit standards adopted for Luxembourg by the Commission de Surveillance du Secteur Financier ("CSSF"). An audit includes, in particular, the performance of audit procedures to obtain documentary evidence for the valuations and information presented in the financial statements.

### **Legal position of shareholders**

The Management Company invests the monies deposited in the individual sub-funds in permitted assets for the shareholders ("shareholders"), in accordance with the principle of risk diversification. The monies invested and the assets acquired with such monies constitute the sub-fund assets, which are held separately from the Management Company's own assets.

As joint owners, the shareholders own a share of the respective sub-fund pro rata to their shares. The shares in the respective sub-fund shall be issued using the certificates and denominations stated in the annex specific to that sub-fund. If registered shares are issued, these are documented by the Registrar in the share register kept on behalf of the Investment Company. Confirmation of entry of the shares in the share register is sent to shareholders at the addresses specified in the share register. There is no entitlement to delivery of physical securities.

All shares in a sub-fund have the same rights unless the Investment Company decides to issue various share classes within a sub-fund. The share classes may have different characteristics and rights in terms of the use of income, fee structure or other specific characteristics and rights. If share classes are formed for a particular sub-fund, details of

the specific characteristics or rights for each share class are set out in the corresponding annex to the Sales Prospectus.

The Investment Company wishes to point out to all shareholders that they can only assert all their rights (particularly the right to participate in shareholders' meetings) against the fund and/or sub-fund directly if they are registered in the shareholders' register for the relevant fund or sub-fund under their own name. In cases where a shareholder has invested in a fund or sub-fund through an intermediary that undertakes investments in its name but on behalf of the shareholder, the shareholder cannot necessarily assert all their rights directly against the fund and/or sub-fund. In particular, the payment of compensation amounts may be impaired in the event of significant calculation errors and/or non-compliance with the applicable investment regulations and/or other errors when subscribing via intermediaries. Compensation to ultimate investors for errors in the NAV calculation, non-compliance with the applicable investment regulations and other errors will always be made in accordance with the provisions of CSSF Circular 24/856. Shareholders are advised to seek information regarding their rights.

The Management Company and the Investment Company have introduced organisational and administrative safeguards in order to ensure compliance with the principles of the fair treatment of shareholders. These include requirements for the Investment Company to:

- a) act in the best interests of the Fund and of shareholders;
- b) carry out investment decisions made for the Fund in compliance with the Fund's objectives, investment policy and risk profile;
- c) take all appropriate measures to ensure that orders are executed with the objective of achieving the best possible result;
- d) ensure that the interests of one group of shareholders are not placed above the interests of another group of shareholders;
- e) ensure that fair, correct and transparent price models and valuation systems are used;
- f) avoid unnecessary costs for the Fund or its shareholders;
- g) take all appropriate steps to avoid conflicts of interest, but, if these cannot be prevented, determine, monitor, resolve and, if appropriate, publicise them in order to prevent them from negatively affecting the interests of the shareholders; and
- h) maintain an efficient complaint management system.

#### **General information on trading in the sub-funds' shares**

Investing in the sub-funds is regarded as a long-term commitment. The Management Company rejects arbitrage techniques such as market timing and late trading.

Market timing refers to the method of arbitrage whereby the shareholder systematically subscribes, exchanges or redeems shares of a (sub-)fund within a short period of time for the purpose of exploiting time differences and/or weaknesses or any incompleteness in the valuation system for the net asset value of the (sub-)fund. The Management Company takes the relevant protection and control measures to prevent such practices. It also reserves the right to reject, cancel or suspend an application from a shareholder for the subscription or exchange of shares if it suspects that the shareholder is engaging in market timing.

The Management Company strictly rejects the purchase or sale of shares after the close of trading at a closing price that is known beforehand or is foreseeable – a practice known as late trading. The Management Company ensures in all cases that shares are issued on the basis of a share value previously unknown to the investor. If there is a suspicion that a shareholder is engaging in late trading, however, the Management Company can refuse to accept the application to subscribe or redeem shares until the applicant has satisfied all doubts in relation to their application.

If the Investment Company has admitted shares in the Fund for official trading on an exchange, this is stated in the relevant annex to the Sales Prospectus.

It cannot be ruled out that the Fund's shares will also be traded on other markets (e.g. inclusion in the open market of a stock exchange).

The market price forming the basis for stock market trading or trading on other markets is not determined exclusively by the value of the assets kept in the Fund, but also by supply and demand. The market price can therefore deviate from the calculated share price.

#### **General provisions of the investment policy (investment conditions)**

The Investment Company consists of one or more sub-funds (or "financial product") whose assets are invested in accordance with the principle of risk diversification pursuant to Part II of the Law of 17 December 2010 and in accordance with the investment policy for each sub-fund described below and the investment restrictions described in Art. 4 of the Articles of Association and the following paragraphs of this Sales Prospectus.

The Board of Directors of the Investment Company is entitled to establish new sub-funds and new share classes within existing sub-funds at any time. In this event, this Sales Prospectus shall be amended accordingly by the addition of an annex.

The objective of the Investment Company's investment policy is to achieve an appropriate performance in the currency of each sub-fund ("sub-fund currency") in terms of income and capital appreciation for all permissible assets (as defined below). The specific form that this investment objective takes for each individual sub-fund, as well as the investment policy that results for each sub-fund, is described in the relevant annex to this Sales Prospectus.

The Management Company and Flossbach von Storch SE as the Fund Manager are using an integrated definition of sustainability for this purpose, in which long-term corporate governance with integrity plays a major role. Further information on the sustainability policy is provided in the "Sustainability policy" section.

#### **Regulatory investment restrictions**

1. In the course of implementing the specific investment policy for each sub-fund, the Investment Company may:

a) purchase investment shares in the following types of investment funds and/or investment companies:

(1) funds established in the Federal Republic of Germany and/or investment companies that fulfil the conditions of Directive 2009/65/EC;

and/or

foreign investment funds that fulfil the conditions of Directive 2009/65/EC;

and/or

(2) investment funds established in the Federal Republic of Germany as defined in Art. 220 KAGB (Kapitalanlagegesetzbuch; German Capital Investment Code) ("other investment funds") that do not themselves invest in other investment funds in accordance with no. 1 a) (2);

and/or

EU investment funds and/or foreign investment funds which meet the requirements for other investment funds and which do not themselves invest in other investment funds in accordance with no. 1 a) (2);

and/or

(3) investment funds established in the Federal Republic of Germany as defined in Art. 218 KAGB ("mixed investment funds");



and/or

EU investment funds and/or foreign investment funds that fulfil the conditions for mixed investment funds;

and/or

(4) other investment funds

- that have been approved in their country of domicile in accordance with legal provisions that subject them to an effective form of public supervision for the protection of investors, and that offer sufficient guarantees for adequate cooperation between the supervisory authority in the respective country of domicile and the Commission de Surveillance du Secteur Financier ("CSSF"); and

- where the degree of protection for investors is equivalent to that of an investor in an investment fund that complies with Directive 2009/65/EC, and particularly where the provisions for the separate custody of assets, borrowing, lending and short sales of securities and money market instruments are equivalent to the requirements of Directive 2009/65/EC; and

- where business activities are subject to annual and semi-annual reports which permit a judgement to be made concerning the assets and liabilities, income and transactions in the reporting period; and

- where the shares are offered with no limit as to the number of shares, and the investors have the right to redeem such shares

(together referred to as the "target funds").

The shares of the aforementioned target funds are generally not listed on a stock exchange. If they are listed on a stock exchange, this stock exchange is in a signatory state to the Agreement on the European Economic Area, in another OECD country, in Liechtenstein or in Hong Kong.

ETFs on individual precious metals are not classed as target funds owing to the lack of risk diversification.

b) purchase securities

- (1) that are admitted for trading on an exchange in a member state of the European Union or another signatory state to the Agreement on the European Economic Area or admitted to or included in another organised market in one of these states;
- (2) that are solely admitted for trading on an exchange outside a member state of the European Union or another signatory state to the Agreement on the European Economic Area or admitted to or included in another organised market in one of these states, provided that the selection of this exchange or this organised market is permitted by the CSSF or the German Federal Financial Supervisory Agency (BaFin);
- (3) whose terms of issue stipulate that they have to apply for admission to an exchange in a member state of the European Union or another signatory state to the Agreement on the European Economic Area or admission to an organised market or inclusion in this market in a member state of the European Union or another signatory state to the Agreement on the European Economic Area, provided that the securities are admitted or included within one year of their issue;
- (4) whose terms of issue stipulate that they have to apply for admission for trading on an exchange or admission to an organised market or inclusion in this market outside the member states of the European Union or outside the other signatory states to the Agreement on the European Economic Area, provided that the selection of this exchange or this organised market is permitted by the CSSF or the German Federal Financial Supervisory Agency (BaFin) and the securities are admitted or included within one year of their issue;
- (5) in the form of shares to which the fund is entitled in the event of a capital increase from company funds;
- (6) that are purchased in the exercise of subscription rights that are part of the fund assets;

(7) securities in the form of shares in closed-end funds that meet the criteria defined in Art. 2 (2), letters a and b of Directive 2007/16/EC;

c) purchase money market instruments if they

- (1) are admitted for trading on an exchange in a member state of the European Union or another signatory state to the Agreement on the European Economic Area or admitted to or included in another organised market in one of these states;
- (2) are solely admitted for trading on an exchange outside a member state of the European Union or another signatory state to the Agreement on the European Economic Area or admitted to or included in another organised market in one of these states, provided that the selection of this exchange or this organised market is permitted by the CSSF or the German Federal Financial Supervisory Agency (BaFin);
- (3) are issued or guaranteed by the European Union, the Federal Republic of Germany, a special fund of the Federal Republic of Germany, a German state, another member state or another central, regional or local authority, the central bank of a member state of the European Union, the European Central Bank or the European Investment Bank, a third state, or if this is a federal state, one member state of this federation, or by an international public institution to which at least one member state of the European Union belongs;
- (4) are issued by a company whose securities are traded on markets defined in the preceding numbers (1) and (2);
- (5) are issued or guaranteed by a bank subject to supervision according to the criteria defined by the law of the European Union;
- (6) are issued or guaranteed by a bank subject to and in compliance with supervisory criteria that the CSSF or the German Federal Financial Supervisory Agency (BaFin) believes to be equivalent to those of European Union law;
- (7) are issued by other issuers and the issuer in question is
  - a) a company with equity of at least EUR 10 million that prepares its annual accounts in accordance with the Fourth Council Directive 78/660/EEC dated 25 July 1978, on the basis of Art. 54 (3), subsection g of the Treaty on the annual accounts of certain types of companies, as amended by Art. 1 of Directive 2012/6/EU;
  - b) an entity within a group comprising one or more publicly listed companies that is responsible for the financing of this group, or
  - c) an entity that is to securitise liabilities by making use of a credit line granted by a bank. Art. 7 of Directive 2007/16/EC applies to the securitisation and the credit line granted by a bank.

The money market instruments named under no. 1 c) may only be acquired if they meet the requirements of Art. 4 (1) and (2) of Directive 2007/16/EC. For money market instruments according to no. 1 c) (1) and (2) above, Art. 4 (3) of Directive 2007/16/EC applies.

The money market instruments named under no. 1 c) (3) to (7) may only be acquired if the issuer or the issuer of those instruments is subject to provisions governing the protection of deposits and investors and also if the criteria in Art. 5 (1) of Directive 2007/16/EC are fulfilled. For the acquisition of money market instruments which are issued pursuant to no. 1 c) (3) by a regional or local authority of a member state of the European Union or by an international public institution within the meaning of no. 1 c) (3), but which are not guaranteed by this member state or, if this is a federal state, by a member state of this federation, and for the acquisition of money market instruments according to no. 1 c) (4) and (7), Art. 5 (2) of Directive 2007/16/EC applies; for the acquisition of all other money market instruments according to no. 1 c) (3) excluding money market instruments which were issued or guaranteed by the European Central Bank or the central bank of a member state of the European Union, Art. 5 (4) of this Directive applies. For the acquisition of money market instruments according to no. 1 c)

(5) and (6), Art. 5 (3) applies and, if these are money market instruments that are issued or guaranteed by a bank subject to and in compliance with supervisory criteria that the German Federal Financial Supervisory Agency (BaFin) believes to be equivalent to those of European Union law, Art. 6 of Directive 2007/16/EC applies.

The securities listed under no. 1 b) (1) to (4) and the money market instruments listed under no. 1 c) (1) to (4) above are only acquired if they are admitted for trading on exchanges or admitted to or included in an organised market situated in North America, South America, Australia (including Oceania), Africa, Asia and/or Europe, provided that the selection of this exchange or this organised market is permitted by the CSSF or the German Federal Financial Supervisory Agency (BaFin).

- d) make demand deposits or term deposits with a term not exceeding 12 months with banks provided that the bank's registered office is in a member state of the EU, or if its registered office is in a third state, it is subject to supervisory criteria that in the opinion of the CSSF are equivalent to those of Community law.
- e) purchase derivative financial instruments ("derivatives"), including equivalent cash-settled instruments, if they are traded on a regulated market as defined in no. 1 b) (1) or (2), and/or derivative financial instruments not traded on an exchange ("OTC derivatives"), provided that
  - the underlying assets are securities, money market instruments, investment shares or financial indices, interest rates, exchange rates or currencies in which the respective sub-fund may invest in line with the investment objectives defined in the Articles of Association,
  - the counterparties for transactions involving OTC derivatives are institutions subject to supervision in a category approved by the CSSF,
  - the OTC derivatives are subject to reliable and verifiable daily valuation and can be sold, liquidated or closed out at an appropriate fair value by a transaction at any time on the initiative of the relevant sub-fund, and
  - these derivatives and OTC derivatives are used for the efficient portfolio management of the respective sub-fund, without changing the investment character of that fund.
- f) derivative financial instruments ("derivatives") described above whose underlying asset is not an underlying asset described in 1 e);
- g) precious metals (gold, silver, platinum, palladium) in physical form;
- h) unsecuritised loan receivables. The main criterion for an unsecuritised loan receivable is that it must be assigned by a third party for consideration;
- i) other investment instruments within the meaning of Art. 198 KAGB.

## 2. Issuer limits and risk diversification

### a) For investments in target funds

- (1) Each sub-fund may not invest more than 20% of its assets in any single one of the target funds defined under 1 a) above.
- (2) Each sub-fund may not invest more than 30% of its net sub-fund assets in shares of target funds as defined in number 1 a) (2) above.
- (3) Shares in the target funds listed in number 1 a) above may only be purchased for the sub-fund if the target fund's investment conditions, Articles of Association or shareholders' agreement in turn allow it to invest a maximum of 10% of the value of its assets in shares in other target funds.

- (4) Shares in the target funds defined in no. 1 a) (2) above may only be purchased for a sub-fund if no more than two target funds are purchased from the same issuer or fund manager and each of these target funds in turn does not invest in shares in other target funds as defined in no. 1 a) (2).
- (5) The fund's acquisition of shares in the target funds listed in no. 1 a) (2) above is limited to max. 10% of the net fund assets if these are not subject to state supervision that is comparable to the requirements of the German Capital Investment Code (KAGB).
- (6) For the selection and monitoring of the target funds defined in no. 1 a) (2), the Fund Manager applies a careful selection and control process ("due diligence") which includes the following criteria:

#### Qualitative criteria

- Assessment of the management and the Fund Manager/the team in terms of personality, experience, training, performance and internal organisation;
- References from inside and outside the sector;
- Investment style, strategy and decision-making processes;
- Availability of relevant information and transparency (prospectuses, information memoranda, annual and semi-annual reports, etc.);
- Reputation of the auditor, Depositary and administration agent;
- Risk monitoring.

#### Quantitative criteria

- Verification of the correlation between the strategy and the performance of individual target funds;
- Comparison between target funds in terms of performance, Sharpe ratio, fund volume and development, fee structure;
- Redemption and subscription conditions.

The objective of the quantitative and qualitative fund analysis is to select funds that will bring added value in the relevant market phase (lower risk and/or outperform the sector).

The aforementioned selection criteria for target funds are not to be considered as definitive. Further criteria that are not listed here can be added in order to take due account of short-term trends and future developments.

The Fund Manager is to determine whether those people responsible for investing the target funds have the general professional competence to do so and whether their experience and practical knowledge correspond to the profile of the Fund.

The target funds may have different characteristics and follow different investment strategies and therefore have different investment principles and limits. However, they may not take out loans of more than 20% of the net assets of the sub-fund, use derivatives that lead to leverage of more than 200%, utilise securities loans if the repayment of the loan is due more than 30 days after the transfer of the securities or if the market value of the securities to be transferred exceeds 15% of the net assets of the sub-fund, or engage in short selling in order to generate leverage. Otherwise there is no restriction to target funds with particular investment strategies. However, the target funds must not be real estate funds as defined by Sections 230–260 KAGB or comparable EU AIFs, or foreign AIFs. In accordance with the terms of 1 a), the registered offices of the target fund may be anywhere in the world.

The assets of these target funds must be held in custody by a depositary or the functions of a depositary must be exercised by a comparable institution ("prime broker").

Subject to no. 2 a), there is no limit to the extent to which these target funds may invest in bank balances, money market instruments and shares in target funds.

A management fee will generally be charged at the level of the target fund when shares in target funds are purchased. For each sub-fund, the Investment Company's annual report will include information on the maximum amount of management fees to be paid by the sub-funds and the target funds.

A sub-fund of an umbrella fund may also invest in other sub-funds of the same umbrella fund. In addition to the conditions for investing in target funds mentioned above, the following conditions apply to investments in target funds that are also sub-funds of the same umbrella fund:

- Circular investments are not permitted. This means that the target sub-funds cannot themselves invest in the sub-funds of the same umbrella fund which itself invests in the target sub-fund.
  - The sub-funds of an umbrella fund that are to be acquired by another sub-fund of the same umbrella fund may, pursuant to their management regulations or articles of association, invest a maximum of 10% of their assets in shares of other target sub-funds of the same umbrella fund.
  - Voting rights from holding shares in target funds that are simultaneously target funds of the same umbrella fund are suspended as long as these shares of a sub-fund of the same umbrella fund are held. This rule does not affect the appropriate recording thereof in the annual accounts and periodic reports,
  - As long as a sub-fund holds shares in another sub-fund of the same umbrella fund, the shares of the target sub-fund are not taken into account in the calculation of net asset value, provided that the calculation serves to determine whether the legal minimum capital of the umbrella fund has been obtained, and
  - If a sub-fund acquires shares of another sub-fund of the same umbrella fund, there may be no double charging of management, subscription or redemption fees at the level of the sub-fund that has invested in the target sub-fund of the same umbrella fund.
- (7) Every sub-fund of a target fund with several sub-funds is to be considered as an independent target fund, on the proviso that these sub-funds are not jointly and severally liable to third parties for the obligations of the other sub-funds.

b) Other sub-fund-specific details

- (1) When investing in shares of target funds, investments may be made in investment funds where the redemption of shares is subject to restrictions.
- (2) The Fund may not invest in shares of foreign target funds from states that do not cooperate in combating money laundering pursuant to international agreements (Non-Cooperative Countries and Territories (NCCTs)).
- (3) No shares may be acquired for the Fund from venture capital, infrastructure and private equity funds or from hedge funds and property funds.

c) Investments in securities, money market instruments and OTC derivatives:

- (1) A maximum of 20% of individual net sub-fund assets may be invested in securities or money market instruments from a single issuer.
- (2) No more than 20% of securities of the same type may be acquired from a single issuer.
- (3) The default risk for the relevant sub-fund's transactions with OTC derivatives may not exceed the following rates:

- 20% of net sub-fund assets if the counterparty is a bank with registered offices in an EU member state or is subject to regulatory criteria that in the opinion of the CSSF are equivalent to those of Community law.
- 10% of net sub-fund assets in all other cases.

The limits defined in points (1) and (2) above do not apply to securities issued or guaranteed by a member state of the OECD or its local authorities or by supranational institutions or by organisations under Community, regional or international law. In this event, the securities held in fund assets must come from at least six different issues, whereby the value of the securities from a single issue may not exceed 30% of net fund assets.

#### d) Bank balances

Individual sub-funds may hold up to 49% of their net sub-fund assets in cash as defined in no. 1 c) and d).

Cash may also be held in a currency other than the currency of the individual sub-fund.

No more than 20% of the value of the relevant sub-fund's assets can be held in the form of bank balances with the Depositary or any other credit institution.

### 3. Loans and encumbrance prohibition

- Each sub-fund may regularly take out loans from banks with top-class credit ratings specialising in this kind of business and from the Depositary.
- The assets belonging to a particular sub-fund must not be pledged or otherwise encumbered, assigned or transferred as collateral, unless this involves borrowing pursuant to c) below, the granting of options to third parties or transactions involving repurchase agreements, financial futures, currency futures, swaps or similar transactions.
- Short-term loans to a sub-fund are permissible provided they do not exceed 20% of the net assets of the sub-fund and provided the loan is taken out subject to normal market terms. Since the loans may only be short term, the associated risks are nevertheless slight. Except for technical overdrafts, the terms of all loans must be approved by the Depositary. The Depositary shall approve the loan if it fulfils the aforementioned requirements as well as the applicable legal provisions and the Articles of Association.
- Loans may neither be granted nor may guarantee obligations be entered into for third parties at the expense of sub-fund assets.

The risks associated with borrowing are described under the general remarks relating to risk in the section "Risks associated with loans".

### 4. Further investment guidelines

- The short selling of securities is not permitted.
- Individual sub-funds will not invest in securities with unlimited liability.
- Sub-fund assets may not be invested in property.
- Precious metals may be purchased for the sub-funds, both in physical form and indirectly. Merchandise and commodities may only be purchased indirectly. Precious metals include gold, silver, platinum and palladium.

Physical precious metals, precious metal derivatives, commodities, merchandise and certificates with a derivative component based on precious metals, commodities and merchandise together with other derivatives and unsecuritised loan receivables, including those suitable for purchase as other investment instruments in accordance with Art. 198 KAGB, may not exceed 30% of the sub-fund's assets. Derivatives within the meaning of Art. 197 (1) KAGB are not included in this limit.

Individual sub-funds may invest up to 15% of their assets directly (physically) in gold, silver, platinum and palladium.

Furthermore, individual sub-funds may invest up to 10% of their assets indirectly (e.g. via certificates, precious metal funds that do not conform to directives provided that they are considered securities in line with the provisions of Art. 41 (1) of the Law of 17 December 2010 and Art. 2 of Directive 2007/16/EC, gold bullion securities, etc.) in gold and other precious metals, whereby the sub-fund's total investment in gold, silver, platinum or palladium (direct and indirect) may not exceed 25% of sub-fund assets at any time. Other precious metals include in particular silver, platinum and palladium.

Precious metals acquired by the sub-fund in physical form shall be kept in the vaults of the Depositary or in the vaults of the sub-depositary of the Depositary. The safekeeping of the precious metals physically acquired by the sub-fund shall be in allocated form. The ingots held must be clearly identifiable and allocated to the relevant sub-fund. They are beneficially owned by the respective sub-fund. Precious metals in a custody account are not the property of the Depositary or the sub-depositary, and are therefore protected in the event of the bankruptcy of the Depositary or its sub-depositary. Allocated precious metals are not loaned and are not associated with any form of derivative.

- e) Subject to the agreement of the Depositary, the Management Company may adopt other investment restrictions in order to comply with conditions in those countries where the shares are or are intended to be distributed.
- f) Securities whose resale is restricted in accordance with contractual agreements will not be purchased.
- g) No more than 20% of the value of the individual sub-fund may be invested in other investment instruments within the meaning of Art. 198 KAGB.
- h) Sub-funds will not hold any particular minimum percentage of their assets in bank balances, money market instruments or other liquid funds.

## 5. Techniques and instruments

Subject to the conditions and restrictions defined by the CSSF, sub-funds may use techniques and instruments relating to securities and money market instruments provided that this takes place for the purpose of managing the assets of the sub-fund efficiently. If derivatives are used in such transactions, the conditions and limits must comply with the Law of 17 December 2010. Moreover, when using techniques and instruments, the Fund is not permitted to depart from its investment objectives set out in the Sales Prospectus.

The Management Company employs a risk management procedure that takes into account the supervisory requirements in Luxembourg and enables it at any time to monitor and assess the risk connected with investment positions as well as their share in the total risk profile of the investment portfolio. The procedure used for the corresponding sub-fund to measure risk as well as any more specific information is stated in the annex for the relevant sub-fund. As part of its investment policy and within the limits defined in no. 2, the Fund may invest in derivatives, provided that the total risk of the underlying assets does not exceed the investment limits defined under no. 2 b) (1). Derivatives embedded in a security or a money market instrument must also be taken into account for the purposes of determining compliance with the provisions of no. 2 above.

In accordance with the General provisions of the investment policy referred to in Article 4 of the Articles of Association, the Management Company can make use of derivatives and other techniques and instruments for a particular sub-fund within the framework of efficient portfolio management. The counterparties for the aforementioned transactions must be institutions subject to supervision in a category approved by the CSSF. In addition, they must specialise in these types of transactions. Derivatives and other techniques and instruments are associated with considerable opportunities but also with high risks. Due to the leverage effect of these products, high losses can be incurred for the sub-fund with a relatively low capital investment. The following is a sample, non-exhaustive list of derivatives, techniques and instruments that can be used for the sub-fund:

#### a) Option rights

An option right is a right to buy ("purchase option"/"call") or sell ("sell option"/"put") a particular asset at a predetermined time ("strike date") or during a predetermined period at a predetermined price ("strike price"). The price of a call or put option is the option premium.

Both call and put options may be purchased and sold for the sub-funds provided that the investment policy defined in the relevant annex for the individual sub-fund allows it to invest in the underlying assets.

However, a call option may only be granted to a third party for the account of the sub-fund assets if the assets that form the basis of the call option are part of the sub-fund's assets at the time the call option is granted.

#### b) Financial futures contracts

Financial futures contracts are unconditionally binding agreements for both contracting parties to buy or sell a determined amount of a specific underlying asset at a determined time, the maturity date, at a price agreed in advance.

Financial futures contracts may only be purchased and sold for the sub-funds provided that the investment policy defined in the relevant annex for the individual sub-fund allows it to invest in the underlying assets.

#### c) Derivatives embedded in financial instruments

Financial instruments with embedded derivatives may be acquired for the respective sub-fund. Financial instruments with embedded derivatives can, for example, be structured products (certificates, reverse convertible bonds, bonds with warrants, convertible bonds, credit-linked notes, etc.) or warrants. Products designed under the concept of derivatives embedded in financial instruments are generally characterised by the fact that the embedded derivative components affect the cash flows of the entire product. Alongside the risk characteristics of securities, the risk characteristics of derivatives and other techniques and instruments are also of relevance.

#### d) Currency futures

The Management Company can conclude currency futures for the various sub-funds.

Currency futures are unconditionally binding agreements for both contracting parties to buy or sell a determined amount of the underlying currencies at a determined time, the maturity date, at a price agreed in advance.

#### e) Swaps

The Management Company can conclude swap transactions for the account of the respective sub-fund within the framework of the investment principles.

A swap is a contract between two parties whose subject is the exchange of cash flows, assets, income or risks. Swap transactions which can be concluded for the sub-funds include, inter alia, interest, currency, equity and credit default swaps.

An interest swap is a transaction in which two parties swap cash flows based on fixed or variable interest payments. The transaction can be compared to borrowing funds at a fixed interest rate and simultaneously lending funds at a variable interest rate. The nominal sums of the assets are not swapped.

Currency swaps usually consist of the exchange of nominal sums of assets. They are treated as equivalent to borrowing funds in one currency and simultaneously lending funds in another currency.

Asset swaps, also known as synthetic securities, are transactions that convert the earnings from a particular asset to another interest flow (fixed or variable), or to another currency by combining the asset (e.g. bond, floating rate note, bank deposit, mortgage) with an interest or currency swap.



An equity swap is an exchange of payment flows, value adjustments and/or income from an asset in return for payment flows, value adjustments and/or income from another asset, in which at least one of the exchanged payment flows or income from an asset represents an equity or equity index.

The contracting partners cannot influence the composition or management of the sub-fund's investment portfolio or the underlying assets of the derivatives. Transactions in connection with the respective investment portfolios do not require the approval of the counterparty.

For these sub-funds, the Investment Company will not transact total return swaps or other derivatives with the same characteristics.

#### f) Swaptions

A swaption is the right, but not the obligation, to enter into a swap, the conditions of which have been precisely specified, at a specific time or within a given time period. In other respects, the principles presented in connection with option dealing apply.

#### g) Techniques for the management of credit risks

For the efficient management of sub-fund assets, the Management Company can also use credit default swaps ("CDS").

Within the market for credit derivatives, CDS represent the most widespread and the most significant instrument. CDS enable the credit risk to be separated from the underlying debtor-creditor relationship. This separate tradability of default risks extends the range of possibilities for systematic risk and income management. With a CDS, a secured party (protection buyer) can hedge against certain risks from a debtor-creditor relationship by paying a periodic premium, calculated on the basis of the nominal amount, for transferring the credit risk to a security provider (protection seller) for a defined period. This premium depends, among other things, on the quality of the underlying reference debtor(s) (= credit risk). The risks to be transferred are defined in advance as credit events. As long as no credit events occur, the CDS seller does not have to render performance. If a credit event occurs, the seller pays the predefined amount or the nominal value or an adjustment payment in the amount of the difference between the nominal sum of the reference assets and their market value after the credit event occurs (cash settlement). The buyer then has the right to tender an asset of the reference debtor which is qualified in the agreement, whilst the buyer's premium payments are stopped as of this point. The respective sub-fund can be either a protection buyer or protection seller.

CDS are traded off-exchange (OTC market) so that more specific, non-standard requirements can be addressed for both counterparties – at the price of lower liquidity.

Exposure to the obligations arising from the CDS must not only be in the exclusive interests of the Fund but also be in harmony with its investment policy. With regard to the investment limits in accordance with Article 4 (2) of the Articles of Association, both the bonds underlying the CDS and the particular issuer must be taken into account.

The valuation of credit default swaps takes place on a regular basis in keeping with reasonable and transparent methods. The Management Company and the auditor will monitor the reasonableness and transparency of the valuation methods and their application. The Management Company will rectify any differences ascertained as a result of the monitoring procedure.

#### Remarks

The aforementioned techniques and instruments can, where appropriate, be expanded by the Management Company if new instruments corresponding to the investment objective are offered on the market, which the sub-funds may use in accordance with regulatory and statutory provisions.

By using techniques and instruments for efficient portfolio management, various direct/indirect costs may be incurred which are then charged to the fund assets or which reduce the fund assets. These costs may be incurred for third parties and for parties related to the Management Company or the Depositary.

h) Securities lending

No securities lending transactions are undertaken for sub-funds.

i) Repurchase agreements

The Investment Company will not engage in repurchase agreements on behalf of sub-funds.

The use of the aforementioned techniques and instruments may give rise to conflicts of interest, which are described in more detail in the section "Risk warnings".

The use of the aforementioned techniques and instruments can have both a positive and a negative effect on sub-fund performance.

6. Possible changes to the investment objectives and investment policy

With the prior approval of the supervisory authority, the Investment Company is entitled to alter a sub-fund's investment policy, investment objectives and investment strategy. In this event, investors are notified in an appropriate manner as described in the section "Information for investors".

7. Exceeding investment limits other than as a result of investment decisions

If the aforementioned or sub-fund-specific percentage limits are exceeded, the primary objective of the sub-fund(s) must be to rectify this situation in consideration of investors' best interests.

Additional investment restrictions

If it states in the specific sub-fund investment policy in the relevant annex of the Sales Prospectus that the sub-fund invests at least 51% or 25% of its assets in equity participations, the following conditions will apply in conjunction with the listed regulatory investment restrictions:

If a sub-fund continuously invests at least 51% of its assets in equity participations, it is an equity fund.

If a sub-fund continuously invests at least 25% of its assets in equity participations, it is a mixed fund.

Unless otherwise stated, the above limits may be undershot on up to 20 valuation days in the financial year.

Equity participations are:

1. shares in a corporation listed for official trading on a stock exchange or on another organised market,
2. shares in a corporation that is not a real estate company and that
  - a) has its registered office in a Member State of the European Union or in another signatory state to the Agreement on the European Economic Area and is subject to income taxation for corporations there and is not exempt from this, or
  - b) has its registered office in a non-Member State and is subject to income taxation for corporations in the amount of at least 15% there and is not exempt from this
3. investment units in equity funds in the amount of 51% of the value of the investment unit,
4. investment units in mixed funds in the amount of 25% of the value of the unit or
5. units in other investment funds in the percentage published on each valuation date of their value which they actually invest in the aforementioned shares in corporations; if no actual percentage is published,

**in the amount of the minimum percentage defined in the investment conditions (constitutional documents and sales prospectus) of the other investment fund.**

**With the exception of the cases outlined in Nos. 3, 4 and 5 of this section, investment units are not regarded as equity participations.**

#### **Sustainability policy**

The sustainability policy of the Management Company and of Flossbach von Storch SE as the Fund Manager describes how certain sustainability factors related to environmental protection, society and corporate governance are taken into account in the management of the respective sub-funds. Further information can be found at [www.fvsinvest.lu](http://www.fvsinvest.lu) under the item “Disclosure requirements under Regulation (EU) 2019/2088” and in the sustainability policy detailed there. For information on its active engagement as a shareholder, please refer to the Management Company’s guidelines on exercising voting rights and participation, which are available on the website indicated above.

Flossbach von Storch SE has signed the United Nations-supported Principles for Responsible Investment (UN PRI) as Fund Manager for the sub-funds. In line with the Group-wide uniform investment policy, the Flossbach von Storch Group is obligated to take ESG factors into account when making investment decisions and actively integrate them into its voting decisions as a shareholder.

Flossbach von Storch SE, as the Fund Manager of the sub-funds, will consider in the investment process the principal adverse impacts (PAIs) of the investment decision on sustainability factors pursuant to Article 7(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector. The principal adverse impacts are determined, prioritised and evaluated within the framework of the in-house analysis process on the basis of specific ESG analyses, which are prepared individually for invested issuers/guarantors and are taken into account in the risk-return profile of the company analyses.

The PAI indicators are prioritised according to relevance, severity of negative impacts, and data availability. The evaluation is not based on rigid bandwidths or thresholds that companies must meet or achieve; rather, the focus is on whether there is a positive development in how they are managing the PAI indicators.

The engagement policy aims to reduce particularly negative impacts, focusing on the indicators of Scope 1 & 2 greenhouse gas emissions, energy consumption of non-renewable energy sources, and serious violations of the UN Global Compact principles and OECD Guidelines for Multinational Enterprises. This means that if one of the portfolio companies does not adequately manage the indicators identified as particularly negative, this is addressed with the company and an attempt is made to work towards a positive development. If the management does not take the necessary steps to improve the situation to a sufficient extent, the voting rights in this regard will be exercised or the shareholding sold.

Due to the insufficient quality and coverage of the data, so-called Scope 3 emissions and energy production of non-renewable energies are not taken into account within the framework of greenhouse emissions. The Fund Manager will continuously monitor data coverage and, if deemed feasible, include it in its investment and engagement process.

In addition, exclusions, such as the production and/or distribution of controversial weapons and the extraction and/or distribution of coal, can help to reduce or avoid individual adverse impacts on sustainability.

Information on the identified principal adverse impacts on sustainability factors that are taken into account in the investment strategy is provided in the annex to the annual report in accordance with Art. 11 of Regulation (EU) 2019/2088.

The investments underlying the sub-funds do not contribute achieving an environmental objective pursuant to Article 9 of Regulation (EU) 2020/852 (EU Taxonomy). The minimum proportion of environmentally sustainable investments undertaken as defined by the EU Taxonomy is 0%.

Further information in connection with the application of environmental and/or social characteristics and, where applicable, sustainable investment objectives in accordance with Article 8 of Regulation (EU) 2019/2088 and Article 6 of Regulation (EU) 2020/852 (EU Taxonomy) for the Flossbach von Storch SICAV - Multiple Opportunities sub-fund can be found in Annex 1b of the Sales Prospectus.

**Exclusions:**

The investment policies of each sub-fund include additional ESG criteria that the Fund Manager takes into account when making investment decisions. Investment decisions are made based on screening in accordance with the following requirements:

**Exclusion criteria applied to all sub-funds:**

Compliance with the Group-wide minimum exclusions is based on revenue thresholds. Investments are excluded in companies that generate:

- >0% of their turnover from controversial weapons,
- >10% of their turnover with the production and/or distribution of armaments,
- >5% of their turnover from producing tobacco products,
- >30% of their turnover from mining and/or selling coal.

With all sub-funds, companies in serious violation of the UNGC principles (with no positive outlook) and sovereign issuers that fail to achieve adequate scores in the Freedom House Index (rating “not free”) are also excluded.

Further product-specific information relating to the sub-funds will be published on the website at [www.fvsinvest.lu](http://www.fvsinvest.lu). Detailed information will also be published on an ongoing basis in the Fund’s annual reports.

**Risk warnings**

Investment shares are securities whose value is determined by daily fluctuations in the quoted price of the assets of the respective investment fund or investment company. These price fluctuations may therefore cause their value to rise or fall. As a result, no guarantee can be given that the objectives of the investment policy will be achieved.

The performance of the sub-funds is calculated by comparing the value of the share at the beginning and the end of a certain period. This means that in order to calculate the actual performance of their investment in the Investment Company, investors must deduct the issue surcharge at the beginning from the performance shown.

General market risk

The securities in which the Management Company invests the sub-fund assets present opportunities for gain but also the possibility of risk. If a sub-fund invests directly or indirectly in securities and other assets, it is subject to many general trends and tendencies on the markets, which are sometimes attributable to irrational factors, particularly on the securities markets. Losses can occur when the market value of the assets decreases against the cost price. If a shareholder disposes of shares in a sub-fund at a time when the price of the sub-fund assets is less than at the time of investment, then the shareholder will not recover the full value of the capital invested. While each sub-fund constantly strives to achieve growth, growth cannot be guaranteed. The risk exposure of the shareholder is, however, limited to the sum invested. There is no obligation to make additional capital contributions beyond investor investments.

### Risk of counterparty default

The issuer of a security held directly or indirectly by a sub-fund or the debtor of a claim belonging to a sub-fund may become insolvent. The corresponding assets of the sub-fund may become worthless as a result of this.

### Counterparty risk

In the case of transactions not conducted via a stock exchange or a regulated market (OTC transactions), there is, in addition to the general risk of counterparty default, the risk that the counterparty to the transaction may default or fail to meet its obligations in full. This applies in particular to transactions that utilise techniques and instruments. In order to reduce counterparty risk in the case of OTC derivatives, the Management Company is authorised to accept collateral for the relevant sub-funds. This shall be in accordance with the requirements of ESMA Guideline 2014/937. Collateral may be paid in cash or in the form of government bonds or bonds from international institutions governed by public law to which one or more member states of the European Union belong, or in the form of covered bonds. Cash collateral received is not reinvested. Other collateral received is not sold, reinvested or pledged. The Management Company applies graded valuation discounts (so-called “haircut strategy”) to the collateral received, taking into account the specific characteristics of the collateral received and the issuer. The following table sets out the details of the lowest valuation discounts applied for each type of collateral:

Collateral	Minimum haircut
Cash (sub-fund currency)	0%
Cash (foreign currencies)	8%
Government bonds	0.50%
Bonds from international institutions governed by public law to which one or more member states of the European Union belong and covered bonds	0.50%

Further details on the haircut strategy used may be requested from the Management Company free of charge at any time.

The collateral is based on individual contractual agreements between the counterparty and the Management Company. These define the type and quality of the collateral, haircuts, margins and minimum transfer amounts. The value of OTC derivatives and collateral already provided is calculated daily. If the individual contractual agreements require an increase or reduction in the amount of collateral, the counterparty is asked to take appropriate action. Details of the agreements can be obtained from the Management Company free of charge at any time.

With regard to risk diversification in the collateral received, the maximum exposure to any one issuer may not exceed 20% of the respective net sub-fund assets. By way of derogation, Article 4 (2) (c) of the Articles of Association pertaining to issuer risk applies with regard to the receipt of collateral from certain issuers.

### Custody risk

A risk of loss is associated with the custody of assets, which can result from the insolvency, breach of the duty of care or fraudulent conduct of the Depositary or a sub-depositary or external events.

### Currency risk

If a sub-fund directly or indirectly holds assets denominated in foreign currencies, then unless the foreign currency positions are hedged it is exposed to currency risk. In the event of a devaluation of the foreign currency against the sub-fund’s reference currency, the value of the assets held in foreign currencies falls.

### Sector risk

If a sub-fund focuses its investments on specific sectors, this reduces risk diversification. As a result the sub-fund is particularly dependent on both general developments and developments in company profits in individual sectors or in sectors that influence each other.

### Concentration risk

Further risks may arise if investments are concentrated in certain assets or markets. Events affecting these assets or markets may have a more pronounced effect on the sub-fund assets, causing proportionately greater losses than would be the case if the investment policy were more diversified.

### Performance risk

In the absence of a guarantee issued by a third party, there is no assurance of positive performance. Assets acquired for the various sub-funds, furthermore, may not perform as expected on acquisition.

### Political risk and regulatory risk

Uncertainties in countries where investments are made – such as international political developments, changes in government policy, taxation, restrictions on foreign investment, currency fluctuations and other legal or regulatory developments – may have an adverse effect on the value of the assets in the Fund. Trading may also take place on exchanges that are not as strictly regulated as those in the USA or EU countries. If the place of jurisdiction is in a foreign country, it may be difficult or expensive to pursue rights in foreign courts or enforce court rulings.

### Country-specific/regional risk

If a sub-fund focuses its investments on specific countries or regions, this shall also reduce risk diversification. Accordingly, the sub-fund shall be particularly dependent on the development of individual or interdependent countries and regions and on companies which are located and/or are active in these countries or regions.

### Legal and tax risk

Amendments to tax provisions and the evaluation of circumstances in countries in which the Fund holds assets could affect the tax situation of the Fund and its investors. The Fund must fulfil all the requirements imposed by tax law. If these laws are amended during the term of the Fund, the legal requirements applicable to the Fund and investors could differ considerably from current requirements.

Statutory and other regulatory framework conditions in relevant jurisdictions could change to the detriment of the sub-fund and/or investors. Points of contact with different jurisdictions could make legal prosecution and the enforcement of claims and other rights of the sub-fund and investors more difficult. The possibility of agreements being interpreted differently than intended or considered invalid by courts cannot be ruled out. Foreign courts might also not judicially recognise the legal form of funds.

### Country and transfer risk

Economic or political instability in countries in which the Fund invests may mean that the Fund does not receive, in whole or in part, the monies owing to it in spite of the solvency of the issuer of the respective security or other asset, does not receive the monies on time or in full, or receives the monies but in another currency. The reasons for this may include, for example, currency or transfer restrictions, the inability or unwillingness to transfer the funds or other legal changes. If the issuer pays in another currency, this position is additionally subject to a currency risk.

### Risk of force majeure

Force majeure is defined as events whose occurrence cannot be controlled by the persons affected. These include but are not limited to serious traffic accidents, pandemics, earthquakes, floods, hurricanes, nuclear accidents, war and terrorism, architectural and construction failures that the Fund cannot control, environmental legislation,

general economic circumstances and industrial disputes. If a sub-fund is affected directly or indirectly by one or more events of force majeure, this can lead to partial losses for or total loss of the respective sub-fund.

#### Liquidity risk

Assets and derivatives that are not admitted for trading on a stock exchange or admitted to another organised market or included in such a market may also be purchased for the Fund. Should the need arise, it may only be possible to sell these assets at greatly reduced prices or after a delay, or it may not be possible to sell them at all. Even assets admitted for trading on a stock exchange may, depending on the market situation, volume, timeframe and planned costs, not be sold at all or only at greatly reduced prices. Although it is only possible to purchase assets for the Fund that can in principle be liquidated at any time, it cannot be ruled out that they can only be sold temporarily or permanently at a loss.

#### Risks in connection with borrowing

The Management Company may take out loans to a limited extent for the account of the relevant sub-fund (see “Specific provisions of the investment policy and investment restrictions” in section “4. Loans and encumbrance prohibition”). Since these loans must be of short duration, the relevant sub-fund’s investment level (or leverage) and associated risks will not normally increase.

#### Interest-rate risk

Investing in fixed-rate securities is associated with the possibility that the interest rate applicable when the security is issued may change. If the market interest rate rises compared with the rate at the time of issue, the price of fixed-income securities generally falls. Conversely, if the current interest rate falls, the price of fixed-rate securities rises. These price movements mean that the current yield of fixed-rate securities roughly corresponds to the current interest rate. However, such fluctuations can have different consequences depending on the term of the fixed-rate securities. Fixed-rate securities with shorter terms carry smaller price risks than those with longer terms. Fixed-rate securities with shorter terms, on the other hand, generally have lower yields than those with longer terms.

#### Risk of negative credit interest

The Management Company invests the Fund’s liquid assets at the Depositary or other credit institutions for the account of the Fund. In some cases, an interest rate is agreed for these balances at credit institutions that is equal to international interest rates minus a certain margin. If these interest rates fall below the agreed margin, this results in negative interest for the corresponding account. Depending on the development of the interest rate policy of the relevant central banks, short-term, medium-term and long-term balances at credit institutions may produce a negative return.

#### Settlement risk

During the settlement of securities transactions, there is a risk that one of the contracting parties does not pay or only pays after a delay or not in accordance with the agreement, or that the securities are not delivered or not delivered on time. This settlement risk also exists in the case of the reversal of collateral for the Fund.

#### Risks from the use of derivatives and other techniques and instruments

The leverage effect of option rights may result in a greater impact on the value of a sub-fund’s assets, both positive and negative, than if the securities and other assets had been acquired directly. Their use is therefore associated with particular risks.

Financial futures which are used for a purpose other than hedging are also associated with considerable opportunities and risks, as only a fraction of the contract value (the margin) needs to be paid immediately.

Price changes may therefore lead to substantial profits or losses. As a result, the risk and the volatility of the sub-fund may increase.

Depending on their structure, the value of swaps can be affected by a future change in the market interest rate (interest rate risk), counterparty insolvency (counterparty risk) or a change in the underlying security. In principle, any future (value) changes to the underlying payment flows, assets, income or risks may lead to gains as well as losses in the Fund.

Techniques and instruments carry certain investment risks and liquidity risks.

As the use of derivatives embedded in financial instruments may be associated with a leverage effect, their use can lead to substantial fluctuations – both positive and negative – in the value of the sub-fund assets.

#### Risks from investing in money market instruments and bank balances

The Management Company may invest sub-fund assets in money market instruments and bank balances. Their value may fluctuate owing to changes in market interest rates. A counterparty default risk for these investments cannot be ruled out either. In particular, bank balances held with the Depositary or other credit institutions are not protected by a deposit guarantee scheme.

#### Risks in connection with bonds on assets that do not form part of the Fund's assets

The risks associated with bonds (certificates, structured products, etc.) that are acquired for a sub-fund, but relate to underlying securities that are not part of the sub-fund's assets, are closely associated with the specific risks of those underlyings, or of the specific investment strategies pursued by such underlyings, for example where the underlyings are (umbrella) hedge funds (see, for example, "Risks in connection with umbrella funds" below). However, those risks can be reduced by diversifying the investments within the target funds whose shares are being acquired, and by diversification within the relevant sub-fund.

#### Particular risks of investment in certificates

With investments in certificates, there is a risk that, even if they are listed on a stock exchange or traded on a regulated market, a regulated market price is sometimes not available owing to their relative illiquidity. This is more likely to be the case with certificates where a substantial part is held by the Fund, as well as with OTC transactions. In order to mitigate the associated valuation risk, the Management Company may decide at its own discretion to have the valuation undertaken by an independent market maker. It also cannot be excluded that higher discounts on the actual price would have to be accepted when the certificates are sold. There is also a counterparty default risk for certificates (see the paragraphs on counterparty default risk and counterparty risk).

#### Risks in connection with umbrella funds

The risks of investment shares purchased for the relevant sub-fund are closely associated with the risks of the assets held by such target funds and/or their investment strategies. However, those risks can be reduced by diversifying the investments within the target funds whose shares are being acquired, and by diversification within the relevant sub-fund.

As the managers of the relevant target funds act independently of each other, several target funds may act according to the same or opposing investment strategies. As a result, risks may be cumulated and possible opportunities may cancel each other out.

It is not normally possible to monitor the management of target funds. Their investment decisions do not necessarily correspond to the assumptions or expectations of the Investment Company or the manager of the relevant sub-fund.

Often the Investment Company or the manager of the relevant sub-fund will not be familiar with the current composition of the target funds. In the event that this does not meet the company's assumptions or expectations, it can respond by redeeming shares of the target funds, but this may be subject to a considerable delay.



#### Risks associated with target funds that are sub-funds of an umbrella fund

Investing in shares of a sub-fund of an umbrella fund may carry additional risks if the umbrella fund is liable to third parties for the total liabilities of each sub-fund. This additional risk can be even higher if these investments are all made in shares of different sub-funds of the same umbrella fund.

#### Risks associated with investing in precious metals

If investments are made directly in precious metals, or indirectly through investments in interest-bearing or other securities whose income, performance and/or return on capital depend on the performance of the underlying precious metal, commodity future, precious metal or commodity index, or in techniques and instruments based on a precious metal, a commodity future, or a precious metal or commodity index (particularly through swaps and futures on commodity future, precious metal and commodity indices), then the relevant risks are those associated with investments in commodities, precious metals and commodity futures in addition to the general risks of the relevant investment vehicle.

General market risk is a particular factor here. The performance of precious metals and commodities is also dependent on their general supply situation, their consumption, expected mining, extraction, manufacture and production as well as expected consumption, and may therefore be highly volatile.

In many jurisdictions the possession, purchase or sale of precious metals may be subject to official restrictions or to additional taxes, levies or charges. The physical transfer of precious metals from and to precious metal custody accounts may also be subject to restrictions imposed by local authorities or other institutions. Situations may also arise where the risk of such transfer cannot be insured, meaning that transport companies may refuse to carry out the transfer or delivery. The prices of precious metals can be subject to relatively strong short-term fluctuations due to changes in inflation rates or inflation forecasts in various countries, in the availability and supply of precious metals, and due to bulk sales by governments, central banks or international agencies, investment speculation, and the monetary or economic decisions taken by governments. Government regulations restricting private ownership of precious metals may also lead to fluctuations in their value.

#### Volatility

Because of their composition, individual sub-funds may be more volatile, i.e. the share prices may be subject to considerable upward and downward fluctuations within short periods.

#### Risk of redemption suspension

Investors may, in principle, request the redemption of their shares from the Management Company in accordance with the information provided in the section on the “Redemption and exchange of shares”. However, the Management Company may temporarily suspend the redemption of shares under exceptional circumstances and buy back the shares at a later point at the price valid at that time (see Article 15 of the Articles of Association, “Suspension of calculation of the net asset value per share and redemption”, and Article 18 of the Articles of Association, “Redemption and exchange of shares”). This price may be lower than it was before redemption was suspended.

The Management Company may also be forced to suspend redemption in particular if one or more target funds whose shares were acquired for a sub-fund suspend(s) the redemption of their units and such shares make up a significant proportion of the net sub-fund assets.

#### Potential conflicts of interests

The Management Company and/or its employees, representatives or affiliated companies may act as members of the Board of Directors, investment advisers, fund managers, depositaries, UCI administrators or as providers of other services to the Fund or sub-funds. The Management Company is aware that conflicts of interest may arise given the different functions performed in relation to the management of the Fund or the sub-funds. The role of the Depositary or sub-depositaries that has/have been appointed to carry out safekeeping tasks can also be assumed by a company

affiliated with the Management Company. The Management Company is aware that conflicts of interest may arise given the different activities performed in relation to the management of the Fund or sub-fund. In accordance with the Law of 17 December 2010, the Law of 12 July 2013 and the applicable administrative provisions of the CSSF, the Management Company has adequate and appropriate structures and control mechanisms in place to ensure that conflicts of interest are avoided and in particular that it acts in the best interests of the funds or sub-funds. Conflicts of interest may arise when activities are outsourced to third parties. Any conflicts of interest that may arise from outsourcing activities are described in the *Principles for dealing with conflicts of interest*, which the Management Company has published on its website, [www.fvsinvest.lu](http://www.fvsinvest.lu). To the extent that investors' interests are compromised by a conflict of interest, the Management Company will disclose the nature and the sources of the existing conflict of interest on its website. The Management Company ensures that third parties have taken the steps necessary to comply with all requirements relating to organisation and the avoidance of conflicts of interest as defined in applicable Luxembourg legislation and regulations, and monitors compliance with these requirements.

### **Risk profiles**

The investment funds managed by the Management Company are classified into one of the following risk profiles. The risk profile for each sub-fund can be found in the annex relating to it. The descriptions of the following profiles were prepared on the assumption of normally functioning markets. In unforeseen market situations or market disturbances, non-functioning markets may result in additional risks beyond those listed in the risk profile.

#### Risk profile – Security-oriented

The fund is suitable for security-oriented investors. Owing to the composition of the net sub-fund assets, there is a low degree of risk but also a low degree of profit potential. The risks may consist in particular of currency risk, credit risk, price risk and interest-rate risk.

#### Risk profile – Conservative

The fund is suitable for conservative investors. Owing to the composition of the net sub-fund assets, there is a moderate degree of overall risk, but also a moderate degree of profit potential. The risks may consist in particular of currency risk, credit risk, price risk and interest-rate risk.

#### Risk profile – Growth-oriented

The fund is suitable for growth-oriented investors. Owing to the composition of the net sub-fund assets, there is a high degree of overall risk but also a high degree of profit potential. The risks may consist in particular of currency risk, credit risk, price risk and interest-rate risk.

#### Risk profile – Speculative

The fund is suitable for speculative investors. Owing to the composition of the net sub-fund assets, there is a very high degree of risk but also a very high degree of profit potential. The risks may consist in particular of currency risk, credit risk, price risk and interest-rate risk.

### **Risk management system**

The Management Company employs a risk management system that enables it to monitor and measure appropriately the risks associated with its investment positions.

Depending on the structure of the fund the Management Company employs one of the following risk management methods:

In accordance with the Law of 17 December 2010 and the applicable regulatory requirements of the CSSF, the Management Company reports regularly to the CSSF on the risk management method employed. To this end, the Management Company makes use of the following methods:

- Commitment approach:

With the commitment approach, the positions from derivative financial instruments are converted into their corresponding (delta-weighted, where applicable) underlying equivalents or nominal values. In doing so, the netting and hedging effects between derivative financial instruments and their underlyings are taken into account. The total of these underlying equivalents may not exceed the total net value of the sub-fund assets.

- Value-at-risk (VaR) approach:

The VaR figure is a mathematical-statistical concept used as a standard risk measure in the financial sector. VaR indicates the maximum possible loss of a portfolio during a certain period (the holding period) with a certain probability (the confidence level).

- Relative VaR approach:

The relative VaR approach is used for sub-funds for which a reference portfolio has been defined that reflects the investment strategy pursued by those sub-funds. When the relative VaR approach is used, a limit is defined as a multiple of the reference portfolio's VaR. This limit is based on the risk profile of the relevant sub-fund and has been determined by the Investment Company in accordance with the risk profiles as follows:

Risk profile – Security-oriented	150% of the reference portfolio's VaR
Risk profile – Conservative	200% of the reference portfolio's VaR
Risk profile – Growth-oriented	300% of the reference portfolio's VaR
Risk profile – Speculative	400% of the reference portfolio's VaR

- Absolute VaR approach:

The absolute VaR approach can be used when a reference portfolio cannot be determined for the sub-fund. When using the absolute VaR approach, a percentage of the sub-fund's net asset value is set as a limit. This limit is based on a holding period of 20 days and a unilateral confidence interval of 99%, and has been determined by the Investment Company according to the risk profiles as follows:

Risk profile – Security-oriented	10% of the sub-fund's net asset value
Risk profile – Conservative	20% of the sub-fund's net asset value
Risk profile – Growth-oriented	30% of the sub-fund's net asset value
Risk profile – Speculative	50% of the sub-fund's net asset value

## Liquidity risk management

The Management Company has drawn up written policies and procedures for the sub-fund to enable it to monitor the sub-fund's liquidity risks and ensure that the liquidity profile of the sub-fund's investments covers the sub-fund's underlying liabilities. On the basis of the investment strategy, the sub-fund's liquidity profile is as follows: A sub-fund's liquidity profile is determined in its entirety by its structure with regard to the sub-fund's assets and liabilities, as well as the investor structure and the redemption conditions set out in the Sales Prospectus.

The policies and procedures include the following:

- The Management Company monitors the liquidity risks that may arise at sub-fund or asset level. In doing so, it assesses the liquidity of the assets held in the sub-fund in relation to the sub-fund's assets and determines liquidity classes for this purpose. The assessment of liquidity includes analysing the trading volume, the complexity or other typical characteristics and, if necessary, assessing the quality of an asset.
- The Management Company monitors the liquidity risks that may arise as a result of increased investor demand for unit redemption or large-scale calls. In doing so, it forms expectations about net changes in funds, taking into account available information about past values from historical net changes in funds.

- The Management Company monitors the sub-fund's ongoing receivables and liabilities and assesses their impact on the sub-fund's liquidity situation.
- The Management Company has determined adequate limits for liquidity risks for the Fund. It monitors compliance with these limits and has established procedures in the event that the limits have been or may be exceeded.
- The procedures put in place by the Management Company ensure consistency between liquidity classes, liquidity risk limits and expected net changes in funds.

The Management Company regularly reviews these policies and updates them as appropriate.

The Management Company conducts regular stress tests, which it can use to assess the sub-fund's liquidity risks. The Management Company bases these stress tests on reliable, up-to-date quantitative information or – if required – qualitative information. This includes the investment strategy, redemption periods, payment obligations and periods during which assets may be sold, as well as specific information about historical events or hypothetical assumptions. The stress tests simulate a situation where the sub-fund assets lack liquidity or where there are an atypical number of redemption requests. They cover market risks and their effects, including margin calls and requirements for collateral or credit lines. They are performed at a frequency appropriate for the type of sub-fund and take account of the Fund's investment strategy, liquidity profile, investor profile and redemption policies.

#### Risk associated with investments in a sustainability strategy

The sub-funds follow an investment strategy that partially reduces the number and categories of target investments available for selection by screening against an exclusion list. The investment strategy of a sub-fund could cause the sub-fund to invest in securities sectors or economic sectors that underperform the market as a whole or individual investment funds that do not take a sustainability strategy into account. As a result, the sub-fund may not perform as strongly.

#### Sustainability risk

The occurrence of an event or fulfilment of a condition related to the environment, society and/or corporate governance could have a significant adverse effect on the performance of the sub-fund and lead to a significant decrease in value. Sustainability risks could have a considerable effect on other types of risks described in this section and contribute to the materiality of these risk types.

#### **Management of sustainability risk**

Sustainability risks could have a considerable effect on other types of risks and contribute to the materiality of these risk types. The Management Company uses an integrated risk management procedure to record and measure market risk, liquidity risk, counterparty risk and all other risks, including operational risks, sustainability risks that are material to the sub-funds.

As part of a specific ESG analysis, sustainability factors are reviewed for their potential opportunities and risks, and an assessment is made to the best of our knowledge and belief as to whether or not a company stands out negatively in terms of its environmental and social activities and how it manages them. Each of the factors is considered from the perspective of a long-term investor to ensure that none of these aspects have a negative impact on the long-term success of an investment.

The findings of the ESG analysis are taken into account in the risk-return profile of the company analyses. Only if there are no serious sustainability risks that could negatively affect the future potential of a company or issuers, is an investment idea included in the focus list (for equities) or guarantor list (for bonds), making it a possible investment. The portfolio managers can only invest in securities that are on the internal focus or guarantor list. This principle

ensures that invested securities have passed the in-house analysis process and comply with the common understanding of quality.

The Management Company continuously monitors developments in the risk-return profile of the company analyses and, as part of the risk management process, coordinates the mitigation of sustainability risks or their impact on the other risk classes and the Fund's overall risk profile with the Fund Manager.

Based on ESG analysis, the Management Company continuously monitors the development of the internally derived ESG risk scores at the individual equity level and aggregates these at the sub-fund level into a weighted overall score, which is monitored depending on the risk profile. In addition, various ESG stress tests are regularly carried out for the sub-funds.

### **Leverage according to the gross and commitment method**

The Management Company has calculated the risk of an AIF using both the gross and the commitment method.

With the gross method, the Management Company calculates the sum of the absolute values of all positions in line with the AIFMD. To calculate the risk using the commitment method, the sum of the absolute values of all positions is also calculated, all derivative positions are converted to an equivalent position in the underlying assets using the conversion methods defined in the AIFMD, and netting/hedging arrangements are applied. For both the commitment method and the gross method, the leverage is no more than 300% of the sub-fund volume.

### **Valuation**

For the purposes of calculating or valuing the net assets, the assets of each sub-fund are converted to the reference currency. Net sub-fund assets are calculated according to the following principles:

- a) Securities, money market instruments, derivative financial instruments (derivatives) and other assets officially listed on a stock exchange are valued at the most recently available closing price that provides a reliable valuation. This does not apply to securities, money market instruments and/or derivatives domiciled in Asia or Oceania. These will be valued on the basis of the last known price at the time of valuation on the valuation day. If securities, money market instruments, derivative financial instruments or other assets are officially listed on more than one stock exchange, the price quoted on the exchange with the most liquidity is used.
- b) Securities, money market instruments, derivative financial instruments (derivatives) and other assets not officially listed on a stock exchange (or whose quoted price is not regarded as representative owing to a lack of liquidity, for instance) but which are traded on a regulated market are valued at a price which may be neither lower than the bid price nor higher than the offer price on the trading day preceding the valuation day, and which the Management Company believes in good faith to be the best possible price at which the securities, money market instruments, derivative financial instruments (derivatives) or other assets could be sold. This does not apply to securities, money market instruments and/or derivatives domiciled in Asia or Oceania. These will be valued on the basis of the last known price at the time of valuation on the valuation day.
- c) OTC derivatives are valued on a daily basis using a verifiable method to be determined by the Management Company in good faith, on the basis of the sale value that is likely to be attainable and in accordance with generally accepted and verifiable valuation models.
- d) Shares in UCI/UCITS are generally valued at the last redemption price fixed before the valuation day or at the latest available price that affords a reliable valuation. If the redemption of investment shares has been suspended or if no redemption price has been set, these shares and all other assets are valued at their appropriate market values as determined in good faith by the Management Company in line with generally accepted and verifiable valuation models.

- e) If the relevant prices are not market prices or if no prices have been set in respect of financial instruments other than those mentioned in subsections a) to d), the values of these financial instruments and of any other legally permissible assets are valued at their market prices as determined in good faith by the Management Company in line with generally accepted and verifiable valuation models (e.g. using suitable valuation models and taking current market conditions into account).
- f) Liquid funds are valued at their nominal value plus interest.
- g) Amounts due, for example, deferred interest claims and liabilities, shall in principle be rated at the nominal value.
- h) Physical precious metals, precious metal accounts, precious metal certificates, futures and option transactions with respect to precious metals are valued at their daily market value.
- i) The market values of securities, money market instruments, derivatives and other assets denominated in a currency other than the relevant sub-fund currency are converted into the relevant sub-fund currency at the exchange rate prevailing at 5 p.m. CET/CEST (4 p.m. GMT/BST) on the trading day preceding the valuation day, as determined via WM/Reuters fixing. Gains and losses on currency transactions are added or subtracted as appropriate.

Sub-fund assets are generally valued by the Management Company. The Management Company may delegate the valuation of assets and make use of an external valuation agent that fulfils statutory regulations. The latter may not delegate its valuation function to a third party. The Management Company notifies the relevant supervisory authority if an external valuation agent is appointed. Even if it has appointed an external valuation agent, the Management Company remains responsible for the proper valuation of sub-fund assets and for calculating and publishing the net asset value. Notwithstanding the preceding sentence, the external valuation agent is liable to the Management Company for any losses incurred by the Management Company that can be attributed to the external valuation agent's negligent or deliberate failure to carry out its tasks.

#### **Calculation of the net asset value per share**

The net company assets of the Investment Company are denominated in euros ("reference currency").

The value of a share ("net asset value per share") is denominated in the sub-fund currency, unless a currency other than the sub-fund currency has been specified in the relevant annex to the Sales Prospectus in relation to any other share classes which may exist ("share class currency").

The net asset value per share is calculated by the Management Company or a third party commissioned by it for this purpose, under the supervision of the Depositary, on each banking day in Luxembourg, with the exception of 24 and 31 December of each year ("valuation day"). In order to calculate the net asset value per share, the value of each sub-fund's assets less its liabilities ("net sub-fund assets") is determined on each valuation day, and the resulting figure is then divided by the number of shares in circulation on that day and rounded to two decimal places.

The net sub-fund assets are reduced by the amount of any distributions paid out to shareholders in the relevant sub-fund.

The net asset value per share is calculated separately for each sub-fund. If share classes were created within a given sub-fund, the resulting net asset value per sub-fund is calculated separately for each share class within the sub-fund according to the above criteria:

- a) Assets are always compiled and allocated separately for each sub-fund.
- b) Cash inflows from share issues increase the share of the respective share class as a percentage of the total value of the sub-fund assets. Cash outflows from share redemptions decrease the share of the respective share class as a percentage of the total value of the sub-fund assets.

- c) If a distribution is carried out, the value of the shares entitled to distributions is reduced by the amount of the distribution. At the same time, the proportion of this share class as a percentage of total sub-fund assets is reduced, while the proportion of the share class not entitled to distributions increases as a percentage of total sub-fund assets.

### **Suspension of the calculation of the net asset value per share, suspension of the issue, exchange and redemption of shares**

The Management Company is authorised to suspend calculation of the net asset value per share for a sub-fund temporarily if and as long as circumstances exist necessitating the suspension of calculations and if the suspension is justifiable taking into account the interests of the shareholders, namely:

1. when a stock exchange or another regulated market on which a significant number of the assets are quoted or traded is closed for reasons other than a normal statutory or bank holiday or when trading on this stock exchange or regulated market is suspended or restricted;
2. in emergency situations in which the Management Company cannot freely access the assets of a sub-fund or in which it is impossible to transfer the transaction value of investment purchases or sales freely or when the net asset value per share cannot be properly calculated.

As long as calculation of the share value has been suspended, redemption and exchange will also be suspended, and no shares may be issued. Subscription, redemption and exchange orders shall be automatically forfeited if calculation of the net asset value per share is suspended.

The temporary suspension of the calculation of the net asset value per share within a sub-fund shall not lead to a temporary suspension with respect to other sub-funds unaffected by this event.

Investors who have placed a subscription, redemption or exchange order are notified immediately of any suspension of the calculation of the net asset value per share and of its resumption.

Subject to the prior approval of the Depositary in observance of the interests of investors, the Management Company is entitled not to carry out substantial redemptions – i.e. to suspend redemptions temporarily – until the corresponding fund assets have been sold without delay in observance of the interests of shareholders. In this case, redemption takes place at the redemption price on the first valuation date after the temporary suspension of redemptions. A substantial redemption is deemed to be the receipt on any valuation day of an application for the redemption of shares amounting to more than 20% of the respective net sub-fund assets. The Management Company will nevertheless ensure that the Fund has sufficient liquid funds to enable shares to be redeemed as soon as possible on the application of investors under normal conditions.

No new shares are issued while the redemption of shares is suspended. The issue of shares is not resumed until the outstanding applications for redemption have been processed.

The Management Company will publish the suspension and resumption of the issue and redemption of shares without delay in the media named in the *Information for shareholders* section of the Sales Prospectus and in the official electronic gazette (e.g. electronic Federal Gazette in the Federal Republic of Germany) in the countries in which shares in the Fund are authorised for general distribution. The Management Company will also report any decision to suspend redemptions without delay to the Luxembourg supervisory authority and to the supervisory authorities of the countries where it distributes shares in the Fund. Investors who have made an application to redeem shares are notified without delay of any suspension of redemptions. Applications to redeem shares are executed in the order in which they were received once the issue and redemption of shares has been resumed.

The Management Company reserves the right to suspend temporarily or definitively the issue of shares in one or more sub-funds and to reject corresponding subscription applications. Any payments already made are returned to shareholders without delay.

## Issue of shares

1. Shares are always issued on the initial issue date of a sub-fund or within the initial issue period of a sub-fund at a set initial issue price plus the issue surcharge paid to the intermediary, if any, in the manner described for the respective sub-fund in the annex to this Sales Prospectus. After this initial issue date or this initial issue period, shares are issued on every valuation day at the issue price. The issue price is the net asset value per share plus the issue surcharge payable to the Sales Agent, if any, the maximum amount of which is stated for each sub-fund in the respective annex to this Sales Prospectus. The issue price can be increased by fees or other charges payable in particular countries where the fund is offered for sale.

This is an example of how the issue price is calculated:

Net asset value per share	EUR 100.00
+ issue surcharge (e.g. 5%)	EUR 5.00
	-----
	EUR 105.00

2. Subscription applications for the purchase of registered shares may be submitted to the Management Company, the Depositary, the Registrar, any Sales Agent and the Paying Agents. These receiving agents are required to forward all subscription applications to the Registrar without delay. The date of receipt by the Registrar ("relevant agent") is decisive. The agent accepts subscription applications on behalf of the Management Company.

Buy orders for the purchase of shares that are certificated by a global certificate ("bearer shares") are forwarded to the Registrar by the agent at which the subscriber holds its securities account. Receipt by the Registrar is decisive.

Completed subscription applications received by the relevant agent by no later than 2 p.m. on a valuation day are settled at the issue price on the next valuation day, provided that sufficient funds are available. The Management Company will ensure that in all cases shares are issued on the basis of a net asset value per share previously unknown to the investor or shareholder. If there is a suspicion that an investor or shareholder is engaging in late trading, however, the Management Company can refuse to accept the application to subscribe shares/buy orders until the applicant has satisfied all doubts in relation to their application/buy orders. Subscription applications received by the relevant agent after 2 p.m. on a valuation day will be settled at the issue price of the next valuation day but one, provided that sufficient funds are available.

If sufficient funds are not available for shares to be subscribed at the time of receipt of the complete subscription application by the relevant agent or if the subscription application is incorrect or incomplete, the subscription application shall be regarded as having been received by the relevant agent on the date on which sufficient funds become available and on which the subscription form is properly submitted.

The issue price is payable in the sub-fund currency to the Depositary in Luxembourg within two valuation days after the relevant valuation day.

Immediately following receipt of the issue price by the Depositary, the registered shares are allocated by the Registrar on behalf of the Management Company and transferred by entry in the share register.

After settlement with the Registrar and Transfer Agent, the bearer shares will be transferred to the agent at which the subscriber holds its securities account using so-called delivery versus payments transactions, i.e. against payment of the stipulated investment amount.

For savings plans, a maximum of one-third of all payments agreed for the first year may be used for covering costs. The remaining costs are distributed evenly across all later payments.



3. The issue of shares is suspended in the following circumstances:
  - a) The Management Company may at any time, at its discretion and without giving reasons, reject a subscription application, temporarily restrict or suspend the issue of shares, permanently discontinue the issue of shares, or unilaterally decide to buy back shares in return for payment of the redemption price if this is deemed to be in the interests of the shareholders, in the interest of the public, for the protection of the Investment Company, for the protection of the respective sub-fund, or for the protection of the shareholders.
  - b) In this case, the Registrar or the Depositary shall immediately reimburse, without interest, any incoming payments received for subscription applications that have not been processed.
  - c) The issue of shares shall in particular be temporarily suspended if the calculation of the net asset value per share is suspended.

In the event that the issue of shares is reserved for particular investors, the annex for the specific sub-fund will include a statement to this effect.

### Redemption and exchange of shares

1. Shareholders are entitled to request redemption of their shares at the net asset value per share at any time less a redemption fee, if applicable ("redemption price"). Shares are only redeemed on a valuation day. If a redemption fee is payable, then both the maximum amount of such redemption fee and the agent on whose behalf it is charged shall be specified for each sub-fund in the respective annex to this Sales Prospectus.

In certain countries, the payment of the redemption price may be reduced owing to local taxes and other charges. The corresponding share is cancelled on payment of the redemption price.

An example of how the redemption price is calculated is shown below:

Net asset value per share	EUR 100.00
- Redemption fee (e.g. 1%)	EUR 1.00
	-----
	EUR 99.00

2. Payment of the redemption price and any other payments to the shareholders are made via the Depositary and via the Depositary with the assistance of the paying agents. The Depositary is only obliged to make payment if there are no legal provisions, such as exchange control regulations or other circumstances beyond the Depositary's control, prohibiting the transfer of the redemption price to the country of the applicant.

The Management Company may buy back shares unilaterally against payment of the redemption price if this is in the interests of or in order to protect shareholders, the Investment Company or one or more sub-funds, insofar as:

- a) there is a suspicion that the shareholder concerned will, by purchasing the shares, engage in market timing, late trading or other market techniques that could be harmful to the investors as a whole;
- b) the investor does not meet the conditions for purchasing the shares; or
- c) the shares were acquired by a person with indications of a US connection, the shareholder was found to have indications of a US connection after the acquisition, the shares have been distributed in a state, or acquired by a person in such a state (e.g. a US citizen) where the sub-fund is not authorised for distribution or the acquisition of shares by such persons is not authorised.

3. The exchange of all or any shares in a sub-fund for shares in another sub-fund shall take place on the basis of the net asset value per share of the relevant sub-fund, taking into account any applicable exchange commission payable to the Sales Agent of up to 3% of the net asset value per share of the shares to be subscribed, but no less than the difference between the issue surcharge for the sub-fund of the shares to be exchanged and the issue surcharge for the sub-fund for whose shares the exchange is made. If it is not possible to exchange shares for a specific sub-fund or if no exchange commission is payable, this is specified in the corresponding annex of the Sales Prospectus for the sub-fund in question.

If various share classes are offered, shares of one class may be exchanged for shares of another class both within the same sub-fund and from one sub-fund to another. An exchange commission of up to 3% of the net asset value per share can also be charged if an exchange is carried out within a single sub-fund.

The Management Company may reject an application for the exchange of shares within a particular sub-fund if this is deemed to be in the interests of the Investment Company, the sub-fund or shareholders, insofar as:

- a) there is a suspicion that the shareholder concerned will, by purchasing the shares, engage in market timing, late trading or other market techniques that could be harmful to the investors as a whole;
  - b) the investor does not meet the conditions for purchasing the shares; or
  - c) the shares were acquired by a person with indications of a US connection, the shareholder was found to have indications of a US connection after the acquisition, the shares have been distributed in a state, or acquired by a person in such a state (e.g. a US citizen) where the sub-fund is not authorised for distribution or the acquisition of shares by such persons is not authorised.
4. Completed applications for the redemption or exchange of registered shares may be submitted to the Management Company, the Depositary, the Registrar, any Sales Agent and the Paying Agent. These receiving agents are required to forward all completed redemption or exchange applications to the Registrar without delay.

Complete sell orders for the redemption of bearer shares shall be forwarded to the Registrar by the office where the shareholder maintains his securities account. The exchange of bearer shares is excluded.

An application for the redemption or exchange of registered shares is deemed to be complete only if it contains the name and address of the shareholder, the number and/or equivalent value of the shares to be redeemed and/or exchanged, the name of the sub-fund and the signature of the shareholder.

Complete redemption/sale orders and/or exchange of shares received by 2 p.m. at the latest on a valuation day are settled at the net asset value per share on the following valuation day, less any applicable redemption fees and/or exchange commissions. The Management Company ensures that in all cases shares are redeemed on the basis of a net asset value per share previously unknown to the investor or shareholder. Completed redemption/sale orders and/or exchange of shares received after 2 p.m. on a valuation day are settled at the net asset value per share on the next valuation day but one, less any applicable redemption fees and/or exchange commissions.

The redemption/sale or exchange application is deemed to have been received once received by the Registrar.

The redemption price is payable in the respective sub-fund currency within two valuation days after the relevant valuation day. In the case of registered shares, payments are made to the account specified by the shareholder.

5. The Management Company is obliged to suspend the redemption of shares temporarily following any suspension of the calculation of the net asset value.
6. Subject to the prior approval of the Depositary in observance of the interests of shareholders, the Management Company is entitled not to carry out substantial redemptions until the corresponding sub-fund assets have been sold without delay. In this event the redemption takes place at the redemption price then valid. The same applies

to applications to exchange shares. The Investment Company will nevertheless ensure that the sub-fund has sufficient liquid funds to enable shares to be redeemed and exchanged as soon as possible on the application of investors under normal conditions.

## Costs

Each sub-fund shall bear the following costs, provided they arise in connection with its assets:

1. If a management company is appointed, it may receive a (fixed and/or performance- related) fee from the individual sub-fund's assets, the maximum amount, calculation and payment of which are specified in the annex to the Sales Prospectus for the respective sub-fund. This fee is subject to value-added tax if applicable.

In addition to the aforementioned fee payable to the Management Company for managing the sub-funds, the sub-fund assets are charged an indirect management fee for the target funds they contain.

The annual and semi-annual reports contain information on the amount of the issue surcharges and redemption fees that have been charged to sub-funds for the purchase and redemption of shares in target funds in the reporting period, and on the amount of the fee charged to sub-funds by the Management Company itself or another management company ("Fund Management Company") or another company affiliated with the Management Company via a significant direct or indirect equity interest or another investment company including its management company as a management fee for the target fund shares held in the respective sub-fund assets.

No issue surcharges or redemption fees may be charged to the sub-funds for the shares in target funds that are managed directly or indirectly by the same management company or by a company affiliated with the Management Company via a significant direct or indirect equity interest.

The same applies to shares in target funds affiliated with the sub-funds as described above.

However, to the extent that the sub-funds invest in target funds launched and/or managed by other companies, the relevant issue surcharges and any redemption fees must be taken into account. It must also be taken into account in all cases that, in addition to the costs charged to sub-funds in accordance with the provisions of the Sales Prospectus (including annexes) and the following Articles of Association, charges for management and administration, depositary fees, auditing fees, taxes and other costs and fees from the target funds in which the sub-fund invests are incurred at the level of these target funds, which may therefore result in similar charges being incurred several times.

If a Fund Manager has been contractually appointed, it may receive a fixed and/or performance-related fee from the respective management fee for the sub-fund, the maximum amount, calculation and payment of which are specified in the annex to the Sales Prospectus for the respective sub-fund. This fee is subject to value-added tax if applicable.

2. In addition, the Management Company receives an annual central administration agent fee. This covers the following remuneration and costs that are not charged separately to the Fund:
  - a) Remuneration of the Depositary;
  - b) Remuneration of the Registrar;
  - c) all external administration and custody fees charged by other correspondent banks and/or clearing agencies (e.g. Clearstream Banking S.A.) for the assets of each sub-fund, as well as all external settlement, dispatch and insurance fees that are incurred in connection with the securities transactions of each sub-fund in shares of other UCITS or UCI;
  - d) the transaction costs for the issue and redemption of bearer shares to the Fund;
  - e) the costs of the auditor of the Investment Company;

- f) costs for the creation, preparation, translation, filing, publication, printing and dispatch of all documents required by the Investment Company, in particular share certificates and coupon renewal sheets, the Sales Prospectus (plus annexes), the key investor information document (KIID), the Articles of Association, the annual and semi-annual reports, the statements of assets, letters convening meetings, sales notifications and/or applications for approval in the countries in which shares in the Investment Company or sub-funds are sold, and correspondence with the respective supervisory authorities;
- g) management fees payable by the Investment Company and/or sub-funds to all relevant authorities, in particular the administrative fees of supervisory authorities in Luxembourg and elsewhere and fees for filing documents of the Investment Company;
- h) costs in connection with any listing on a stock exchange;
- i) advertising costs and costs incurred directly in connection with the offer and sale of shares;
- j) fees, expenses and other costs of foreign representatives, Paying Agents, information agents and other agents that must be appointed abroad and that are incurred in connection with the relevant sub-fund assets;
- k) further management costs including the costs of interest groups;
- l) the costs of determining the breakdown of the investment result by individual success factors (also known as performance attribution);
- m) costs for the credit rating of the Investment Company and/or sub-funds by nationally and internationally recognised rating agencies;
- n) costs of any external valuation agent.

3. The respective sub-fund will also bear the following costs:

- a) costs incurred in connection with the acquisition and disposal of assets, in particular customary bank fees for securities transactions and transactions involving other assets and rights of the Investment Company and/or a sub-fund and the safekeeping of such, as well as customary bank fees for the safekeeping of foreign investment units abroad;

This does not include issue surcharges and redemption fees for shares of target funds that are managed directly or indirectly by the Management Company itself or by another company with which the Management Company is affiliated via a significant direct or indirect equity interest.

- b) taxes levied on the assets of the Investment Company or sub-fund, their income and the expenses charged to the respective sub-fund, plus the costs incurred for any exemptions, reductions, offsetting or reimbursement of taxes and financial charges;
- c) costs of legal advice and monitoring any legal claims that may arise for the Investment Company, the Management Company (if appointed) or the Depositary when acting in the interest of the shareholders of the relevant sub-fund;
- d) interest payable on any borrowings;
- e) expenses of any investment committee;
- f) notices to shareholders;
- g) any fees and expenses of the Investment Company's Board of Directors, and insurance costs;
- h) costs of establishing the Investment Company or individual sub-funds and the initial issue of shares.

The costs of establishing the Investment Company and the initial issue of shares were written off against the assets of the sub-funds existing at the time of establishment. The foundation costs and aforementioned costs that are not exclusively attributable to any specific sub-fund are allocated to the respective sub-fund assets on a *pro rata* basis. Costs relating to the establishment of additional sub-funds are written off against the assets of the respective sub-fund to which they are attributable in the first financial year. The costs of introducing new share classes for existing sub-funds must be charged to the share prices of the new share classes.

All the aforementioned costs, fees and expenses are subject to value-added tax if applicable.

All costs and fees are charged first to ordinary income, then to capital gains and only then to the Investment Company's fund assets.

Management fees and other expenses of a regular and recurring nature may be charged in advance on the basis of estimates for years or other periods and divided over these periods *pro rata temporis*.

Costs, fees and expenses attributable to any sub-fund are borne by that sub-fund. Otherwise they are divided *pro rata* according to the amount of sub-fund assets of all, or all the relevant, sub-funds.

A total cost ratio is calculated for each share class of the individual sub-funds, based on the figures for the previous financial year. This total cost ratio includes costs, fees and expenses. This figure does not include any performance-related fees and transaction costs, with the exception of the Depositary's transaction costs.

The Management Company receives no reimbursements from the fees paid or expenses repaid to the Depositary or third parties from sub-fund assets. A significant part of the fees taken from sub-fund assets is used for fees to brokers based on the holdings of brokered shares.

Investors also pay any issue surcharge, which may not exceed 5% of the net asset value per share. No redemption fee is charged.

#### **Particular features of target fund purchases**

In addition to the aforementioned fees for the management of the relevant sub-fund, management fees are also charged for the shares of target funds held in the sub-fund. The aforementioned costs, fees, taxes and other expenses that are charged to the sub-fund or incurred by the shareholder when acquiring shares in a sub-fund are also charged when the relevant sub-fund acquires shares in target funds so that these too are directly or indirectly borne by the shareholders of the sub-fund.

#### **Merging the Investment Company with another undertaking for collective investment ("UCI")**

The Investment Company may be merged with another UCI by resolution of the general meeting. The meeting must be quorate, and the resolution requires the majority defined in the Law of 10 August 1915 for amendments to the Articles of Association. The resolution of the general meeting to merge the Investment Company is published in accordance with statutory provisions.

Shareholders of the investment company to be absorbed have the right to demand the redemption of some or all of their shares at the relevant net asset value per share, free of charge, for a period of one month. Shares of shareholders who have not demanded the redemption of their shares are replaced with shares of the acquiring UCI on the basis of the net asset value per share on the date when the merger takes effect. Fractional amounts may be settled in cash.

#### **Merger of one or more sub-funds**

Merger of a sub-fund of the Investment Company by way of integration into another sub-fund of the Investment Company or into another Luxembourg UCI or a sub-fund of another Luxembourg UCI.

By resolution of the Board of Directors of the Investment Company, a sub-fund of the Investment Company may be merged by way of integration into another sub-fund of the Investment Company or another Luxembourg UCI or

UCITS or a sub-fund of another Luxembourg UCI or UCITS established in accordance with the Law of 17 December 2010. A merger resolution may be passed in the following particular cases:

- if the net sub-fund assets on a valuation day fall below an amount deemed to be a minimum amount required to manage the sub-fund economically. The Investment Company has set this amount at EUR 1.25 million.
- if, owing to a significant change in the economic or political environment or for reasons of economic performance, the continued management of the sub-fund no longer appears economically viable.

The merger resolution taken by the Board of Directors is published in the media listed in the *Information for shareholders* section of the Sales Prospectus.

Notwithstanding the preceding paragraph, shareholders affected by the merger who do not agree with the merger are entitled to redeem their shares free of charge within one month of the publication of the notification of the merger to shareholders. Shareholders who do not exercise this right are bound by the merger resolution passed by the Board of Directors.

Merger resolutions require the prior approval of the Luxembourg supervisory authority for the financial sector.

### **Liquidation of the Investment Company**

1. The Investment Company can be liquidated by resolution of the general meeting. This resolution is to be passed in compliance with the provisions for amendments to the Articles of Association, unless the Articles of Association, the Law of 10 August 1915 or the Law of 17 December 2010 waive compliance with these provisions.

If the Investment Company's assets fall below two-thirds of the minimum capital, the Board of Directors of the Investment Company is obliged to convene a general meeting and to put forward a proposal on the liquidation of the Investment Company. The liquidation resolution is passed by simple majority of the shares present or represented.

If the Investment Company's assets fall below one quarter of the minimum capital, the Board of Directors of the Investment Company is also obliged to convene a general meeting and to put forward a proposal on the liquidation of the Investment Company. In this event, the liquidation resolution is passed with a majority of 25% of the shares present or represented at the general meeting.

Letters convening the aforementioned general meetings must be sent within 40 days after it has been determined that the Investment Company's assets have fallen below two-thirds or one-quarter of its minimum capital.

The resolution of the general meeting to liquidate the Investment Company is published in accordance with statutory provisions.

2. Subject to a resolution to the contrary by the Board of Directors, the Investment Company shall not issue, redeem or exchange shares in the Investment Company from the date of the liquidation resolution until this resolution has been implemented.
3. Net liquidation proceeds which shareholders have not claimed by the end of the liquidation proceedings are deposited at the *Caisse des Consignations* in the Grand Duchy of Luxembourg for the account of the relevant shareholders by the Depositary, where they are forfeited if not claimed within the statutory period.

### **Liquidation of one or more sub-funds**

1. A sub-fund of the Investment Company can be liquidated by resolution of the Board of Directors of the Investment Company, in the following events particularly:
  - if the net sub-fund assets on a valuation day fall below an amount deemed to be a minimum amount required to manage the sub-fund economically. The Investment Company has set this amount at EUR 1.25 million;

- if, owing to a significant change in the economic or political environment or for reasons of economic performance, the continued management of the sub-fund no longer appears economically viable.

The Board of Director's liquidation resolution is to be published in accordance with the provisions for the publication of notifications to shareholders and in the corresponding form. The liquidation resolution requires the prior approval of the Luxembourg supervisory authority.

Subject to a resolution to the contrary by the Board of Directors, the Investment Company shall not issue, redeem or exchange shares in the sub-fund to be liquidated from the date of the liquidation resolution until this resolution has been implemented.

2. Net liquidation proceeds which shareholders have not claimed by the end of the liquidation proceedings are deposited at the *Caisse des Consignations* in the Grand Duchy of Luxembourg for the account of the relevant shareholders by the Depositary, where they are forfeited if not claimed within the statutory period.

### **Taxation of the Investment Company and its sub-funds**

The company is not subject to tax on income or profits from its assets in the Grand Duchy of Luxembourg. The assets of the company are only subject to the so-called "taxe d'abonnement" in the Grand Duchy of Luxembourg, at a current rate of 0.05% p.a. A reduced "taxe d'abonnement" of 0.01% p.a. is applicable to (i) sub-funds or share classes whose shares are only issued to institutional shareholders within the meaning of Article 174 of the Law of 17 December 2010, (ii) sub-funds whose only purpose is investing in money market instruments, in term money at financial institutions, or both. If the sub-fund invests in sustainable economic activities in accordance with Article 3 of Regulation (EU) 2020/852 (EU Taxonomy), a reduction in the "taxe d'abonnement" may be made in accordance with Article 174(3) of the Law of 17 December 2010. The "taxe d'abonnement" is payable quarterly on the sub-fund's net assets reported at the end of each quarter. The amount of the "taxe d'abonnement" is specified for the respective sub-fund or the share class in the relevant annex to the Sales Prospectus. An exemption from the "taxe d'abonnement" applies to sub-fund assets that are invested in other Luxembourg investment funds that are themselves already subject to the "taxe d'abonnement", as well as in other situations. Registration fees could be incurred.

Income received from the Investment Company (in particular interest and dividends) could be subject to withholding tax or investment tax in the countries where the (sub-)fund assets concerned are invested. The Investment Company could also be subject to tax on realised or unrealised capital gains in the source country. Neither the Depositary nor the Management Company is obliged to obtain tax certificates.

Shareholders and potential investors are advised to inform themselves about the laws and regulations that apply to taxation of the company assets and the subscription, purchase, possession, redemption or transfer of shares and to seek advice from outside third parties, in particular from a tax advisor.

### **Taxation of earnings from shares in the Investment Company held by the shareholder**

Natural persons who are resident for tax purposes in the Grand Duchy of Luxembourg are subject to the progressive Luxembourg income tax.

Companies that are resident for tax purposes in the Grand Duchy of Luxembourg are subject to corporate tax on income from the Fund shares.

Shareholders that are or were not resident for tax purposes in the Grand Duchy of Luxembourg and do not maintain a business establishment or have a permanent representative there are not subject to Luxembourg income tax on income or disposal gains from their shares in the Fund.

Shareholders and potential investors are advised to inform themselves about the laws and regulations that apply to taxation of the company assets and the subscription, purchase, possession, redemption or transfer of shares and to seek advice from outside third parties, in particular from a tax advisor.

## **Use of income**

1. The Board of Directors can distribute the income generated by sub-funds to shareholders or retain this income within the sub-fund. This is mentioned in the annex to this Sales Prospectus for the relevant sub-fund.
2. Both ordinary net income and realised gains may be distributed. Unrealised gains, other assets and in exceptional cases also share capital may also be distributed provided that the net assets do not fall below the minimum defined in Art. 12 of these Articles of Association as a result of the distribution. Portions of the issue price for issued shares that are attributable to income may be used for distribution (income equalisation procedure).
3. Distributions are paid in respect of shares in circulation on the distribution date. Distributions may be carried out in full or in part in the form of free shares. Any fractions remaining may be paid in cash. Income not claimed five years after the publication of notification of a distribution shall be forfeited in favour of the respective sub-fund.
4. Distributions to holders of registered shares are carried out by reinvesting the distribution amount for the benefit of the holders of registered shares. If this is not desired, the holders of registered shares can apply to the Registrar for the distribution to be made to a designated account within ten days of receiving the distribution notice. Distributions to holders of bearer shares are carried out in the same way as the payment of the redemption price to holders of bearer shares.
5. Distributions which have been declared but not paid on a bearer share entitled to distributions, especially when in connection with physical share certificates no coupon has been presented, can no longer be claimed by the holder of such shares after five years from the payment notice and are credited to the Investment Company's sub-fund assets and attributed to the relevant share class, provided that share classes have been formed. No interest is paid on declared distributions from the time they fall due.

## **Publication of the net asset value per share and the issue and redemption prices**

The current net asset value per share and the issue and redemption prices, as well as all other information required by the shareholders, may be requested at any time at the registered offices of the Investment Company, Management Company, Depositary, paying agents/information agents or any sales agent. The issue and redemption prices are also published on each stock exchange day on the Management Company's website ([www.fvsinvest.lu](http://www.fvsinvest.lu)).

## **Information for shareholders**

The Board of Directors of the Investment Company prepares an audited annual report and a semi-annual report for the Investment Company in line with legislation in the Grand Duchy of Luxembourg. The annual and semi-annual reports are prepared in accordance with the Lux GAAP accounting standard. Every annual and semi-annual report states the amount of issue surcharges and redemption fees charged to each sub-fund for the purchase and redemption of shares in target funds during the reporting period, as well as the management fees charged to each sub-fund by another management company (fund management company) or another investment company, including its management company, for managing the shares in target funds held in each sub-fund.

The Sales Prospectus (including annexes), the Key Information Document, copies of the Articles of Association, and annual and semi-annual reports of the Investment Company are available in printed form free of charge for shareholders at the registered offices of the Investment Company, the Management Company, the Depositary, every Paying Agent and the Sales Agent. The current Sales Prospectus (including annexes), the Key Information Document and the annual and semi-annual reports of the Investment Company can be obtained free of charge from the Management Company's website, [www.fvsinvest.lu](http://www.fvsinvest.lu). The current management agreement, depositary agreement, fund management agreement, central management agreement and paying agent agreement are available for inspection at the registered offices of the Investment Company, Management Company, Paying Agents and Sales Agents.



Annual shareholders' meetings are convened by publication in the RESA and in a Luxembourg daily newspaper, in accordance with Luxembourg law. Letters convening the shareholders' meeting include the place and date of the meeting, as well as the conditions for admission and the agenda. Shareholders registered in the share register receive a written invitation no later than eight days before the annual shareholders' meeting.

Information, especially notices to investors of significant changes to the Fund, is published on the Management Company's website, [www.fvsinvest.lu](http://www.fvsinvest.lu). Notices are also published in the Grand Duchy of Luxembourg in the RESA and in the "Tageblatt", where required by law. In other countries where shares are sold, notices are published in the required media in the cases specified by law.

Information about investment limits, risk management, risk management methods and the latest developments in risks and returns for the main categories of fund assets can be obtained free of charge in electronic and printed form from the Management Company.

Information on the percentage of the Fund's assets that is difficult to liquidate is published in the current annual report and the semi-annual report.

Information about the total leverage used by the Fund is published in the current annual report under "Risk management".

The Flossbach von Storch Group has established an appropriate remuneration system for all employees that takes into account relevant functions and is consistent with the Flossbach von Storch Group business and risk strategy and objectives and values as well as the company's long-term interests and measures in relation to handling conflicts of interest. The policy surrounding remuneration is adapted to the companies' risk profile and incorporates sustainability risks, i.e. events or conditions relating to the environment, social affairs or corporate governance that could have a negative impact on the company's financial situation or profits, or on the reputation of Flossbach von Storch. It takes into account the long-term and sustainable performance of the Flossbach von Storch Group as well as the interests of the company's employees, customers, investors and owners, and is thus designed to avoid conflicts of interest.

An employee's total remuneration may be composed of both a fixed and a variable component.

Fixed remuneration is defined as the contractually agreed fixed salary, usually paid monthly, as well any financial benefits or benefits in kind within the meaning of the law that are based on a previously established, general, permanent and non-discretionary Flossbach von Storch regulation. Variable remuneration is granted by Flossbach von Storch as a performance-related bonus in return for an employee's sustained and risk-adjusted performance based on an assessment of the individual performance, the performance of the division or business unit in question and the overall financial performance of Flossbach von Storch; payment of variable remuneration and the amount thereof will be based on merit and be at the discretion of Flossbach von Storch. Qualitative and quantitative criteria should be taken into account in the determination of variable remuneration.

The variable and fixed remuneration must be appropriately balanced, with a view to avoiding excessive risk assumption.

The companies of the Flossbach von Storch Group are obligated to identify people who, due to their role and/or responsibilities, could potentially have a significant influence on the risk profile of the respective Flossbach von Storch company or the portfolios it manages. Accordingly, individual employees are determined as being "identified employees" or "risk carriers" pursuant to statutory requirements.

The establishment of a remuneration committee is currently not required in view of proportionality principles, i.e. on the basis of the internal organisation of Flossbach von Storch and the nature and scope of its transactions.

Details regarding the Flossbach von Storch Group's remuneration policy, including a description of how the remuneration and the other benefits are calculated, and the responsibilities for allocating the remuneration and

other benefits, are available free of charge on the Management Company's website at [www.fysininvest.lu](http://www.fysininvest.lu). A paper version will be provided free of charge to investors on request.

The Management Company has the option, under certain conditions, to grant preferential treatment to investors (e.g. a discount on the management fee), provided that the fair treatment of investors is guaranteed. These conditions can be requested from the Management Company free of charge at any time.

### **Information on possible sub-fund-specific changes**

The Investment Company can change the investment objectives and/or investment policy of a sub-fund after obtaining prior approval from the supervisory authority. Shareholders are appropriately informed of the above-mentioned changes as described in the "Information for shareholders" section above. A notice is also included in the semi-annual or annual report.

### **Information for investors in the United States of America**

The shares of the Investment Company have not been, are not nor will they be admitted or registered in accordance with the *US Securities Act of 1933* as amended (the "US Securities Act") or according to the stock market legislation of individual states or local authorities of the United States of America or one of its territories, or other territories which are either possessions of or under the jurisdiction of the United States of America, including the Commonwealth of Puerto Rico (the "United States"); it is also prohibited for them, directly or indirectly, to be transferred, offered or sold to or for the benefit of a US person (in accordance with the definition in the US Securities Act).

The Investment Company is not, nor will it be, admitted or registered in accordance with the US *Investment Company Act of 1940* as amended or in accordance with the laws of individual federal states of the USA, and the shareholders have no claim to the advantage of registration in accordance with the Investment Company Act.

In addition to any other requirements contained in the Sales Prospectus, the Articles of Association or the subscription certificate, the shareholders may not be (a) a "US Person" as defined in Regulation S of the Securities Act, (b) a "Specified US Person" as defined in the *Foreign Account Tax Compliance Act* ("FATCA"); the investor may be (c) a "non-US Person" within the meaning of the Commodity Exchange Act, and may not be (d) a "US Person" within the meaning of the US *Internal Revenue Code* of 1986 as amended (the "Code") and within the meaning of the US *Treasury Regulations* issued in accordance with the Code. For further information, please feel free to contact the Management Company.

Persons wishing to acquire shares must confirm in writing that they meet the above requirements.

FATCA was adopted into law in the United States as part of the *Hiring Incentives to Restore Employment Act* of March 2010. FATCA obligates financial institutions outside of the United States of America ("foreign financial institutions" or "FFIs") to provide information annually on *financial accounts* held directly or indirectly by *Specified US Persons* to the US *Internal Revenue Service* (IRS). A withholding tax in the amount of 30% is levied on certain US income from FFIs that do not comply with this obligation.

On 28 March 2014 the Grand Duchy of Luxembourg entered into an intergovernmental agreement ("IGA"), in accordance with Model 1, with the United States of America and an associated *Memorandum of Understanding*.

The Management Company and the Investment Company comply with the FATCA regulations.

The share classes of the Investment Company can be subscribed by shareholders either

- (i) through a FATCA-compliant independent intermediary (*nominee*) or
- (ii) directly, and indirectly through a sales agent (that acts solely as a mediator and not as a nominee), with the exception of:

- *Specified US Persons*

This group includes those US persons who are classified by the government of the United States as at risk with respect to practices pertaining to tax avoidance and evasion. This does not, however, concern publicly listed companies, tax-exempt organisations, real estate investment trusts (REIT), trusts, US securities dealers or similar.

- *Passive non-financial foreign entities (or passive NFFE) with one or more substantial US owners*

This group includes passive NFFE, the substantial ownership of which lies with one or several US persons.

- *Non-participating financial institutions*

The United States of America identifies this status on the basis of the non-conformity of a financial institution which has not complied with stipulated requirements owing to a breach of conditions of the relevant country-specific IGA within 18 months of first being notified of these.

Should the Investment Company be obliged to pay a withholding tax or submit reports or should it suffer other damage as a result of a shareholder not being FATCA-compliant, the Investment Company reserves the right, notwithstanding other rights, to assert claims for compensation against the shareholder concerned.

For questions relating to FATCA and the FATCA status of the Investment Company, it is recommended that shareholders, and potential shareholders, consult their financial, tax and/or legal advisor.

#### **Applicable law, place of jurisdiction and contract language**

The Investment Company is subject to the laws of the Grand Duchy of Luxembourg. The same applies to legal relations between investors, the Management Company and the Depositary, unless regardless of the above another jurisdiction subjects these legal relations to particular regulations. In particular, the provisions of the Law of 17 December 2010 apply in addition to the provisions of this Sales Prospectus. The Articles of Association of the Investment Company are filed with the Trade and Companies Register in Luxembourg. Any legal dispute between investors, the Investment Company, the Management Company and the Depositary is subject to the jurisdiction of the relevant court in the Luxembourg district of the Grand Duchy of Luxembourg. The Investment Company and the Depositary are entitled to subject themselves and the Fund to the jurisdiction and law of any country in which shares in the Fund are sold with regard to claims made by investors resident in that country and matters relating to the Fund or sub-fund.

In the event of disputes, the German wording of this Sales Prospectus is authoritative. For shares in the Fund sold to investors in a non-German-speaking country, the Investment Company and the Depositary may declare on their behalf and on behalf of the Fund that translations into the languages of the countries where the shares are offered for sale to the public are binding.

If terms that are not defined in this Sales Prospectus require interpretation, the provisions of the Law of 17 December 2010 apply. This applies in particular for the terms defined in Art. 1 of the Law of 17 December 2010.

#### **Information for shareholders regarding the automatic exchange of information**

With Council Directive 2014/107/EU of 9 December 2014 regarding the mandatory automatic exchange of (tax) information and the Common Reporting Standard ("CRS"), a reporting and due diligence standard for the automatic exchange of information on financial accounts that was developed by the OECD, the automatic exchange of information is implemented in accordance with the intergovernmental agreements and the Luxembourg regulations (Law on the implementation of the automatic exchange of information on financial accounts in tax matters of 18 December 2015).

In this respect, financial institutions subject to mandatory reporting will report information on the applicants and the registers that are subject to mandatory reporting to the Luxembourg tax authority ("Administration des

Contributions Directes in Luxembourg”), which will in turn forward this to the tax authorities of the countries in which applicants are resident for tax purposes.

This includes, in particular, the communication of:

- The name, address, tax identification number, states of residence, as well as date and place of birth of each person subject to mandatory reporting,
- Registration number,
- Register balance or value,
- Credited capital income including sales proceeds.

The information subject to mandatory reporting for a specific tax year that must be communicated to the Luxembourg tax authority by 30 June of the following year is exchanged between the relevant financial authorities up to 30 September of that year.

#### **Information for shareholders regarding disclosure requirements - DAC 6**

The Sixth Council Directive on Administrative Cooperation (EU) 2018/822 (“DAC 6”) amending EU Directive 2011/16/EU, implemented in Luxembourg by the Law of 25 March 2020, as amended, sets out mandatory disclosure requirements for cross-border tax arrangements with an EU connection under certain conditions (fulfilment of one or more characteristics) and for certain types of intermediaries or taxpayers.

DAC 6 regulates a mandatory exchange of information on tax arrangements by such intermediaries or taxpayers to their competent tax authorities and introduces an automatic exchange of information between the tax authorities of the different EU Member States.

The Management Company may be deemed to be an intermediary for certain tax arrangements under the rules of DAC 6 and may therefore be required to report to the relevant tax authorities certain information on tax arrangements that meet the characteristics. Such a report could include information about a shareholder in relation to its identity and the reported tax arrangement such as name, tax residence and TIN number. Shareholders may be subject to DAC 6 reporting themselves or may wish to seek further advice on DAC 6, in which case shareholders should consult their tax advisors.

## Annex 1a:

# Flossbach von Storch SICAV - Multiple Opportunities

This sub-fund promotes environmental and social characteristics within the meaning of Article 8 of Regulation (EU) 2019/2088 (Disclosure Regulation).

### *Investment objectives*

Flossbach von Storch SICAV - Multiple Opportunities (hereinafter the “sub-fund” in this Annex 1) strives to achieve its investment objective of appropriate capital growth in the sub-fund currency while taking into account the risk of its investments. The investment strategy is defined based on fundamental analyses of the global financial markets. The sub-fund is actively managed. The fund manager chooses, regularly reviews and, if necessary, adjusts the composition of the portfolio in accordance with the criteria specified in the investment policy. No index is used for comparison purposes.

**As a general rule, past performance provides no guarantee of future performance. We cannot guarantee that the investment objective will be achieved.**

### *Investment policy*

The General provisions of the investment policy described in this Sales Prospectus apply, unless explicitly abrogated or amended below.

When making investment decisions for the sub-fund, the fund manager shall take into account the requirements of the sustainability policy of the management company and the criteria it contains, as specified in detail in the “Sustainability policy” section. Flossbach von Storch follows a holistic sustainability approach across the group: As a long-term investor, Flossbach von Storch attaches importance to companies dealing responsibly with their environmental and social footprint and actively counteracting negative impacts of their activities. To be able to recognise negative impacts at an early stage, the handling of investments with their ecological and social footprint is examined and evaluated. For this purpose, certain environmental and social characteristics are taken into account in the investment strategy and, where possible or necessary, positive development is worked towards. Specifically, this means: among other things, portfolio companies are checked for set climate targets and progress is monitored on the basis of certain sustainability indicators.

Furthermore, Flossbach von Storch applies group-wide exclusion criteria for social and environmental characteristics. These include the exclusion of investments in companies with certain business models. This includes, for example, controversial weapons.

A binding participation policy is also implemented to work towards positive development in the event of particularly severe negative impacts on certain sustainability factors in investments. This covers the following areas in particular: greenhouse gas emissions and social issues/employment.

Depending on the market situation and appraisal by the fund management, the sub-fund generally has the possibility to invest in shares, money market instruments, certificates and bonds of all types, including zero-coupon bonds, variable-rate securities and structured products (e.g. reverse convertible bonds, warrant-linked bonds and convertible bonds), target fund units, cash and fixed-term deposits.

In compliance with the “Additional investment restrictions” and in accordance with Art. 4 of the Articles of Association, at least 25% of the sub-fund’s net assets shall be continuously invested in equity interests.

With respect to the target funds held by the fund (including ETFs) as well as certificates and derivatives on commodities, commodity indices and baskets, it is agreed that no physical deliveries of commodities or goods shall take place on behalf of the fund. This does not apply to deliveries of gold.

Up to 15% of the sub-fund's net assets may be invested directly (physically) in gold. In addition, the respective sub-fund may invest up to 10% of its net assets indirectly (e.g. through certificates, gold bullion securities etc.) in gold and other precious metals, provided that the total (direct and indirect) investment in gold never exceeds 25% of the sub-fund's net assets.

The use of derived financial instruments ("derivatives") is permitted in order to achieve the aforementioned investment objectives, as well as for investment and hedging purposes. These include options, swaps and forward contracts on securities, money market instruments, financial indices within the meaning of Art. 9 (1) of Directive 2007/16/EC and Art. XIII of the ESMA Guidelines 2014/937, interest rates, exchange rates, currencies and investment funds in accordance with Art. 196 KAGB, as well as other underlying assets. The other underlyings are precious metals, commodities, investment funds not established in accordance with Art. 196 KAGB, and indices on the aforementioned instruments that are not a financial index.

Contrary to the general investment principles and restrictions, short-term borrowing is permitted (only up to 10% of the sub-fund assets).

Acquiring equity interests in companies that are not listed on a stock exchange or included in an organised market is also prohibited, as is the acquisition of unsecuritised loan receivables. For this sub-fund, the Management Company will not conclude total return swaps or other derivative transactions with the same characteristics.

Information about the environmental and social characteristics promoted by the sub-fund and their implementation in the investment policy is set out in Annex 1b of the Sales Prospectus.

#### *Risk profile of the sub-fund*

##### *Risk profile – Growth-oriented*

The fund is suitable for growth-oriented investors. Owing to the composition of the net sub-fund assets, there is a high degree of overall risk but also a high degree of profit potential. The risks may consist in particular of currency risk, credit risk, price risk and interest-rate risk.

##### *Commitment approach*

The commitment approach is used to monitor and measure the total risk associated with derivatives.

#### *Risk profile of the typical shareholder*

The investor should be seeking a long-term investment. The shareholder's return expectations based on the investment strategy are matched by a reasonable acceptance of risk. The shareholder must be willing and able to assume the very high risks resulting from the investment strategy (see also in this respect the section "Risk warnings").

#### *Further information*

	Share class F	Share class R	Share class I	Share class VI	Share class VII
Securities ID no. (WKN):	A0M43Z	A0M430	A1W0MN	A3D2XB	A3D2XC
ISIN code:	LU0323578574	LU0323578657	LU0945408952	LU2559004630	LU2559004713
Initial issue price: (plus issue surcharge)	EUR 100.00	EUR 100.00	EUR 100.00	EUR 100.00	EUR 100.00

	Share class F	Share class R	Share class I	Share class VI	Share class VII
Payment of the initial issue price:	24 October 2007		02 October 2013	05 January 2023	05 January 2023
Initial issue date and initial issue period:	19 October to 22 October 2007		16 September to 30 September 2013	03 January 2023	03 January 2023
Sub-fund currency:	EURO				
Type of certificates:	Bearer shares are documented in global certificates. Registered shares are entered in the share register.				
Denomination:	Bearer and registered shares are issued up to three decimal places.				
Use of income:	Distributing	Distributing	Distributing	Distributing	Distributing
Share class currency:	EURO	EURO	EURO	EURO	EURO
Minimum initial investment:	5,000,000.00**	None	1,000,000.00**	1,000,000.00**	1,000,000.00**
Savings plans for bearer shares	You can obtain information from the institution that maintains your custody account				
Withdrawal plan for bearer shares	You can obtain information from the institution that maintains your custody account				
Financial year-end of the Investment Company: Initially:	30 September 30 September 2008				
Annual and semi-annual reports of the Investment Company: First semi-annual report (unaudited): First annual report (audited):	31 March 2008  30 September 2008				
Calculation of net asset value:	On every banking day in the Grand Duchy of Luxembourg except 24 and 31 December of each year				

\*\*The Management Company is also authorised to accept lower amounts at its discretion.

	Share class H
Securities ID no. (WKN):	A3E4TT
ISIN Code:	LU2737649090
Initial issue price: (plus issue surcharge)	EUR 100.00
Payment of the initial issue price:	11 January 2024
Initial issue date and initial issue period:	9 January 2024
Sub-fund currency:	EURO
Type of certificates:	Bearer shares are documented in global certificates. Registered shares are entered in the share register.
Denomination:	Bearer and registered shares are issued up to three decimal places.
Use of income:	Distributing
Share class currency:	EURO
Minimum initial investment:	None
Savings plans for bearer shares	You can obtain information from the institution that maintains your custody account
Withdrawal plan for bearer shares	You can obtain information from the institution that maintains your custody account
Financial year-end of the Investment Company: Initially:	30 September 30 September 2008
Annual and semi-annual reports of the Investment Company: First semi-annual report (unaudited): First annual report (audited):	31 March 2008 30 September 2008
Calculation of net asset value:	On every banking day in the Grand Duchy of Luxembourg except 24 and 31 December of each year

The sub-fund is established for an indefinite period of time.

#### Shares in the sub-fund and share classes

The Investment Company has decided to issue different share classes for the sub-fund. A distinction is made between share classes F, R, I, VI, VII and H. The investment policy of the share classes is identical to that of the overall sub-fund; the differences are mainly in the minimum investment amount and the amount of the management fee. Subject to



the discretion of the Management Company, share classes “VI” and “VII” are reserved exclusively for asset management clients of Flossbach von Storch SE. Subject to the discretion of the Management Company (taking into account legal requirements at national level), class H shares are intended exclusively for providers of independent investment advice or discretionary financial portfolio management services or other distributors who

- (i) provide investment services and activities within the meaning of Directive 2014/65/EU on markets in financial instruments (MiFID II Directive) and
- (ii) have concluded separate remuneration agreements with their clients in relation to these services and activities and
- (iii) do not receive any other remuneration, rebates or other payments from the Management Company or the relevant sub-fund in relation to these services and activities
- or
- (iv) institutional investors who qualify as professional investors or eligible counterparties as defined in the MiFID II Directive. This includes, for example, investments by insurance companies as part of unit-linked insurance solutions.

Costs reimbursed from the sub-fund’s assets

#### 1. Management fee

In return for managing the sub-fund, the Management Company receives a fee of 0.965% p.a. for share classes F, of 1.465% p.a. for share class R, of 0.715% p.a. for share classes I, 0.660% p.a. for the share class VI, of 0.910% p.a. for share class VII and of 0.815% p.a. for share class H, calculated based on the average net sub-fund assets derived from the daily values at the end of each month. For days that are not valuation days, the last determined value of the net sub-fund assets is used. The management fee is paid in arrears.

In addition, the Management Company also receives a performance fee from the net assets of the R, I, VI and H share classes in the amount of up to 10% of the gross share value performance if the gross share value at the end of an accounting period exceeds the share value at the end of the preceding accounting periods from the last 5 years (“high-water mark principle”) but does not total more than 2.5% of the average net asset value of the sub-fund in the accounting period of the relevant share class. If there are not full accounting periods for the sub-fund for the past 5 years, all previous accounting periods are taken into account when calculating the fee claim. For the sub-fund’s first accounting period, the high-water mark will be replaced by the share value at the start of the first accounting period. The performance fee attributed to and accrued for share redemptions at the time of outperformance of the share class during the year is retained for these shares (“crystallisation”) and paid to the Management Company at the end of the accounting period. The increase in the performance fee attributed to subscriptions at the time of outperformance of the share class during the year is not taken into account on a proportionate basis.

Accounting period: The accounting period commences on 1 October and ends on 30 September of each calendar year. The accounting period may be reduced in the event of mergers or dissolution of the sub-fund.

The performance fee for the respective share class is calculated on each valuation date by comparing the current share value plus the performance amount contained in the current share value for each share (gross share value) to the highest share value at the end of the previous accounting periods (high-water mark) on the basis of the shares currently in circulation. In order to determine the share value performance, any distributions made in the meantime will be taken into account accordingly.

On the valuation dates on which the gross share value exceeds the high-water mark, the accrued total amount changes. On the valuation dates on which the gross share value falls below the high-water mark, the total amount accrued in the respective share class will be dissolved. The performance fee amount that has already been crystallised for share redemptions over the course of a year is also retained in the event of a future negative gross value performance.

The performance fee amount accrued on the last valuation date of the accounting period for the current shares in circulation and the crystallised assets may be taken from the sub-fund at the expense of the relevant share class at the end of the accounting period. Any fees that comprise the performance fee do not include any VAT.

#### Calculation example:

##### Calculation assumptions for accounting period 1:

Net share value at the start of the accounting period:	EUR 100.00
Gross share value at the end of the accounting period:	EUR 118.00
(Gross share value EUR 118.00 = net share value EUR 117.00 + performance fee already included from previous day EUR 1.00)	
Performance fee:	10%
High watermark:	EUR 110.00
(Current high watermark EUR 110.00, i.e. the highest share value of the last five accounting period end points: EUR 90.00, EUR 110.00, EUR 91.00, EUR 95.00, EUR 100.00)	
Distribution in the accounting period:	EUR 0.00
Number of shares at the start and end of the accounting period:	100
No share movements in the accounting period	
Average sub-fund assets in the accounting period:	EUR 11,000.00
Maximum performance fee payout volume	2.5% of the sub-fund

##### Calculation of accounting period end point 1:

$(\text{EUR } 118.00 + \text{EUR } 0.00 - \text{EUR } 110.00) \times 10\% \times 100 = \text{EUR } 80.00$  performance fee or EUR 0.80 per share

*(Gross share value plus distribution at the end of the accounting period minus high watermark) multiplied by performance fee rate multiplied by number of shares*

##### Calculation of maximum amount at accounting period end point 1:

$\text{EUR } 11,000.00 \times 2.5\% = \text{EUR } 275.00$

*(Average sub-fund assets in the accounting period multiplied by maximum amount in %)*

The result is that the performance fee can be paid out, as the gross share value of EUR 118.00 exceeds the high watermark of EUR 110.00 at the end of the accounting period. The payout amount of EUR 80.00 is below the maximum possible amount of EUR 275.00.

##### Calculation assumptions for accounting period 2:

Net share value at the start of the accounting period:	EUR 117.20
Gross share value at the end of the previous period minus the performance fee paid out:	EUR 118.00 - EUR 0.80 = EUR 117.20
Redemption of shares in the accounting period:	20
Gross share value at the time of redemption of the shares	EUR 126.20
Gross share value EUR 126.20 = net share value EUR 125.10 + performance fee already included from previous day EUR 1.10	

Gross share value at the end of the accounting period:	EUR 110.20
Gross share value EUR 110.20 = net share value EUR 110.20 + performance fee already included from previous day EUR 0.00	
Performance fee:	10%
High watermark:	EUR 117.20
Current high watermark EUR 117.20, highest share value of the last five accounting period end points: (EUR 110.00, EUR 91.00, EUR 95.00, EUR 100.00, EUR 117.20)	
Distribution two months before the end of the accounting period and after the redemption date:	EUR 2.00
Number of shares at the start of the accounting period:	100
Number of shares at the end of the accounting period:	80

#### **Calculation of crystallisation amount on the redemption date:**

$(\text{EUR } 126.20 + \text{EUR } 0.00 - \text{EUR } 117.20) \times 10\% \times 20 = \text{EUR } 18.00$  performance fee or EUR 0.90 per share redeemed

*(Gross share value plus distribution on the redemption date of the shares minus the high watermark) multiplied by performance fee rate multiplied by number of shares redeemed*

The result is that the performance fee can be crystallised proportionately on the redemption date of the shares, as the gross share value of EUR 126.20 exceeds the prevailing high watermark of EUR 117.20 on the redemption date. Irrespective of the subsequent performance, the amount of EUR 18.00 will be paid out to the management company at the end of the accounting period.

#### **Calculation of accounting period end point 2:**

$(\text{EUR } 110.20 + \text{EUR } 2.00 - \text{EUR } 117.20) \times 10\% \times 80 = \text{EUR } 0.00$  performance fee or EUR 0.00 per share

*(Gross share value plus distribution at the end of the accounting period minus high watermark) multiplied by performance fee rate multiplied by number of shares*

The result is that no performance fee can be paid proportionately for the existing shareholders at the end of the accounting period (total of 80 shares), as the gross share value plus distribution in the amount of EUR 112.20 did not exceed the high watermark of EUR 117.20 at the end of the accounting period.

However, the management company is entitled to a proportionate performance fee payout amount of EUR 18.00 at the end of the accounting period from those shareholders who have redeemed their shares during the year with a positive gross share performance (= crystallisation amount).

## **2. Central administration agent fee**

The Management Company receives a central administration agent fee taken from the sub-fund assets of up to 0.105% p.a. of the net sub-fund assets for the share classes F, R, I and H and of up to 0.160% p.a. of the net sub-fund assets for the share classes VI and VII, calculated based on the average net sub-fund assets derived from the daily values at the end of each month, i.e. for days that are not valuation days, the last determined value of the net sub-fund assets is used. The central administration agent fee is paid in arrears. This fee is subject to value-added tax, if applicable.

## **3. Further costs**

The costs listed in the Sales Prospectus may also be charged to the sub-fund.

Costs to be borne by the shareholders

	Share class F	Share class R	Share class I	Share class VI	Share class VII
Issue surcharge: (payable to the Sales Agent)	up to 5%	up to 5%	up to 5%	up to 5%	up to 5%
Redemption fee:	None	None	None	None	None
Exchange commission: (based on the net asset value per share of the shares to be acquired, payable to the Sales Agent)	up to 3%	up to 3%	up to 3%	up to 3%	up to 3%

	Share class H
Issue surcharge: (payable to the Sales Agent)	None
Redemption fee:	None
Exchange commission: (based on the net asset value per share of the shares to be acquired, payable to the Sales Agent)	None

#### Information on cost disclosures

If a third party advises or acts as an intermediary for a shareholder making a purchase, the third party may provide information on costs or percentage costs that differ from the costs indicated in this Sales Prospectus and the key information document. This may, in particular, be due to the third party including additional costs for its own activities (e.g. acting as an intermediary, providing advice or maintaining a securities account). The third party might also include one-time costs, such as issue surcharges, and may, as a rule, use different calculation methods or estimates for the expenses incurred at the sub-fund level, which might, in particular, include the transaction costs of the sub-fund.

Differences in the cost disclosures can occur both in the information provided before conclusion of an agreement and in the regular cost information provided for an existing sub-fund investment under a long-term client relationship.

#### Use of income

The sub-fund's income is distributed. Distributions are made at the intervals determined by the Investment Company. For holders of registered shares, a number of shares in the sub-fund corresponding to the amount of the distribution is entered in the share register. On request, distributions are also made to an account designated by the shareholder. If the issue price was originally paid by direct debit, pay-outs are made to the same account.

Detailed information regarding the use of income is published on the Management Company's website ([www.fvsinvest.lu](http://www.fvsinvest.lu)).

#### Performance

The fund's performance is calculated in accordance with the BVI method, which is defined as follows:

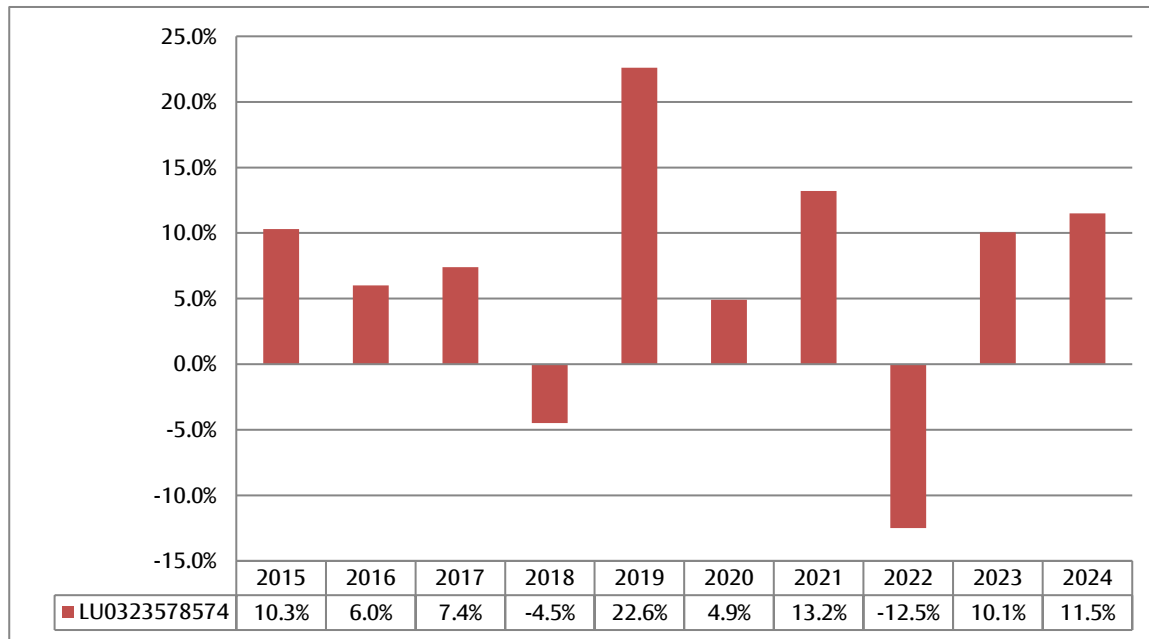
The calculation of the fund's performance consists of comparing the asset values (net asset values) at the beginning and end of a calculation period. Distributions made during the calculation period are always regarded as reinvested at net asset value on the day of distribution. The capital gains tax (interest income tax) amount and the solidarity

surcharge are included in the reinvestment. The reinvestment of the distribution must also be assumed because otherwise the performance of distributing and accumulating funds cannot be compared with each other.

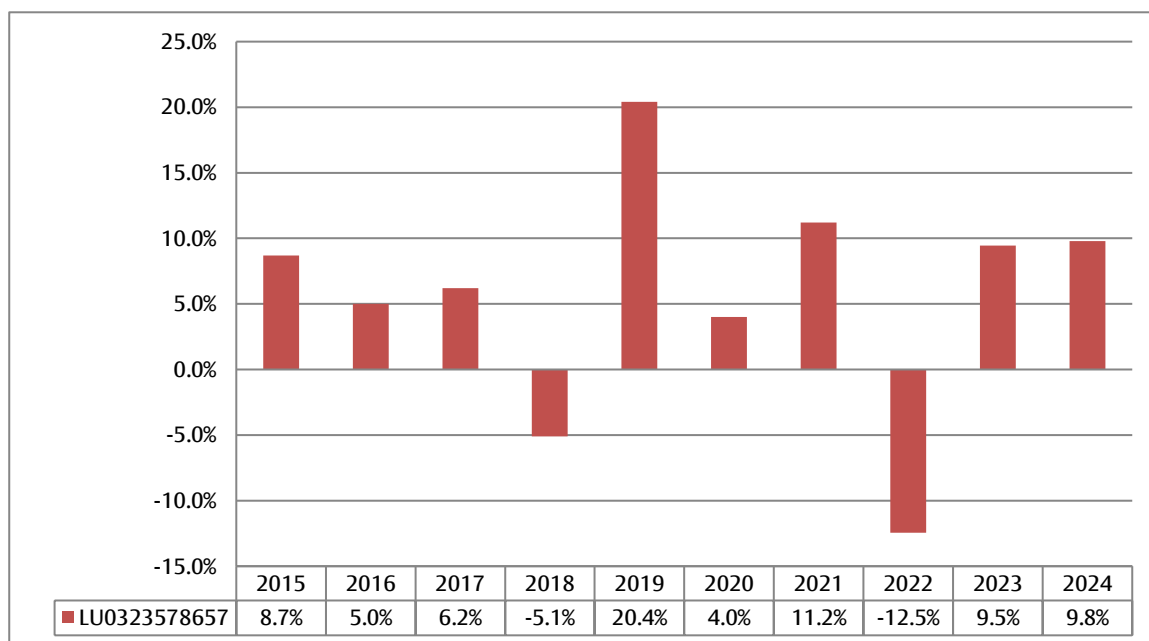
Information on the past performance of the share classes, if available, can be found on the website [www.flossbachvonstorch.de](http://www.flossbachvonstorch.de).

The historical performance of the sub-fund or the individual share classes does not permit any forecast of future performance.

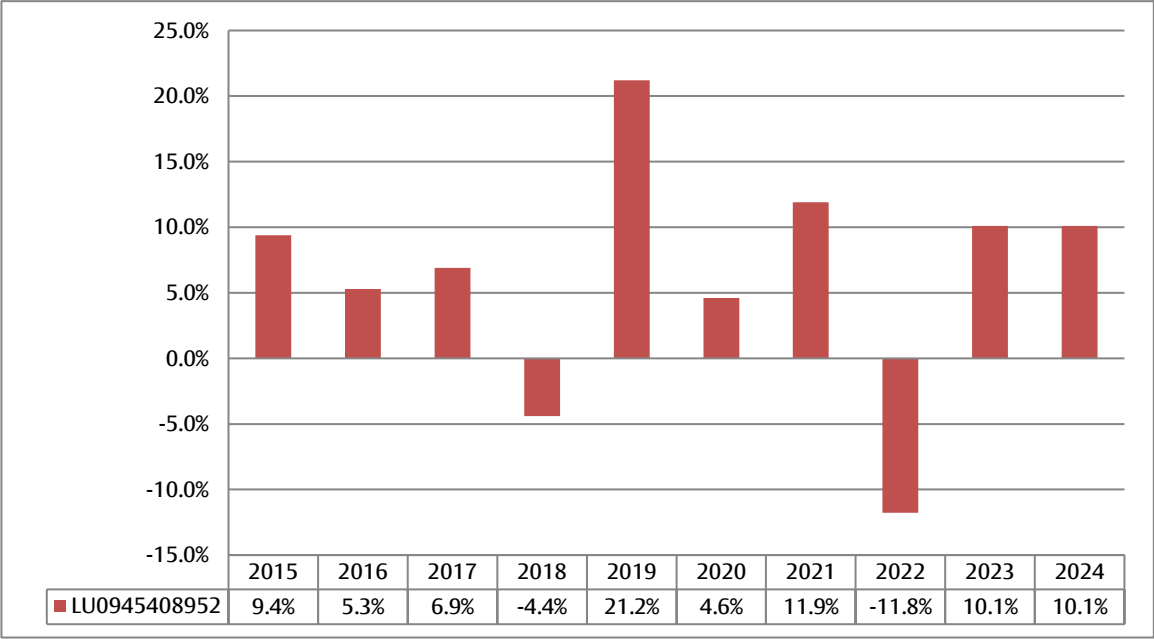
#### Performance of the last full calendar years of share class F



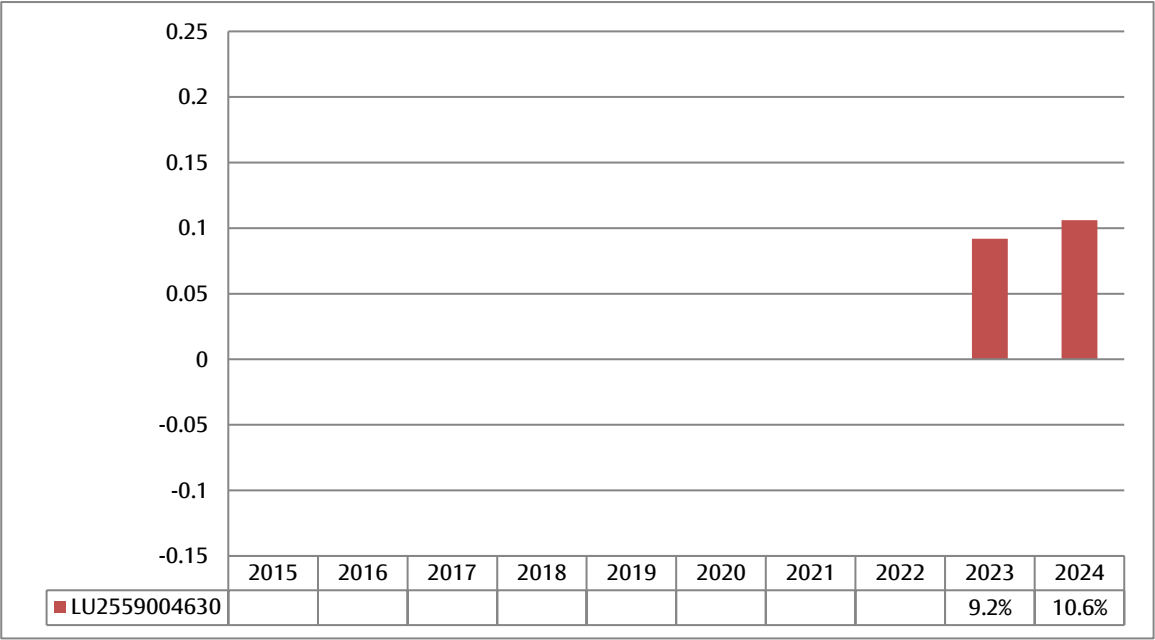
#### Performance of the last full calendar years of share class R



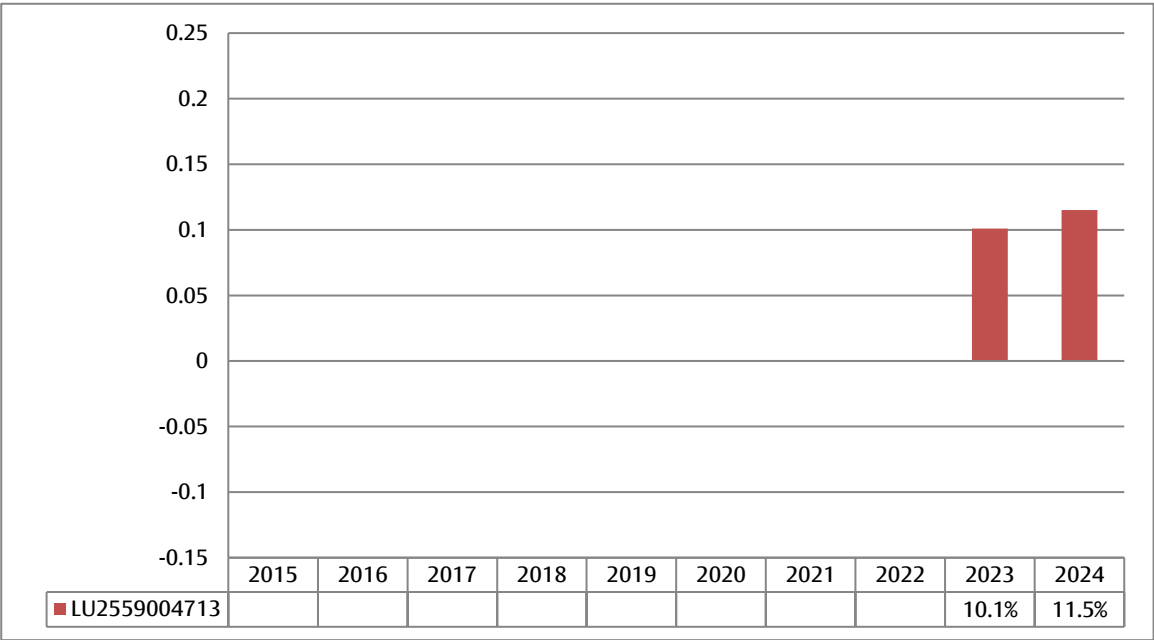
Performance of the last full calendar years of share class I



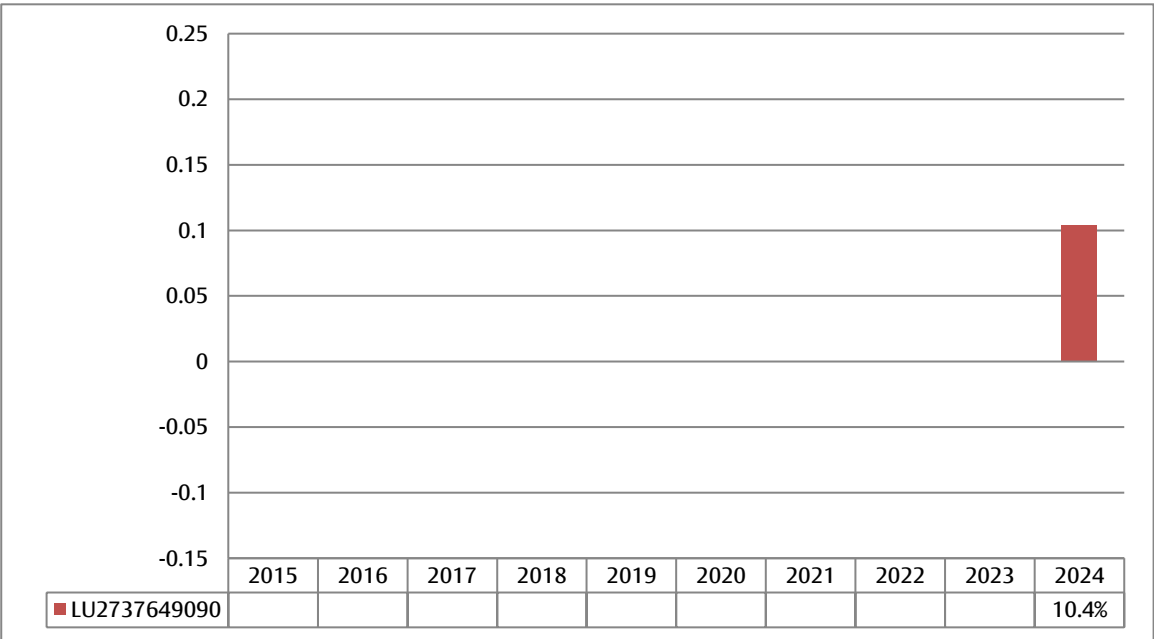
Performance of the last full calendar years of share class VI



Performance of the last full calendar years of share class VII



Performance of share class H over the last full calendar year



Annex 1b: Flossbach von Storch SICAV - Multiple Opportunities – pre-contractual disclosure

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

**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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Product name:  
**Flossbach von Storch SICAV -  
Multiple Opportunities**

Legal entity identifier:  
**529900KJXETIL37T3T24**

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☒ ☒ ☐ Yes

☒ ☐ ☒ No

<div><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> <u>  </u>%<div><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy<input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</div></div> <div><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> <u>  </u>%</div>	<div><input type="checkbox"/> It promotes <b>Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of <b>0 percent</b> of sustainable investments<div><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy<input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy<input type="checkbox"/> with a social objective</div></div> <div><input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments.</b></div>
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**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

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

Flossbach von Storch follows a holistic sustainability approach across the group: As a long-term investor, Flossbach von Storch attaches importance to portfolio companies managing their environmental and social footprint responsibly and actively counteracting negative impacts of their activities. To be able to recognise negative impacts at an early stage, the handling of investments with their ecological and social footprint is examined and evaluated. For this purpose, certain environmental and social characteristics are taken into account in the investment strategy and, where possible or necessary, positive development is worked towards. Specifically, this means: Portfolio companies are, for example, reviewed for set climate targets and progress is monitored on the basis of certain sustainability indicators.

The following environmental and social characteristics are promoted as part of the investment strategy:

### 1) Application of exclusions:

Flossbach von Storch SICAV - Multiple Opportunities implements exclusion criteria with social and environmental characteristics. This means, for example, excluding investments in companies with certain business models. This includes, for example, controversial weapons.

### 2) Participation policy in the event of particularly serious negative effects:

In addition, a participation policy is implemented as part of the investment strategy in order to be able to work towards a positive development in the event of particularly severe negative impacts on certain sustainability factors in investments. This could be, but is not limited to, the topic area of greenhouse gas emissions and social issues/employment.

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

In order to achieve the environmental and social characteristics promoted by Flossbach von Storch SICAV - Multiple Opportunities, the following sustainability indicators are considered.

#### 1) Application of exclusions:

The exclusions are applied based on turnover thresholds. Investments are excluded in companies that generate

- >0% of their turnover from controversial weapons,
- >10% of their turnover from producing and/or selling armaments,
- >5% of their turnover from producing tobacco products,
- >30% of their turnover from mining and/or selling coal.

Companies that commit serious violations of the principles of the UN Global Compact with no prospect of remedying them are also excluded. A positive outlook is assumed if the company seeks clarification and has announced or already taken (initial) action to address the circumstances that led to the violation. Furthermore, state issuers that are considered “not free” according to the Freedom House Index are excluded.

Compliance with the exclusion criteria is monitored both before an investment is made and on an ongoing basis while the investment is held. Compliance with turnover thresholds and defined criteria is monitored based on external and internal data.

#### 2) Participation policy in the event of particularly serious negative effects:

In order to measure potential severe negative environmental/social impacts of portfolio companies' activities, Flossbach von Storch takes into account the so-called “principal adverse impacts” (PAIs) pursuant to Article 7 (1) (a) of Regulation (EU) 2019/2088 (Disclosure Regulation) as part of the investment process.

Flossbach von Storch SICAV - Multiple Opportunities has a particular focus on the following PAI indicators:

In the area of greenhouse gas emissions, the greenhouse gas emissions (Scope 1 and 2), the greenhouse gas emission intensity and the carbon footprint based on Scope 1 and 2 as well as the energy consumption of non-renewable energy sources are analysed. Portfolio companies are also reviewed for the climate targets they have set and progress is monitored using the sustainability indicators mentioned above.

In the area of social affairs/employment, attention is paid to violations of the principles of the UN Global Compact, violations of the OECD Guidelines for Multinational Enterprises and processes to comply with the principles and guidelines.

The indicators of the subject areas are prioritised according to relevance, severity of negative impacts, and data availability. The evaluation is not based on rigid bandwidths or thresholds that companies must meet or achieve; rather, the focus is on whether there is a positive development in how they are managing the indicators or if they are working towards this where possible and necessary. More detailed information is provided below in the section on taking principal adverse impacts into account.

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

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

Not applicable. Flossbach von Storch SICAV - Multiple Opportunities promotes E/S characteristics but does not 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?**

Not applicable. Flossbach von Storch SICAV - Multiple Opportunities promotes E/S characteristics but does not make sustainable investments.

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

Not applicable.

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

Not applicable.

The EU Taxonomy sets out a “do no 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

Flossbach von Storch SICAV - Multiple Opportunities considers the principal adverse impacts of the investment decision on sustainability factors (PAIs or PAI indicators) in accordance with Article 7 (1) (a) of Regulation (EU) 2019/2088 (Disclosure Regulation), as well as an additional climate-related indicator and two additional social indicators of the Disclosure Regulation in its in-house investment process.

As part of this process, best efforts will be made to determine and document the information on the evaluation and prioritisation of the principal adverse impacts on sustainability factors. The identification, prioritisation and evaluation of the principal adverse impacts is carried out as part of the in-house analysis process using specific ESG analyses, which are prepared individually for invested issuers/guarantors and are taken into account in the risk/reward profile of the company analyses. The PAI indicators are prioritised according to relevance, severity of negative impacts, and data availability. The evaluation is not based on rigid bandwidths or thresholds that companies must meet or achieve; rather, the focus is on whether there is a positive development in how they are managing the PAI indicators.

The consideration of PAIs also serves to achieve the environmental and social characteristics promoted by Flossbach von Storch SICAV - Multiple Opportunities:  
As part of the participation policy, efforts are made to reduce particularly negative impacts for, among others, the indicators of greenhouse gas emissions Scope 1 & 2, as well as serious violations of the UN Global Compact Principles and OECD Guidelines for Multinational Enterprises. This means that, if one of the portfolio companies does not adequately manage the indicators identified as particularly negative, this is addressed with the company and an attempt is made to work towards a positive development over an appropriate period of time. If the management does not take the necessary steps for improvement to a sufficient extent during this period, escalation measures will follow, including the utilisation of voting rights or the sale of the investment. In addition, exclusions such as producing and/or selling controversial weapons and mining and/or selling coal may contribute to a reduction or avoidance of individual adverse sustainability impacts.

Due to the insufficient quality and coverage of the data, so-called Scope 3 emissions and energy production of non-renewable energies are not taken into account within the framework of greenhouse emissions. The fund manager will continuously monitor data coverage and, if deemed feasible, include it in its investment and engagement process.

☐ No



## What investment strategy does this financial product follow?

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

The general investment policy and investment strategy of Flossbach von Storch SICAV - Multiple Opportunities is defined in Annex 1a and is based on the generally applicable sustainability approach of ESG integration, participation and voting of the Flossbach von Storch Group, as well as exclusion criteria and consideration of the principal adverse impacts of the investment decision on sustainability factors (as described above).

Flossbach von Storch integrates sustainability factors comprehensively into its multi-stage investment process. Sustainability factors include aspects related to environmental, social and employee matters, respect for human rights, and anti-corruption and anti-bribery matters, such as PAI indicators and other

ESG controversies.

As part of a specific ESG analysis, sustainability factors are reviewed for their potential opportunities and risks, and an assessment is made to the best of our knowledge and belief as to whether or not a company stands out negatively in terms of its environmental and social activities and how it manages them. Each of the factors is considered from the perspective of a long-term investor to ensure that none of these aspects have a negative impact on the long-term success of an investment.

The findings of the ESG analysis are taken into account in the risk/reward profile of the company analyses. Only if there are no serious sustainability conflicts that jeopardise the future potential of a company or issuer is an investment idea entered in the focus list (for equities) or guarantor list (for bonds), thus becoming a potential investment. The fund managers can only invest in securities that are on the internal focus or guarantor list. This principle ensures that invested securities comply with the common understanding of quality.

In connection with active participation as a shareholder, Flossbach von Storch follows a fixed participation policy and guidelines for exercising voting rights. The developments of the portfolio investments are monitored and analysed in this context. If one of the portfolio companies does not adequately manage the sustainability factors identified as particularly negative, which can have a long-term impact on business development, this is addressed directly with the company and an attempt is made to work towards a positive development. Flossbach von Storch sees itself as a constructive sparring partner (where possible) or as a corrective partner (where necessary) that makes appropriate suggestions and supports management in the implementation. If the management does not take the necessary steps, the fund management will use its voting rights in this regard or sell the investment.

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

- **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?**

**1) Application of exclusions:**

The sub-fund only makes investments in companies that comply with the following exclusion criteria:

- Controversial weapons (turnover tolerance  $\leq 0\%$ )
- Producing and/or selling armaments (turnover tolerance  $\leq 10\%$ )
- Producing tobacco products (turnover tolerance  $\leq 5\%$ )
- Mining and/or selling coal (turnover tolerance  $\leq 30\%$ )
- No serious violations of the UN Global Compact with no positive outlook

In addition, sovereign issuers with an insufficient score according to the Freedom House Index classification (classification "not free") are excluded.

**2) Participation policy in the event of particularly serious negative effects:**

The sub-fund shall ensure responsible management of the following PAI indicators: Greenhouse gas emissions (Scope 1 and 2), greenhouse gas emission intensity and carbon footprint based on Scope 1 and 2, as well as the consumption of non-renewable energies. In addition, attention is paid to violations of the principles of the UN Global Compact, violations of the OECD Guidelines for Multinational Enterprises and the processes in place to comply with the two guidelines.

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

Not applicable. The sub-fund does not commit to reducing the investment portfolio by a certain minimum rate.

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

Flossbach von Storch pays particular attention to corporate governance in its analysis process,

as this is responsible for the sustainable development of the company. This also requires responsible management of environmental and social factors that contribute to the long-term success of the company.

Within the framework of the multi-stage analysis process, an in-house review is carried out and an attempt is made to ensure, to the best of our knowledge and belief, that investments are made in companies that demonstrate good governance practices. This includes addressing the following questions:

- Does management properly and sufficiently take into account environmental, social and economic conditions?
- Do the (employed) managers act responsibly and with a view to the future?

In addition, the guidelines on the exercise of voting rights define critical factors that can stand in the way of good governance and that must be taken into account in principle when attending general and shareholders' meetings.



### 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.

## What is the asset allocation planned for this financial product?

Depending on the market situation and appraisal by the fund management, the sub-fund generally has the possibility to invest in equities, money market instruments, certificates and bonds of all kinds, other structured products (e.g. reverse convertible bonds, warrant-linked bonds, convertible bonds), derivatives, target funds, cash and fixed-term deposits.

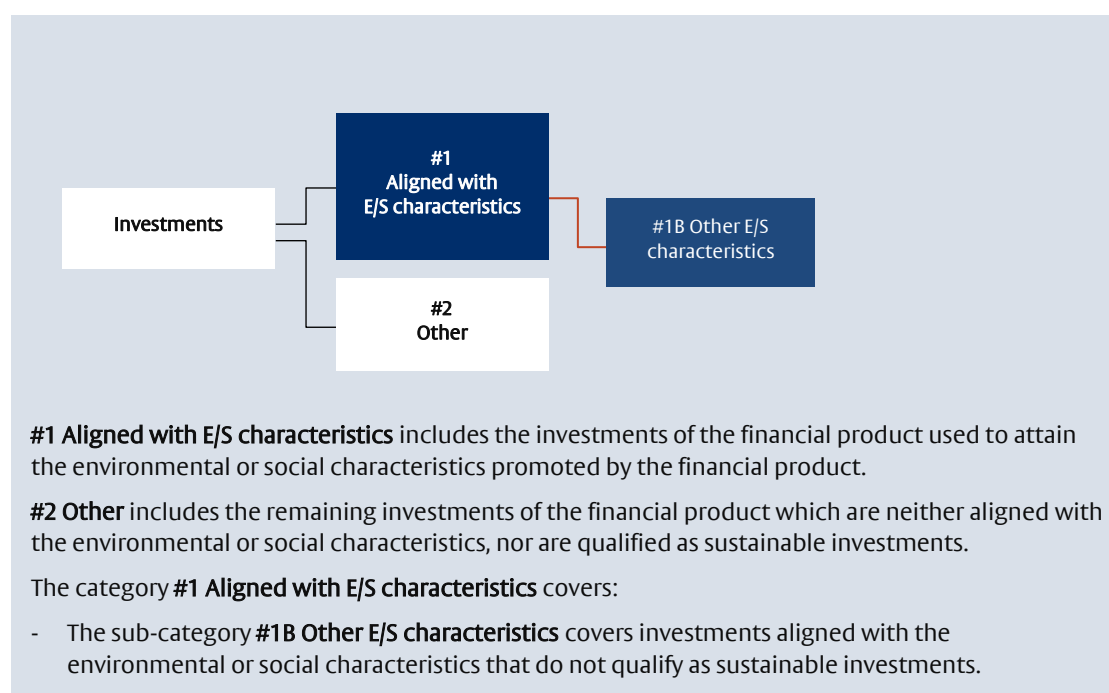
The planned asset allocation is as follows.

### #1 Aligned with E/S characteristics:

At least 51% is invested in securities and money market instruments. These portfolio securities and investments in internal funds are subject to ongoing screening with regard to the aforementioned exclusion criteria and PAI indicators.

### #2 Other:

The remaining investment portion relates to liquid assets (esp. cash to service short-term payment obligations), derivatives, third-party funds and, for further diversification, indirect investments in precious metals, solely in (physical) gold and gold certificates.



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

Derivatives are not used to achieve the sub-fund's environmental and social characteristics advertised with the sub-fund.

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



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

The investments underlying Flossbach von Storch SICAV - Multiple Opportunities do not contribute to achieving an environmental objective pursuant to Article 9 of Regulation (EU) 2020/852 (EU Taxonomy). The minimum proportion of environmentally sustainable investments made in accordance with the EU Taxonomy is 0 per cent.

The main objective of the sub-fund is to contribute to the pursuit of the environmental and social characteristics. Therefore, this sub-fund does not currently commit to investing a minimum proportion of its total assets in environmentally sustainable economic activities as defined in Article 3 of the EU Taxonomy. This also concerns information on investments in economic activities classified as enabling or transitional activities under Article 16 or 10 (2) of the EU Taxonomy.

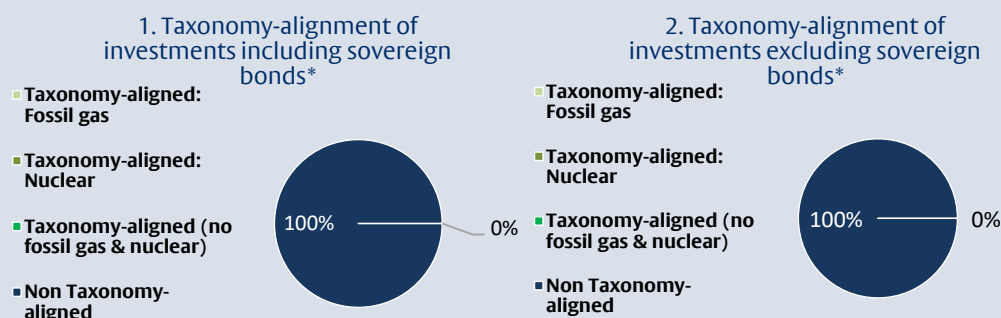
- Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?

- ☐ Yes:
- ☐ In fossil gas ☐ In nuclear energy
- ☒ No

The sub-fund does not aim to make any taxonomy-aligned investments in fossil gas or nuclear energy.


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

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



\* For the purpose of these graphs, "sovereign bonds" consist of all sovereign exposures.

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

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

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

Not applicable. Flossbach von Storch SICAV - Multiple Opportunities promotes E/S characteristics but does not make sustainable investments (0%).



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

Not applicable. Flossbach von Storch SICAV - Multiple Opportunities promotes E/S characteristics but does not make sustainable investments.



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

Not applicable. Flossbach von Storch SICAV - Multiple Opportunities promotes E/S characteristics but does not make sustainable investments.



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

The following investments fall under “#2 Other”:

Liquid assets are used primarily in the form of cash to service short-term payment obligations. No environmental or social minimum safeguards are defined here.

Derivatives can be used for both investment and hedging purposes. No minimum environmental or social protection is defined.

Direct and indirect investments in precious metals, currently exclusively gold and/or gold certificates, are used for further diversification. These are only sourced from partners who are committed to adhering to the London Bullion Market Association's (LBMA) Responsible Gold Guidance. This Guidance aims to prevent gold from contributing to systematic or widespread human rights abuses, conflict financing, money laundering or terrorist financing.

Investments in third-party funds are used for further diversification. When selecting third-party funds, the environmental and social characteristics promoted by this sub-fund will not be considered.



- **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Not applicable. Flossbach von Storch SICAV - Multiple Opportunities promotes E/S characteristics but does not designate an index as a reference benchmark.

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



## Where can I find more product-specific information online?

More product-specific information can be found on the website:  
[www.fvsinvest.lu/esg](http://www.fvsinvest.lu/esg).



## **ARTICLES OF ASSOCIATION OF FLOSSBACH VON STORCH SICAV**

I. Name, registered office and purpose of the Investment Company

### **Article 1 Name**

An investment company in the form of a public limited company in accordance with the law on commercial companies (as subsequently amended and supplemented) ("Law of 10 August 1915") shall herewith be formed as a "société d'investissement à capital variable" under the name Flossbach von Storch SICAV ("Investment Company"). This company shall have as its members the parties present and all persons who become holders of subsequently issued shares.

The Investment Company, an alternative investment fund (AIF) pursuant to the provisions in Part II of the Luxembourg Law of 17 December 2010 on undertakings for collective investment ("Law of 17 December 2010"), is an umbrella fund with several sub-funds ("sub-funds"). The assets of these sub-funds are managed separately and have no joint liability. Each sub-fund is treated as a separate ring-fenced asset pool as far as the separate investors are concerned. The rights of investors and creditors with regard to any one sub-fund, in particular its inception, management and liquidation, are limited to the assets of this sub-fund.

### **Article 2 Registered office**

The registered office is in Luxembourg City, Grand Duchy of Luxembourg.

By ordinary resolution of the Board of Directors of the Investment Company ("Board of Directors"), the registered office may be relocated to another place within Luxembourg. Furthermore, the company may set up branches and other offices in other locations both within the Grand Duchy of Luxembourg and abroad.

In the event of exceptional social, economic, political or military events affecting normal business activities at the registered office or frictionless movement between the registered office and abroad, the Board of Directors may, by ordinary resolution, temporarily move the registered office to another country until normal conditions have been fully restored. In this case, temporarily moving the company's registered office abroad is not harmful and the Investment Company will retain Luxembourg nationality.

### **Article 3 Purpose**

The exclusive purpose of the Investment Company is investment in permitted assets in accordance with the principle of risk diversification pursuant to Part II of the Law of 17 December 2010 on undertakings for collective investment ("Law of 17 December 2010"), with the objective of achieving a reasonable performance for the benefit of the shareholders by pursuing a specific investment policy.

The Investment Company may undertake any action that serves its purpose or is useful, taking into account the provisions of the Law of 17 December 2010 and the Law of 10 August 1915.

### **Article 4 General investment principles and restrictions (investment conditions)**

The Investment Company consists of one or more sub-funds whose assets are invested in accordance with the principle of risk diversification pursuant to Part II of the Law of 17 December 2010 and in accordance with the investment policy described below and within the investment restrictions.

The Board of Directors of the Investment Company is entitled to establish new sub-funds and new share classes within existing sub-funds at any time. In this event, this Sales Prospectus shall be amended accordingly by the addition of an annex.

The objective of the Investment Company's investment policy is to achieve an appropriate performance in the currency of each sub-fund ("sub-fund currency") in terms of income and capital appreciation for all permissible assets (as defined below). The specific form that this investment objective takes for each individual sub-fund, as well as the investment policy that results for each sub-fund, is described in the relevant annex to this Sales Prospectus.

Regulatory investment restrictions

1. In the course of implementing the specific investment policy for each sub-fund, the Investment Company may:

a) purchase investment shares in the following types of investment funds and/or investment companies:

(1) funds established in the Federal Republic of Germany and/or investment companies that fulfil the conditions of Directive 2009/65/EC;

and/or

foreign investment funds that fulfil the conditions of Directive 2009/65/EC;

and/or

(2) investment funds established in the Federal Republic of Germany as defined in Art. 220 KAGB (Kapitalanlagegesetzbuch; German Capital Investment Code) ("other investment funds") that do not themselves invest in other investment funds in accordance with no. 1 a) (2);

and/or

EU investment funds and/or foreign investment funds which meet the requirements for other investment funds and which do not themselves invest in other investment funds in accordance with no. 1 a) (2);

and/or

(3) investment funds established in the Federal Republic of Germany as defined in Art. 218 KAGB ("mixed investment funds");

and/or

EU investment funds and/or foreign investment funds that fulfil the conditions for mixed investment funds;

and/or

(4) other investment funds

- that have been approved in their country of domicile in accordance with legal provisions that subject them to an effective form of public supervision for the protection of investors, and that offer sufficient guarantees for adequate cooperation between the supervisory authority in the respective country of domicile and the Commission de Surveillance du Secteur Financier ("CSSF"); and

- where the degree of protection for investors is equivalent to that of an investor in an investment fund that complies with Directive 2009/65/EC, and particularly where the provisions for the separate custody of assets, borrowing, lending and short sales of securities and money market instruments are equivalent to the requirements of Directive 2009/65/EC; and

- where business activities are subject to annual and semi-annual reports which permit a judgement to be made concerning the assets and liabilities, income and transactions in the reporting period; and

- where the shares are offered with no limit as to the number of shares, and the investors have the right to redeem such shares

(together referred to as the "target funds").

The shares of the aforementioned target funds are generally not listed on a stock exchange. If they are listed on a stock exchange, this stock exchange is in a signatory state to the Agreement on the European Economic Area, in another OECD country, in Liechtenstein or in Hong Kong.

ETFs on individual precious metals are not classed as target funds owing to the lack of risk diversification.

b) purchase securities

- (1) that are admitted for trading on an exchange in a member state of the European Union or another signatory state to the Agreement on the European Economic Area or admitted to or included in another organised market in one of these states;
- (2) that are solely admitted for trading on an exchange outside a member state of the European Union or another signatory state to the Agreement on the European Economic Area or admitted to or included in another organised market in one of these states, provided that the selection of this exchange or this organised market is permitted by the CSSF or the German Federal Financial Supervisory Agency (BaFin);
- (3) whose terms of issue stipulate that they have to apply for admission to an exchange in a member state of the European Union or another signatory state to the Agreement on the European Economic Area or admission to an organised market or inclusion in this market in a member state of the European Union or another signatory state to the Agreement on the European Economic Area, provided that the securities are admitted or included within one year of their issue;
- (4) whose terms of issue stipulate that they have to apply for admission for trading on an exchange or admission to an organised market or inclusion in this market outside the member states of the European Union or outside the other signatory states to the Agreement on the European Economic Area, provided that the selection of this exchange or this organised market is permitted by the CSSF or the German Federal Financial Supervisory Agency (BaFin) and the securities are admitted or included within one year of their issue;
- (5) in the form of shares to which the fund is entitled in the event of a capital increase from company funds;
- (6) that are purchased in the exercise of subscription rights that are part of the fund assets;
- (7) securities in the form of shares in closed-end funds that meet the criteria defined in Art. 2 (2), letters a and b of Directive 2007/16/EC;

c) purchase money market instruments if they

- (1) are admitted for trading on an exchange in a member state of the European Union or another signatory state to the Agreement on the European Economic Area or admitted to or included in another organised market in one of these states;
- (2) are solely admitted for trading on an exchange outside a member state of the European Union or another signatory state to the Agreement on the European Economic Area or admitted to or included in another organised market in one of these states, provided that the selection of this exchange or this organised market is permitted by the CSSF or the German Federal Financial Supervisory Agency (BaFin);
- (3) are issued or guaranteed by the European Union, the Federal Republic of Germany, a special fund of the Federal Republic of Germany, a German state, another member state or another central, regional or local authority, the central bank of a member state of the European Union, the European Central Bank or the European Investment Bank, a third state, or if this is a federal state, one member state of this federation, or by an international public institution to which at least one member state of the European Union belongs;
- (4) are issued by a company whose securities are traded on markets defined in the preceding numbers (1) and (2);

- (5) are issued or guaranteed by a bank subject to supervision according to the criteria defined by the law of the European Union;
- (6) are issued or guaranteed by a bank subject to and in compliance with supervisory criteria that the CSSF or the German Federal Financial Supervisory Agency (BaFin) believes to be equivalent to those of European Union law;
- (7) are issued by other issuers and the issuer in question is
  - a) a company with equity of at least EUR 10 million that prepares its annual accounts in accordance with the Directive 2013/34/EU on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC and repealing Council Directives 78/660/EEC and 83/349/EEC, or
  - b) a legal entity within a group comprising one or more publicly listed companies that is responsible for the financing of this group, or
  - c) a legal entity with the purpose of securitising liabilities by making use of a credit line granted by a bank. Art. 7 of Directive 2007/16/EC applies to the securitisation and the credit line granted by a bank.

The money market instruments named under no. 1 c) may only be acquired if they meet the requirements of Art. 4 (1) and (2) of Directive 2007/16/EC. For money market instruments according to no. 1 c) (1) and (2) above, Art. 4 (3) of Directive 2007/16/EC applies.

The money market instruments named under no. 1 c) (3) to (7) may only be acquired if the issue or the issuer of those instruments is subject to provisions governing the protection of deposits and investors and also if the criteria in Art. 5 (1) of Directive 2007/16/EC are fulfilled. For the acquisition of money market instruments which are issued pursuant to no. 1 c) (3) by a regional or local authority of a member state of the European Union or by an international public institution within the meaning of no. 1 c) (3), but which are not guaranteed by this member state or, if this is a federal state, by a member state of this federation, and for the acquisition of money market instruments according to no. 1 c) (4) and (7), Art. 5 (2) of Directive 2007/16/EC applies; for the acquisition of all other money market instruments according to no. 1 c) (3) excluding money market instruments which were issued or guaranteed by the European Central Bank or the central bank of a member state of the European Union, Art. 5 (4) of this Directive applies. For the acquisition of money market instruments according to no. 1 c) (5) and (6), Art. 5 (3) applies and, if these are money market instruments that are issued or guaranteed by a bank subject to and in compliance with supervisory criteria that the German Federal Financial Supervisory Agency (BaFin) believes to be equivalent to those of European Union law, Art. 6 of Directive 2007/16/EC applies.

The securities listed under no. 1 b) (1) to (4) and the money market instruments listed under no. 1 c) (1) to (4) above are only acquired if they are admitted for trading on exchanges or admitted to or included in an organised market, provided that the selection of this exchange or organised market is permitted by the CSSF or the German Federal Financial Supervisory Agency (BaFin).

- d) make demand deposits or term deposits with a term not exceeding 12 months with banks provided that the bank's registered office is in a member state of the EU, or if its registered office is in a third state, it is subject to supervisory criteria that in the opinion of the CSSF are equivalent to those of Community law.
- e) purchase derivative financial instruments ("derivatives"), including equivalent cash-settled instruments, if they are traded on a regulated market as defined in no. 1 b) (1) or (2), and/or derivative financial instruments not traded on an exchange ("OTC derivatives"), provided that
  - the underlying assets are securities, money market instruments, investment shares or financial indices, interest rates, exchange rates or currencies in which the respective sub-fund may invest in line with the investment objectives defined in the Articles of Association,

- the counterparties for transactions involving OTC derivatives are institutions subject to supervision in a category approved by the CSSF,
  - the OTC derivatives are subject to reliable and verifiable daily valuation and can be sold, liquidated or closed out at an appropriate fair value by a transaction at any time on the initiative of the relevant sub-fund, and
  - these derivatives and OTC derivatives are used for the efficient portfolio management of the respective sub-fund, without changing the investment character of that fund.
- f) derivative financial instruments (“derivatives”) described above whose underlying asset is not an underlying asset described in 1 e);
- g) precious metals (gold, silver, platinum, palladium) in physical form;
- h) unsecuritised loan receivables. The main criterion for an unsecuritised loan receivable is that it must be assigned by a third party for consideration;
- i) other investment instruments within the meaning of Art. 198 KAGB.

## 2. Issuer limits and risk diversification

### a) For investments in target funds

- (1) Each sub-fund may not invest more than 20% of its assets in any single one of the target funds defined under 1 a) above.
- (2) Each sub-fund may not invest more than 30% of its net sub-fund assets in shares of target funds as defined in number 1 a) (2) above.
- (3) Shares in the target funds listed in number 1 a) above may only be purchased for the sub-fund if the target fund’s investment conditions, Articles of Association or shareholders’ agreement in turn allow it to invest a maximum of 10% of the value of its assets in shares in other target funds.
- (4) Shares in the target funds defined in no. 1 a) (2) above may only be purchased for a sub-fund if no more than two target funds are purchased from the same issuer or fund manager and each of these target funds in turn does not invest in shares in other target funds as defined in no. 1 a) (2).
- (5) The fund’s acquisition of shares in the target funds listed in no. 1 a) (2) above is limited to max. 10% of the net fund assets if these are not subject to state supervision that is comparable to the requirements of the German Capital Investment Code (KAGB).
- (6) The target funds may have different characteristics and follow different investment strategies and therefore have different investment principles and limits. However, they may not take out loans of more than 20% of the net assets of the sub-fund, use derivatives that lead to leverage of more than 200%, utilise securities loans if the repayment of the loan is due more than 30 days after the transfer of the securities or if the market value of the securities to be transferred exceeds 15% of the net assets of the sub-fund, or engage in short selling in order to generate leverage. Otherwise there is no restriction to target funds with particular investment strategies. However, the target funds must not be real estate funds as defined by Sections 230–260 KAGB or comparable EU AIFs, or foreign AIFs. In accordance with the terms of 1 a), the registered offices of the target fund may be anywhere in the world.

The assets of these target funds must be held in custody by a depositary or the functions of a depositary must be exercised by a comparable institution (“prime broker”).

Subject to no. 2 a), there is no limit to the extent to which these target funds may invest in bank balances, money market instruments and shares in target funds.

A management fee will generally be charged at the level of the target fund when shares in target funds are purchased. For each sub-fund, the Investment Company's annual report will include information on the maximum amount of management fees to be paid by the sub-funds and the target funds.

A sub-fund of an umbrella fund may also invest in other sub-funds of the same umbrella fund. In addition to the conditions for investing in target funds mentioned above, the following conditions apply to investments in target funds that are also sub-funds of the same umbrella fund:

- Circular investments are not permitted. This means that the target sub-funds cannot themselves invest in the sub-funds of the same umbrella fund which itself invests in the target sub-fund.
  - The sub-funds of an umbrella fund that are to be acquired by another sub-fund of the same umbrella fund may, pursuant to their management regulations or articles of association, invest a maximum of 10% of their assets in shares of other target sub-funds of the same umbrella fund.
  - Voting rights from holding shares in target funds that are simultaneously target funds of the same umbrella fund are suspended as long as these shares of a sub-fund of the same umbrella fund are held. This rule does not affect the appropriate recording thereof in the annual accounts and periodic reports,
  - As long as a sub-fund holds shares in another sub-fund of the same umbrella fund, the shares of the target sub-fund are not taken into account in the calculation of net asset value, provided that the calculation serves to determine whether the legal minimum capital of the umbrella fund has been obtained, and
  - If a sub-fund acquires shares of another sub-fund of the same umbrella fund, there may be no double charging of management, subscription or redemption fees at the level of the sub-fund that has invested in the target sub-fund of the same umbrella fund.
- (7) Every sub-fund of a target fund with several sub-funds is to be considered as an independent target fund, on the proviso that these sub-funds are not jointly and severally liable to third parties for the obligations of the other sub-funds.

b) Other sub-fund-specific details

- (1) When investing in shares of target funds, investments may be made in investment funds where the redemption of shares is subject to restrictions.
- (2) The Fund may not invest in shares of foreign target funds from states that do not cooperate in combating money laundering pursuant to international agreements (Non-Cooperative Countries and Territories (NCCTs)).
- (3) No shares may be acquired for the Fund from venture capital, infrastructure and private equity funds or from hedge funds and property funds.

c) Investments in securities, money market instruments and OTC derivatives:

- (1) A maximum of 20% of the respective net sub-fund assets may be invested in securities or money market instruments from a single issuer.
- (2) No more than 20% of securities of the same type may be acquired from a single issuer.
- (3) The default risk for the relevant sub-fund's transactions with OTC derivatives may not exceed the following rates:
  - 20% of net sub-fund assets if the counterparty is a bank with registered offices in an EU member state or is subject to regulatory criteria that in the opinion of the CSSF are equivalent to those of Community law.

- 10% of net sub-fund assets in all other cases.

The limits defined in points (1) and (2) above do not apply to securities issued or guaranteed by a member state of the OECD or its local authorities or by supranational institutions or by organisations under Community, regional or international law. In this event, the securities held in fund assets must come from at least six different issues, whereby the value of the securities from a single issue may not exceed 30% of net fund assets.

d) Bank balances

Individual sub-funds may hold up to 49% of their net sub-fund assets in cash as defined in no. 1 c) and d).

Cash may also be held in a currency other than the currency of the individual sub-fund.

No more than 20% of the value of the relevant sub-fund's assets can be held in the form of bank balances with the Depositary or any other credit institution.

3. Loans and encumbrance prohibition

- Each sub-fund may regularly take out loans from banks with top-class credit ratings specialising in this kind of business and from the Depositary.
- The assets belonging to a particular sub-fund must not be pledged or otherwise encumbered, assigned or transferred as collateral, unless this involves borrowing pursuant to c) below, the granting of options to third parties or transactions involving repurchase agreements, financial futures, currency futures, swaps or similar transactions.
- Short-term loans to a sub-fund are permissible provided they do not exceed 20% of the net assets of the sub-fund and provided the loan is taken out subject to normal market terms. Since the loans may only be short term, the associated risks are nevertheless slight. Except for technical overdrafts, the terms of all loans must be approved by the Depositary. The Depositary shall approve the loan if it fulfils the aforementioned requirements as well as the applicable legal provisions and the Articles of Association.
- Loans may neither be granted nor may guarantee obligations be entered into for third parties at the expense of sub-fund assets.

The risks associated with borrowing are described under the general remarks relating to risk in the section "Risks associated with loans".

4. Further investment guidelines

- The short selling of securities is not permitted.
- Individual sub-funds will not invest in securities with unlimited liability.
- Sub-fund assets may not be invested in property.
- Precious metals may be purchased for the sub-funds, both in physical form and indirectly. Merchandise and commodities may only be purchased indirectly. Precious metals include gold, silver, platinum and palladium.

Physical precious metals, precious metal derivatives, commodities, merchandise and certificates with a derivative component based on precious metals, commodities and merchandise together with other derivatives and unsecuritised loan receivables, including those suitable for purchase as other investment instruments in accordance with Art. 198 KAGB, may not exceed 30% of the sub-fund's assets. Derivatives within the meaning of Art. 197 (1) KAGB are not included in this limit.

The respective sub-fund may invest up to 15% of its assets directly (physically) or up to 10% of its assets indirectly in gold, silver, platinum and palladium, whereby the total investment may never exceed 25%.

- e) Subject to the agreement of the Depositary, the Management Company may adopt other investment restrictions in order to comply with conditions in those countries where the shares are or are intended to be distributed.
  - f) Securities whose resale is restricted in accordance with contractual agreements will not be purchased.
  - g) No more than 20% of the value of the individual sub-fund may be invested in other investment instruments within the meaning of Art. 198 KAGB.
  - h) Sub-funds will not hold any particular minimum percentage of their assets in bank balances, money market instruments or other liquid funds.
6. Possible changes to the investment objectives and investment policy

With the prior approval of the supervisory authority, the Investment Company is entitled to alter a sub-fund's investment policy, investment objectives and investment strategy. In this event, investors are notified in an appropriate manner as described in the section on "Information for investors".

7. Exceeding investment limits other than as a result of investment decisions

If the aforementioned or sub-fund-specific percentage limits are exceeded, the primary objective of the sub-fund(s) must be to rectify this situation in consideration of investors' best interests.

Additional investment restrictions

If it states in the specific sub-fund investment policy in the relevant annex of the Sales Prospectus that the sub-fund invests at least 51% or 25% of its assets in equity participations, the following conditions will apply in conjunction with the listed regulatory investment restrictions:

If a sub-fund continuously invests at least 51% of its assets in equity participations, it is an equity fund.

If a sub-fund continuously invests at least 25% of its assets in equity participations, it is a mixed fund.

Unless otherwise stated, the above limits may be undershot on up to 20 valuation days in the financial year.

Equity participations are:

1. shares in a corporation listed for official trading on a stock exchange or on another organised market,
2. shares in a corporation that is not a real estate company and that
  - a. has its registered office in a Member State of the European Union or in another signatory state to the Agreement on the European Economic Area and is subject to income taxation for corporations there and is not exempt from this, or
  - b. has its registered office in a non-Member State and is subject to income taxation for corporations in the amount of at least 15% there and is not exempt from this
3. investment units in equity funds in the amount of 51% of the value of the investment unit,
4. investment units in mixed funds in the amount of 25% of the value of the unit or
5. units in other investment funds in the percentage published on each valuation date of their value which they actually invest in the aforementioned shares in corporations; if no actual percentage is published, in the amount of the minimum percentage defined in the investment conditions (constitutional documents and sales prospectus) of the other investment fund.

With the exception of the cases outlined in Nos. 3, 4 and 5 of this section, investment units are not regarded as equity participations.



## II. Duration, merger and liquidation of the Investment Company

### **Article 5 Duration of the Investment Company**

The Investment Company is established for an indefinite period.

The company may be dissolved by a corresponding resolution of the general meeting in accordance with the applicable Articles of Association and the provisions of the Law of 10 August 1915. The Board of Directors may set a specific duration for the sub-funds of the umbrella fund.

Details of the duration, merger or liquidation of one or more sub-funds are set out in Section III.

### **Article 6 Merging the Investment Company with another undertaking for collective investment (“UCI”)**

The Investment Company may be merged with another UCI in Luxembourg or abroad by resolution of the general meeting. The meeting must be quorate, and the resolution requires the majority defined in the Law of 10 August 1915 for amendments to the Articles of Association. The resolution of the general meeting to merge the Investment Company is published in accordance with statutory provisions.

Shareholders of the investment company to be absorbed have the right to demand the redemption of some or all of their shares at the relevant net asset value per share, free of charge, for a period of one month. Shares of shareholders who have not demanded the redemption of their shares are replaced with shares of the acquiring UCI on the basis of the net asset value per share on the date when the merger takes effect. Fractional amounts may be settled in cash.

### **Article 7 Liquidation of the Investment Company**

The Investment Company can be liquidated by resolution of the general meeting. This resolution is to be passed in compliance with the provisions for amendments to the Articles of Association, unless the Articles of Association, the Law of 10 August 1915 or the Law of 17 December 2010 waive compliance with these provisions. In the event of a resolution in favour of liquidation, the general meeting will appoint the liquidators of the Investment Company. The liquidation process will be governed by the Law of 10 August 1915 unless the Law of 17 December 2010 contains more specific provisions.

If the Investment Company's assets fall below two-thirds of the minimum capital, the Board of Directors of the Investment Company is obliged to convene a general meeting and to put forward a proposal on the liquidation of the Investment Company. The liquidation resolution is passed by simple majority of the shares present or represented.

If the Investment Company's assets fall below one quarter of the minimum capital, the Board of Directors of the Investment Company is also obliged to convene a general meeting and to put forward a proposal on the liquidation of the Investment Company. In this event, the liquidation resolution is passed with a majority of 25% of the shares present or represented at the general meeting.

Letters convening the aforementioned general meetings must be sent within 40 days after it has been determined that the Investment Company's assets have fallen below two-thirds or one-quarter of its minimum capital.

The resolution of the general meeting to liquidate the Investment Company is published in accordance with statutory provisions.

Subject to a resolution to the contrary by the Board of Directors, the Investment Company shall not issue, redeem or exchange shares in the Investment Company from the date of the liquidation resolution until this resolution has been implemented. Net liquidation proceeds which shareholders have not claimed by the end of the liquidation proceedings are deposited at the *Caisse des Consignations* in the Grand Duchy of Luxembourg for the account of the relevant shareholders, where they are forfeited if not claimed within the statutory period.

### III. Sub-funds, duration, merger and liquidation of one or more sub-funds

#### **Article 8 Sub-funds**

The Investment Company consists of one or more sub-funds. The Board of Directors may decide at any time to establish further sub-funds, provided that the rights and obligations of investors of existing sub-funds are not affected. In this event, the Sales Prospectus shall be amended accordingly.

Each sub-fund is treated as a separate asset pool in the relationship between the shareholders. The rights and obligations of the shareholders in any given sub-fund are separate from those of the shareholders in other sub-funds. The assets of each individual sub-fund are liable to third parties only in respect of obligations entered into by that sub-fund.

#### **Article 9 Duration of the individual sub-funds**

The sub-funds can be established for a defined or an indefinite period. The duration of each sub-fund is defined in the corresponding annex to the Sales Prospectus.

#### **Article 10 Merger of one or more sub-funds**

By resolution of the Board of Directors of the Investment Company, a sub-fund of the Investment Company may be merged by way of integration into another sub-fund of the Investment Company or another Luxembourg UCI or UCITS or a sub-fund of another Luxembourg UCI or UCITS established in accordance with the Law of 17 December 2010. A merger resolution may be passed in the following particular cases:

- if the net sub-fund assets on a valuation day fall below an amount deemed to be a minimum amount required to manage the sub-fund economically. The Investment Company has set this amount at EUR 1.25 million.
- if, owing to a significant change in the economic or political environment or for reasons of economic performance, the continued management of the sub-fund no longer appears economically viable.

The merger resolution taken by the Board of Directors is published in the media listed in the Information for shareholders section of the Sales Prospectus.

Notwithstanding the preceding paragraph, shareholders affected by the merger who do not agree with the merger are entitled to redeem their shares free of charge within one month of the publication of the notification of the merger to shareholders. Shareholders who do not exercise this right are bound by the merger resolution passed by the Board of Directors.

Merger resolutions require the prior approval of the Luxembourg supervisory authority for the financial sector (CSSF).

#### **Article 11 Liquidation of one or more sub-funds**

A sub-fund of the Investment Company can be liquidated by resolution of the Board of Directors of the Investment Company, in the following events particularly:

- if the net sub-fund assets on a valuation day fall below an amount deemed to be a minimum amount required to manage the sub-fund economically. The Investment Company has set this amount at EUR 1.25 million;
- if, owing to a significant change in the economic or political environment or for reasons of economic performance, the continued management of the sub-fund no longer appears economically viable;
- if there is a legitimate interest on the part of the sub-fund's investors.

The liquidation resolution of a sub-fund will have no effect on the holding of other sub-funds or on the Investment Company as a whole unless the last remaining sub-fund is being liquidated, in which case the Investment Company must be dissolved in accordance with Art. 27 of the Law of 17 December 2010.

The Board of Directors may submit the question of liquidation to the general meeting for resolution, whereby a quorum is not required and the resolution can be passed by the affected investors of the sub-fund or share class with a simple majority of the investors present.

The liquidation resolution of the Board of Directors must be made known to the investors concerned in writing or in any other permissible form before the date on which the resolution enters into force. The reasons for and a description of the procedure must be communicated to investors to the same extent. The liquidation resolution requires the prior approval of the Luxembourg supervisory authority.

Subject to a resolution to the contrary by the Board of Directors, the Investment Company shall not issue, redeem or exchange shares in the sub-fund to be liquidated from the date of the liquidation resolution until this resolution has been implemented.

Net liquidation proceeds which shareholders have not claimed by the end of the liquidation proceedings are deposited at the Caisse des Consignations in the Grand Duchy of Luxembourg for the account of the relevant shareholders by the Depositary, where they are forfeited if not claimed within the statutory period.

#### IV. Capital and shares

##### **Article 12 Capital**

The capital of the Investment Company corresponds at all times to the sum of the net sub-fund assets of all the Investment Company's sub-funds ("net assets of the company") pursuant to Art. 14, no.4 of these Articles of Association, and is represented by fully paid-up no-par-value shares.

The initial capital of the Investment Company on formation amounts to EUR 31,000 divided into 310 no-par-value shares, with an initial issue price of EUR 100 per share.

According to the law of the Grand Duchy of Luxembourg, the minimum capital of the Investment Company must be the equivalent of EUR 1,250,000 and this must be attained within a period of six months after approval of the Investment Company by the Luxembourg supervisory authority. The basis for this is the net assets of the company.

##### **Article 13 Shares**

Shares are shares in the individual sub-funds. The shares are issued in the denominations defined by the Investment Company. Bearer and registered shares ('shares') are issued up to three decimal places. The Investment Company may issue global certificates.

Registered shares issued are documented by the Registrar in the share register kept on behalf of the Investment Company. In addition to the shareholder's name, the share register should contain at least their address, email address (if the shareholder has consented to communication via email), number of shares held and price thereof. In this context, confirmation of entry of the shares in the share register is sent to shareholders at the addresses specified in the share register, after acceptance of the subscription certificate and full subscription of the shares. Any change in the number of shares held by the shareholder must be recorded accordingly in the shareholders' register.

Investors are not entitled to the delivery of physical securities, either for bearer or registered shares. Details of the type of shares issued by each sub-fund are contained in the corresponding annex to this Sales Prospectus. The shareholders own a share of the respective sub-fund pro rata to their shares.

In order to ensure the smooth transferability of shares, an application will be made for the shares to be held in collective custody.

If shares are transferred to sub-funds, the Investment Company must be notified in writing via a declaration signed by the transferring party and the recipient, or their legal representatives. Upon receipt of all documents relating to the transfer, the Investment Company will have the shareholders' register updated accordingly.

To enable investors to be identified by the Investment Company, each shareholder is required to provide the company with complete and correct information about their postal address and place of residence. In addition, they must provide the Investment Company with valid payment details and other information as determined by the Investment Company's Board of Directors. Investors may voluntarily consent to communication via email or other means of communication. Otherwise, all notices or announcements will be sent in writing to the address listed in the shareholders' register. Notwithstanding the due diligence obligations for customer identification (KYC) in accordance with applicable laws and regulatory requirements, the Investment Company may enter a note in the shareholders' register stating that the shareholder has not provided an address or that the address provided is out of date. Unless and until the investor provides a valid address to the contrary, the investor may be treated as though their address is that of the Investment Company. The handling of such registers with regard to the Investment Company's obligations under money laundering legislation, in particular with regard to the escalation and reporting of such accounts, remains unaffected by this notional status.

If the investor acquires shares in a fraction of a share, the investor will not have any voting rights in this respect, but will only participate pro rata in any dividends or other distributions of the sub-fund.

Share classes within a sub-fund may be merged by resolution of the Board of Directors.

#### **Article 14 Calculation of the net asset value per share**

The net company assets of the Investment Company are denominated in euro (EUR) ("reference currency").

The value of a share ("net asset value per share") is denominated in the currency laid down in the annex to the Sales Prospectus ("sub-fund currency"), unless a currency other than the sub-fund currency has been specified in the relevant annex to the Sales Prospectus in relation to any other share classes which may exist ("share class currency").

The net asset value per share will be calculated by the Management Company or by a third party commissioned by it for this purpose under the supervision of the Depositary on each banking day in Luxembourg, except 24 and 31 December of each year ("valuation day"), and will be rounded to two decimal places. In order to calculate the net asset value per share, the value of the assets of each sub-fund less the liabilities of each sub-fund ("net sub-fund assets") is determined on each valuation day and divided by the number of shares in circulation on the valuation day.

To the extent that information on the situation of the net assets of the company and/or other financial statistics must be provided in the annual or semi-annual reports in accordance with the applicable statutory provisions or those of these Articles of Association, the value of the assets of each sub-fund is converted to the reference currency. Net sub-fund assets are calculated according to the following principles:

- a) Securities, money market instruments, derivative financial instruments (derivatives) and other assets officially listed on a stock exchange are valued at the most recently available closing price that provides a reliable valuation. This does not apply to securities, money market instruments and/or derivatives domiciled in Asia or Oceania. These will be valued on the basis of the last known price at the time of valuation on the valuation day. If securities, money market instruments, derivative financial instruments or other assets are officially listed on more than one stock exchange, the price quoted on the exchange with the most liquidity is used.
- b) Securities, money market instruments, derivative financial instruments (derivatives) and other assets not officially listed on a stock exchange (or whose market price is not regarded as representative owing to a lack of liquidity, for instance) but that are traded on a regulated market are valued at a price that may be neither lower than the bid price nor higher than the offer price on the trading day preceding the valuation day, and that the Management Company believes in good faith to be the best possible price at which the securities, money market instruments, derivative financial instruments (derivatives) or other assets could be sold. This does not apply to securities, money market instruments and/or derivatives domiciled in Asia or Oceania. These will be valued on the basis of the last known price at the time of valuation on the valuation day.

- c) OTC derivatives are valued on a daily basis using a verifiable method to be determined by the Management Company in good faith, on the basis of the sale value that is likely to be attainable and in accordance with generally accepted and verifiable valuation models.
- d) Shares in UCI/UCITS are generally valued at the last redemption price established before the valuation day or at the latest available price that affords a reliable valuation. If the redemption of investment shares has been suspended or if no redemption price has been set, these shares and all other assets are valued at their appropriate market values as determined in good faith by the Management Company in line with generally accepted and verifiable valuation models.
- e) If the relevant prices are not market prices or if no prices have been set in respect of financial instruments other than those mentioned in subsections a) to d), the values of these financial instruments and of any other legally permissible assets are valued at their market prices as determined in good faith by the Investment Company in line with generally accepted and verifiable valuation models (e.g. using suitable valuation models and taking current market conditions into account).
- f) Liquid funds are valued at their nominal value plus interest.
- g) Receivables and payables, e.g. deferred interest claims and liabilities, are in principle reported at their nominal value.
- h) Physical precious metals, precious metal accounts, precious metal certificates, futures and option transactions with respect to precious metals are valued at their daily market value.
- i) The market values of securities, money market instruments, derivatives and other assets denominated in a currency other than the relevant sub-fund currency are converted into the relevant sub-fund currency at the exchange rate prevailing at 5 p.m. CET/CEST (4 p.m. GMT/BST) on the trading day preceding the valuation day, as determined via WM/Reuters fixing. Gains and losses on currency transactions are added or subtracted as appropriate.

The net sub-fund assets are reduced by the amount of any distributions paid out to shareholders in the relevant sub-fund.

The net asset value per share is calculated separately for each sub-fund according to the criteria listed above. If share classes were created within a given sub-fund, the resulting net asset value per sub-fund is calculated separately for each share class within the sub-fund according to the above criteria.

- a) Assets are always compiled and allocated separately for each sub-fund.
- b) Cash inflows from share issues increase the share of the respective share class as a percentage of the total value of the sub-fund assets. Cash outflows from share redemptions decrease the share of the respective share class as a percentage of the total value of the sub-fund assets.
- c) If a distribution is carried out, the value of the shares entitled to distributions is reduced by the amount of the distribution. At the same time, the proportion of this share class as a percentage of total sub-fund assets is reduced, while the proportion of the share class not entitled to distributions increases as a percentage of total sub-fund assets.

Sub-fund assets are generally valued by the Management Company. The Management Company may delegate the valuation of assets and make use of an external valuation agent that fulfils statutory regulations. The latter may not delegate its valuation function to a third party. The Management Company notifies the relevant supervisory authority if an external valuation agent is appointed. Even if it has appointed an external valuation agent, the Management Company remains responsible for the proper valuation of sub-fund assets and for calculating and publishing the net asset value. Notwithstanding the preceding sentence, the external valuation agent is liable to the Management Company for any losses incurred by the Management Company that can be attributed to the external valuation agent's negligent or deliberate failure to carry out its tasks.

## Article 15 Suspension of the calculation of the net asset value per share and redemption

The Management Company is authorised to suspend the calculation of the net asset value per share temporarily if and as long as circumstances exist necessitating the suspension of calculations and if the suspension is justifiable taking into account the interests of the shareholders, viz.:

- a) when a stock exchange or another regulated market on which a significant number of the assets are quoted or traded is closed for reasons other than a normal statutory or bank holiday or when trading on this stock exchange or regulated market is suspended or restricted;
- b) in emergency situations in which the Investment Company cannot freely access the assets of a sub-fund or in which it is impossible to transfer the transaction value of investment purchases or sales freely or when the net asset value per share cannot be properly calculated.

The temporary suspension of the calculation of the net asset value per share within a sub-fund shall not lead to a temporary suspension with respect to other sub-funds unaffected by this event.

Shareholders who have submitted an application for the redemption or exchange of shares are informed immediately of the suspension of the calculation of the net asset value per share and also informed immediately of the resumption of the calculation of the net asset value per share. Redemption and exchange applications will not be processed while the calculation of the net asset value per share is suspended.

In the event that the calculation of the net asset value per share is suspended, applications for the redemption and/or exchange of shares may be cancelled by shareholders until the calculation of the net asset value per share is resumed.

## Article 16 Issue of shares

1. Shares are always issued on the initial issue date of a sub-fund or within the initial issue period of a sub-fund at a set initial issue price plus the issue surcharge paid to the intermediary, in the manner described for the respective relevant sub-fund in the annex to the Sales Prospectus. After this initial issue date or this initial issue period, shares are issued on every valuation day at the issue price. The issue price is the net asset value per share as defined in Art. 14, no. 4 of the Articles of Association plus the issue surcharge payable to the Sales Agent, if any, the maximum amount of which is stated for each sub-fund in the respective annex to this Sales Prospectus. The issue price can be increased by fees or other charges payable in particular countries where the fund is offered for sale.

This is an example of how the issue price is calculated:

Net asset value per share	EUR 100.00
+ issue surcharge (e.g. 5%)	EUR 5.00
	-----
	EUR 105.00

2. Subscription applications for the purchase of registered shares may be submitted to the Management Company, the Depositary, the Registrar, any Sales Agent and the Paying Agents. These receiving agents are required to forward all subscription applications to the Registrar without delay. The date of receipt by the Registrar ("relevant agent") is decisive. The agent accepts subscription applications on behalf of the Management Company.

Buy orders for the purchase of bearer shares are submitted by the agent where the subscriber has a deposit account to the Registrar and Transfer Agent. The date of receipt by the Registrar and Transfer Agent is decisive.

Completed subscription applications for the purchase of shares received by the relevant agent by the time on a valuation day defined in the Sales Prospectus are settled at the issue price of the following valuation day, provided that sufficient funds are available. The Management Company ensures in all cases that shares are issued on the basis of a net asset value per share previously unknown to the applicant. If there is a suspicion that an applicant is engaging in late trading, however, the Management Company can refuse to accept the application to subscribe shares/buy orders until the applicant has satisfied all doubts in relation to their application/buy order. Completed subscription applications for the purchase of shares received by the relevant agent after the time on a valuation day defined in the Sales Prospectus are settled at the issue price of the next valuation day but one, provided that sufficient funds are available.

If sufficient funds are not available for shares to be subscribed at the time of receipt of the complete subscription application by the Registrar or if the subscription application is incorrect or incomplete, the subscription application shall be regarded as having been received by the Registrar on the date on which sufficient funds are available and on which the subscription application is properly submitted.

Immediately following receipt of the issue price by the Depositary, the registered shares are allocated by the Registrar on behalf of the Management Company and transferred by entry in the share register.

Bearer shares shall, after settlement with the Registrar, be transferred step by step, i.e. against payment of the investment amount due, to the entity with which the subscriber maintains his securities account via so-called payment/delivery transactions.

The issue price is payable in the sub-fund currency to the Depositary in Luxembourg within two valuation days after the relevant valuation day.

3. For savings plans, a maximum of one-third of all payments agreed for the first year may be used for covering costs. The remaining costs are distributed evenly across all later payments.

#### **Article 17 Restrictions on and suspension of the issue of shares**

The Management Company may at any time, at its discretion and without giving reasons, reject a subscription application, temporarily restrict or suspend the issue of shares, permanently discontinue the issue of shares, or unilaterally decide to buy back shares in return for payment of the redemption price if this is deemed to be in the interests of the shareholders or in the interest of the public, or necessary for the protection of the Investment Company, for the protection of the respective sub-fund, or for the protection of the shareholders, in particular if:

- a) there is a suspicion that the shareholder concerned will, by purchasing the shares, engage in market timing, late trading or other market techniques that could be harmful to the shareholders as a whole;
- b) the issue of shares or the transfer of shares would result in the direct beneficial owner being a person who is not entitled to own shares in the Investment Company;
- c) the shares were acquired by a person with indications of a US connection, the shares have been distributed in a state, or acquired by a person in such a state (e.g. a US citizen) where the sub-fund is not authorised for distribution or the acquisition of shares by such persons is not authorised. The US person is defined as those persons who fall under the definition of Regulation "S" of the United States Security Act of 1933, as amended.

In this case, the Registrar or the Depositary shall immediately reimburse, without interest, any incoming payments received for subscription applications that have not been processed.

The issue of shares shall in particular be temporarily suspended if the calculation of the net asset value per share is suspended.

## Article 18 Redemption and exchange of shares

1. Shareholders are entitled to request redemption of their shares at the net asset value per share as defined in Art. 14, no. 4 of the Articles of Association at any time less a redemption fee, if applicable ("redemption price"). Shares are only redeemed on a valuation day. If a redemption fee is payable, the maximum amount of this redemption fee for each sub-fund is set out in the relevant annex to this Sales Prospectus.

In certain countries the payment of the redemption price may be reduced by local taxes and other charges. The corresponding share is cancelled on payment of the redemption price.

An example of how the redemption price is calculated is shown below:

Net asset value per share	EUR 100.00
- Redemption fee (e.g. 1%)	EUR 1.00
	-----
	EUR 99.00

2. Payment of the redemption price and any other payments to the shareholders are made via the Depositary and via the Depositary with the assistance of the paying agents. The Depositary is only obliged to make payment if there are no legal provisions, such as exchange control regulations or other circumstances beyond the Depositary's control, prohibiting the transfer of the redemption price to the country of the applicant.

The Management Company may buy back shares unilaterally against payment of the redemption price if this is in the interests of or in order to protect shareholders, the Investment Company or one or more sub-funds, insofar as:

- a) there is a suspicion that the shareholder concerned will, by purchasing the shares, engage in market timing, late trading or other market techniques that could be harmful to the investors as a whole;
  - b) the investor does not meet the conditions for purchasing the shares; or
  - c) the shares were acquired by a person with indications of a US connection, the shareholder was found to have indications of a US connection after the acquisition, the shares have been distributed in a state, or acquired by a person in such a state (e.g. a US citizen) where the sub-fund is not authorised for distribution or the acquisition of shares by such persons is not authorised.
3. The exchange of all or any shares in a sub-fund for shares in another sub-fund shall take place on the basis of the net asset value per share of the relevant sub-fund, taking into account any applicable exchange commission payable to the Sales Agent of up to 3% of the net asset value per share of the shares to be subscribed, but no less than the difference between the issue surcharge for the sub-fund of the shares to be exchanged and the issue surcharge for the sub-fund for whose shares the exchange is made. If it is not possible to exchange shares for a specific sub-fund or if no exchange commission is payable, this is specified in the corresponding annex of the Sales Prospectus for the sub-fund in question.

If more than one share class is offered within a sub-fund, shares of one class may be exchanged for those of another class, both within the same sub-fund and from one sub-fund to another. An exchange commission of up to 3% of the net asset value per share can also be charged if an exchange is carried out within a single sub-fund.

The Management Company may reject an application for the exchange of shares within a particular sub-fund if this is deemed to be in the interests of the Investment Company, the sub-fund or shareholders, insofar as:

- a) there is a suspicion that the shareholder concerned will, by purchasing the shares, engage in market timing, late trading or other market techniques that could be harmful to the investors as a whole;



- b) the investor does not meet the conditions for purchasing the shares; or
- c) the shares were acquired by a person with indications of a US connection, the shareholder was found to have indications of a US connection after the acquisition, the shares have been distributed in a state, or acquired by a person in such a state (e.g. a US citizen) where the sub-fund is not authorised for distribution or the acquisition of shares by such persons is not authorised.

4. Completed redemption or exchange applications for redeeming or exchanging registered shares may be submitted to the Investment Company, the Management Company, the Depositary, the Registrar, any Sales Agent and the Paying Agents.

These receiving agents are required to forward all completed redemption or exchange applications to the Registrar without delay. The date of receipt by the Registrar is decisive.

Complete sell orders for the redemption of bearer shares shall be forwarded to the Registrar by the office where the shareholder maintains his securities account. Receipt by the Registrar is decisive. The exchange of bearer shares is excluded.

An application for the redemption or exchange of registered shares is deemed to be complete only if it contains the name and address of the shareholder, the number and/or equivalent value of the shares to be redeemed and/or exchanged, the name of the sub-fund and the signature of the shareholder.

Completed applications for the redemption/sell orders and/or exchange of shares received by the time defined in the Sales Prospectus on a valuation day are settled at the net asset value per share on the following valuation day, less any applicable redemption fees and/or exchange commissions. The Management Company ensures in all cases that shares are redeemed and exchanged on the basis of a net asset value per share previously unknown to the shareholder. Completed applications for the redemption/sell orders and/or exchange of shares received after the time defined in the Sales Prospectus on a valuation day are settled at the net asset value per share on the next valuation day but one, less any applicable redemption fees and/or exchange commissions.

The redemption price is payable in the respective sub-fund currency within two valuation days after the relevant valuation day. In the case of registered shares, payments are made to the account specified by the shareholder.

5. The Management Company is obliged to suspend the redemption of shares temporarily following any suspension of the calculation of the net asset value. The conditions for temporarily suspending the calculation of the net asset value are set out in Art. 15 of these Articles of Association.
6. Subject to the prior approval of the Depositary in observance of the interests of shareholders, the Management Company is entitled not to carry out substantial redemptions – i.e. to suspend redemptions temporarily – until the fund assets have been sold without delay in observance of the interests of shareholders. A substantial redemption is deemed to be the receipt on any valuation day of applications for the redemption of shares amounting to 20% of net sub-fund assets. In this event the redemption takes place at the redemption price then valid. No new shares are issued while the redemption of shares is suspended. The issue of shares is not resumed until the outstanding applications for redemption have been processed. The same applies to applications to exchange shares. The Investment Company will nevertheless ensure that the sub-fund has sufficient liquid funds to enable shares to be redeemed and exchanged as soon as possible on the application of investors under normal conditions. The Investment Company shall notify shareholders of any suspension and resumption of redemptions or exchanges of shares by means of notifications in business journals or newspapers with an adequate circulation, and where appropriate in the official electronic media in the Grand Duchy of Luxembourg and in the countries where shares in the fund are distributed. The Investment Company shall also report any decision to suspend redemptions without delay to the Luxembourg supervisory authority as well as the supervisory authorities of the countries where it distributes shares in the fund.

## V. General meeting

### Article 19 Rights of the general meeting

A properly convened general meeting represents all the shareholders of the Investment Company. The general meeting has the authority to initiate and confirm all dealings of the Investment Company. The resolutions of the general meeting are binding for all shareholders, insofar as these resolutions are in accordance with the law of the Grand Duchy of Luxembourg and these Articles of Association, in particular insofar as they do not interfere with the rights of the separate meetings of shareholders of a particular share class or particular sub-fund.

### Article 20 Convocation

1. The annual general meeting is held, pursuant to Luxembourg law, in Luxembourg on the second Wednesday in February of each year at 11 a.m. at the company's registered office or at another location within the district in which the company's registered office is located as specified in the notice convening the meeting, with the first meeting being held in 2009. If this day is a bank holiday in Luxembourg, the annual general meeting is held on the next banking day in Luxembourg.

The annual general meeting may be held abroad if the Board of Directors deems fit as a result of extraordinary circumstances. A resolution of this kind by the Board of Directors may not be contested.

2. The shareholders may also be called to a meeting convened by the Board of Directors in accordance with statutory provisions. A meeting may also be convened at the request of shareholders representing at least one-tenth of the assets of the Investment Company.
3. The agenda is prepared by the Board of Directors, except in cases in which the general meeting is convened on the basis of a written application by the shareholders; in this event, the Board of Directors may prepare an additional agenda.
4. Extraordinary general meetings are held at the time and place specified in the notice of the extraordinary general meeting.
5. The regulations specified in 2 to 4 above shall apply accordingly to separate general meetings convened for the shareholders of one or several sub-funds or share classes.

### Article 21 Quorum and voting

Unless otherwise stated, all shareholders are entitled to attend the general meetings. All shareholders may be represented at the meeting by appointing another person in writing as a proxy.

Only those shareholders who hold shares of the corresponding sub-fund or share class may attend general meetings convened for individual sub-funds or share classes, which may only pass resolutions concerning the relevant sub-fund or share class.

Powers of attorney, the form of which may be determined by the Board of Directors, must be submitted to the company's registered office at least five days before the general meeting.

All shareholders and proxies must sign the attendance register drawn up by the Board of Directors before entering the general meeting.

The general meeting decides on all matters specified by the Law of 10 August 1915 and the Law of 17 December 2010; resolutions shall be passed in the form and with the quorum and majority specified in the aforementioned laws. Unless stated otherwise in the aforementioned laws or these Articles of Association, the resolutions voted on by a properly convened general meeting shall be passed on the basis of a simple majority of shareholders present and votes cast.

Every share confers one voting right. Fractions of shares are not entitled to vote.

Matters that affect the Investment Company as a whole shall be voted on jointly by all shareholders. However, separate voting shall be held on matters that only affect one or more sub-fund(s) or one or more share class(es).

#### **Article 22 Chairperson, recording officer and secretary**

1. The general meeting is chaired by the chairperson of the Board of Directors or, if this person is absent, by a chairperson to be elected by the general meeting.
2. The chairperson shall appoint a secretary for the meeting, who does not necessarily have to be a shareholder, and the general meeting shall appoint a recording officer from amongst the shareholders and proxies present at the meeting who will accept this appointment.
3. The minutes of the general meeting are to be signed by the chairperson, the recording officer and the secretary of each general meeting, as well as by the shareholders who so request.
4. Copies and extracts that are to be drawn up by the Investment Company shall be signed by the chairperson of the Board of Directors or by two members of the Board of Directors.

#### **VI. Board of Directors**

#### **Article 23 Composition**

1. The Board of Directors has at least three members who shall be appointed by the general meeting and who must not be shareholders in the Investment Company.

The general meeting may only elect as a new member of the Board of Directors a person who has not previously been a member of the Board of Directors if

- a) this person has been proposed by the Board of Directors or
  - b) a shareholder who is fully entitled to vote at the general meeting convened by the Board of Directors informs the chairperson - or, if this is impossible, another member of the Board of Directors - in writing not less than six and not more than thirty days before the scheduled date of the general meeting of their intention to put forward a person other than himself or herself for election or re-election, together with written confirmation from this person that they wish to be put forward for election; however, the chairperson of the general meeting, provided they receive the unanimous consent of all shareholders present at the meeting, may declare the waiving of the requirement for the aforementioned written notice and resolve that this nominated person should be put forward for election.
2. The general meeting determines the number of members of the Board of Directors, as well as their term of office. A term of office may not exceed a period of six years. Members of the Board of Directors may be re-elected.
  3. If a member of the Board of Directors leaves office before the expiry of their term of office, the remaining members of the Board of Directors appointed by the general meeting may determine a temporary successor before the next general meeting. The thus appointed successor shall complete the term of office of their predecessor.
  4. The members of the Board of Directors may be dismissed at any time by the general meeting.

#### **Article 24 Powers**

The Board of Directors is authorised to carry out all transactions that are necessary or beneficial for the fulfilment of the company's purpose. It is responsible for all the affairs of the Investment Company, unless they are specified in accordance with the Law of 10 August 1915 or these Articles of Association as being reserved for the general meeting.

The Board of Directors is also authorised to pay interim dividends.

#### **Article 25 Internal organisation of the Board of Directors**

The Board of Directors appoints a chairperson from among its members.

The chairperson of the Board of Directors is responsible for chairing the meetings of the Board of Directors; in their absence, the Board of Directors shall appoint another member of the Board of Directors to chair these meetings.

The chairperson may appoint a secretary, who does not necessarily have to be a member of the Board of Directors and who is responsible for recording the minutes of meetings of the Board of Directors and the general meeting.

The Board of Directors is authorised to appoint a management company, fund manager, investment adviser and investment committees for the respective sub-funds and to determine their powers.

#### **Article 26 Frequency and convocation**

The Board of Directors shall meet at the invitation of the chairperson or of two members of the Board of Directors at the place specified in the notice convening the meeting; the Board of Directors shall meet as often as the interests of the Investment Company require but at least once a year.

The members of the Board of Directors are convened at least 48 (forty-eight) hours before the meeting in writing by way of letter, fax or email, unless the observance of the aforementioned notice period is not possible owing to the urgency of the situation. In this event, details of and the reasons for the urgency are to be stated in the notice.

A letter of invitation is not required if the members of the Board of Directors do not object to the form of the invitation when attending the meeting or have given their written consent by letter, fax or email.

It is not necessary to send a specific invitation if a meeting is to take place at a location and time already specified in a resolution passed by the Board of Directors.

#### **Article 27 Meetings of the Board of Directors**

All members of the Board of Directors may participate in all meetings of the Board of Directors, including by appointing another member of the Board of Directors as their representative in writing by way of letter or fax.

Furthermore, any member of the Board of Directors may take part in a meeting of the Board of Directors through a telephone conferencing facility or similar communications method which allows all participants at the meeting of the Board of Directors to hear each other. This form of participation is equivalent to personal attendance at the meeting of the Board of Directors.

The Board of Directors is only quorate if at least half of the members of the Board of Directors are present or represented at the meeting. Resolutions shall be passed by a simple majority of votes cast by the members of the Board of Directors present or represented. In the event of a tie, the chairperson of the meeting has the casting vote.

The members of the Board of Directors may only pass resolutions during the course of meetings of the Board of Directors of the Investment Company that have been properly convened; this does not apply to resolutions passed in circulation procedures.

Members of the Board of Directors may also pass unanimous resolutions in circulation procedures. In this event, the resolutions signed by all members of the Board of Directors are just as valid and enforceable as resolutions passed during a meeting of the Board of Directors that has been properly convened. The signatures of the members of the Board of Directors may be obtained collectively on one single document or individually on several copies of the same document and may be submitted by letter or fax.

The Board of Directors may delegate its powers and obligations for day-to-day management to natural persons and/or legal entities that are not members of the Board of Directors and pay these persons and/or entities the fees or commissions set out in detail in Article 37 for their work.

#### **Article 28 Minutes**

The resolutions passed by the Board of Directors are recorded in minutes that are entered in the register kept for this purpose and signed by the chairperson of the meeting and the secretary.

Copies and extracts of these minutes are to be signed by the chairperson of the Board of Directors or by two members of the Board of Directors.

#### **Article 29 Authority to sign**

The Investment Company is legally bound by the signatures of two members of the Board of Directors. The Board of Directors may authorise one or more member(s) of the Board of Directors to represent the Investment Company as sole signatories. Furthermore, the Board of Directors may authorise other legal entities or natural persons to represent the Investment Company either as sole signatories or jointly with one member of the Board of Directors or another legal entity or natural person authorised by the Board of Directors.

#### **Article 30 Provisions on incompatibility**

No agreement, settlement or other transaction made between the Investment Company and another company will be influenced or invalidated as a result of the fact that one or more members of the Board of Directors, directors, managers or authorised agents of the Investment Company have any interests or investments in any other company or by the fact that such persons are members of the board of directors, shareholders, directors, managers, authorised agents or employees of the other company.

A member of the Board of Directors, director, manager or authorised agent of the Investment Company who is simultaneously a member of the board of directors, director, manager, authorised agent or employee of another company with which the Investment Company has agreements or has business relations of another kind will not lose the entitlement to advise, vote and negotiate matters concerning such agreements or other business relations.

However, in the event that a member of the Board of Directors, director or authorised agent has a personal interest in any matters of the Investment Company, this member of the Board of Directors, director or authorised agent of the Investment Company must inform the Board of Directors of this personal interest and this person may no longer advise, vote and negotiate matters connected with this personal interest. A report on this matter and on the personal interest of the member of the Board of Directors, director or authorised agent must be presented at the next general meeting.

The term “personal interest” as used in the previous paragraph does not apply to any business relations and interests that come into being solely as a result of legal transactions between the Investment Company, on one hand, and the Fund Manager, the Central Administration Agent, the Registrar or the Sales Agent (if any, or of a directly or indirectly affiliated company) or any other company appointed by the Investment Company, on the other hand.

The above conditions are not applicable in cases in which the Depositary is party to such an agreement, settlement or other legal transaction. Managing directors, authorised signatories and holders of a general power of attorney for all operations of the Depositary may not be appointed at the same time as an employee of the Investment Company in a day-to-day management role. Managing directors, authorised signatories and the holders of a general power of attorney for all operations of the Investment Company may not be appointed at the same time as an employee of the Depositary in a day-to-day management role.

## **Article 31 Indemnification**

The Investment Company shall be obliged to hold harmless all members of the Board of Directors, directors, managers and authorised agents, their heirs, executors and administrators against all lawsuits, claims and liability of all kinds, insofar as the affected parties have properly fulfilled their duties, and indemnify them against all costs, expenses and liabilities incurred in connection with such lawsuits, proceedings, claims and liabilities.

The right to compensation shall not exclude other rights that a member of the Board of Directors, director, manager or authorised agent may have.

## **Article 32 Management company**

The Board of Directors of the Investment Company may on its own responsibility appoint a management company for the asset management, administration and distribution of shares of the Investment Company.

The Investment Company's Board of Directors has on its own responsibility appointed Flossbach von Storch Invest S.A., with its registered office in Luxembourg, as the Management Company.

The Management Company acts as an external manager of the Investment Company (AIFM) within the meaning of the Law of 12 July 2013.

The Management Company is responsible for the management and administration of the Investment Company. Acting on behalf of the Investment Company, it may take all management and administrative measures and exercise all rights directly or indirectly connected with the assets of the Investment Company or the sub-funds and, in particular, delegate its tasks to qualified third parties in whole or in part; it also has the right to obtain advice from third parties, particularly from various investment advisers and/or an investment committee at its own expense and responsibility.

The Management Company carries out its obligations with the care of a paid authorised agent (*mandataire salarié*).

Insofar as the Management Company contracts a third party to manage assets, it may only appoint a company that is approved or registered to engage in asset management and is subject to regulatory oversight.

Investment decisions, the placement of orders and the selection of brokers are the sole responsibility of the Management Company, insofar as no fund manager has been appointed to manage the assets.

The Management Company is entitled to authorise a third party to place orders under its own responsibility and control.

Such delegation must not impair the effectiveness of the supervision by the Management Company in any way. In particular, the delegation of tasks must not obstruct the Management Company from acting in the interests of shareholders and ensuring that the Investment Company is managed in the best interests of shareholders.

## **Article 33 Fund manager**

If the Investment Company makes use of Art. 32 (1) and the Management Company subsequently transfers the fund manager role to a third party, it is the duty of such fund manager in particular to implement the day-to-day investment policy of the respective sub-fund's assets and to manage the day-to-day transactions connected with asset management as well as other related services under the supervision, responsibility and control of the Management Company. These tasks must be performed in accordance with the principles of the investment policy and investment restrictions of the respective sub-fund, as described in these Articles of Association and the Sales Prospectus (including annex) of the Investment Company, as well as the statutory investment restrictions.

The Fund Manager must be licensed for asset management and must be subject to proper supervision in its country of residence.

The Fund Manager is authorised to select agents and brokers to process transactions relating to the assets of the Investment Company and its sub-funds. The Fund Manager is responsible for investment decisions and the issuing of orders.

The Fund Manager has the right to obtain advice from third parties, particularly from various investment advisers, at its own expense and on its own responsibility.

The Fund Manager is authorised, with the prior consent of the Management Company, to delegate some or all of its tasks to a third party, whose remuneration will be paid entirely by the Fund Manager.

The Fund Manager bears all the costs and expenses it incurs in connection with the provision of its services to the Investment Company. Commission for brokers, transaction fees and other transaction costs arising in connection with the purchase and sale of assets are borne by the relevant sub-fund.

## VII. Auditor

### Article 34 Auditor

An auditing company or one or several auditors are to be appointed to audit the annual reports of the Investment Company; this auditing company or this/these auditor(s) must be approved in the Grand Duchy of Luxembourg and is/are to be appointed by the general meeting.

The auditor(s) may be appointed for a term of up to six years and may be dismissed at any time by the general meeting.

## VIII. General and final provisions

### Article 35 Use of income

1. The Board of Directors can distribute the income generated by sub-funds to shareholders or retain this income within the sub-fund. This is mentioned in the annex to this Sales Prospectus for the relevant sub-fund.
2. Both ordinary net income and realised gains may be distributed. Unrealised gains, other assets and in exceptional cases also share capital may also be distributed provided that the net assets do not fall below the minimum defined in Art. 12 of these Articles of Association as a result of the distribution. Portions of the issue price for issued shares that are attributable to income may be used for distribution (income equalisation procedure).
3. Distributions are paid in respect of shares in circulation on the distribution date. Distributions may be carried out in full or in part in the form of free shares. Any fractions remaining may be paid in cash. Income not claimed five years after the publication of notification of a distribution shall be forfeited in favour of the respective sub-fund.
4. Distributions to holders of registered shares are carried out by reinvesting the distribution amount for the benefit of the holders of registered shares. If this is not desired, the holders of registered shares can apply to the Registrar for the distribution to be made to a designated account within ten days of receiving the distribution notice. Distributions to holders of bearer shares are carried out in the same way as the payment of the redemption price to holders of bearer shares.

If physical share certificates have been issued, the distributions are paid on presentation of the coupon to the payment agents designated by the Investment Company.

5. Distributions which have been declared but not paid on a bearer share entitled to distributions, especially when in connection with physical share certificates no coupon has been presented, can no longer be claimed by the holder of such shares after five years from the payment notice and are credited to the Investment Company's

sub-fund assets and attributed to the relevant share class, provided that share classes have been formed. No interest is paid on declared distributions from the time they fall due.

## **Article 36 Reports**

1. The Board of Directors prepares an audited annual report and a semi-annual report for the Investment Company in line with legislation in the Grand Duchy of Luxembourg. The first financial year began on the date of formation and ended on 30 September 2008. Reports are published in accordance with applicable regulations in the countries in which the fund is distributed and can also be obtained free of charge at any time at the registered offices of the Investment Company, the Management Company, the Depositary, the payment agents and the sales agents.
  - No later than six months after the end of each financial year, the Board of Directors shall publish an audited annual report in accordance with the regulations applicable in the Grand Duchy of Luxembourg.
  - Two months after the end of the first half of each financial year, the Board of Directors shall publish an unaudited semi-annual report.
  - Insofar as this is necessary for permission to distribute the fund in other countries, additional audited and unaudited interim reports may also be drawn up.
2. Every annual and semi-annual report will state the amount of issue surcharges and redemption fees that have been charged to each sub-fund for the purchase and redemption of shares in target funds during the reporting period, as well as the management fees that have been charged to each sub-fund by another management company (fund management company) or another investment company, including its management company, for managing the shares in target funds held in each sub-fund.

## **Article 37 Costs**

Each sub-fund shall bear the following costs, provided they arise in connection with its assets:

1. If a management company is appointed, it may receive a (fixed and/or performance- related) fee from the individual sub-fund's assets, the maximum amount, calculation and payment of which are specified in the annex to the Sales Prospectus for the respective sub-fund. This fee is subject to value-added tax if applicable.

In addition to the aforementioned fee payable to the Management Company for managing the sub-funds, the sub-fund assets are charged an indirect management fee for the target funds they contain.

The annual and semi-annual reports contain information on the amount of the issue surcharges and redemption fees that have been charged to sub-funds for the purchase and redemption of shares in target funds in the reporting period, and on the amount of the fee charged to sub-funds by the Management Company itself or another management company ("Fund Management Company") or another company affiliated with the Management Company via a significant direct or indirect equity interest or another investment company including its management company as a management fee for the target fund shares held in the respective sub-fund assets.

No issue surcharges or redemption fees may be charged to the sub-funds for the shares in target funds that are managed directly or indirectly by the same management company or by a company affiliated with the Management Company via a significant direct or indirect equity interest.

The same applies to shares in target funds affiliated with the sub-funds as described above.

However, to the extent that the sub-funds invest in target funds launched and/or managed by other companies, the relevant issue surcharges and any redemption fees must be taken into account. It must also be taken into account in all cases that, in addition to the costs charged to sub-funds in accordance with the provisions of the



Sales Prospectus (including annexes) and the following Articles of Association, charges for management and administration, depositary fees, auditing fees, taxes and other costs and fees from the target funds in which the sub-fund invests are incurred at the level of these target funds, which may therefore result in similar charges being incurred several times.

If a fund manager has been contractually appointed, it may receive a (fixed and/or performance-related) fee from the respective management fee for the sub-fund, the maximum amount, calculation and payment of which are specified in the annex to the Sales Prospectus for the respective sub-fund. This fee is subject to value-added tax if applicable.

2. In addition, the Management Company receives an annual central administration agent fee. This covers the following remuneration and costs that are not charged separately to the Fund:

- a) remuneration of the Depositary;
- b) remuneration of the Registrar;
- c) all third-party depositary fees charged by other correspondent banks and/or clearing houses (e.g. Clearstream Banking S.A.) for the assets of the respective sub-fund;
- d) the transaction costs for the issue and redemption of bearer shares to the Fund;
- e) the costs of the auditor of the Investment Company;
- f) costs for the creation, preparation, translation, filing, publication, printing and dispatch of all documents required by the Investment Company, in particular share certificates and coupon renewal sheets, the Sales Prospectus (plus annexes), the key information document (KID), the Articles of Association, the annual and semi-annual reports, the statements of assets, letters convening meetings, sales notifications and/or applications for approval in the countries in which shares in the Investment Company or sub-funds are sold, and correspondence with the respective supervisory authorities;
- g) management fees payable by the Investment Company and/or sub-funds to all relevant authorities, in particular the administrative fees of supervisory authorities in Luxembourg and elsewhere and fees for filing documents of the Investment Company;
- h) costs in connection with any listing on a stock exchange;
- i) advertising costs and costs incurred directly in connection with the offer and sale of shares;
- j) fees, expenses and other costs of foreign representatives, Paying Agents, information agents and other agents that must be appointed abroad and that are incurred in connection with the relevant sub-fund assets;
- k) further management costs including the costs of interest groups;
- l) the costs of determining the breakdown of the investment result by individual success factors (also known as performance attribution);
- m) costs for the credit rating of the Investment Company and/or sub-funds by nationally and internationally recognised rating agencies;
- n) costs of any external valuation agent.

3. The respective sub-fund will also bear the following costs:

- a) costs incurred in connection with the acquisition, sale and, where applicable, external administrative costs of assets, in particular customary bank fees for securities transactions and transactions involving other assets and rights of the Investment Company or a sub-fund;

This does not include issue surcharges and redemption fees for shares of target funds that are managed directly or indirectly by the Management Company itself or by another company with which the Management Company is affiliated via a significant direct or indirect equity interest;

- b) taxes levied on the assets of the Investment Company or sub-fund, their income and the expenses charged to the respective sub-fund, plus the costs incurred for any exemptions, reductions, offsetting or reimbursement of taxes and financial charges;
- c) costs of legal advice and monitoring any legal claims that may arise for the Investment Company, the Management Company (if appointed) or the Depositary when acting in the interest of the shareholders of the relevant sub-fund;
- d) interest payable on any borrowings;
- e) expenses of any investment committee;
- f) notices to shareholders;
- g) any fees and expenses of the Investment Company's Board of Directors, and insurance costs;
- h) costs of establishing the Investment Company or individual sub-funds and the initial issue of shares.

The costs of establishing the Investment Company and the initial issue of shares were written off against the assets of the sub-funds existing at the time of establishment. The foundation costs and aforementioned costs that are not exclusively attributable to any specific sub-fund are allocated to the respective sub-fund assets on a pro rata basis. Costs relating to the establishment of additional sub-funds are written off against the assets of the respective sub-fund to which they are attributable in the first financial year. The costs of introducing new share classes for existing sub-funds must be charged to the share prices of the new share classes.

All the aforementioned costs, fees and expenses are subject to value-added tax if applicable.

All costs and fees are charged first to ordinary income, then to capital gains and only then to the Investment Company's fund assets.

Management fees and other expenses of a regular and recurring nature may be charged in advance on the basis of estimates for years or other periods and divided over these periods pro rata temporis.

Costs, fees and expenses attributable to any sub-fund are borne by that sub-fund. Otherwise they are divided pro rata according to the amount of sub-fund assets of all, or all the relevant, sub-funds.

A total cost ratio is calculated for each share class of the individual sub-funds, based on the figures for the previous financial year. This total cost ratio includes costs, fees and expenses; any performance-related fees and transaction costs – with the exception of the transaction costs of the Depositary – are not included in this figure.

The Management Company receives no reimbursements from the fees paid or expenses repaid to the Depositary or third parties from sub-fund assets. A significant part of the fees taken from sub-fund assets is used for fees to brokers based on the holdings of brokered shares.

Investors also pay any issue surcharge, which may not exceed 5% of the net asset value per share. No redemption fee is charged.

## **Article 38 Financial year**

The Investment Company's financial year begins on 1 October and ends on 30 September of the following year. The first financial year commences on the date of formation and ends on 30 September 2008.

## Article 39     Depositary

1. The Investment Company shall ensure that a sole depositary is appointed. The appointment of the Depositary is agreed in writing in the depositary agreement. Detailed information on the Depositary can be found in the current Sales Prospectus. The rights and obligations of the Depositary are governed by the Law of 17 December 2010, the applicable regulations, the depositary agreement, these Articles of Association and the Sales Prospectus (including annexes).
2. The Investment Company and the Depositary may both terminate this contract with effect from the end of the Investment Company's relevant half-year by giving the other party six months' written notice. However, the Investment Company may not dismiss the Depositary unless a new depositary assumes the tasks and responsibilities of a depositary as defined in these Articles of Association, the Sales Prospectus, the depositary agreement and the applicable laws. After the dismissal of the Depositary, it shall continue to fulfil its functions for as long as necessary to transfer all of the assets of the fund to the new depositary.
3. The Depositary is appointed to hold the sub-fund's assets in custody.
  - a) Financial instruments are held in custody subject to the following provisions:
    - i. the Depositary holds all financial instruments capable of being kept in an account for financial instruments, and all financial instruments that can be physically transferred to the Depositary;
    - ii. to this end, the Depositary is to ensure that all financial instruments capable of being held in an account for financial instruments are registered in accordance with the principles defined in Art. 16 of Directive 2006/73/EC in the Depositary's books in separate accounts that have been opened on behalf of the Investment Company or of the Management Company acting on its behalf, so that the financial instruments can be clearly identified as instruments belonging to the relevant sub-fund at any time under applicable legislation.
  - b) Other assets are subject to the following provisions:
    - i. the Depositary examines whether the fund or the Management Company acting on behalf of the fund has title to the relevant assets by determining, based on information or documents provided by the fund or the Management Company and to the extent available on external evidence, whether the fund or the Management Company acting on behalf of the fund is the owner;
    - ii. the Depositary keeps records on the assets for which it has ascertained that the fund or the Management Company acting on behalf of the fund has title and it keeps its records up-to-date.

The Depositary regularly provides the Management Company with a comprehensive list of all assets of the fund.
  - c) The Depositary can delegate the depositary tasks described in 3 a) and b) above to another company ("sub-depositary") on the following terms:
    - i. the tasks are not delegated with the intention of evading applicable legislation;
    - ii. the Depositary can demonstrate that there is an objective reason for the delegation;
    - iii. the Depositary applies the appropriate expertise, care and due diligence
      - a) in the selection and appointment of a sub-depositary to which it wants to delegate some of its tasks, and
      - b) in the ongoing monitoring and regular auditing of sub-depositaries to which it has delegated some of its tasks and of the sub-depositary's precautionary measures for the tasks delegated to it;

- d) the Depositary ensures that in carrying out the tasks delegated to it, the sub-depositary complies at all times with the following conditions:
  - i. the sub-depositary has the organisational structure and expertise that are appropriate and adequate for the type and complexity of the assets entrusted to it by the Investment Company or the Management Company acting on its behalf;
  - ii. in terms of the custodial functions described in 3. a) i) above, the sub-depositary is subject to effective regulatory control, including minimum capital requirements, and regulation in the relevant jurisdiction and regular external auditing to ensure that the financial instruments are in its possession;
  - iii. the sub-depositary separates the assets of the Depositary's clients from its own assets and from the Depositary's assets in such a way that they can be clearly assigned to the clients of a particular depositary at any time;
  - iv. the re-use of the assets by the sub-depositary is ruled out; and
  - v. the sub-depositary takes all necessary steps to guarantee that in the case of the insolvency of the sub-depositary, the assets of the Investment Company held by the sub-depositary cannot be distributed to the creditors of the sub-depositary or used for their benefit and
  - vi. the sub-depositary complies with the obligations and prohibitions of point 3 a) and b) above and the following points 9), 10) and 13).
- e) If legislation of a third country requires that certain financial instruments are held in custody by a local entity and if there is no local entity that meets the conditions of point 3 d) ii) above for being appointed, the Depositary may only delegate its custodial functions to such a local entity to the extent and for as long as required by the law of the third country and there are no local entities that meet the conditions for sub-custody; the first clause applies subject to the following conditions:
  - i. the Management Company has properly notified the Investment Company's investors before they made their investment
    - (1) that such sub-custody is required by the law of the third country, and
    - (2) of the circumstances that justify the delegation, and
  - ii. the Investment Company or the Management Company acting on behalf of the Investment Company must instruct the Depositary to delegate the custody of these financial instruments to such a local entity.
- f) Subject to the conditions of 3 c), d) and e) above, the sub-depositary may subcontract the custodial tasks described in 3 a) and b) above to another company. The following points 16) and 17) apply accordingly to the parties involved.
- g) With the exception of the custodial functions described in 3 a) and b) above, the Depositary may not outsource the functions defined in 3) c), d) and e).

#### 4. The Depositary

- a) ensures that the sale, issue, redemption, disbursement and cancellation of shares in the Investment Company is performed in accordance with the applicable statutory regulations and according to the procedures outlined in the Articles of Association of the Investment Company,
- b) ensures that the calculation of the value of the shares in the Investment Company is performed in accordance with the applicable statutory regulations and according to the procedures outlined in the Articles of Association,

- c) observes the instructions of the Management Company, unless these instructions are in breach of the applicable laws or the Articles of Association,
  - d) ensures that, for transactions with fund assets, the equivalent value is paid to the Investment Company within the usual time limits,
  - e) ensures that the Investment Company's income is used in accordance with statutory regulations, the Investment Company's investment conditions and the Articles of Association.
5. If the Investment Company holds shares in a property company, the Depositary is to verify the company's statement of assets as of the valuation date and to verify that equity interests are acquired in line with statutory provisions.
6. The Depositary ensures that the cash flows of the Investment Company are duly monitored and guarantees in particular that all payments made upon the subscription of shares in the Investment Company by shareholders or on behalf of shareholders have been received and that all of the funds of the Investment Company have been booked to cash accounts which:
- a) are opened in the name of the Investment Company, the name of the Management Company acting on behalf of the Investment Company or in the name of the Depositary acting on behalf of the Investment Company;
  - b) are opened at an institution specified in Article 18 (1) (a), (b) and (c) of Directive 2006/73/EC of 10 August 2006 implementing Directive 2004/39/EC of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive ("Directive 2006/73/EC"); and
  - c) are managed in accordance with the principles set out in Article 16 of Directive 2006/73/EC.
- If the cash accounts are opened in the name of the Depositary acting on behalf of the Investment Company, neither the monies of the institution specified under no. 6 (b) nor the monies of the Depositary itself shall be booked to such accounts.
7. The Management Company may only carry out the following transactions with the consent of the Depositary:
- a) borrowing, apart from technical overdrafts;
  - b) investing the Investment Company's funds in bank accounts at other credit institutions and carrying out transactions using such bank balances;
  - c) disposing of equity interests in property companies or, if the interest is not a minority interest, disposing of the assets of such companies and making changes to the shareholders' agreement or the Articles of Association.
- The Depositary is to give its consent to transactions described in point 7) above if they meet the specified requirements and are in accordance with other statutory regulations and the investment conditions. If it consents to a transaction even though the conditions are not met, this does not affect the validity of the transaction. A transaction without the consent of the Depositary is not valid with respect to investors. The rules in favour of bona fide purchasers are to be applied accordingly.
8. In performing its tasks, the Depositary is to act honestly, fairly, professionally, independently of the Management Company and in the interests of the Investment Company and its investors.
9. The tasks of the Management Company and of the Depositary may not be assumed by one and the same company.
10. The Depositary may not perform any tasks for the Investment Company or the Management Company acting on behalf of the Investment Company which could create a conflict of interest between the Investment Company, the investors in the Investment Company, the Management Company and itself. This does not apply if its tasks as depositary have been separated functionally and hierarchically from those tasks which could potentially conflict with them and the potential conflicts of interest have been properly identified, managed, observed and

disclosed to the investors in the Investment Company. The Depositary is to ensure by means of organisational and procedural rules that in the performance of its tasks all conflicts of interest between the Depositary and the Management Company are avoided. Compliance with these rules is to be monitored by a person independent of all hierarchical levels, including the company directors.

11. The assets held in custody by the Depositary shall not be re-used for own account by the Depositary or by a third party to which the depositary function has been delegated. Re-use is considered to be any transaction involving the assets held in custody, including transfer, pledging, sale and lending.

The assets held in custody by the Depositary may only be re-used if

- a) the assets are re-used for the account of the Investment Company,
- b) the Depositary is observing the instructions of the Management Company acting on behalf of the Investment Company,
- c) the re-use is for the benefit of the Investment Company as well as in the interests of the shareholders and
- d) the transaction is covered by high-quality liquid collateral that the fund has received in accordance with an agreement on a transfer of title.

The market value of the collateral must at all times be at least as high as the market value of the re-used assets plus a supplement.

The assets listed in point 3) (a) and (b) above must not be re-used by the Depositary without the prior consent of the AIF or the AIFM acting on behalf of the AIF.

12. In the event of the insolvency of the Depositary to which the custody of the fund assets has been transferred, the fund assets held in custody shall not be distributed to the creditors of this Depositary or used for their benefit.
13. The Depositary is to provide the supervisory authority on request with all information received in the course of performing its tasks which the relevant supervisory authority for the Investment Company or the Management Company may require.
14. The choice of and any change in the depositary must be approved by the relevant supervisory authority. The relevant supervisory authority can instruct the Management Company to change its depositary at any time.
15. The Depositary is liable to the Investment Company and to the investors in the Investment Company for the loss of a financial instrument held in custody by the Depositary or the sub-depositary to which the custody of financial instruments as described in 3) a) and b) above has been delegated. In the event of the loss of a financial instrument held in custody, the Depositary of the Investment Company or of the Management Company acting for the Investment Company is to return a financial instrument of the same kind without delay or to reimburse the corresponding amount. The Depositary is not liable in accordance with the Law of 17 December 2010 if it can prove that the loss was due to external events that cannot reasonably be controlled and the consequences of which could not have been avoided despite all reasonable efforts.
16. The Depositary shall also be liable to the Investment Company, or to the investors of the Investment Company, for all other losses suffered by them as a result of the Depositary's negligent or intentional failure to fulfil its statutory obligations.
17. The Depositary's liability shall not be affected by any delegation referred to in 3) c) above.
18. The Investment Company shall be entitled and obliged to pursue in its own name
  - a) investors' claims against the Management Company for breaches of statutory regulations or the investment conditions;

- b) in the event of transactions described in point 7) above, to pursue investors' claims against the purchaser of an object of the Investment Company in its own name; and
- c) to oppose by way of legal action the enforcement of a claim against the Investment Company for which the Investment Company is not liable; investors cannot appeal against the enforcement themselves.

Point 18) above does not preclude the assertion of claims against the Management Company by the investors.

- 19. The Investment Company shall be entitled and obliged to pursue in its own name all claims of the investors against the Depositary. This does not prevent the investors from pursuing claims for damages against the Depositary themselves.
- 20. In the event that the Management Company calculates share values incorrectly or breaches investment limits or purchasing instructions, it is to define suitable procedures for compensating the investors concerned. The procedures must, in particular, include the preparation of a compensation plan and the auditing of the compensation plan and the compensation measures by an auditor.

#### **Article 40 Specialised companies for the safekeeping of physical precious metals**

With regard to the storage of physical precious metal holdings, the Investment Company or the Management Company (with the prior consent of the Investment Company) is authorised to appoint entities other than the Depositary. Provided that these entities are specialised companies that have the technical and material means to ensure the preservation and integrity of the physical precious metal holdings and are contractually obliged to provide the Depositary with the necessary documents and information in order to fulfil the obligations pursuant to Article 34(3)(b) of the Law of 2010. Furthermore, the companies must ensure that the physical precious metal holdings are identifiable at all times and are stored separately from their own precious metal holdings and assets as well as those of other clients. The specialised companies that have been commissioned to store the physical precious metal holdings are liable for the complete or partial loss of the holdings. This also applies if the specialised companies have transferred custody of the precious metal holdings to a third party.

#### **Article 41 Amendments to the Articles of Association**

These Articles of Association may be amended or supplemented at any time by resolution of the shareholders, provided the conditions for amendments to the Articles of Association under the Law of 10 August 1915 are met.

#### **Article 42 Miscellaneous**

With regard to any points which are not set forth in these Articles of Association, please refer to the provisions of the Law of 10 August 1915 and the Law of 17 December 2010.

## NOTES FOR INVESTORS OUTSIDE THE GRAND DUCHY OF LUXEMBOURG

### Additional information for investors in Switzerland

#### 1. Representative

The representative in Switzerland is FIRST INDEPENDENT FUND SERVICES AG, with registered office at Feldeggstrasse 12, CH-8008 Zurich, will take over the function as Swiss representative.

#### 2. Paying agent

The paying agent in Switzerland is Banque Cantonale de Genève, with its registered office at 17, quai de l'Île, CH-1204 Geneva, will take over the function as Swiss paying agent.

#### 3. Place where the relevant documents may be obtained

The prospectus, the Key Investor Information Document (KIID), the articles of association and the annual and semi-annual reports can be obtained free of charge from the representative.

#### 4. Payment of retrocessions and rebates

1. The Management Company and its agents may pay retrocessions as remuneration for distribution activity in respect of fund shares in Switzerland. This remuneration may be deemed payment for the following services in particular:

- the offering of shares of the foreign collective investment scheme in Switzerland as well as the at-tendant consulting and support activities to investors taking into account existing legal obligations within the respective permissible sales structure in Switzerland;
- promotion of the foreign collective investment scheme in Switzerland by including the respective collective investment scheme in the product range of the distributor as well as the promotion of the collective investment scheme with the assistance of third parties (e.g. platforms, banks) taking into account existing legal obligations within the respective permissible sales structure in Switzerland.

Retrocessions are not deemed to be rebates even if they are ultimately passed on, in full or in part, to the investors.

The disclosure of the receipt of retrocessions is subject to the relevant FIDLEG regulations.

2. In the case of distribution activity in Switzerland, the Management Company and its agents may, upon request, pay rebates directly to investors. The purpose of rebates is to reduce the fees or costs incurred by the investor in question. Rebates are permitted provided that

- they are paid from fees received by the the Management Company and therefore do not represent an additional charge on the fund assets;
- they are granted on the basis of objective criteria;
- all investors who meet these objective criteria and demand rebates are also granted these within the same timeframe and to the same extent.

The objective criteria for the granting of rebates by the Management Company are as follows:

- the volume subscribed by the investor or the total volume they hold in the collective investment scheme or, where applicable, in the product range of the promoter;
- the amount of the fees generated by the investor;
- the investment behavior shown by the investor (e.g. expected investment period);
- the investor's willingness to provide support in the launch phase of a collective investment scheme.

At the request of the investor, the Management Company must disclose the amounts of such rebates free of charge.



#### 5. Places of fulfilment and place of jurisdiction

In respect of the shares distributed in Switzerland, the place of performance is the registered office of the Representative. The place of jurisdiction is the registered office of the Representative or the registered office or place of residence of the investor.