PROSPECTUS

MANDATUM SICAV-UCITS

A public limited company (*société anonyme*) organized as an investment company with variable capital (*société d'investissement à capital variable*) under the laws of the Grand Duchy of Luxembourg

January 2023

VISA 2023/172026-11741-0-PC L'apposition du visa ne peut en aucun cas sei d'argument de publicité Luxembourg, le 2023-01-11 Commission de Surveillance du Secteur Financier

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The Fund

Registered office

53, Boulevard Royal L-2449 Luxembourg Grand Duchy of Luxembourg

Board of Directors

Mr Antti Sorsa, Chief Operating Officer, Mandatum Asset Management Ltd, residing professionally at Bulevardi 56, P.O. Box 1221, 00101 Helsinki, Finland

Mrs Laura Halmela, Senior Legal Counsel, Mandatum Life Services Limited, residing professionally at Bulevardi 56, P.O. Box 1210, 00101 Helsinki, Finland

Mrs Hanna Duer, Independent Director, residing professionally at Unit 9a, Reeds Farm Estate, Roxwell Road, Writtle, Chelmsford, CM1 3ST, United Kingdom

Management Company

Mandatum Fund Management S.A. 53, Boulevard Royal L-2449 Luxembourg Grand Duchy of Luxembourg

Board of Directors

Mr Timo Strengell, Director of Management Accounting and Risk Management, Mandatum Life Insurance Company Limited, residing professionally at Bulevardi 56, P.O. Box 627, 00101 Helsinki, Finland

Mrs Hanna Duer, Independent Director, residing professionally at Unit 9a, Reeds Farm Estate, Roxwell Road, Writtle, Chelmsford, CM1 3ST, United Kingdom

Mr Mark Phillips, Independent Director, residing professionally at 51, boulevard Grand Duchesse Charlotte, L-1331 Luxembourg, Grand Duchy of Luxembourg

Conducting Officers

Mr Vesa Tyrisevä, Executive Director, residing professionally at 53, Boulevard Royal, L-2449 Luxembourg, Grand Duchy of Luxembourg

Ms Céline Avedissian, Compliance Officer, residing professionally at 53, Boulevard Royal, L-2449 Luxembourg, Grand Duchy of Luxembourg

Mr Kalle Rinne, Risk Manager, residing professionally at 53, Boulevard Royal, L-2449 Luxembourg, Grand Duchy of Luxembourg

Portfolio Manager

Mandatum Asset Management Ltd Bulevardi 56, P.O. Box 1221 00101 Helsinki Finland

Sub-Portfolio Manager

Fourton Oy Tapiolan Keskustorni 13 krs Tapiontori 1 PL 111, 02100 Espoo Finland

Principal Distributor

Mandatum Asset Management Ltd Bulevardi 56, P.O. Box 1221 00101 Helsinki Finland

Depositary

RBC Investor Services Bank S.A. 14, Porte de France L-4360 Esch-sur-Alzette Grand Duchy of Luxembourg

Central Administrator

RBC Investor Services Bank S.A. 14, Porte de France L-4360 Esch-sur-Alzette Grand Duchy of Luxembourg

Auditor

Deloitte Audit S.à r.l. 20, Boulevard de Kockelscheuer L-1821 Luxembourg Grand Duchy of Luxembourg

Legal Advisers as to Luxembourg Law

Ashurst LLP, Luxembourg Branch 15, rue Bender L-1229 Luxembourg Grand Duchy of Luxembourg

IMPORTANT INFORMATION

All capitalised terms used in this Prospectus shall have the meanings given to them under the heading "GLOSSARY" unless the context requires otherwise.

The Board of Directors accepts responsibility for the information contained in the Prospectus. To the best of the knowledge and belief of the Board of Directors (which has taken all reasonable care to ensure that such is the case) the information contained in the Prospectus is in accordance with the facts and does not omit anything likely to affect the import of such information. The Board of Directors accepts responsibility accordingly.

This Prospectus includes information relating to the Fund, an undertaking for collective investment in transferable securities under part I of the Law of 2010. Such registration does not imply approval by any Luxembourg authority of the contents of the Portfolio or the portfolio of securities held by the Fund. Any representation to the contrary is unauthorised and unlawful.

This Prospectus and the KIIDs can also be accessed on the Website or obtained from the registered office of the Fund.

No person has been authorised to give any information or to make any representations, other than those contained in the Prospectus, the KIIDs and the Reports, in connection with the offering of Shares and, if given or made, such information or representations must not be relied on as having been authorised by the Fund. Neither the delivery of the Prospectus or the KIIDs nor the allotment or issue of Shares will, under any circumstances, create any implication that there has been no change in the affairs of the Fund since the date hereof.

Marketing

Shares are not being offered or sold in any jurisdiction where the offer or sale is prohibited by law or to any person who is not qualified to participate in the subscription of Shares.

The distribution of this Prospectus and the offering of Shares in certain jurisdictions may be restricted. Persons into whose possession this Prospectus comes are required by the Fund to inform themselves of, and to observe, any such restrictions and all applicable laws and regulations of any relevant jurisdictions. The Prospectus does not constitute an offer or solicitation by anyone in any jurisdiction in which such offer or solicitation is not authorised or to any person to whom it is unlawful to make such offer or solicitation. Prospective applicants for Shares should inform themselves as to legal requirements so applying and any applicable exchange control regulations and taxes in the countries of their respective citizenship, residence or domicile. If you are in any doubt about the contents of this Prospectus, you should consult your stockbroker, bank manager, solicitor, accountant or other financial adviser.

The Shares have not been and will not be registered under the U.S. Securities Act and the Fund has not been and will not be registered under the United States Investment Company Act of 1940. Accordingly, Shares may not be offered, sold, transferred, or delivered, directly or indirectly, in the United States or to any United States Person, except in compliance with the securities laws of the United States and of any state thereof in which such offer or sale is made. The Fund reserves the right to make a private placement of its Shares to a limited number or category of United States Persons.

If it comes to the attention of the Fund at any time that a United States Person unauthorised by the Fund, either alone or in conjunction with any other person, owns Shares, the Fund may compulsorily redeem such Shares.

Listing

Information on the listing of the Shares on the Luxembourg Stock Exchange, if applicable, is disclosed for each Sub-Fund in the relevant Appendix.

The eligibility requirements applicable to Shareholders, as set forth in this Prospectus, are collectively referred to as the "Eligibility Requirements". Although the Shares are required to be negotiable and transferable on the Luxembourg Stock Exchange upon their admission to trading thereon (and trades registered thereon are not able to be cancelled by the Fund), the Eligibility Requirements will nevertheless apply to any party to which Shares are transferred on the Luxembourg Stock Exchange. The holding at any time of any Shares by a party which does not satisfy the Eligibility Requirements may result in the compulsory redemption of such Shares by the Fund.

Forward-looking statements

This Prospectus contains forward-looking statements, which provide current expectations or forecasts of future events. Words such as "may", "expects", "future" and "intends", and similar expressions, may identify forward-looking statements, but the absence of these words does not mean that a statement is not forward-looking. Forwardlooking statements include statements about the Fund's plans, objectives, expectations and intentions and other statements that are not historical facts. Forward-looking statements are subject to known and unknown risks and uncertainties and inaccurate assumptions that could cause actual results to differ materially from those expected or implied by the forward-looking statements. Prospective Shareholders should not unduly rely on these forward-looking statements, which apply only as of the date of this Prospectus.

Use of ICE Data Services

ICE Data Services, its affiliates and their respective third party suppliers disclaim any and all warranties and representations, express and/or implied, including any warranties of merchantability or fitness for a particular purpose or use, including the indices, index data and any data included in, related to, or derived therefrom. Neither ICE Data Services, its affiliates nor their respective third party suppliers shall be subject to any damages or liability with respect to the adequacy, accuracy, timeliness or completeness of the indices or the index data or any component thereof, and the indices and index data and all components thereof are provided on an "as is" basis and their use is at the own risk of the user. ICE Data Services, its affiliates and their respective third party suppliers do not sponsor, endorse, or recommend the Fund or the Sub-Funds, or any of its products or services.

GLOSSARY

This glossary is intended to help readers who may be unfamiliar with the terms used in this Prospectus. It is not intended to give definitions for legal purposes.

Administration Agency Agree- ment	The agreement between the Management Company, the Central Administrator and the Fund pursuant to which the Central Administrator was appointed as the central adminis- trative agent and registrar and transfer agent of the Fund, as the same may be amended from time to time.
Ancillary Liquid Assets	Ancillary liquid assets that may be held by the Fund in the form of bank deposits at sight, such as cash held in current ac- counts with a bank accessible at any time, in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets provided under article 41 (1) of the Law of 2010 or for a period of time strictly necessary in case of unfavourable market conditions.
	The holding of such ancillary liquid assets is limited to 20% of the net assets of a Sub-Fund and shall only be temporarily breached for a period of time strictly necessary when, be- cause of exceptionally unfavourable market conditions, cir- cumstances so require and where such breach is justified hav- ing regard to the interests of the Shareholders.
Appendix	An appendix to this Prospectus in which the name and the specifications of each Sub-Fund and each Class are described.
Articles of Incor- poration	The articles of incorporation of the Fund.
Benchmark Regu- lation	Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Direc- tives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014.
Board of Direc- tors	The board of directors of the Fund.

Business Day	Unless otherwise provided for in the relevant Appendix, a day on which banks and other financial institutions are fully open for business (other than Saturdays, Sundays and public holi- days) in Finland and Luxembourg. For the avoidance of doubt, half-closed bank business days in Finland and Luxembourg are considered as being closed for business.
Capitalisation Classes	The Classes with the suffix "cap.".
Central Adminis- trator	RBC Investor Services Bank S.A.
CET	Central European Time.
Circular 08/356	CSSF Circular 08/356 on the rules applicable to undertakings for collective investment when they employ certain techniques and instruments relating to Transferable Securities and Money Market Instruments, as amended.
Circular 14/592	Circular CSSF 14/592 on Guidelines of the European Securi- ties and Markets Authority (ESMA) on ETFs and other UCITS issues.
Class	One class of Shares of no par value in a Sub-Fund.
CoCos	Means contingent convertible instruments.
CRS	Common Reporting Standard.
CSSF	The <i>Commission de Surveillance du Secteur Financier</i> , the Luxembourg Supervisory Authority.
Currency Hedged Classes	The Classes with the suffix "(hedged)".
Depositary	RBC Investor Services Bank S.A.
Depositary Agree- ment	The agreement between the Depositary and the Fund pursu- ant to which the Depositary was appointed as the depositary bank and principal paying agent of the Fund, as the same may be amended from time to time.

Directive 2014/65/EU	Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU.
Directors	The members of the Board of Directors for the time being and any successors to such members as they may be appointed from time to time.
Distributing Clas- ses	The Classes with the suffix "distr.".
Distributor	Any person from time to time appointed or authorised to dis- tribute Shares.
EEA	The European Economic Area.
Eligible Market	A stock exchange or Regulated Market in one of the Eligible States.
Eligible State	Any Member State or any other state in Eastern and Western Europe, Asia, Africa, Australia, North America, South America and Oceania.
ESMA	The European Securities and Markets Authority (formerly the Committee of European Securities Regulators).
ESMA Guidelines 2014/937	ESMA Guidelines 2014/937 dated 1 August 2014 regarding Guidelines on ETFs and other UCITS issues.
Establishment Costs	Costs and expenses in relation to, without limitation, legal, re- search and development, accountancy and tax advice, in- curred in structuring, organizing and establishing the Fund, any intermediary vehicle intended for multiple use, or, where the context dictates, a Sub-Fund.
ETFs	Exchange Traded Funds.
EU	The European Union.
EU Savings Di- rective	Council Directive 2003/48/EC on the taxation of savings in- come, as amended.
EUR or Euro	The Euro, the official currency of the Eurozone.

Eurozone	The monetary union of the Member States who have adopted the Euro.
FATCA	The U.S. Foreign Account Tax Compliance Act.
FATF	The Financial Action Task Force established by the G-7 Sum- mit in Paris in July 1989 to examine measures to combat money laundering.
FATF State	Such country (as shall be reviewed and) deemed from time to time by the FATF to comply with the FATF regulations and criteria necessary to become a member country of FATF and to have acceptable standards of anti-money laundering legis- lation.
FDI	A financial derivative instrument.
First Class Insti- tution	Means first class financial institutions having their registered office in a Member State specialised in securities financing transactions and typically having a credit rating of at least A from Standard & Poor's or Fitch Ratings or similar rating from Moody's Investors Services.
Fund	Mandatum SICAV-UCITS.
Grand-Ducal Reg- ulation of 2008	The Grand-Ducal Regulation of 8 February 2008 relating to certain definitions of the Law of 2010.
Initial Offering Pe- riod	The date or period during which Shares of a Class are offered for subscription at the Initial Offering Price.
Initial Offering Price	The price at which a Class will be offered during the Initial Of- fering Period as specified in the relevant Appendix.
Institutional In- vestor	An institutional investor within the meaning of articles 174, 175 and 176 of the Law of 2010.
KIID	A key investor information document withing the meaning of articles 159 to 163 of the Law of 2010 and, from 1 January 2023, of articles 159 to 163-1 of the Law of 2010.
Law of 1915	The Luxembourg law of 10 August 1915 on commercial companies, as amended.

Law of 2010	The Luxembourg law dated 17 December 2010 concerning undertakings for collective investment, as amended.
Management Company	Mandatum Fund Management S.A.
Management Company Agree- ment	The agreement between the Fund and the Management Com- pany pursuant to which the Management Company was ap- pointed as the management company and domiciliary agent of the Fund, as the same may be amended from time to time.
Management Fee	The management company fee payable by the Fund to the Management Company.
Member State	A member state of the EU. The states that are contracting par- ties to the agreement creating the EEA other than the member states of the EU, within the limits set forth by this agreement and related acts, are considered as equivalent of member states of the EU.
Money Market In- struments	Money market instruments within the meaning of the Law of 2010 and the Grand-Ducal Regulation of 2008.
NAVadjusted	A limit set by a performance fee model. If the Net Asset Value exceeds the NAVadjusted, a Performance Fee shall be paid.
Net Asset Value	The net value of the assets less liabilities attributable to the Fund or a Sub-Fund or a Class, as applicable, and calculated in accordance with the provisions of this Prospectus.
OECD	Organisation for Economic Cooperation and Development.
Other UCI	An undertaking for collective investment within the meaning of Article 1, paragraph (2), points a) and b) of the UCITS Directive.
Performance Fee	The performance fee payable by the Fund to the Management Company, where applicable.
Performance Fee Classes	The Classes with the suffix "perf.".

Performance In- dex	An index which the performance of the Net Asset Value of a Class is compared to when calculating the Performance Fee as specified in the relevant Appendix.
Portfolio Manage- ment Agreement	The agreement between the Fund, the Management Com- pany and the Portfolio Manager pursuant to which the Portfo- lio Manager was appointed as the portfolio manager of the Fund, as the same may be amended from time to time.
Portfolio Manager	Mandatum Asset Management Ltd.
Precluded Person	A person who is precluded from holding Shares.
Principal Distribu- tor	Mandatum Asset Management Ltd.
Principal Distrib- uting Agreement	The agreement between the Fund, the Management Com- pany and the Principal Distributor pursuant to which the Prin- cipal Distributor was appointed as the principal distributor of the Fund, as the same may be amended from time to time.
Prospectus	The prospectus of the Fund drafted in accordance with the Law of 2010.
Redemption Price	Unless otherwise provided for in the relevant Appendix, the redemption price of Shares in a Class corresponds to the Net Asset Value of the relevant Class determined on the Valuation Date on which the application for redemption is accepted by the Central Administrator, reduced by any applicable redemption fee, as detailed for each Sub-Fund in the relevant Appendix.
Reference Cur- rency	The reference currency of the Fund as well as of each Sub- Fund and of each Class as specified in the relevant Appendix.
Register	The register of Shareholders of the Fund.
Regulated Market	 a regulated market within the meaning of article 4, item (21) of Directive 2014/65/EU; a market in a Member State which is regulated, operates regularly and is recognised and open to the public; a stock exchange or market in a non-Member State which is regulated, operates regularly and is recognised and open to the public.

Reports	The most recent, if any, annual and semi-annual reports of the Fund.
RESA	Recueil Electronique des Sociétés et Associations.
Securities Lend- ing Agent	RBC Investor Services Bank S.A. to which the Fund has out- sourced the performance of a securities lending activity in- cluding lending to borrowers, collateral management and reg- ulatory support.
SEK	The Swedish Krona, the lawful currency of the Kingdom of Sweden.
SFDR	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, as amended from time to time.
SFT Regulations	Regulation (EU) No 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending EMIR ("SFTR"), each Commission Delegated Regulation sup- plementing SFTR and each Commission Implementing Reg- ulation laying down implementing technical standards accord- ing to SFTR.
Shareholders	Holders of Shares.
Shares or Share	Shares or a share of the Fund.
Sub-Fund	A separate sub-fund established and maintained in respect of one or more Classes to which the assets and liabilities and income and expenditure attributable or allocated to each such Class or Classes will be applied or charged.
Subscription Price	Unless otherwise provided for in the relevant Appendix, the subscription price of the Shares in each Class, denominated in the Reference Currency of the Class indicated in the relevant Appendix, corresponds to the Net Asset Value of the relevant Class determined on the Valuation Date on which the subscription application is accepted, increased by any applicable initial sales charge, as detailed for each Sub-Fund in the relevant Appendix.

Transferable Se- curities	Transferable securities within the meaning of the Law of 2010 and the Grand-Ducal Regulation of 2008.
U.S. or United States	The United States of America, its territories and possessions and places subject to its jurisdiction, any state of the United States of America, the District of Columbia and the Common- wealth of Puerto Rico.
U.S. Securities Act	The United States Securities Act of 1933.
UCITS	An undertaking for collective investment in transferable secu- rities authorised pursuant to the UCITS Directive.
UCITS Directive	Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regula- tions and administrative provisions relating to undertakings for collective investment in transferable securities, as amended.
USD	The United States Dollar, the lawful currency of the United States.
U.S. Person	As defined in the section headed "General Information – Def- inition of a U.S. Person".
Valuation Date	Each day on which the Net Asset Value shall be determined, which, unless otherwise provided for in the relevant Appendix, shall be each Business Day.
Website	https://www.mandatumam.com/ucits.

The descriptions in the main body of this Prospectus are generally applicable to all Sub-Funds. However, where different descriptions or exceptions appear in the Appendix of a Sub-Fund, the descriptions or exceptions in such Appendix shall prevail. Thus, it is advisable to carefully review the relevant Appendices together with the main body of the Prospectus.

OVERVIEW OF THE FUND

Status and regulation

The Fund was incorporated for an unlimited period on 11 June 2018 as a public limited company (*société anonyme*) under the laws of the Grand Duchy of Luxembourg and qualifies as an open-ended investment company with variable capital (*société d'inves-tissement à capital variable*) under part I of the Law of 2010.

The deed of incorporation, including the Articles of Incorporation, was published on 20 June 2018 in the RESA.

The Fund is registered with the *Registre de Commerce et des Sociétés* of Luxembourg under number RCS Luxembourg B225330.

The Fund is authorised by the CSSF as a UCITS under the Law of 2010.

The Capital of the Fund

The Fund was incorporated with an initial capital of 30,000 Euro. The capital of the Fund shall be equal to the net assets of the Fund. The minimum capital of the Fund is 1,250,000 Euro.

The Sub-Funds

The Fund is a single legal entity with several Sub-Funds, each one representing a specific portfolio of assets and liabilities.

The Sub-Funds may be distinguished mainly by their investment objectives and policies, minimum investment per investor, fee structure, Reference Currency and any other characteristics that the Board of Directors may decide from time to time. The specifications of each Sub-Fund are described within the relevant Appendix. The Board of Directors may, at its discretion, at any time, decide to create additional Sub-Funds or to close an existing Sub-Fund and in such cases, this Prospectus will be updated accordingly.

For the purpose of the relations as between investors, each Sub-Fund will be deemed to be a separate entity. Pursuant to article 181 of the Law of 2010, the rights of investors and of creditors concerning a Sub-Fund or which have arisen in connection with the creation, operation or liquidation of a Sub-Fund are limited to the assets of that Sub-Fund. There is no cross liability between Sub-Funds.

The Fund retains the right to offer at its discretion certain Sub-Funds for purchase by specific investors.

The Classes

The Board of Directors may, at its sole discretion, decide to issue, within each Sub-Fund, separate Classes, which may carry different rights and obligations, *inter alia* with regard to distributions, their fee structure, their minimum initial subscription and holding amounts, their redemption rights, currencies or their target investors. Information on the availability and specific features of the Classes within each Sub-Fund are described within the relevant Appendix. A Class is expressed in its Reference Currency as set out within the relevant Appendix. The Fund retains the right to offer at its discretion only one or more Classes for purchase by specific investors.

The Board of Directors may also decide to create at any time additional Classes or to close an existing Class.

Shares of each Class will be issued with no par value in registered form only. There will be no issue of certificates for Shares.

All registered Shares issued by the Fund shall be registered in the Register. The registration of the Registered Shareholder's name in the Register evidences the Registered Shareholder's ownership of the Shares. Each Registered Shareholder will receive written confirmation of its shareholding in the Fund.

Fractions of Shares may be issued, up to four decimal places.

Each whole Share or fraction of a Share is entitled to participate within the relevant Class, in the profits of and distributions by, the relevant Sub-Fund and Fund and in its assets on liquidation or closure relating to the Sub-Fund or Class. In other respects, all Shares have the same rights and privileges, except as defined in the section "FEES AND EXPENSES". Each whole Share is entitled to one vote at all General Meetings and one vote relating to matters concerning a particular Sub-Fund or Class. Fractions of Shares will not entitle the holder to vote.

Shares are transferable and convertible subject to the prior written consent of the Board of Directors and in accordance with the section "CONVERSION OF SHARES" and "TRANSFERS".

BOARD OF DIRECTORS

Unless otherwise provided for under the Law of 1915, this Prospectus or the Articles of Incorporation, the Board of Directors shall have the broadest powers to perform all acts of administration and disposition of the Fund. All powers not expressly reserved under the Law of 1915 or the Articles of Incorporation to a general meeting of shareholders of the Fund or of any Sub-Fund, where applicable shall be exercisable by the Board of Directors.

In particular, subject to the restrictions contained in this Prospectus and the Law of 1915, the Board of Directors shall have power to implement the investment policies and borrowing restrictions, as well as the course of conduct of the management and business affairs of the Fund and to manage the investments for the account of the Fund with a view to achieving the investment objectives of each Sub-Fund as described within the relevant Appendix. The Board of Directors shall have complete discretion and full power, authority and right to represent and bind the Fund, either itself or wholly in part through its authorized agents or delegates.

The Board of Directors meets at least quarterly.

The Board of Directors is granted with the power to take any decisions on the following items (this list being not exhaustive and not limitative):

- appointment and replacement of the Depositary;
- appointment and replacement of the Management Company;
- suspension of the Net Asset Value calculation;
- deferral of redemption orders if on a given valuation date, it is necessary to redeem more than 10% of the Shares issued by any given Sub-Fund;
- the Fund's annual accounts and semi-annual accounts;
- all changes of the investment objectives and restrictions of the concerned Sub-Fund;
- launch of any new Sub-Fund or Class and liquidation / close of any existing Sub-Fund or Class, under the conditions set forth in this Prospectus.

MANAGEMENT COMPANY

Pursuant to the Management Company Agreement, Mandatum Fund Management S.A. was appointed as the management company of the Fund.

The Management Company was incorporated on 2 September 2014. The Management Company's articles of association were amended for the last time on 3 November 2021 and were published on 17 November 2021 in the RESA. The Management Company is registered with the *Registre de Commerce et des Sociétés* of Luxembourg under number RCS Luxembourg B 190.624 and is established for an undetermined period of time. Its fully paid-up share capital amounts to EUR 4,900,000.- (four million nine hundred thousand Euro).

At the date of the Prospectus, the Management Company does not manage other undertakings for collective investment.

Duties

The Management Company is governed by Chapter 15 of the Law of 2010 and, in this capacity, is responsible on a day-to-day basis, under the supervision of the Board of Directors, for the collective portfolio management of the Fund which, in accordance with appendix II of the Law of 2010, includes the following functions:

- (i) Investment management (including portfolio management and risk management)
- (ii) Administration
- (iii) Marketing.

The Management Company also provides domiciliary services to the Fund.

In accordance with the laws and regulations currently in force and with the prior approval of the Board of Directors, the Management Company is authorised to delegate, unless otherwise provided herein, all or part of its duties and powers to any person or company, which it may consider appropriate, it being understood that the Prospectus will be amended prior thereto and that the Management Company will remain entirely liable for the actions of such representative(s) and delegate(s).

The Management Company has delegated the administration functions to the Central Administrator and the portfolio management function to the Portfolio Manager.

Remuneration policy

The Management Company has in place a remuneration policy in line with the Law of 2010.

The Management Company has established and applies remuneration policies and practices that are consistent with, and promote, sound and effective risk management and that neither encourage risk taking which is inconsistent with the risk profiles of the Fund or the Articles of Incorporation nor impair compliance with the Management Company's duty to act in the best interest of the Fund.

The remuneration policy includes fixed and variable components of salaries and discretionary pension benefits and applies to those categories of staff, including senior management, risk takers, control functions and any employee receiving total remuneration that falls within the remuneration bracket of senior management and risk takers whose professional activities have a material impact on the risk profiles of the Management Company or of the Fund. The remuneration policy is in line with the business strategy, objectives, values and interests of the Management Company, the Fund and the Shareholders, and includes measures to avoid conflicts of interest.

Fixed and variable components of total remuneration are appropriately balanced and the fixed component represents a sufficiently high proportion of the total remuneration to allow the operation of a fully flexible policy on variable remuneration components, including the possibility to pay no variable remuneration component.

The remuneration policy shall be reviewed annually and every time deemed necessary in respect of regulatory changes, market changes or changes within the Management Company.

The Management Company has acknowledged that integration of sustainability risks as well as considering adverse sustainability impacts of its own operations are critical for the long-term success of the Mandatum Group. Therefore, the remuneration structure includes measures to ensure that the integration of sustainability risks and adverse sustainability impacts are taken into accordance account in the remuneration of relevant employees.

Details of the up-to-date remuneration policy, including, but not limited to, a description of how remuneration and benefits are calculated, the identity of persons responsible for awarding the remuneration and benefits are available on the Website. A paper copy of the remuneration policy will be made available free of charge upon request.

PORTFOLIO MANAGEMENT

Portfolio Manager

Mandatum Asset Management Ltd has been appointed portfolio manager of each Sub-Fund.

The Portfolio Manager is a wholly owned subsidiary of Mandatum Holding Ltd and it is authorized as investment firm under Directive 2004/39/EC by the Financial Supervision Authority (Finanssivalvonta) in Finland.

The Portfolio Manager will manage the investment and reinvestment of the assets of the Sub-Funds in accordance with the investment objectives and restrictions of the Fund and each particular Sub-Fund, under the overall responsibility of the Board of Directors.

Sub-Portfolio Manager

The Portfolio Manager may, with the prior written consent of the Management Company and at his own costs and responsibility, delegate the performance of part of or all of the management of the portfolio of a Sub-Fund to a Sub-Portfolio Manager.

The Sub-Portfolio Manager, if any, of each Sub-Fund is set out in the relevant Appendix.

Fourton Oy

Fourton Oy is registered for the purpose of asset management with and acts under the supervision of the Financial Supervision Authority (Finanssivalvonta) in Finland.

DEPOSITARY

Depositary's duties and functions

In accordance with the Law of 2010 and pursuant to the Depositary Agreement, the Fund has appointed RBC Investor Services Bank S.A. as depositary bank and principal paying agent of the Fund with responsibility for the

- (i) safekeeping of the assets,
- (ii) oversight duties,
- (iii) cash flow monitoring and
- (iv) principal paying agent functions.

The Depositary is registered with the *Registre de Commerce et des Sociétés* of Luxembourg under number RCS Luxembourg B.47192 and was incorporated in 1994 under the name "First European Transfer Agent". It is licensed to carry out banking activities under the terms of the Luxembourg law of 5 April 1993 on the financial sector, as amended, and specialises in custody, fund administration and related services.

The Depositary has been authorized by the Fund to delegate its safekeeping duties (i) to delegates in relation to other assets and (ii) to sub-custodians in relation to financial instruments and to open accounts with such sub-custodians. An up-to-date description of any safekeeping functions delegated by the Depositary and an up-to-date list of the delegates and sub-custodians may be obtained, upon request, from the Depositary or on the following website:

http://gmi.rbcits.com/rt/gss.nsf/Royal+Trust+Up-

dates+Mini/53A7E8D6A49C9AA285257FA8004999BF?opendocument.

The Depositary shall act honestly, fairly, professionally, independently and solely in the interests of the Fund and the Shareholders in the execution of its duties under the Law of 2010 and the Depositary Agreement.

Under its oversight duties, the Depositary must:

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

The Depositary will also ensure that cash flows are properly monitored in accordance with the Law of 2010 and the Depositary Agreement.

Depositary conflicts of interest

From time to time, conflicts of interest may arise between the Depositary and the delegates, for example where an appointed delegate is an affiliated group company which receives remuneration for another custodial service it provides to the Fund. On an ongoing basis, the Depositary analyses, based on applicable laws and regulations any potential conflicts of interest that may arise while carrying out its functions. Any identified potential conflict of interest is managed in accordance with the RBC's conflicts of interest policy which is subject to applicable laws and regulation for a credit institution according to and under the terms of the Luxembourg law of 5 April 1993 on the financial sector, as amended.

Further, potential conflicts of interest may arise from the provision by the Depositary and/or its affiliates of other services to the Fund, the Management Company and/or other parties. For example, the Depositary and/or its affiliates may act as the depositary, custodian and/or administrator of other funds. It is therefore possible that the Depositary (or any of its affiliates) may in the course of its business have conflicts or potential conflicts of interest with those of the Fund, the Management Company and/or other funds for which the Depositary (or any of its affiliates) act.

The Depositary has implemented and maintains a management of conflicts of interest policy, aiming namely at:

- a) Identifying and analysing potential situations where conflicts of interest may arise;
- b) Recording, managing and monitoring the conflicts of interest situations in:
 - implementing a functional and hierarchical segregation making sure that operations are carried out at arm's length from the Depositary business;

- implementing preventive measures to decline any activity giving rise to the conflict of interest such as:
 - o the Depositary and any third party to whom the custodian functions have been delegated do not accept any investment management mandates;
 - o the Depositary does not accept any delegation of the compliance and risk management functions;
 - the Depositary has a strong escalation process in place to ensure that regulatory breaches are notified to compliance which reports material breaches to senior management and the board of directors of the Depositary;
 - o a dedicated permanent internal audit department provides independent, objective risk assessment and evaluation of the adequacy and effectiveness of internal controls and governance processes.

The Depositary confirms that based on the above and as at the date of this Prospectus no potential situation of conflicts of interest could be identified. An up-to-date information on conflicts of interest policy referred to above may be obtained, upon request, from the Depositary or on the following website:

https://www.rbcits.com/AboutUs/CorporateGovernance/p_InformationOnConflictsOfInterestPolicy.aspx

ADMINISTRATION

Pursuant to the Administration Agency Agreement, RBC Investor Services Bank S.A. has been appointed as central administrative agent and registrar and transfer agent of the Fund.

The Central Administrator is responsible for processing the issue (registration), redemption and conversion of shares in the Fund, as well as for keeping official records of the Register. As Central Administrator, RBC Investor Services Bank S.A. is mainly responsible for the bookkeeping of the Fund and for the calculation of the Net Asset Value.

PRINCIPAL DISTRIBUTOR

General

Pursuant to the Principal Distribution Agreement, the Management Company has appointed Mandatum Asset Management Ltd as the principal distributor of the Fund. The Management Company may appoint from time to time one or more other entities with the prerequisite qualifications, competence, capacity and regulatory authorizations to distribute the Shares. The Principal Distributor is incorporated under the laws of Finland and duly authorised by the Financial Supervision Authority (Finanssivalvonta) in Finland to carry on its activities.

The Principal Distributor may accept applications for the issue, conversion or redemption of Shares and may also appoint sub-distributors (both affiliated and non-affiliated) authorised to that end to perform this function.

The sub-distributors will transmit all applications to the Central Administrator.

In case of a delegation to sub-distributors, the agreement between the Principal Distributor and any sub-distributor will be subject to and will comply with any applicable law and regulation, including with regard to anti-money laundering.

Use of Nominees

With respect to Shares to be offered to investors, the Fund expects that the Distributor(s) will offer to enter into arrangements with the relevant investors to provide nominee services to those investors in relation to the Shares or arrange for third party nominee service providers to provide such nominee services to the underlying investors.

All Distributors and nominee service providers must be (i) professionals of the financial sector of a FATF State which are subject under their local regulations to anti money laundering rules equivalent to those required by Luxembourg law or (ii) professionals established in a non-FATF State provided they are a subsidiary of a professional of the financial sector of a FATF State and they are obliged to follow anti money laundering and terrorism financing rules equivalent to those required by Luxembourg law as a result of internal group policies. Whilst and to the extent that such arrangements subsist, such underlying investors will not appear in the Register and will have no direct right of recourse against the Fund.

Unless the use of the services of a nominee are indispensable or even compulsory for legal, regulatory or compelling practical reasons, the investors have the possibility to directly invest in the Fund without using a nominee and the agreements between the nominee and the investors must include a termination clause which gives the investors the right to claim, at any time, direct title to the securities subscribed through the nominee.

EXTERNAL AUDITOR

The Fund has appointed Deloitte Audit S.à r.l. as its external auditor.

The Auditor reviews the accounting information contained in the annual report of the Fund and issues a report on the accounts of the Fund and, where applicable, its

remarks, all of which are reproduced in full in the annual report. The Auditor also issues *ad hoc* reports for specific events such as subscriptions or redemptions in kind, liquidation or merger of the Fund.

INVESTMENT OBJECTIVES AND POLICIES

The objective of the Fund is to spread the investment risks and to ensure for the Shareholders the benefit of the results of the management of its assets and to seek to achieve the objectives of each Sub-Fund as described within the relevant Appendix.

The investments of a Sub-Fund may be denominated in currencies other than the Reference Currency of that Sub-Fund. The value of those investments (when converted to the Reference Currency of that Sub-Fund) may fluctuate due to changes in exchange rates. The price of Shares and the income from them can go down as well as up and investors may not realise their initial investment.

There can be no guarantee that the investment objectives of the Sub-Funds will be achieved.

The investors' attention is drawn to the "RISK FACTORS ANNEX".

Where an investment policy requires a particular percentage to be invested in a specific type or range of investments, a Sub-Fund may hold the remaining percentage in cash or other Transferable Securities or Money Market Instruments that are consistent with its investment objectives, policies and strategies, including, but not limited to, bonds, shares of UCITS or other UCIs (subject to the 10% limit set forth in section VI. (1) under the heading "INVESTMENT RESTRICTIONS"), repurchase agreements or other instruments.

As a result of a defaulted borrower and/or of a restructuring of an investment, each Sub-Fund may hold up to 10% of its total net assets in assets other than those mentioned in the investment objective and policy or in the investment restrictions. If a Sub-Fund holds assets other than those mentioned in the investment objective and policy or in the investment restrictions as a result of a defaulted borrower and/or of a restructuring of an investment, it must adopt as a priority objective for its sales transactions the remedying of that situation, taking due account of the interests of the Shareholders.

Pre-contractual Sustainability Disclosure Pursuant to Articles 6 and 8 of SFDR

As of the date of this Prospectus, the majority of the Sub-Funds fall within the category of funds which promote environmental or social characteristics, as classified under SFDR. However, a number of Sub-Funds do not exhibit sufficient characteristics to be classified as such under SFDR.

As a result, sustainability risks are integrated into investment decisions at the Sub-Fund level and in the manner described in the relevant parts of the Appendices. Similarly, risk assessments on the likely impacts of sustainability risks on the returns of the Fund are also undertaken at the Sub-Fund level. The results of the risk assessment into likely impacts of sustainability risks on the returns of a particular Sub-Fund are set out in the relevant Appendix.

Where a Sub-Fund does promote environmental or social characteristics, information on how these characteristics are met is set out in the relevant Appendix.

PROFILE OF THE TYPICAL INVESTOR

It is recommended that potential investors in the Sub-Funds seek independent financial advice before making their investment decision.

The profile of the typical investor in each Sub-Fund is described in the Appendix of the relevant Sub-Fund.

RISK PROFILE

The risk profile of each Sub-Fund is described in the Appendix of the relevant Sub-Fund.

DIVIDEND POLICY

General

Distributions may be made out of any net investment income and realized capital gains save where not available, in which case distributions may be made out of the net assets of the relevant Sub-Fund.

Distributions declared but not paid within five years from their payment date will lapse and revert to the relevant Sub-Fund. No interest will be paid on the distributions declared but not claimed and held by the Fund for the account of the Shareholder(s) concerned. Investors should seek tax advice in respect of the tax treatment of distributions paid out of income and/or capital in the jurisdiction in which such investor resides or is domiciled for tax purposes.

Capitalisation Classes

Under normal circumstances, the Sub-Funds do not intend to declare and make distributions with respect to the net investment income and realised capital gains of the Capitalisation Classes. Accordingly, the Net Asset Value per Share of these Capitalisation Classes will reflect any net investment income or capital gains.

Distributing Classes

The Sub-Funds intend to make annual distributions with respect to the Distributing Classes, whether or not there are any net investment income and realized capital gains attributable to that Class. The Board of Directors aims for distributions to amount to 2 -4% of the Net Asset Value per Share, regardless of the level of investment income attributable to such Classes or the investment performance of such Classes. The exact amount to be distributed will be determined by the Board of Directors, and it is therefore possible that there could be circumstances when it is not possible to declare dividends or the level of the dividends is lower. Such distributions will be made out of any net investment income and realized capital gains save where not available, in which case distributions will be made out of the net assets of the relevant Sub-Fund.

No distribution may be made whenever it would result in the net assets of the Fund falling below the minimum provided for by the Law of 2010.

Dividends are declared on the last Valuation Date of March each year and are expected to be paid to the Shareholders within thirty (30) Business Days of the declaration.

The Classes within each Sub-Fund are not separate legal entities. As a consequence, if there are no net investment income and realized capital gains attributable to Distributing Classes, distributions will be made out of the net assets of the relevant Sub-Fund as a whole. All distributions made for a specific Class will be fully reflected in the Net Asset Value per Share of that Class and not have any impact on the Net Asset Values per Share of any other Classes.

INVESTING IN THE FUND

Eligible Investors

Shareholder eligibility requirements which apply to each Class are specified in the relevant Appendix to the Prospectus in respect of the relevant Sub-Fund.

The Board of Directors has the power to accept and reject subscriptions at its discretion.

Investors must represent and warrant to the Fund that, among other things, they are able to acquire Shares without violating applicable laws especially the rules and regulations aiming to prevent money laundering. The Fund will not knowingly offer or sell Shares to any investors to whom such offer or sale would be unlawful.

Shareholders will be required to hold harmless and indemnify the Fund, the Board of Directors, the Shareholders and the Fund's agents for any damages, losses and expenses resulting from or connected to such holding where the relevant Shareholder has

provided misleading or untrue documentation or has made misleading or untrue representations.

Restrictions on Shareholding

The Board of Directors shall have the power to impose or relax such restrictions on any Class or Sub-Fund as it may think necessary for the purpose of ensuring that no Shares in the Fund or no Shares of any Sub-Fund in the Fund are acquired or held by or on behalf of:

- (a) any person in breach of the law or requirements of any country or governmental or regulatory authority (if the Board of Directors shall have determined that any of them, the Fund, any manager of the Fund's assets, any of the Fund's portfolio managers or advisers would suffer any disadvantage as a result of such breach), or
- (b) any person in circumstances which in the opinion of the Board of Directors might result in the Fund or its shareholders incurring any liability to taxation or suffering any other pecuniary disadvantage which they might not otherwise have incurred or suffered, including a requirement to register under any securities or investment or similar laws or requirements of any country or authority, or market timing and/or late trading practices.

More specifically, the Fund may restrict or prevent the ownership of Shares in the Fund by any person, firm or corporate body, and, without limitation, by any U.S. Person.

The Fund may:

- 1. decline to issue any Share where it appears to it that such registration would or might result in such Share being directly or beneficially owned by a Precluded Person;
- 2. at any time require any person whose name is entered in the Register to provide it with any information, supported by affidavit, which it may consider necessary for the purpose of determining whether or not beneficial ownership of such shareholder's Shares rests in a Precluded Person;
- 3. where it appears to the Fund that any person, who is a Precluded Person, either alone or in conjunction with any other person is a beneficial or registered owner of Shares, compulsorily redeem from any such shareholder all Shares held by such shareholder as set out in the Articles of Incorporation; and
- 4. decline to accept the vote of any Precluded Person at any general meeting of shareholders of the Fund.

Offering of Shares

All Shares issued will be in registered form and the Share register constitutes proof of ownership.

Shares may normally be bought from or sold to the Fund at buying and selling prices based on the Net Asset Value of the relevant Shares. The Subscription Price is set out below under the heading "SUBSCRIPTIONS" and the Redemption Price is set out below under the heading "REDEMPTIONS".

The Fund may not issue warrants, options or other rights to subscribe for Shares to the Shareholders or to other persons.

The right is reserved by the Fund to reject any application for Shares in whole or in part. If an application is rejected, the application money or balance thereof will be returned at the risk of the applicant and without interest as soon as reasonably practicable at the cost of the applicant.

The Fund may, at any time and at its discretion, suspend or limit the issue of Shares in a Sub-Fund to potential investors temporarily or permanently both in particular cases and/or in particular countries or areas.

Performance of a Sub-Fund can be affected by the Sub-Fund's size. With this in mind and depending upon market conditions, the Board of Directors may consider the imposition of periods in which Classes are closed to new investors and/or further investment where they consider this will be beneficial to the Sub-Fund as a whole.

As of the date of the Prospectus, the Fund is not accepting applications to invest from U.S Persons or from non-U.S. Persons for the benefit or account of, directly or indirectly, a U.S. Person, but reserves the right to do so in the future.

Late Trading and Market Timing

As per CSSF Circular 04/146, late trading is not permitted as it violates the provisions of the Prospectus. The Board of Directors will use its reasonable endeavours to ensure that late trading cannot take place. The effectiveness of these procedures is closely monitored.

The Fund does not knowingly allow investments which are associated with market timing practices, as such practices may adversely affect the interests of all Shareholders.

As per CSSF Circular 04/146, market timing is defined as an arbitrage method through which an investor systematically subscribes and redeems or converts units or shares of the same undertaking for collective investment within a short time period, by taking advantage of time differences and/or imperfections or deficiencies in the method of determination of the net asset values of the sub-funds of the undertaking for collective investment.

Opportunities may arise for the market timer either if the Net Asset Values of the Sub-Funds are calculated on the basis of market prices which are no longer up to date (stale prices) or if the Sub-Funds accept orders on a Business Day after calculating the Net Asset Value for that Business Day.

Market timing practices are not acceptable as they may affect the performance of the Fund through an increase in costs and/or dilution in Net Asset Value. The Fund is not designed for investors with short-term investment horizons. Activities which may adversely affect the interests of the Shareholders (for example that disrupt investment strategies or impact expenses) such as market timing or the use of the Fund as an excessive or short-term trading vehicle are not permitted.

While recognising that Shareholders may have legitimate needs to adjust their investments from time to time, the Board of Directors, in at discretion may, if it deems that such activities adversely affect the interests of the Shareholders, take action as appropriate to deter such activities.

Accordingly, if the Fund determines or suspects that a Shareholder has engaged in such activities, the Fund may suspend, cancel, reject or otherwise deal with that Shareholder's subscription, redemption or conversion applications and take any action or measures as appropriate or necessary to protect the Fund and the Shareholders.

Luxembourg Anti-Money Laundering Regulations

The Fund, the Central Administrator and their agents will comply with Luxembourg laws and regulations aimed at preventing the misuse of the financial system for the purpose of money laundering and terrorist financing, such as, but not limited to:

- the law of 12 November 2004, as amended,
- the Grand-Ducal regulation of 1 February 2010 as amended,
- the law of 19 December 2020 and the Grand-Ducal regulation of 29 October 2010 as amended,
- the relevant circulars and regulations of the CSSF (especially CSSF Regulation No 12-02 of 14 December 2012 as amended, CSSF Circular 13/556 and any CSSF regulation or circular amending, supplementing or replacing them).

Prospective investors must provide adequate proof of identity to the Central Administrator or its agents (as the case may be) and meet such other requirements as the Fund may deem necessary. The Central Administrator is also required to verify the source of the money invested or transmitted by investors or their agents as may be required under Luxembourg law and according to the applicable identification procedure.

Distributors and nominees, if any, will comply with applicable anti money laundering laws and regulations in force in each country of distribution and will also comply with any additional requirements as requested by the Fund, the Central Administrator and their agents.

PERSONAL DATA

The Fund processes personal data of its Shareholders and persons connected to Shareholders who are Institutional Investors. Personal data is processed for the purposes of managing the Fund, Shareholder holdings and Shareholder relationships, as well as to fulfil the statutory obligations of the Fund. Personal data is also processed for the purposes of marketing. For these kinds of processing of personal data, the Fund is the data processor referred to in the applicable data protection legislation.

The legal grounds for the processing of personal data for the purposes of managing the Fund are the legal obligation of the Fund and the performance of a contract between the Shareholder and the Fund. The processing of personal data for marketing purposes is based on pursuing the legitimate interests of the controller.

In addition to the Fund, other entities taking part in managing or providing other services to the Fund (including, but not limited to the Management Company, Portfolio Manager, Central Administrator, Depositary, Principal Distributor, Distributor or their sub-processors) may also process personal data of the Shareholders. When these entities process personal data of Shareholders on behalf of the Fund, they are considered data processors acting on behalf of the Fund under General Data Protection Regulation.

The Fund may disclose personal data of Shareholders to external recipients as allowed or as required by law. Personal data may be disclosed for example to authorities and to companies involved in managing the fund, such as the Depositary and the Central Administrator. These recipients of personal data are data controllers themselves.

The personal data of Shareholders is stored according to the statutory requirements applicable to the Fund. Unless required by law to store the data longer, personal data is stored at longest for 10 years after the Shareholder has redeemed all her Shares in the Fund.

Potential investors and Shareholders can find more information about the processing of personal data and Shareholders' rights regarding the processing of personal data in the privacy policy of the Fund and the Management Company. The privacy policy is available on the Website.

CLASSES OF SHARES

The Fund may issue different Classes of Shares, as determined by the Board of Directors which may differ *inter alia* in their fee structure and distribution policy applying to them. The Classes for each Sub-Fund are indicated in the relevant Appendix.

The amounts invested in the various Classes of each Sub-Fund are themselves invested in a common underlying portfolio of investments. The Board of Directors may decide to create further Classes with different characteristics (such as hedged classes, different charging structures, different minimum amounts of investment or different currencies of denomination), and in such cases, the Prospectus will be updated accordingly.

Currency Hedged Classes

Currency Hedged Classes are Classes of a Sub-Fund denominated in currencies other than the Reference Currency of the Sub-Fund and which have adopted a foreign exchange hedging policy against the Reference Currency of that Class.

Institutional Classes

If it appears at any time that a holder of Shares of a Sub-Fund or Class reserved to Institutional Investors is not an Institutional Investor, the Board of Directors will convert the relevant Shares into Shares of a Sub-Fund or Class which is not restricted to Institutional Investors or compulsorily redeem the relevant Shares. The Board of Directors will refuse to give effect to any transfer of Shares and consequently refuse any transfer of Shares to be entered into the Register in circumstances where such transfer would result in a situation where Shares of a Sub-Fund or Class restricted to Institutional Investors would, upon such transfer, be held by a person not qualifying as an Institutional Investor. Investors should further refer to article 8 of the Articles of Incorporation.

Performance Fee Classes

Performance Fee Classes of a Sub-Fund will be subject to a Performance Fee calculated in accordance with the formulas set out under the heading "FEES AND EX-PENSES" and as set out in the relevant Appendix.

SUBSCRIPTIONS

Initial Offering Period

During the Initial Offering Period, Shares will be issued at the Initial Offering Price per Share.

Payment must be received by a date and time specified by the Board of Directors, at which point the application will be accepted provided that it complies with the provisions herein.

As from the first Business Day following the Initial Offering Period, Shares may be issued and redeemed according to the normal procedures described below.

Minimum Initial Subscription and Holding Amounts

The Board of Directors will set and waive in its sole discretion a minimum initial subscription amount and a minimum ongoing holding amount per Class in each Sub-Fund for each registered Shareholder, to be specified in the relevant Appendix.

Subscription Procedure

Applicants wishing to subscribe for Shares after the Initial Offering Period for a particular Class should complete an application for subscription form and send it to the Central Administrator together with all required identification documents. Should such documents not be provided, the Central Administrator will request such information and documentation as is necessary to verify the identity of an applicant. Shares will not be issued until such time as the Central Administrator has received and is satisfied with all the information and documentation requested to verify the identity of the applicant.

The KIID for the relevant Class for which a subscription application is being made must be read prior to any subscription.

The Board of Directors may discontinue the issue of new Shares in any Sub-Fund or Class at any time in its sole discretion.

Share fractions may be issued up to four decimal places.

Fractions of Shares do not confer voting rights at any meeting of Shareholders but entitle the holder thereof to a correspondent amount in case of payment of dividend distribution, redemption proceeds or liquidation proceeds.

Prior Notice Requirements

Applications for subscription must be received in proper form by the Central Administrator by 2 p.m. CET on the relevant Valuation Date on which the investor is seeking to be issued Shares, subject to the discretion of the Board of Directors to determine otherwise. Subscription applications must mention the cash amount being invested.

Subject to the discretion of the Board of Directors to determine otherwise, subscription applications received and approved, or deemed to be received and approved, by the

Central Administrator after 2 p.m. CET on the relevant Valuation Date will be deemed to have been received for the next Valuation Date.

The Board of Directors may at its discretion refuse to accept any application for subscription received after the date on which such application is due.

Retail Investors' or retail Shareholders' subscriptions in the Fund will be handled on an actual mode basis which means that the subscription will be registered once the cleared subscription monies are received by the Fund or by the Depositary.

Subscriptions from Institutional Investors or distributors (whether on behalf of Institutional Investors or non-Institutional Investors) will be handled on a contractual mode basis, which means that the Shares are provisionally allotted to the relevant investors and/or the Shareholders on the Valuation Date, and the subscription price is provisionally credited to the Fund on the pre-determined payment date (the "Contractual Settlement Date"). Contrary to the actual mode basis, the transaction will be cleared at the Contractual Settlement Date.

Subscription Price per Share

After any Initial Offering Period, the Subscription Price per Share of each Class is the Net Asset Value per Share of such Class determined as at the Valuation Date on which the application has been accepted, increased by any applicable subscription charge.

Pursuant to the Articles of Incorporation, in determining the Subscription Price per Share, the Board of Directors has discretion to increase the Net Asset Value per Share by the addition of appropriate fiscal and purchase charges. The details of such fiscal and purchase charges (if any) will be disclosed in the relevant Appendix.

Payment of the Subscription Price

The Subscription Price, payable in the Reference Currency of the relevant Class, must be paid by the prospective Shareholder and received in cleared funds (net of all bank charges) by the Depositary within two (2) Business Days of the relevant Valuation Date for which the subscription application was received by the Central Administrator, subject to the discretion of the Board of Directors to determine otherwise.

The Subscription Price will be unknown at the time that the subscription application is made.

Unless otherwise specified in the relevant Appendix, no interest will be paid on payments received prior to the closing date of any Initial Offering Period or prior to any Valuation Date.
The Board of Directors reserves the right to accept subscriptions by way of *in specie* transfer of assets. In exercising their discretion, the Board of Directors will take into account the investment objective, philosophy and approach of the Sub-Fund and whether the proposed *in specie* assets comply with those criteria including the permitted investments of the Sub-Fund. In order for Shares to be issued further to an *in specie* subscription, the transfer of the legal ownership of the assets to the Fund must have been completed and the assets in question must have already been valued. In the specific case of an *in specie* transfer of shares or units of an undertaking for collective investment (including, without limitation, mutual investment funds, hedge funds, futures funds, etc.), Shares will only be issued once the name of the Fund or the Sub-Fund has been entered into in the register of shares or units of such undertaking have been valued on the basis of the next net asset value to be calculated after the aforementioned entry.

Any *in specie* subscription must meet the investment criteria and the valuation will be subject to a special audit report by the Auditors. Upon receipt of that verification and a properly completed application form, the Central Administrator will allot the requisite number of Shares in the normal manner. The Board of Directors reserves the right to decline to register any person on the register of Shareholders until the subscriber has been able to prove title to the assets in question. The subscriber shall be responsible for all custody and other costs involved in changing the ownership of the relevant assets unless the Board of Directors otherwise agree.

Acceptance of Subscriptions

The Board of Directors reserves the right to accept or refuse, at its discretion, any application to subscribe for Shares in whole or in part, in which case a notice of rejection will be sent to the applicant and the subscription amount re-transferred to the applicant's bank account with no interest, less applicable expenses of the Central Administrator, if any, within ten (10) Business Days as from the sending of the notice of rejection.

Suspension of Subscriptions

The Board of Directors may suspend the issue of Shares of any Sub-Fund or Class whenever the determination of the Net Asset Value of such Sub-Fund or Class is suspended.

Irrevocability of Subscriptions

Any request for subscriptions shall be irrevocable and may not be withdrawn by any investor in any circumstance, except in the event of a suspension of the determination of the Net Asset Value of the relevant Sub-Fund or Class. In the event of a suspension,

the Fund will process the subscription requests on the first applicable Valuation Date following the end of the period of suspension.

Confirmation of Subscriptions

The Central Administrator will normally send a contract note confirming subscription by facsimile, email or post to the applicant as soon as reasonably practicable and normally within three Business Days following the relevant Valuation Date. No formal Share certificates will be issued.

REDEMPTIONS

Redemption Procedure

Subject to the restrictions provided in the Prospectus and the relevant Appendix, each Shareholder may apply for the redemption of all or part of his Shares or for a fixed amount on each Valuation Date at the Net Asset Value per Share determined as at that Valuation Date. If the value of a Shareholder's holding on the relevant Valuation Date following the requested redemption would be less than the specified minimum holding amount, the Shareholder will be deemed to have requested the redemption of all of his Shares, subject to the Board's discretion to determine otherwise.

Applicants who wish to redeem must send the application to the Central Administrator, in accordance with the paragraph "Prior Notice Requirements" in the section "Redemptions" of the Offering Document.

Prior Notice for Redemptions

Each Shareholder may apply for the redemption of all or part of his Shares or for a fixed amount. If the value of a Shareholder's holding on the relevant Valuation Date following the requested redemption would be less than the specified minimum holding amount detailed in respect of each Class above, the Shareholder will be deemed to have requested the redemption of all of his Shares.

Unless otherwise provided for in the relevant Appendix, no application for redemption will be accepted unless the written application is received by the Central Administrator at the latest at 2 p.m. CET on the relevant Valuation Date (or in such form and by such earlier or later date and/or time as the Board of Directors may in its discretion determine, provided that all redemption applications are received prior to the relevant Valuation Date). Applications for redemption received after such deadline will be dealt with on the following Valuation Date.

The Board of Directors will normally, subject to its discretion to decide otherwise, refuse to accept any application for redemption received after the date on which such application is due as specified in the relevant Appendix. Such applications will be dealt with on the next Valuation Date.

The Central Administrator will normally send a contract note confirming redemption by facsimile, email or post to the Shareholder as soon as reasonably practicable and normally within three Business Days following the relevant Valuation Date.

Minimum Holding Amount

If as a result of a redemption, the value of a Shareholder's holding would become less than the minimum holding amount specified in the relevant Appendix, the Board of Directors may decide that the redeeming Shareholder shall be deemed to have requested the conversion of the rest of his Shares into Shares of the Class of the same Sub-Fund with a lower minimum holding amount (subject to the fulfilment of any requirements imposed on such Class). If the redeeming Shareholder was holding Shares of the Class with the lowest minimum holding amount, the Board of Directors may decide that the redeeming Shareholder shall be deemed to have requested the redemption of all of his Shares. The Board of Directors may also at any time decide to compulsorily redeem all Shares from any Shareholder whose holding is less than the minimum holding amount specified in the relevant Appendix. Before any such compulsory redemption or conversion, each Shareholder concerned will receive one month's prior notice to increase his holding above the applicable minimum holding amount at the applicable Net Asset Value per Share.

Redemption Fee

In each Class of each Sub-Fund, a redemption fee retained by the Sub-Fund for the benefit of remaining investors, as specified in the relevant Appendix, may be charged or waived in whole or in part at the discretion of the Board of Directors, as specified in the relevant Appendix, provided however that, in respect of all redemption requests for a same Class of a Sub-Fund dealt with on the same Valuation Date, the same redemption fee (if any) will be applied and the equal treatment of Shareholders is assured.

Redemption Price per Share

Shares may not be redeemed during their Initial Offering Period. After any Initial Offering Period, unless otherwise provided in the relevant Appendix, the Redemption Price per Share of each Class is the Net Asset Value per Share of such Class determined as at the Valuation Date on which the redemption application has been accepted, reduced by any applicable redemption fee.

Payment of Redemption Proceeds

Redemption proceeds will be typically settled within two (2) Business Days following the relevant Valuation Date for which the redemption request was received.

In case the Shareholder account is not compliant with the applicable anti-money laundering requirements, the settlement of redemption proceeds will be delayed until such time that the Central Administrator is satisfied that the status on the account is compliant with the applicable anti-money laundering requirements.

The Redemption Price will be unknown at the time at which the redemption request is made.

In exceptional circumstances, the Board of Directors may, with the prior consent of a redeeming Shareholder, satisfy a redemption request *in specie* by transferring underlying investments to such redeeming Shareholder. The underlying investments will be equal in value to the value of the holding to be redeemed. The nature and type of underlying investments to be transferred in such case shall be determined on a fair and reasonable basis and without prejudicing the interests of the other Shareholders. The valuation used in respect of such transfers shall be confirmed by a special report of the Auditors, the cost of which shall be borne by the redeeming Shareholder. The Board of Directors will ensure that the transfer of assets *in specie* in cases of such redemptions will not be detrimental to the remaining Shareholders by pro-rating the redemption *in specie* as far as possible across the entire portfolio of securities. The specific costs for such redemptions *in specie* will be borne by the redeeming Shareholder.

Suspension of Redemptions

Redemption of Shares of any Sub-Fund or Class may be suspended whenever the determination of the Net Asset Value of such Sub-Fund or Class is suspended.

Irrevocability of Redemption Requests

Applications for redemptions of Shares are irrevocable and may not be withdrawn by any Shareholder, except in the event of a suspension of the determination of the Net Asset Value of the relevant Sub-Fund. In the event of such a suspension, the Shareholders of the relevant Sub-Fund, who have made an application for redemption of their Shares, may give written notice to the Fund that they wish to withdraw their application. Furthermore, the Board of Directors may at its discretion, taking due account of the principle of equal treatment among Shareholders, decide to accept any withdrawal of an application for redemption.

Limitation on Redemption Requests

Unless otherwise specified in the relevant Appendix, if the redemption of Shares in a Sub-Fund or in a Class on any Valuation Date exceeds 10% of the Net Asset Value of that Sub-Fund or that Class in issue that Valuation Date, the Board of Directors may restrict the number of redemptions to 10% (or such greater percentage allowing a greater proportion of redemptions as the Board of Directors may determine) of the Net Asset Value of the Shares in that Sub-Fund or that Class in issue on that Valuation Date. To safeguard the interests of the Shareholders, this limitation will apply to all Shareholders who have requested the redemption (or conversion) of their Shares in a Sub-Fund or a Class on a Valuation Date *pro rata* of the Shares in the Sub-Fund or the Class tendered by them for redemption (or conversion). Any redemptions (or conversion) not carried out on that Valuation Date will be carried forward to the next Valuation Date. They will be dealt with on that Valuation Date under the same limitations, but in priority according to the date of receipt of the application for redemption (or conversion). If redemption (or conversion) requests are carried forward, the Fund will inform the Shareholders affected thereby.

Compulsory Redemption

The Board of Directors will have the right to compulsorily redeem a holding of Shares where the aggregate Net Asset Value of those Shares is less than the minimum amount indicated in the relevant Appendix.

The Board of Directors shall have the power to compulsorily redeem Shares to comply with the restrictions of shareholding set out above under "INVESTING IN THE FUND - Restrictions on Shareholding".

The Board of Directors is also entitled to compulsorily redeem all Shares of a shareholder where:

- 1. a shareholder has transferred or attempted to transfer any portion of its Shares in violation of the Prospectus and/or of these Articles of Incorporation; or
- 2. any of the representations or warranties made by a shareholder in connection with the acquisition of Shares was not true when made or has ceased to be true; or
- 3. a shareholder (i) has filed a voluntary petition in bankruptcy; (ii) has been adjudicated bankrupt or insolvent, or has had entered against it an order for relief, in any bankruptcy or insolvency proceeding; (iii) has filed a petition or answer seeking any reorganization, arrangement, composition, readjustment, liquidation, dissolution or similar relief under any statute, law or regulation; (iv) has filed an answer or other pleading admitting or failing to contest the material allegations of a petition filed against him in any proceeding of this nature; or (v) has sought, consented to or acquiesced in the appointment of a trustee,

receiver or liquidator of such shareholder or of all or any substantial part of the shareholder's properties; or

4. in any other circumstances in which the Board of Directors determines in its absolute discretion that such compulsory redemption would avoid material legal, pecuniary, tax, economic, proprietary, administrative or other disadvantages to the Fund.

The Fund may further cause Shares to be redeemed if such Shares are held by/or for the account and/or on behalf of (i) a person that does not provide the necessary information requested by the Fund in order to comply with legal and regulatory rules such as but not limited to the FATCA provisions or (ii) a person who is deemed to cause potential financial risk for the Fund.

CONVERSION OF SHARES

General

Unless otherwise provided for in the relevant Appendix and subject to the qualifications for investment being met, Shares of a Class may be converted into Shares of another existing Class within the same or a different Sub-Fund.

No conversion of Shares into Shares of another existing Class within the same or a different Sub-Fund may be made at any time when issues and redemptions of Shares in either or both of the relevant Classes are suspended. A conversion of Shares may give rise to a tax liability. For additional information on conversion, Shareholders should contact their intermediary.

Irrevocability of Conversion Requests

Any request for conversions shall be irrevocable and may not be withdrawn by any Shareholder in any circumstances, except in the event of a suspension of the determination of the Net Asset Value of the relevant Sub-Fund or Class. In the event of a suspension, the Fund will process the conversion requests on the first applicable Valuation Date following the end of the period of suspension.

Conditions

Acceptance of any application for conversion is contingent upon the satisfaction of any conditions, including any minimum subscription and prior notice requirements, applicable to the Class into which the conversion is to be effected.

Minimum Holding Amount

If as a result of a conversion, the value of a Shareholder's holding in the new Class would be less than any minimum holding amount specified in the relevant Appendix, the Board of Directors may decide not to accept the conversion request.

If as a result of a conversion, the value of a Shareholder's holding in the original Class would become less than the minimum subscription amount specified in the relevant Appendix, the Board of Directors may decide that such Shareholder shall be deemed to have requested the conversion of all of his Shares in the original Class.

Prior Notice for Conversions

The Shareholders may convert their Shares on each Valuation Date.

Unless otherwise provided for in the relevant Appendix, conversion applications must be received in proper form by the Central Administrator no later than 2 p.m. CET on the relevant Valuation Date on which the Shareholder is seeking to be converted from one Class to another, unless otherwise determined by the Board of Directors at their discretion.

The Shareholders must read the KIID relevant to the Class for which they are applying to convert before submitting a conversion application.

Subject to the discretion of the Board of Directors to determine otherwise and the relevant Appendix, conversion requests received or deemed to be received by the Central Administrator later than 2 p.m. CET on the relevant Valuation Date will be held over until the next Valuation Date and Shares will then be converted at the price applicable to that next Valuation Date.

Conversion Value

The number of full and fractional Shares issued upon conversion is determined on the basis of the Net Asset Value per Share of each Class concerned on the common Valuation Date on which the conversion request is effected. If there is no common Valuation Date for any two Classes, the conversion is made on the basis of the Net Asset Value calculated on the following Valuation Date of the Class of Shares to be converted and on the following Valuation Date of the Class into which conversion is requested, or on such other days as the Board of Directors may reasonably determine.

TRANSFERS

All transfers of Shares must be effected by written instrument signed by the transferor and the transferee and containing the name of the transferee and the number of Shares being transferred, or in such other manner or form and subject to such evidence as the Board of Directors and the Central Administrator shall consider appropriate. A specific transfer form can be obtained upon request from the Central Administrator. The transfer will take effect upon registration of the transferee as holder of the Shares. The transferee will be required to give the warranties contained in the Fund's application form and thereafter hold Shares with a minimum value, as set out in the Appendix of the relevant Sub-Fund, and must also provide such additional information as the Central Administrator or the Fund deem necessary. The Board of Directors may set different levels for minimum investments or minimum transactions for investors in certain countries for investment in different categories of each Sub-Fund, if the Board of Directors decides to introduce this facility.

The Board of Directors may restrict transfers of Shares to any U.S. Persons. In addition, the Board of Directors may restrict the transfer of Shares to any "private fund" (as defined under the U.S. Investment Advisers Act of 1940) that accepts investments from U.S. Persons or to any investor holding Shares for the account or benefit of a U.S. Person. Further, the Board of Directors may require the transfer of Shares which are held by any such person or any other person holding Shares where such Shares are owned directly or beneficially by any person who, by virtue of the holding concerned gives rise to a regulatory, pecuniary, legal, taxation or material administrative disadvantage to the Fund or its Shareholders.

FEES AND EXPENSES

Subscription, Redemption and Conversion Fees

A subscription, redemption and/or conversion fee may be applied in respect of a Sub-Fund, as specified in the relevant Appendix.

Management Fee

The Fund will pay out of the assets of the relevant Sub-Fund the fees of the Management Company specified in the relevant Appendix.

No Management Fee is paid out of the assets of the Class X Shares at the level of the Fund. Investors wishing to subscribe in Class X Shares must conclude a specific remuneration agreement with the Fund, the Management Company or the Portfolio Manager.

Portfolio Manager Fee

The Management Company will pay the fees of the Portfolio Manager.

Sub-Portfolio Manager Fee

The Portfolio Manager will pay the fees of the Sub-Portfolio Manager.

Performance Fee

The Management Company will receive a Performance Fee in respect of Performance Fee Classes, and will pay the received Performance Fee to the Portfolio Manager as a part of the Portfolio Manager Fee.

No Performance Fee is paid out of the assets of the Class X Shares at the level of the Fund. Investors wishing to subscribe in Class X Shares must conclude a specific remuneration agreement with the Fund, the Management Company or the Portfolio Manager.

The Performance Fee shall be calculated and accrued daily. The Performance Fee will be crystallised on an annual basis. The accrued amount, if any, of the Performance Fee will be paid to the Management Company within two weeks after the end of each financial year. If any Shares are redeemed during the financial year, any Performance Fee accrued during this period, in respect of those Shares, will become payable to the Management Company within two weeks after the end of the financial year during which the redemption took place.

A daily accrual shall only be made if the NAVadjusted is exceeded.

The Performance Fee balance will be reduced if the NAV_T on a given Valuation Date is above NAVadjusted_T on such Valuation Date but lower than the NAV_T of the previous Valuation Date for which a Performance Fee was accrued. No Performance Fee will be paid unless the NAV_T on the last Valuation Date of the financial year is higher than the NAVadjusted, except if any Shares are redeemed as indicated above.

If on any Valuation Date the NAV_T is below the NAVadjusted_T, no Performance Fee shall be accrued for that Valuation Date and any Performance Fee balance will be totally reversed. No Performance Fee shall be accrued on subsequent Valuation Dates until the NAV_T is above NAVadjusted_T on any such Valuation Date.

The Net Asset Value which serves as a basis for the calculation of the Performance Fee is net of all fees.

The performance reference period is equal to the whole life of the Performance Fee Class, and it cannot be reset. This ensures that the Performance Fee cannot be accrued or paid more than once for the same level of performance. Any underperformance previously incurred during the performance reference period should be recovered before the Performance Fee becomes payable.

NAVadjusted will take into account the effect of new subscriptions received and redemptions requested since the start of the financial year. The adjustment, FlowAdj, is proportional to the number of Shares, and the difference between Subscription Price and the Net Asset Value per Share previously achieved in the relevant Class when a Performance Fee was crystallized; or the Initial Offering Price if no Performance Fee has been paid.

$FlowAdj_{T} = \frac{NAV_{CRYST} \times (Number of Shares_{CRYST} - Redeemed) + NAV_{SUBS} \times Subscribed}{NAV_{SUBS} \times Subscribed}$	
Number of Shares _T × NAV _{CRYST}	
<u>Where</u> NAV _{SUBS}	Subscription Price.
NAVCRYST	The Net Asset Value per Share previously achieved in the relevant Class when a Performance Fee was crys- tallized; or the Initial Offering Price if no Performance Fee has been paid.
Redeemed	Number of Shares redeemed since the start of the fi- nancial year.
Subscribed	Number of Shares subscribed.

The Performance Fee calculations are disclosed for each Sub-Fund in the relevant Appendix.

Depositary Fee

The Fund will pay out of the assets of the relevant Sub-Fund to the Depositary annual fees which will amount to a maximum percentage of 0.30 % of the Net Asset Value per Sub-Fund depending on the total net assets of the Fund with an annual minimum fee per Fund of EUR 32,000.-. These fees are payable on a monthly basis and do not include any transaction related fees and costs of sub-depositaries or similar agents. The Depositary is also entitled to be reimbursed of reasonable disbursements and out of pocket expenses which are not included in the above mentioned fees.

The amount paid by the Fund to the Depositary will be mentioned in the annual report of the Fund.

Administrative Fee

The fees of the Central Administrator relating to its services under the Administration Agency Agreement will be borne by the Management Company.

Value Added Taxes

Fees as indicated in the Prospectus are exclusive of value added tax, which, if chargeable, will be in addition at the rate for the time being applicable.

Directors' Fees

The remuneration of the Directors, if any, will be borne by the Management Company.

Auditor's Fees

The fees of the Auditor will be borne by the Management Company.

Establishment Costs

Establishment Costs will be borne by the Management Company or any affiliated or associated company thereof.

Operational Expenses

The Fund will pay out of its assets certain other costs and expenses incurred in its operation as more fully described under the heading "DETERMINATION OF THE NET ASSET VALUE OF SHARES".

Other fees may be charged for a Sub-Fund as specified in the relevant Appendix.

INVESTMENT RESTRICTIONS

The Fund has the following investment powers and restrictions:

- I. (1) The Fund may invest in:
 - a) Transferable Securities and Money Market Instruments admitted to or dealt in on an Eligible Market.
 - b) recently issued Transferable Securities and Money Market Instruments, provided that the terms of issue include an undertaking that application will be made for admission to official listing on an Eligible Market and such admission is secured within one year of the issue;
 - c) units of UCITS and/or Other UCIs, whether situated in a Member State or not, provided that:
 - such Other UCIs have been authorised under the laws of any Member State, OECD member state or under the laws of Canada, Guernsey, Hong Kong, India, Japan, Jersey, Liechtenstein, Norway, Singapore, Switzerland or the United States of America,
 - the level of protection for unitholders in such Other UCIs is equivalent of that provided for unitholders in a UCITS, and in particular that the rules on assets segregation, borrowing, lending, and uncovered sales

of Transferable Securities and Money Market Instruments are equivalent of the requirements of the UCITS Directive,

- the business of such Other UCIs is reported in half-yearly and annual reports to enable an assessment of the assets and liabilities, income and operations over the reporting period,
- no more than 10% of the assets of the UCITS or Other UCIs, whose acquisition is contemplated, can, according to their constitutional documents, in aggregate be invested in units of other UCITS or Other UCIs;
- d) deposits with credit institutions which are repayable on demand or have the right to be withdrawn, and maturing in no more than 12 months, provided that the credit institution has its registered office and is authorised under the laws of any Member State, FATF State OECD member state or under the laws of Canada, Guernsey, Hong Kong, India, Japan, Jersey, Liechtenstein, Norway, Singapore, Switzerland or the United States of America;
- e) FDIs, including equivalent cash-settled instruments, dealt in on an Eligible Market and/or FDIs dealt in over-the-counter ("OTC derivatives"), provided that:
 - the underlying consists of instruments covered by this section, financial indices, interest rates, foreign exchange rates or currencies, in which the Sub-Fund may invest according to its investment objective;
 - the counterparties to OTC derivative transactions are institutions subject to prudential supervision, and belonging to the categories approved by the CSSF;
 - the OTC derivatives are subject to reliable and verifiable valuation on a daily basis and can be sold, liquidated or closed by an offsetting transaction at any time at their fair value at the Fund's initiative;

and/or

- f) Money Market Instruments other than those dealt in on an Eligible Market, if the issue or the issuer of such instruments are themselves regulated for the purpose of protecting investors and savings, and provided that such instruments are:
 - issued or guaranteed by a central, regional or local authority or by a central bank of a Member State, the European Central Bank, the EU or the European Investment Bank, a non-Member State or, in case of a Federal State, by one of the members making up the federation, or by a public international body to which one or more Member States belong, or

- issued by an undertaking any securities of which are dealt in on Regulated Markets, or
- issued or guaranteed by a credit institution which has its registered office in a country which is an OECD member state and a FATF State, or
- issued by other bodies belonging to the categories approved by the CSSF provided that investments in such instruments are subject to investor protection equivalent of that set forth in the first, the second or the third indent and provided that the issuer is a company whose capital and reserves amount to at least ten million euro (10,000,000 Euro) and which presents and publishes its annual accounts in accordance with the fourth directive 78/660/EEC, is an entity which, within a group of companies which includes one or several listed companies, is dedicated to the financing of the group or is an entity which is dedicated to the financing of securitisation vehicles which benefit from a banking liquidity line.
- (2) In addition, the Fund may invest a maximum of 10% of the net assets of any Sub-Fund in Transferable Securities and Money Market Instruments other than those referred to under (I) above.
- II. The Fund may hold Ancillary Liquid Assets.
- III.(1) (a) The Fund will invest no more than 10% of the net assets of any Sub-Fund in Transferable Securities or Money Market Instruments issued by the same issuing body.
 - (b) The Fund may not invest more than 20% of the net assets of any Sub-Fund in deposits made with the same body. The risk exposure of a Sub-Fund to a counterparty in an OTC derivative transaction may not exceed 10% of its net assets when the counterparty is a credit institution referred to in I. d) above or 5% of its net assets in other cases.
 - (2) The total value of the Transferable Securities and Money Market Instruments held by a Sub-Fund in the issuing bodies in each of which it invests more than 5% of its net assets shall not exceed 40% of the value of its net assets. This limitation does not apply to deposits and OTC derivative transactions made with financial institutions subject to prudential supervision.

Notwithstanding the individual limits set forth in paragraph a), the Fund may not combine, where this would lead to investment of more than 20% of the net assets of a Sub-Fund in a single body, any of the following:

- investments in Transferable Securities or Money Market Instruments issued by that body;

- deposits made with that body; and/or
- exposure arising from OTC derivative transactions undertaken with that body.
- (3) The limit of 10% set forth in sub-paragraph (1) (a) above is increased to a maximum of 35% in respect of Transferable Securities or Money Market Instruments which are issued or guaranteed by a Member State, its local authorities, or by another Eligible State or by public international bodies of which one or more Member States are members.
- (4) The limit of 10% set forth in sub-paragraph (1) (a) is increased to 25% for certain bonds when they are issued by a credit institution which has its registered office in a Member State and is subject by law, to special public supervision designed to protect bondholders. In particular, sums deriving from the issue of these bonds must be invested in conformity with the law in assets which, during the whole period of validity of the bonds, are capable of covering claims attaching to the bonds and which, in case of bankruptcy of the issuer, would be used on a priority basis for the repayment of principal and payment of the accrued interest.

If a Sub-Fund invests more than 5% of its net assets in the bonds referred to in this sub-paragraph and issued by one issuer, the total value of such investments may not exceed 80% of the net assets of the Sub-Fund.

(5) The Transferable Securities and Money Market Instruments referred to in paragraphs (3) and (4) shall not be included in the calculation of the limit of 40% in paragraph (2).

The limits set out in paragraphs (1), (2), (3) and (4) may not be aggregated and, accordingly, investments in Transferable Securities or Money Market Instruments issued by the same issuing body, in deposits or in FDIs effected with the same issuing body, may not, in any event, exceed a total of 35% of any Sub-Fund's net assets;

Companies which are part of the same group for the purposes of the establishment of consolidated accounts, as defined in accordance with directive 83/349/EEC or in accordance with recognised international accounting rules, are regarded as a single body for the purpose of calculating the limits contained in this paragraph III.

The Fund may cumulatively invest up to 20% of the net assets of a Sub-Fund in Transferable Securities and Money Market Instruments within the same group.

6) Notwithstanding the above provisions, the Fund is authorised to invest up to 100% of the net assets of any Sub-Fund, in accordance with the principle

of risk spreading, in Transferable Securities and Money Market Instruments issued or guaranteed by a Member State, by its local authorities or agencies, by another member State of the OECD, by public international bodies of which one or more Member States are members or a non-Member State, as acceptable by the CSSF from time to time (which at the date of this Prospectus are the following non-Member States: Hong Kong, the Federal Republic of Brazil, the Republic of India, the Republic of Indonesia, the Republic of South Africa and the Republic of Singapore), provided that such Sub-Fund must hold securities from at least six different issues and securities from one issue do not account for more than 30% of the net assets of such Sub-Fund.

- IV. (1) Without prejudice to the limits set forth in paragraph V., the limits provided in paragraph III. are raised to a maximum of 20% for investments in shares and/or bonds issued by the same issuing body if the aim of the investment policy of a Sub-Fund is to replicate the composition of a certain stock or bond index which is sufficiently diversified, represents an adequate benchmark for the market to which it refers, is published in an appropriate manner and is disclosed in the relevant Sub-Fund's investment policy.
 - (2) The limit set forth in paragraph IV. (1) is raised to 35% where justified by exceptional market conditions, in particular on Regulated Markets where certain Transferable Securities or Money Market Instruments are highly dominant. The investment up to this limit is only permitted for a single issuer.
- V. (1) The Fund may not acquire shares carrying voting rights which should enable it to exercise significant influence over the management of an issuing body.
 - (2) The Fund may acquire no more than:
 - 10% of the non-voting shares of the same issuer;
 - 10% of the debt securities of the same issuer;
 - 10% of the Money Market Instruments of the same issuer.
 - (3) These limits under the second and third indents may be disregarded at the time of acquisition, if at that time the gross amount of debt securities or of the Money Market Instruments or the net amount of the instruments in issue cannot be calculated.

The provisions of paragraph V. shall not be applicable to Transferable Securities and Money Market Instruments issued or guaranteed by a Member State or its local authorities or by any other Eligible State, or issued by public international bodies of which one or more Member States are members. These provisions are also waived as regards shares held by the Fund in the capital of a company incorporated in a non-Member State which invests its assets mainly in the securities of issuing bodies having their registered office in that State, where under the legislation of that State, such a holding represents the only way in which the Fund can invest in the securities of issuing bodies of that State provided that the investment policy of the company from the non-Member State complies with the limits set forth in paragraph III., V. and VI. (1), (2), (3) and (4).

- VI. (1) The Fund may acquire units of the UCITS and/or Other UCIs referred to in paragraph I(1) c), provided that no more than 10% of a Sub-Fund's net assets be invested in the units of UCITS or Other UCIs or in one single such UCITS or Other UCI.
 - (2) The underlying investments held by the UCITS or Other UCIs in which the Fund invests do not have to be considered for the purpose of the investment restrictions set forth under III. above.
 - (3) When the Fund invests in the units of UCITS and/or Other UCIs that are managed directly or by delegation by the Management Company or by any other company with which the Management Company is linked by common management or control, or by a substantial direct or indirect holding, the Management Company or other company cannot charge subscription or redemption fees to the Fund on account of its investment in the units of such UCITS and/or UCIs.

In respect of a Sub-Fund's investments in UCITS and Other UCIs, the total management fee (excluding any performance fee, if any) charged both to such Sub-Fund and the UCITS and/or Other UCIs concerned shall not exceed 2% of the relevant assets. The Fund will indicate in its annual report the total management fees charged both to the relevant Sub-Fund and to the UCITS and Other UCIs in which such Sub-Fund has invested during the relevant period.

- (4) The Fund may not acquire more than 25% of the units of the same UCITS or Other UCI. This limit may be disregarded at the time of acquisition if at that time the gross amount of the units in issue cannot be calculated. In case of a UCITS or Other UCI with multiple compartments, this restriction is applicable by reference to all units issued by the UCITS or Other UCI concerned, all compartments combined.
- VII. The Fund shall ensure for each Sub-Fund that the global exposure relating to FDIs does not exceed the net assets of the relevant Sub-Fund.

The exposure is calculated taking into account the current value of the underlying assets, the counterparty risk, foreseeable market movements and the time

available to liquidate the positions. This standard shall also apply to the following subparagraphs.

If the Fund invests in FDIs, the exposure to the underlying assets may not exceed in aggregate the investment limits set forth in paragraph III above. When the Fund invests in index-based FDIs (such index to be compliant with Circular 14/592), these investments are not subject to the limits set forth in paragraph III.

When a Transferable Security or Money Market Instrument embeds a derivative, the latter must be taken into account when complying with the requirements of this paragraph VII.

- VIII. (1) The Fund may not borrow for the account of any Sub-Fund amounts in excess of 10% of the net assets of that Sub-Fund, any such borrowings to be from banks and to be effected only on a temporary basis, provided that the Fund may acquire foreign currencies by means of back to back loans;
 - (2) The Fund may not grant loans to or act as guarantor on behalf of third parties.

This restriction shall not prevent the Fund from (i) acquiring Transferable Securities, Money Market Instruments or other financial instruments referred to in I. (3), (5) and (6) which are not fully paid, and (ii) performing permitted securities lending activities, neither of which shall be deemed to constitute the making of a loan.

- (3) The Fund may not carry out uncovered sales of Transferable Securities, Money Market Instruments or other financial instruments.
- (4) The Fund may not acquire movable or immovable property.
- (5) The Fund may not acquire either precious metals or certificates representing them.
- IX. (1) The Fund needs not comply with the limits set forth in this section when exercising subscription rights attaching to Transferable Securities or Money Market Instruments which form part of its assets. While ensuring observance of the principle of risk spreading, recently created Sub-Funds may derogate from paragraphs III., IV. and VI. (1), (2) and (3) for a period of six months following the date of their launch.
 - (2) If the limits referred to in paragraph (1) are exceeded for reasons beyond the control of the Fund or as a result of the exercise of subscription rights, it must

adopt as a priority objective for its sales transactions the remedying of that situation, taking due account of the interests of the Shareholders.

(3) To the extent that an issuer is a legal entity with multiple compartments where the assets of the compartment are exclusively reserved to the investors in such compartment and to those creditors whose claim has arisen in connection with the creation, operation or liquidation of that compartment, each compartment is to be considered as a separate issuer for the purpose of the application of the risk spreading rules set out in paragraphs III., IV. and VI.

If provided for in the Appendix of a Sub-Fund, such Sub-Fund may, under the conditions set out under article 181 (8) of the Law of 2010, subscribe, acquire and/or hold Shares to be issued or issued by one or more other Sub-Funds without the Fund being subject to the requirements of the Law of 1915, with respect to the subscription, acquisition and/or the holding of its own shares.

The Fund will in addition comply with such further restrictions as may be required by the regulatory authorities in any country in which the Shares are marketed.

RISK MANAGEMENT PROCESS

The Fund and the Management Company will employ a risk-management process which enables them to work with the Portfolio Manager to monitor and measure at any time the risk of the positions held by the Fund and their contribution to the overall risk profile of each Sub-Fund. The Fund and the Management Company will employ, if applicable, a process for accurate and independent assessment of the value of any OTC derivative instrument to the extent such investments are utilized.

In accordance with ESMA Guidelines 10-788 and CSSF Circular 11/512 as amended, the Management Company will determine for each Sub-Fund, as specified in the relevant Appendix, the global exposure determination methodology, the expected level of any leverage (in case the VaR approach is applied) and/or the reference portfolio (in case the relative VaR is applied).

Upon request of a shareholder, the Management Company will provide supplementary information to such shareholder relating to the quantitative limits that apply in the risk management of each Sub-Fund, to the methods chosen to this end and to the recent evolution of the risks and yields of the main categories of instruments.

TECHNIQUES AND INSTRUMENTS RELATING TO TRANSFERABLE SECURI-TIES AND MONEY MARKET INSTRUMENTS

I. General

Unless further restricted in the Appendix in respect of a specific Sub-Fund, the Fund may employ techniques and instruments relating to Transferable Securities and Money Market Instruments. Such techniques and instruments will also be used for efficient portfolio management or hedging purposes.

When these operations concern the use of FDIs, these conditions and limits will conform to the provisions laid down under the heading "INVESTMENT RESTRICTIONS".

Under no circumstances will these operations cause a Sub-Fund to diverge from its investment objectives and policies.

Upon request by any Shareholder, information relating to the risk management methods employed for any Sub-Fund, including the quantitative limits that are applied and any recent developments in risk and yield characteristics of the main categories of investments may be provided to such Shareholder by the Fund.

II. Securities lending

A Sub-Fund may, if provided in the relevant Appendix, enter into securities lending transactions in accordance with the provisions of Circular 08/356, Circular 14/592, ESMA Guidelines 2014/937 and the SFT Regulations.

The Fund will ensure that it is able at any time to recall any security that has been lent out or terminate any securities lending agreement into which it has entered.

Equities and equity-related securities, Money Market Instruments, fixed-income securities, corporate and government bonds may be subject to securities lending transactions.

III. Repurchase agreements

A Sub-Fund may, if provided in the relevant Appendix, enter into sale with right of repurchases transactions ("*achat de titres à réméré*") as well as reverse repurchase transactions ("*opérations de prise en pension*") and repurchase agreement transactions ("*vente de titres à réméré*") in accordance with the provisions of Circular 08/356, Circular 14/592, ESMA Guidelines 2014/937 and the SFT Regulations.

Equities and equity-related securities, Money Market Instruments, fixed-income securities, corporate and government bonds may be subject to repurchase agreements.

IV. Efficient Portfolio Management

The reference to techniques and instruments which relate to Transferable Securities and Money Market Instruments and which are used for the purpose of efficient portfolio management shall be understood as a reference to techniques and instruments which fulfil the following criteria:

- (a) they are economically appropriate in that they are realized in a cost-effective way;
- (b) they are entered into for one or more of the following specific aims:
 - i) reduction of risk;
 - ii) reduction of cost;
 - iii) generation of additional capital or income for the Fund with a level of risk which is consistent with the risk profile of the Fund and the risk diversification rules set forth under the heading "INVESTMENT RESTRICTIONS" above;
- (c) their risks are adequately captured by the risk management process of the Fund.

Techniques and instruments which comply with the criteria set out in the paragraph above and which relate to Money Market Instruments shall be regarded as techniques and instruments relating to Money Market Instruments for the purpose of efficient portfolio management.

A Sub-Fund's ability to use these strategies may be limited by market conditions, regulatory limits and tax considerations. The use of these strategies involves special risks, such as credit risk, counterparty risk and market risk. Please see the "RISK FACTORS ANNEX" of the Prospectus.

If applicable, direct and indirect operational costs and fees arising from efficient portfolio management technique will be deducted from the revenue delivered to the Fund. These costs and fees will not include hidden revenue. Such costs and fees should, under normal circumstances, not be higher than 40% of the market value of the relevant efficient portfolio management technique as set out under VIII below. Positive returns arising from the use of efficient portfolio management techniques will be solely for the benefit of the relevant Sub-Fund(s). Those costs and fees incurred as well as the identity of the counterparty(ies) to the corresponding efficient portfolio management technique (and their relationship if any with the Portfolio Manager) will be disclosed in the annual report of the Fund.

Before a Sub-Fund enters into any arrangement regarding efficient portfolio management techniques, the Management Company or, where applicable, the Portfolio Manager will be required to (a) carefully estimate the expected costs and fees and to compare them with the applicable market standard (if any) and (b) evaluate whether the use of the efficient portfolio management techniques is in the best interest of the Shareholders of the relevant Sub-Fund(s).

The net exposures (i.e. the exposures of the Fund less the collateral, if any, received by the Fund) to a counterparty arising from the use of efficient portfolio management techniques will be taken into account in the 20% limit provided for in Article 43(2) of the Law of 2010 pursuant to point 2 of Box 27 of ESMA Guidelines 2014/937.

The Fund will further respect all rules established by the CSSF in relation to the efficient portfolio management techniques, and in particular the rules set out in Circular 08/356, Circular 14/592, ESMA Guidelines 2014/937 and any additional laws, regulations and provisions, which may apply to such transactions.

It is not expected that conflicts of interest will arise when using techniques and instruments for the purpose of efficient portfolio management.

The Fund's annual report will contain details of the following:

- a) the exposure obtained through efficient portfolio management techniques;
- b) the identity of the counterparty(ies) to these efficient portfolio management techniques;
- c) the type and amount of collateral received by the Fund to reduce counterparty exposure; and
- d) the revenues arising from efficient portfolio management techniques for the entire reporting period together with the direct and indirect operational costs and fees incurred.

V. Currency hedging

Depending on the Portfolio Manager's view, the Portfolio Manager may apply a foreign exchange hedging policy to all the Classes of a Sub-Fund denominated in the same currency as the Reference Currency of the Sub-Fund.

Currency Hedged Classes are Classes of a Sub-Fund denominated in currencies other than the Reference Currency of the Sub-Fund and which have adopted a foreign exchange hedging policy against the Reference Currency of that Class.

On the basis of those foreign exchange hedging policies, the Portfolio Manager hedges the foreign exchange exposures in the relevant Classes against the Reference Currency of those Classes.

While the relevant foreign exchange hedging policies of the relevant Sub-Funds will attempt to actively manage and hedge this risk, there can be no guarantee that they will be successful in doing so. This activity may increase or decrease the return to investors in those Classes.

VI. Use of FDIs

The Fund may use FDIs involving Transferable Securities and Money Market Instruments for the purpose of efficient portfolio management of its assets and for hedging purposes, as detailed in the Appendix for the relevant Sub-Fund. The Fund may also use FDIs for investment purposes in accordance with ESMA Guidelines 2014/937 to meet the Fund's investment objectives only if provided for in the Prospectus and/or the Appendix for the relevant Sub-Fund. The Fund may use financial FDIs under the conditions and within the limits set forth by law, regulation and administrative practice.

A Sub-Fund may, if provided in the relevant Appendix, use total return swaps or other FDIs with the same or similar characteristics in accordance with ESMA Guidelines 2014/937.

VII. Securities Financing Transactions

A Sub-Fund may, if provided for in the relevant Appendix, enter into or invest in one or more of the following securities financing transactions within the meaning of the SFT Regulations:

- repurchase transactions; and
- securities lending transactions (*prêt de titres*) or securities borrowing transactions (*emprunt de titres*).

Should a Sub-Fund enter or invest in one or more of these securities financing transactions, the disclosure requirements of the SFT Regulations will be set out in the relevant Appendix.

A Sub-Fund may only lend or borrow securities through a standardised system organised by a recognised clearing institution or through a First Class Institution.

VIII. Fee Sharing Arrangement on Securities Lending Activity

The Portfolio Manager may, if provided for in the relevant Appendix, manage securities lending activities, if any, on behalf of a Sub-Fund. The Fund has appointed RBC Investor Services Bank S.A. as the Securities Lending Agent. To the extent a Sub-Fund under-takes securities lending, the Sub-Fund pays 35% of the gross revenues generated from securities lending activities as costs / fees to the Securities Lending Agent and 5% of the gross revenues generated from securities lending activity. The Sub-Fund retains 60% of the gross revenues generated from securities lending activity. The Fund retains 60% of the gross revenues generated from securities lending activity are paid from the Securities Lending Agent's and the Management Company' portions of the gross income totalling to 40%. This includes all direct and indirect costs / fees generated by the securities

lending activities. Full financial details of the amounts earned with respect to securities lending for the Sub-Fund will also be included in the annual financial statements. The Management Company will, at least annually, review the securities lending arrangements.

IX. Management of collateral

When using FDIs or entering into securities lending transactions, repurchase agreements or other efficient portfolio management techniques, each of the Fund and its counterparty may require delivery of collateral as security against its exposure thereunder. Collateral received by a Sub-Fund must take the form of cash or highly liquid assets and/or equity and/or corporate debt instruments and/or bonds issued or guaranteed by a highly rated member state of the OECD or by their local authorities or by supranational institutions and undertakings of a community, regional or worldwide nature compliant with the applicable Luxembourg regulations.

The haircut applicable for the valuation of collateral may differ depending on the efficient portfolio management techniques the collateral is applied for. In particular, as regards to securities lending transactions performed via the Securities Lending Agent, the Fund, in addition to the collateral received, is covered by full indemnity from the Securities Lending Agent in case of borrower default and/or collateral shortfalls. In the case of borrower default and/or collateral shortfalls, the Securities Lending Agent provides compensation to the Fund for the difference between the collateral value and value of securities lent (as further described in section "Management of collateral for securities lending activities" below). The Fund will apply the following haircuts.

Collateral	Haircut
1. Bonds issued or guaranteed by a highly rated member state of the OECD or by their local authorities or by supranational institutions	Min. 2%, max. 20%
2. Corporate debt instruments	Min. 5%, max. 20%
3. Shares	Min. 5%, max. 50%

Shares may be received as collateral for securities lending activities on the condition that the transactions are performed via the Securities Lending Agent where the Fund, in addition to the collateral received, is covered by full indemnity from the Securities Lending Agent in case of borrower default and/or collateral shortfalls. Additionally, the shares received as collateral must be included within a main index.

Corporate debt instruments may be received as collateral for securities lending activities on the condition that the transactions are performed via the Securities Lending Agent where the Fund, in addition to the collateral received, is covered by full indemnity from the Securities Lending Agent in case of borrower default and/or collateral shortfalls. Additionally, the corporate debt instruments received as collateral must be rated at least A- from Standard & Poor's or Fitch Ratings or similar rating from Moody's Investors Services.

Cash collateral can only be:

- A. placed on deposit with credit institutions which have their registered office in an EEA Member State or, if the registered office of the credit institution is situated in a third country, provided that it is subject to prudential rules considered by the CSSF as equivalent to those laid down in EU law;
- B. invested in high-quality government bonds;
- C. used for the purpose of reverse repurchase transactions provided the transactions are with credit institutions subject to prudential supervision and the Fund is able to recall at any time the full amount of cash on accrued basis;
- D. invested in short-term money market funds as defined in ESMA's Guidelines on a Common Definition of European Money Market Funds.

Collateral received will be safe-kept with the Depositary or by a third party custodian which is subject to prudential supervision and which is unrelated to the provider of the collateral.

Re-invested cash collateral exposes the Fund to certain risks such as the risk of a failure or default of the issuer of the relevant security in which the cash collateral has been invested. Please see "Credit Risk" and "Counterparty Risk" as described under the "RISK FACTORS ANNEX" of the Prospectus.

Management of collateral for securities lending activities

The Securities Lending Agent on behalf of the relevant Sub-Fund will ensure that its counterparty delivers collateral either in the form of cash, or in the form of highly liquid assets and/or in the form of equity and/or bonds issued or guaranteed by a highly rated member state of the OECD or by their local authorities or by supranational institutions and undertakings of a community, regional or worldwide nature compliant with the applicable Luxembourg regulations. The Securities Lending Agent has the duty to monitor and calculate the market value on at least a daily basis to check that the market value of the collateral is still enough to cover the market value plus the haircut of the loaned securities.

The Depositary has delegated the safekeeping of the Fund's collateral related to securities lending to the Securities Lending Agent who will hold the collateral received by the Fund in custody with itself or with a sub-custodian within its network of sub-custodians.

The haircut applicable for the valuation of collateral is different when securities lending is performed via the Securities Lending Agent, where the Fund, in addition to the collateral received, is covered by full indemnity from the Securities Lending Agent in case of

borrower default and/or collateral shortfalls. In the case of borrower default and/or collateral shortfalls, the Securities Lending Agent provides compensation to the Fund for the difference between the collateral value and value of securities lent.

The collateral for the securities lending activities is deposited with the Securities Lending Agent and held on trust for the benefit of the Fund. The Securities Lending Agent may use intermediaries (which may include affiliates of the Securities Lending Agent) to hold the collateral.

Re-invested cash collateral exposes the Fund to certain risks such as the risk of a failure or default of the issuer of the relevant security in which the cash collateral has been invested.

DETERMINATION OF THE NET ASSET VALUE OF SHARES

Reference Currency

The Reference Currency of the Fund is the Euro and the Net Asset Value of the Fund is expressed in Euro.

Valuation Principles

The Central Administrator will calculate the Net Asset Value for each Valuation Date to four decimal places on each Business Day unless otherwise determined by the Board of Directors in cooperation with the Central Administrator.

The Net Asset Value per Share shall be determined by dividing the net assets of the Fund, being the value of the assets of the Fund less the liabilities of the Fund, by the number of outstanding Shares of the Fund.

A. The assets of the Fund shall be deemed to include:

- (i) all cash on hand or on deposit, including any interest accrued thereon;
- (ii) all bills and demand notes and accounts receivable (including proceeds of securities sold but not delivered);
- (iii) all bonds, time notes, shares, stock, debenture stocks, units/shares in undertakings for collective investment, subscription rights, warrants, options and other investments and securities owned or contracted for by the Fund;
- (iv) all stock, stock dividends, cash dividends and cash distributions receivable by the Fund (provided that the Fund may make adjustments with regard to fluctuations in the market value of securities caused by trading ex-dividends or ex-rights or by similar practices);
- (v) all interest accrued on any interest-bearing securities owned by the Fund except to the extent that the same is included or reflected in the principal amount of such security;

- (vi) the preliminary expenses of the Fund insofar as the same have not been written off; and
- (vii) all other assets of every kind and nature, including prepaid expenses.

The value of such assets shall be determined as follows:

- The value of any cash on hand or on deposit, bills and demand notes and accounts receivable, prepaid expenses, cash dividends and interest declared or accrued as aforesaid and not yet received shall be deemed to be the full amount thereof, unless in any case the same is unlikely to be paid or received in full, in which case the value thereof shall be arrived at after making such discount as the Board of Directors may consider appropriate in such case to reflect the true value thereof;
- 2) The value of securities and/or FDIs which are quoted or dealt in on any stock exchange shall be based, except as defined in 3) below, in respect of each security on the latest available dealing prices on the stock exchange which is normally the principal market for such security or the latest available quoted bid prices obtained by an independent pricing service;
- 3) Where investments of the Fund are both listed on a stock exchange and dealt in by market makers outside the stock exchange on which the investments are listed, then the Board of Directors will determine the principal market for the investments in question and they will be valued at the latest available price in that market;
- 4) Securities dealt in on another regulated market are valued in a manner as near as possible to that described in paragraph 2);
- 5) In the event that any of the securities held in the Fund's portfolio on the Valuation Date are not quoted or dealt in on a stock exchange or another regulated market, or for any of such securities, no price quotation is available, or if the price as determined pursuant to sub-paragraphs 2) and/or 4) is not in the opinion of the Board of Directors representative of the fair market value of the relevant securities, the value of such securities shall be determined prudently and in good faith, based on the reasonably foreseeable sales or any other appropriate valuation principles which may be based on the indicative quotes provided by specialist brokers, banks or other service providers. The brokers, banks or other service providers may provide in writing a bid/ask quote, which will be dated on the day the position is valued;
- 6) The FDIs which are not listed on any official stock exchange or traded on any other organised market will be valued in a reliable and verifiable manner on a daily basis and verified by the Central Administrator;
- 7) Units or shares in underlying open-ended investment funds shall be valued at their last available net asset value reduced by any applicable charges;
- 8) Liquid assets and Money Market Instruments are valued at their market price, at their nominal value plus accrued interest or on an amortised cost basis in accordance with ESMA's Guidelines on a Common Definition of European Money

Market Funds. If the Fund considers that an amortisation method can be used to assess the value of a Money Market Instrument, it will ensure that this will not result in a material discrepancy between the value of the Money Market Instrument and the value calculated according to the amortisation method;

- 9) In the event that the above mentioned calculation methods are inappropriate or misleading, the Board of Directors may adjust the value of any investment or permit some other method of valuation to be used for the assets of the Fund if it considers that the circumstances justify that such adjustment or other method of valuation should be adopted to reflect more fairly the value of such investments.
- B. The liabilities of the Fund shall be deemed to include:
 - (i) all loans, bills and accounts payable;
 - (ii) all accrued or payable administrative expenses (including but not limited to management fees or performance fees, depositary fees and corporate agents' fees);
 - (iii) all known liabilities, present and future, including all matured contractual obligations for payments of money or property, including the amount of any unpaid dividends declared by the Fund where the Valuation Date falls on the record date for determination of the person entitled thereto or is subsequent thereto;
 - (iv) an appropriate provision for future taxes based on capital and income to the Valuation Date, as determined from time to time by the Fund, and other provisions, if any, authorised and approved by the Board of Directors covering, among others, liquidation expenses; and
 - (v) all other liabilities of the Fund of whatever kind and nature except liabilities represented by Shares in the Fund. In determining the amount of such liabilities the Fund shall take into account all expenses payable by the Fund. Such expenses may include formation expenses, the remuneration and expenses of its Directors and officers, including their insurance cover, fees payable to its investment advisers or portfolio managers, fees and expenses payable to its service providers and officers, accountants, depositary and correspondents, domiciliary, registrar and transfer agents, any paying agent and permanent representatives in places of registration, any other agent employed by the Fund, fees and expenses incurred in connection with the listing of the Shares of the Fund at any stock exchange or to obtain a quotation on another regulated market, payment for corporate access services, fees for legal and tax advisers in Luxembourg and abroad, cash penalties, fees for auditing services, printing, reporting and publishing expenses, including the cost of preparing, translating, distributing and printing of the prospectuses, notices, rating agencies, explanatory memoranda, registration statements, or interim and annual reports, taxes or governmental charges, shareholders servicing fees and distribution fees payable to distributors of Shares in the Fund, currency conversion costs, and all other operating expenses, including the cost of buying and selling assets, interest, bank charges and brokerage, postage, telephone and telex. The Fund may

calculate administrative and other expenses of a regular or recurring nature on an estimated figure for yearly or other periods in advance and may accrue the same in equal proportions over any such period.

Swing Pricing

The purpose of swing pricing is to provide reasonable protection to existing shareholders in a Sub-Fund against the negative dilution impact occurring when the Sub-Fund invests/disinvests in securities as a result of Shareholder activity. This is achieved by transferring the estimated impact arising to those Shareholders transacting. In order to mitigate the dilution impact the Board of Directors may apply swing pricing, i.e. adjust the Net Asset Value in the manner described below. The factors to adjust the Net Asset Value are approved by the Board of Directors and reviewed at least annually.

If on any Valuation Date the aggregate transactions in Shares of all Classes of a Sub-Fund result in a net increase or decrease of Shares which exceeds a threshold set by the Board of Directors from time to time for that Sub-Fund (relating to the cost of market dealing for that Sub-Fund), the Net Asset Value of the Sub-Fund will be adjusted by an amount which reflects in particular but not exclusively the estimated fiscal charges and dealing costs that may be incurred by the Sub-Fund and the estimated bid/offer spread of the assets in which the Sub-Fund invests. The adjustment will be an addition when the net movement results in an increase of all Shares of the Fund and a deduction when it results in a decrease. Under normal market conditions, the adjustment will not exceed 2.5% of the Net Asset Value of the Sub-Fund. In unusual market conditions characterised by exceptionally low market liquidity however, the Board of Directors may increase this maximum level up to 5% of the Net Asset Value of the Sub-Fund to protect the interests of Shareholders. Such an increase over of 2.5% of the Net Asset Value of the Sub-Fund shall be disclosed on the Website and will be notified to the CSSF.

Shareholders should note that due to adjustments being made to the Net Asset Value per Share, the volatility of a Sub-Fund's Net Asset Value per Share may not fully reflect the true performance of the Sub-Fund's underlying assets. Performance Fee in respect of Performance Fee Classes shall be calculated on the basis the Net Asset Value before swing pricing is applied.

The Sub-Funds in scope of swing pricing and whether the respective Sub-Funds apply a threshold is disclosed on the Website.

TEMPORARY SUSPENSION OF THE CALCULATION OF NET ASSET VALUE

Under article 21 of the Articles of Incorporation, the Fund may temporarily suspend the calculation of the Net Asset Value of one or more Sub-Funds and the issue, redemption and conversion of Shares in the following cases:

- a) during any period when any market or stock exchange, which is the principal market or stock exchange on which a material part of the investments of the relevant Sub-Fund for the time being are quoted, is closed, other than for legal holidays or during which dealings are substantially restricted or suspended, provided that such restriction or suspension affects the valuation of the investments of the Sub-Fund attributable to such Sub-Fund;
- b) during the existence of any state of affairs which constitutes an emergency, in the opinion of the Board of Directors, as a result of which disposal or valuation of investments of the relevant Sub-Fund by the Fund is not possible;
- c) during any breakdown in the means of communication normally employed in determining the price or value of any of the relevant Sub-Fund's investments or the current price or value on any market or stock exchange;
- d) if the Fund is being (or is proposed to be) wound up or merged, from the date on which notice is given of a general meeting of Shareholders at which a resolution to wind up or merge the Fund is to be proposed or if a Sub-Fund is being liquidated or merged, from the date on which the relevant notice is given;
- e) when for any other reason the prices of any investments owned by the Fund attributable to a Sub-Fund cannot promptly or accurately be ascertained (including the suspension of the calculation of the net asset value of an underlying undertaking for collective investment);
- f) during any period when the Fund is unable to repatriate funds for the purpose of making payments on the redemption of Shares of a Sub-Fund or during which any transfer of funds involved in the realisation or acquisition of investments or payments due on redemption of Shares cannot, in the opinion of the Board of Directors, be effected at normal rates of exchange; or
- g) any other circumstances beyond the control of the Board of Directors.

The Board of Directors may, in any of the circumstances listed above, suspend the issue, redemption and/or conversion of Shares without suspending the calculation of the Net Asset Value.

Notice of such suspension will be given to the CSSF and, if the Fund markets its Shares in other Member States, to the competent authorities of those states.

If, in the opinion of the Board of Directors, a period of suspension is likely to exceed seven (7) Business Days, a notice of the beginning and of the end of such period of suspension will be published on the Website and may also be made available or published in newspapers and via any other media as may be decided by the Board of Directors from time to time.

The Fund is not liable for any error or delay in publication or, to the extent that the Fund had instructed a third party to arrange for a publication, for non-publication.

Notice will likewise be given to any applicant or Shareholder as the case may be applying for purchase, redemption, or conversion of Shares in the Sub-Fund(s) concerned. Such Shareholders may give notice that they wish to withdraw their application for subscription, redemption and conversion of Shares. If no such notice is received by the Fund such application for redemption or conversion as well as any application for subscription will be dealt with on the first Valuation Date following the end of the period of suspension.

TAXATION

<u>General</u>

The following statements on taxation below are intended to be a general summary of certain tax consequences that may result to the Fund and Shareholders in connection with their investment in the Fund and are included herein solely for information purposes. They are based on the law and practice in force at the date of the Prospectus.

There is no assurance that the tax status of the Fund or Shareholders will not be changed, even retroactively, as a result of amendments to, or changes in the interpretation of, relevant tax legislation and regulations. This summary is of general nature only and is not intended to be, nor should it be construed to be, legal or tax advice to any particular investor. Prospective investors should therefore consult their own professional advisers as to the effects of state, local or foreign tax laws, including Luxembourg tax law, to which they might be subject.

As is the case with any investment, there can be no guarantee that the tax position or proposed tax position prevailing at the time an investment in the Fund is made will endure indefinitely. The information should not be regarded as legal or tax advice.

Taxation of the Fund

The Fund is not liable for any Luxembourg tax on profits or income.

The Fund is liable in Luxembourg for an annual subscription tax (*"taxe d'abonnement"*) which is payable quarterly on the basis of the value of the net assets of the Fund at the end of the relevant calendar quarter.

The rate of the subscription tax is 0.05% per annum of the Net Asset Value of each Class which is available to all investors.

The rate of the subscription tax is 0.01% per annum of the Net Asset Value for:

- (a) Sub-Funds whose sole object is the collective investment in Money Market Instruments and the placing of deposits with credit institutions,
- (b) Sub-Funds whose sole object is the collective investment in deposits with credit institutions and

(c) Sub-Funds or Classes which are reserved to one or more Institutional Investors.

A Sub-Fund that satisfies the following conditions is exempt from the annual subscription tax:

- (i) the securities issued by the Sub-Fund are reserved to Institutional Investors, and
- (ii) the sole object of the Sub-Fund is the collective investment in Money Market Instruments and the placing of deposits with credit institutions, and
- (iii) the weighted residual portfolio maturity of the Sub-Fund does not exceed 90 days, and
- (iv) the Sub-Fund has obtained the highest possible rating from a recognized rating agency.

The rate of the subscription tax is 0.04%, 0.03%, 0.02% or 0.01% per annum for the proportion of the Net Asset Value of a Sub-Fund invested in sustainable economic activities as defined by article 3 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending the SFDR, as amended, if such proportion represents at least 5%, 20%, 35% or 50%, respectively, of the Net Asset Value of such Sub-Fund and if the conditions set out in article 174 (3) of the Law of 2010 are fulfilled.

The Fund was liable for an initial fixed charge of 75 Euro which was paid upon its incorporation.

No Luxembourg tax is payable on the realized capital gains or unrealized capital appreciation of the assets of the Fund.

Dividends and interest received by the Fund on its investments are in many cases subject to irrecoverable withholding taxes at source.

Tax Information Exchange Regimes

Pursuant to FATCA, the Fund will be required to comply (or be deemed compliant) with extensive new reporting and withholding requirements designed to inform the U.S. Department of the Treasury of U.S.-owned foreign investment accounts. Failure to comply (or be deemed compliant) with these requirements will subject the Fund to U.S. withholding taxes on certain US-sourced income and (effective 1 January 2019) gross proceeds. Pursuant to an intergovernmental agreement between the United States and Luxembourg which was ratified in Luxembourg by the law of 24 July 2015 relating to FATCA, the Fund may be deemed compliant, and therefore not subject to the withholding tax, if it identifies and reports U.S. taxpayer information directly to the Luxembourg government. Investors may be requested to provide additional information to the Fund to enable the Fund to satisfy these obligations. Failure to provide requested information or, if applicable, satisfy its own FATCA obligations may subject an investor to liability for any

resulting U.S. withholding taxes, U.S. tax information reporting and/or mandatory redemption, transfer or other termination of the investor's investment in its Shares.

Drawing extensively on the intergovernmental approach to implementing FATCA, the OECD developed the CRS to address the issue of offshore tax evasion on a global basis. Aimed at maximizing efficiency and reducing cost for financial institutions, the CRS provides a common standard for due diligence, reporting and exchange of financial account information. Pursuant to the CRS, participating jurisdictions will obtain from reporting financial institutions, and automatically exchange with other tax authorities in participating jurisdictions in which the investors of the reporting financial institutions are tax resident on an annual basis, financial information with respect to all reportable accounts identified by financial institutions on the basis of common due diligence and reporting procedures. The first information exchanges began in 2017. The Grand Duchy of Luxembourg has implemented the CRS. As a result the Fund will be required to comply with the CRS due diligence and reporting requirements, as adopted by the Grand Duchy of Luxembourg. Investors may be required to provide additional information to the Fund to enable the Fund to satisfy its obligations under the CRS. Failure to provide requested information may subject an investor to liability for any resulting penalties or other charges and/or mandatory termination of its interest in the Fund.

As part of its reporting obligations, the Fund (or its delegates, including, in particular, the Portfolio Manager and the Central Administrator) may be required to disclose certain confidential information (including, but not limited to, the Shareholder's name, address, tax identification number, if any, and certain information relating to the Shareholder's investment in the Fund self-certification, GIIN number or other documentation) that they have received from (or concerning) their investors and automatically exchange information with the Luxembourg taxing authorities or other authorized authorities as necessary to comply with FATCA, CRS or other applicable laws or regulations.

The Fund may take such action as it considers necessary in accordance with applicable law in relation to an investor's holding to ensure that any withholding tax payable by the Fund, and any related costs, interest, penalties and other losses and liabilities suffered by the Fund, the Central Administrator, the Portfolio Manager or any other investor, or any agent, delegate, employee, director, officer or affiliate of any of the foregoing persons, arising from such investor's failure to provide the requested information to the Fund, is economically borne by such investor.

GENERAL MEETINGS OF SHAREHOLDERS

The annual general meeting of Shareholders shall be held in Luxembourg at the registered office of the Fund, or at such other place in Luxembourg and at such date and time as may be specified in the notice of meeting.

Shareholders will meet upon the call of the Board of Directors in accordance with the provisions of Luxembourg law.

In accordance with the Articles of Incorporation and Luxembourg law, all decisions taken by the Shareholders pertaining to the Fund shall be taken at the general meeting of all Shareholders. Any decisions affecting Shareholders in one or several Sub-Funds may be taken by just those Shareholders in the relevant Sub-Funds to the extent that this is allowed by law. In this particular instance, the requirements on quorum and majority voting rules as set forth in the Articles of Incorporation shall apply.

FINANCIAL YEAR

The financial year of the Fund ends on 31 December in each year.

REPORTS

The Fund will issue an audited annual report within four months after the end of the financial year and an un-audited semi-annual report within two months after the end of the period to which it refers. Audited annual reports and un-audited interim reports for the Fund combining the accounts of the Sub-Funds will be drawn up in Euro. For this purpose, if the accounts of a Sub-Fund are not expressed in Euro, such accounts shall be converted into Euro. The Reports will also be made available at the registered office of the Fund.

Unless otherwise provided for in the convening notice to the annual general meeting of Shareholders, the audited annual reports will be available at the registered office of the Fund (and as may be required by applicable local laws and regulations).

The Reports will be available on the Website and at the registered office of the Fund and will be sent to investors upon request.

DURATION, MERGER, LIQUIDATION AND DIVISION

Duration

The Fund

The Fund was incorporated for an unlimited duration. However, the Board of Directors may at any time move to dissolve the Fund at an extraordinary general meeting of Shareholders.

The Sub-Funds

Unless otherwise provided for in the relevant Appendix, each Sub-Fund will be set up for a continuous and unlimited term of years.

Merger

The Fund

The Fund may be merged in accordance with the provisions of the Law of 2010. In the event the Fund is involved in a merger as the surviving UCITS, the Board of Directors, in its sole discretion, will decide on the merger and the effective date thereof; in the event the Fund is involved in a merger as the absorbed UCITS and thereafter ceases to exist, a general meeting of shareholders will be required to approve and decide on the effective date of such merger by a resolution adopted with no quorum requirement and at the simple majority of the votes validly cast at such meeting. Any applicable contingent deferred sales charges are not to be considered as redemption fees and shall therefore be due.

Sub-Funds

The Board of Directors may resolve to proceed with a merger (within the meaning of the Law of 2010) of any Sub-Fund, either as receiving or absorbed Sub-Fund, with (i) another existing Sub-Fund within the Fund or another sub-fund within another Luxembourg or foreign UCITS; or (ii) a new Luxembourg or foreign UCITS, and as appropriate, to redesignate the Shares of the Sub-Fund concerned as Shares of the new Sub-Fund or of the new UCITS as applicable. Any applicable contingent deferred sales charges are not to be considered as redemption fees and shall therefore be due.

Classes

A Class may merge with one or more other Classes by resolution of the Board of Directors if the Net Asset Value of a Class is below such amount as determined by the Board of Directors in its sole discretion or in the event of special circumstances beyond its control, such as political, economic, or military emergencies, or if the Board of Directors should conclude, in light of prevailing market or other conditions, including conditions that may adversely affect the ability of a Class to operate in an economically efficient manner, and with due regard to the best interests of shareholders, that a Class should be merged. Shareholders shall be notified of any decision made pursuant to this paragraph as required. Each shareholder of the relevant Class shall be given the option, within a period to be determined by the Board of Directors (but not being less than one (1) month, unless otherwise authorised by the regulatory authorities, and specified in said notice), to request free of any redemption fee either the repurchase of its Shares or the exchange of its Shares against Shares of any Class not concerned by the merger. Any applicable contingent deferred sales charges are not to be considered as redemption fees and shall therefore be due.

Liquidation

The Fund

If the Fund's share capital falls below two-thirds of the minimum capital required by law, the Board of Directors must refer the matter of the dissolution to a general meeting of Shareholders, deliberating without any quorum and deciding by a simple majority of the Shares represented at the meeting.

If the Fund's share capital is less than a quarter of the minimum capital required by law, the Board of Directors must refer the matter of dissolution of the Fund to a general meeting of Shareholders, deliberating without any quorum; the dissolution may be decided by Shareholders holding a quarter of the Shares represented at the meeting.

In the event of a dissolution of the Fund, liquidation shall be carried out by one or several liquidators (who may be physical persons or legal entities) named by decision of the Shareholders effecting such dissolution and which shall determine their powers and their compensation. The completion of the liquidation of the Fund must in principle take place within a period of nine months from the date of the decision relating to the liquidation. Where the liquidation of the Fund cannot be fully completed within a period of nine months, a written request for exemption shall be submitted to the CSSF detailing the reasons why the liquidation cannot be completed.

The net proceeds of liquidation corresponding to each Class shall be distributed by the liquidators to the holders of Shares of each Class in proportion to their holding of Shares in such Class. Any funds to which Shareholders are entitled upon the liquidation of the Fund and which are not claimed by those entitled thereto prior to the close of the liquidation process shall be deposited for the persons entitled thereto with the *Caisse de Consignation* in Luxembourg in accordance with the Law of 2010.

The Sub-Funds and Classes

A Sub-Fund or a Class may be terminated by resolution of the Board of Directors if the Net Asset Value of a Sub-Fund or a Class is below such amount as determined by the Board of Directors or in the event of special circumstances beyond its control, such as political, economic, or military emergencies, or if the Board of Directors should conclude, in light of prevailing market or other conditions, including conditions that may adversely affect the ability of a Sub-Fund or a Class to operate in an economically efficient manner, and with due regard to the best interests of Shareholders, that a Sub-Fund or a Class should be terminated. In such event, the assets of the Sub-Fund shall be realised, the liabilities discharged and the net proceeds of realisation distributed to Shareholders in proportion to their holding of shares in that Sub-Fund or Class and such other evidence of discharge as the Board of Directors may reasonably require. This decision will be notified to Shareholders as required. No Shares shall be redeemed after the date of

the decision to liquidate the Sub-Fund or a Class. The completion of the liquidation of a Sub-Fund or a Class must in principle take place within a period of nine months from the date of decision of the Board of Directors relating to the liquidation. Where the liquidation of Sub-Fund or a Class cannot be fully completed within a period of nine months, a written request for exemption shall be submitted to the CSSF detailing the reasons why the liquidation cannot be completed. Assets, which could not be distributed to Shareholders upon the close of the liquidation of the Sub-Fund concerned, will be deposited with the *Caisse de Consignation* in Luxembourg on behalf of their beneficiaries.

Division

If the Board of Directors determines that it is in the interests of the Shareholders of the relevant Sub-Fund or Class or that a change in the economic or political situation relating to the Sub-Fund or Class concerned has occurred which would justify it, the reorganization of one Sub-Fund or Class, by means of a division into two or more Sub-Funds or Classes, may take place. This decision will be notified to Shareholders as required. The notification will also contain information about the two or more new Sub-Funds or Classes. The notification will be made at least one month before the date on which the reorganization becomes effective in order to enable the Shareholders to request the sale of their Shares, free of charge, before the operation involving division into two or more Sub-Funds or Classes becomes effective.

CONFLICTS OF INTEREST

The following inherent or potential conflicts of interest should be considered by prospective investors before investing in the Fund.

Other Clients

The Board of Directors, the Portfolio Manager, the Central Administrator, the Depositary, the Management Company and other service providers referenced in this Prospectus (together the "**Service Providers**") may act as director, investment advisor, general partner, manager, broker, administrator, prime broker, portfolio manager or investor or provide other services to other clients (including funds and/or managed accounts) now or in the future.

The Service Providers will engage in other business activities. The Service Providers are not required to refrain from any other activity, to account for any profits from any such activity, whether as partners of additional investment companies or otherwise or to devote all or any particular part of the time and effort of any of its or their partners, officers, directors or employees to the Fund and its affairs. The investment objectives or strategies of such clients may be identical, similar or different to those of the Fund. There can be no assurance that the investment returns of the Fund will be similar or identical to the investment returns of any other fund or account managed by the Portfolio Manager. Service Providers may additionally serve as consultants to, partners or
shareholders in other investment funds, companies and investment firms. Certain investments may be appropriate for the Fund and also for other clients advised or managed by the Portfolio Manager. Investment decisions for the Fund and for such other clients are made with a view to achieving their respective investment objectives and after consideration of such factors as their current holdings, the current investment views of the different portfolio managers of the Portfolio Manager, availability of cash for investment, and the size of their positions generally. Frequently, a particular investment may be bought or sold for only the Fund or only one client or in different amounts and at different times for more than one but less than all clients, including the Fund. Likewise, a particular investment may be bought for the Fund or one or more clients when one or more other clients are selling the same security. In addition, purchases or sales of the same investment may be made for two or more clients, including the Fund, on the same date and mirror portfolios may be operated for other clients. In such event, such transactions will be allocated among the Fund and clients in a manner believed by the Portfolio Manager to be equitable to each. Purchase and sale orders for the Fund may be combined with those of other clients of the Portfolio Manager. In effecting transactions, it may not always be possible, or consistent with the possibly differing investment objectives of the various clients and of the Fund, to take or liquidate the same investment positions at the same time or at the same prices. The Portfolio Manager may manage other accounts or funds to which structured products are linked; in so doing it may take or be required to take actions which impact adversely upon the Fund and its valuations.

In calculating the Fund's Net Asset Value, the Central Administrator may consult with the Management Company and the Portfolio Manager, with respect to the valuation of certain investments.

There is an inherent conflict of interest between the involvement of the Management Company and the Portfolio Manager in determining the Net Asset Value of the Fund and the entitlement of the Management Company and the Portfolio Manager to a Management Fee and portfolio management fee, respectively, which is calculated on the basis of the Net Asset Value of the Fund.

The Management Company has established and implemented a conflicts of interest policy that contains appropriate measures to mitigate such conflicts of interest.

The foregoing does not purport to be a complete list of all potential conflicts of interest involved in an investment in the Sub-Funds. Each member of the Board of Directors will seek to ensure that any conflict of interest of which they are aware is resolved timely and fairly.

Interested Party Transactions

The Service Providers, any of their directors, officers, employees, agents and connected persons and the Board of Directors and any person or company with whom they are affiliated or by whom they are employed (each an "**Interested Party**") may be involved in other financial, investment or other professional activities which may cause conflicts of interest with the Fund. In particular, an Interested Party may provide services similar to those provided to the Fund to other entities and will not be liable to account for any profit earned from any such services. For example, an Interested Party may acquire investments (on behalf of clients) in which the Fund may invest. However, where the Portfolio Manager could (a) allocate an investment between two or more funds or accounts which it manages (including the Fund's); or (b) make a disposal of investments held by two or more such funds or accounts, it will act fairly as between the relevant funds or accounts in making such allocation or disposal, having regard to, *inter alia*, factors such as cash availability and portfolio balance.

The Fund may acquire securities from or dispose of securities to any Interested Party or any investment fund or account advised or managed by any such person. An Interested Party may provide professional services to the Fund (but no Interested Party will act as auditor to the Fund) or hold Shares and buy, hold and deal in any investments for their own accounts notwithstanding that similar investments may be held by the Fund. An Interested Party may contract or enter into any financial or other transaction with any Shareholder or with any entity any of whose securities are held by or for the account of the Fund, or may be interested in any such contract or transaction. Furthermore, any Interested Party may receive commissions to which such Interested Party is contractually entitled in relation to any sale or purchase of any investments of the Fund effected by it for the account of the Fund, if in each case the terms are no less beneficial to the Fund than a transaction involving a disinterested party and any commission is in line with market practice.

Dealing Commissions

The Portfolio Manager may at its discretion execute transactions for the Fund through brokers or other persons under arrangements where the Portfolio Manager passes on the broker or other person's charges to the Fund and in return for such charges the Portfolio Manager receives goods or services in addition to execution of orders. The nature of such goods or services will vary, but the Portfolio Manager will satisfy itself that such additional goods and services will always be in the interest of the Sub-Funds, will comply with any applicable CSSF rules and will reasonably assist the Portfolio Manager in the provision of its services to the Fund.

Employees of the Portfolio Manager will not enter in their own name into soft commission arrangements. The amounts of the soft commissions will be disclosed in the audited report of the Fund. Any soft commission arrangements are subject to the following conditions:

- i. the Portfolio Manager will act at all times in the best interest of the Fund and the Management Company when entering into soft commission arrangements;
- ii. the research services provided will be in direct relationship to the activities of the Portfolio Manager;
- iii. brokerage commissions on portfolio transactions for the Fund will be directed by the Portfolio Manager to broker-dealers that are entities and not to individuals; and
- iv. the Portfolio Manager will provide reports to the Management Company with respect to soft commission arrangements including the nature of the services it receives.

In the event of a conflict of interest arising, the Board of Directors will endeavour to ensure that it is resolved fairly.

Board of Directors' Interests

No Director has any interest, direct or indirect, in the promotion of, or in any assets which have been or are proposed to be acquired or disposed of by, or leased to, the Fund, and no member of the Board of Director is materially interested in any contract or arrangement subsisting at the date of this Prospectus which is unusual in its nature or condition or which is significant in relation to the business of the Fund.

RESPONSIBLE INVESTMENT POLICY

Responsibility is a key part of the investment process of the Fund. The Board of Directors believes that in the long run, the securities of companies and issuers who operate responsibly will yield better results as investment objects. Therefore, the Board of Directors has decided to instruct the Portfolio Manager to apply its Responsible Investment Policy as regards to certain Sub-Funds (as further specified in the relevant Appendices).

The Responsible Investment Policy encompasses the consideration of environmental, social and governance (ESG) factors. As further described in the Responsible Investment Policy, sustainability analysis has been incorporated into investment analysis, including positive screening, norms-based screening and exclusion of certain sectors or companies.

The sustainability analysis of an investment is based on information collected from public sources and ESG risk rating provided by an external service provider. The ESG risk rating identifies ESG risks that are significant to the investee company using numerous criteria covering environmental, social and governance related risks. In order to mitigate dependency on the external service provider, all investee companies are thoroughly analysed including an analysis of risks arising from ESG criteria based on all available material. This also ensures that ESG risk is considered for investee companies for which a service provider's ESG risk rating is not available.

Investments are continuously monitored from an ESG perspective and an external service provider specialising in ESG matters reviews the investments quarterly. The investments are monitored on the basis of the UN Global Compact principles. Additionally, the carbon footprint of each investment is determined annually and monitored separately.

The Portfolio Manager has identified a list of industry or product groups (currently controversial weapons, tobacco, adult entertainment, coal mining, coal or fossil oil based energy, gambling, and defence materials) and classified these groups in several tolerance categories based on how much of the investee company's net sales is generated, directly or indirectly, by the business in question.

The Responsible Investment Policy is approved by the board of directors of the Portfolio Manager and it is reviewed and updated annually. The Portfolio Manager has signed the UN Principles for Responsible Investments and is thus committed to integrating ESG factors into its investment analysis, decision-making processes and active ownership practices.

As responsible investing is constantly developing, investors are advised to read the currently applicable Responsible Investment Policy which can be found on the Website.

GENERAL INFORMATION

Publication of Prices

The Net Asset Value per Share, as well as the Subscription Price and Redemption Price, may be obtained from the registered office of the Fund and on the Website. Share prices may also be made available or published in newspapers and via any other media as may be decided by the Board of Directors from time to time.

The Net Asset Value per Share, as well as the Subscription Price and Redemption Price, will be available on the first Business Day following the Valuation Date.

The Fund is not liable for any error or delay in publication or for non-publication of a price.

Official Language

The official language of the Prospectus and of the Articles of Incorporation is English. However, the Board of Directors, the Depositary, the Management Company, the Domiciliary and Corporate Agent, the Central Administrator and the Registrar and Transfer Agent may, on their own behalf and on the Fund's behalf, consider it essential that these documents be translated into the languages of the countries in which the Fund's Shares are offered and sold. Unless contrary to local law in the jurisdiction concerned, in the event of any inconsistency or ambiguity in relation to the meaning of any word or phrase in any translation, the English text shall always prevail.

Historical Performance

The Sub-Funds present their performance as average annual total return, reflecting all charges and expenses accrued by the relevant Sub-Fund. Performance does not include any adjustment for sales charges and does not consider any tax consequence to Shareholders as a result of investing in Shares.

The Sub-Funds, when presenting their average annual total return, also may present their performance using other means of calculation, and may compare their performance to various benchmarks and indices.

Past performance is not necessarily indicative of future results. Past performance of the Sub-Funds launched for a full year or more is disclosed for each Class or Sub-Fund in the relevant KIID which is available from the registered office of the Fund and on the Website.

Benchmark Regulation

Certain Sub-Funds may be users of benchmarks as defined by the Benchmark Regulation.

The Appendix of any Sub-Funds which uses a benchmark that falls within the scope of the Benchmark Regulation will mention the benchmark administrator and whether the administrator is included in the register of administrators established and maintained by ESMA.

The Benchmark Regulation requires the Management Company to produce and maintain robust written plans setting out the actions that it would take in the event that a benchmark materially changes or ceases to be provided. The Management Company shall comply with this obligation. Further information on the plan is available free of charge upon request at the Management Company.

Complaints

Complaints regarding the operation of the Fund may be submitted to the Management Company, the Central Administrator, the Principal Distributor as well as with the local distributor/sub-distributor and/or paying agent(s) of the relevant country of distribution.

Shareholders' Rights

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

Shareholders may find a summary of investor rights (including information on access to collective redress mechanisms at EU and national level in the event of litigation) resulting from an investment in the Fund on the Website.

Material Contracts

The following contracts, not being contracts entered into in the ordinary course of business, have been entered or will be entered into and are or may be material:

- The Management Company Agreement;
- The Portfolio Management Agreement;
- The Depositary Agreement;
- The Administration Agency Agreement; and
- The Principal Distribution Agreement.

Documents Available for Inspection

Copies of the Articles of Incorporation, the most recent Prospectus, the most recent KIID and the latest available Reports are available for inspection and may be obtained free of charge at the registered office of the Fund and on the Website.

The material contracts referred to above are available for inspection at the registered office of the Fund.

Details of the Remuneration Policy are available on the Website and on request as a paper copy free of charge.

An up-to-date description of any safekeeping functions delegated by the Depositary and an up to date list of the delegates and sub-depositaries may be obtained, free of charge and upon request, from the Depositary or on the following website:

https://apps.rbcits.com/RFP/gmi/updates/Appointed%20subcustodians.pdf.

Portfolio Disclosures

The Management Company may publicly disclose a description of the portfolio holdings of the Sub-Funds on a calendar quarter basis. The information will be made available no earlier than the first Business Day falling 30 calendar days after the quarter's end and will remain accessible until the posting of the following quarter's portfolio holdings. The portfolio holdings will be available to all Shareholders at the same time free of charge by contacting the Management Company.

The Management Company may share the Sub-Funds' non-public holdings information with Shareholders of the respective Sub-Fund (requiring such information in order to comply with for their own reporting obligations) as well as with service providers including any advisers to the Sub-Funds who may require access to such information in order to fulfil their contractual duties to the Sub-Funds. The Management Company may also disclose non-public information regarding the Sub-Funds' portfolio holdings to certain mutual fund analysts, pricing services rating agencies and rating and tracking entities, such as Morningstar and Lipper Analytical Services, or other entities that have a legitimate business purpose in receiving such information, sooner than 30 calendar days after a quarter's end or on a more frequent basis as applicable.

The above policy does not apply to prohibit the Management Company from publicly distributing non-specific and/or summary information about the Sub-Funds.

Definition of a U.S. Person

A "U.S. Person" for purposes of this Prospectus is a person who is in either of the following two categories: (a) a person included in the definition of "U.S. person" under Rule 902 of Regulation S under the 1933 Act or (b) a person excluded from the definition of a "Non-United States person" as used in CFTC Rule 4.7. For the avoidance of doubt, a person is excluded from this definition of U.S. Person only if he or it does not satisfy any of the definitions of "U.S. person" in Rule 902 and qualifies as a "Non-United States person" under CFTC Rule 4.7.

General

Investors should remember that the price of Shares of any of the Sub-Funds and any income from them may fall as well as rise and that investors may not get back the full amount invested. Past performance is not a guide to future performance and, depending on each Sub-Fund's investment objectives, policies and strategies, a Sub-Fund should be regarded as a short- or long-term investment. Where a purchase involves a foreign exchange transaction, it may be subject to the fluctuations of currency values. Exchange rates may also cause the value of underlying overseas investments to go down or up. The investor should be aware that not all of the following risk warnings apply to all Sub-Funds.

The Sub-Funds' investments are subject to normal market fluctuations and the risks inherent in all investments and there can be no assurances that appreciation will occur. It will be the policy of the Fund to maintain a diversified portfolio of investments so as to minimise risk.

The investments of a Sub-Fund may be denominated in currencies other than the Reference Currency of that Sub-Fund. The value of those investments (when converted to the Reference Currency of that Sub-Fund) may fluctuate due to changes in exchange rates. The price of Shares and the income from them can go down as well as up and investors may not realise their initial investment.

General risks associated with investments in security markets

Volatile political, market and economic conditions

The investments of the Sub-Fund may be affected by general economic and market conditions, such as interest rates, credit availability, inflation rates, economic uncertainty, changes in laws and national and international political circumstances.

<u>Equity risk</u>

The Sub-Funds, investing in common stocks and other equity securities and equity related FDIs, are subject to market risk that historically has resulted in greater price volatility than experienced by bonds and other fixed income securities.

Interests and credit risks of debt securities

The Sub-Funds, investing in bonds and other fixed income securities and FDIs related to these securities may decline in value if interest rates change. In general, the prices of debt securities rise when interest rates fall and fall when interest rates rise. Longer term bonds are usually more dependent on interest rate changes. The Sub-Funds, investing in bonds and other fixed income securities and FDIs related to these securities are subject to the risk that some issuers may not make payments on such securities. Furthermore, an issuer may suffer adverse changes in its financial condition that could lower the credit quality of a security, leading to greater volatility in the price of the security and in the value of a Sub-Fund. A change in the quality rating of a bond or other security can also affect the security's liquidity and make it more difficult to sell. The Sub-Funds, investing in lower quality debt securities are more susceptible to these problems and its value may be more volatile.

Counterparty risk

The Sub-Funds' use of OTC derivatives (where applicable) may result in a decline of the Net Asset Value of a Sub-Fund in case of a counterparty credit event.

Currency exchange risk

Each Sub-Fund may be invested, according to variable proportions and limits, in values and instruments expressed in other currencies than the Reference Currency of the Sub-Fund or Class and, consequently, may lead to be exposed to a variation of the currency exchange rates. For Sub-Funds or Classes implementing a systematic hedging, a residual currency risk may exist due to the imperfection of the hedging.

Commodities risk

Exposure to the commodities markets (including financial futures markets) may subject a Sub-Fund to greater volatility than investments in traditional securities. The values of commodities and commodity-linked investments can be affected by events that might have less impact on the values of stocks and bonds. Prices of commodities and related contracts may fluctuate significantly over shorter and longer periods for a variety of reasons, including: changes in interest rates, commodity specific supply and demand relationships, international trade and tariffs; weather and natural disasters; governmental, agricultural, fiscal, monetary and exchange control programs and policies; acts of terrorism and international economic, political, military and regulatory developments.

Management and Investment Strategy Risk

Sub-Funds may seek to generate performance by making forecasts on the evolution of certain markets compared to others through the arbitrage strategies. These anticipations can be erroneous and cause a performance lower than the objective of management.

Past results are not indicative of future performance

The Fund is a newly formed entity and has no prior operating or performance history upon which the investor may predict future success or failure.

Past performance is not a guarantee of future performance

The historical performance of the Sub-Fund (if any) is not a guarantee of its future performance, which can vary considerably.

Specific risks associated with investing in UCITS and Other UCIs

Shareholders indirectly bear the cost of all fees and expenses of the underlying funds

In addition to the fees and costs charged to the Fund, the Fund will incur the investment management fees and expenses in the UCITS and Other UCIs. This will result in a higher expense and/or lower level of investment for Shareholders than if Shareholders invested directly in the UCITS and Other UCIs.

Underlying funds may retain and reinvest proceeds of investments and recall distributions

The timing and amount of distributions is generally at the sole discretion of the UCITS and Other UCIs. The UCITS and Other UCIs may also direct that the distributions received from their investments or the proceeds from the disposal of interests in their investments be used to meet current or anticipated obligations. If the UCITS and Other UCIs retain and reinvest these distributions or proceeds, the amount reinvested will be deemed distributed and re-contributed to the UCITS and Other UCIS.

Hedging instruments may adversely affect overall performance

The Fund may choose to engage in transactions designed to reduce the risk or to protect the value of its assets, including securities and currency hedging transactions. These hedging strategies could involve a variety of derivative transactions, including transactions in forward, swap or option contracts or other financial instruments with similar characteristics, including forward foreign currency exchange contracts, currency and interest rate swaps, options and short sales (collectively "Hedging Instruments" to ease the reading of this paragraph). Hedging against a decline in the value of a portfolio position does not eliminate fluctuations in the values of portfolio positions or prevent losses if the value of those positions decline, but establishes other positions designed to gain from those same developments, thereby offsetting the decline in the portfolio positions' value. While these transactions may reduce the risks associated with an investment, the transactions themselves entail risks that are different to those of the investment. The risks posed by these transactions include interest rate risk, market risk, risk that these complex instruments and techniques will not be successfully evaluated, monitored and/or priced, counterparty risk, liquidity risk and leverage risk. Changes in liquidity may result in significant, rapid and unpredictable changes in the prices for derivatives. Thus, while the Fund may benefit from the use of Hedging Instruments, unanticipated changes in interest rates, securities prices or currency exchange rates may result in poorer overall performance for the Fund than if it had not used those Hedging Instruments.

Moreover, it may not be possible to hedge against a currency exchange rate, interest rate or public security price fluctuation that is so widely anticipated that the Fund is not able to enter into a hedging transaction at a price sufficient to protect them from the decline in the value of the portfolio position anticipated as a result of the fluctuation. The success of hedging transactions will be subject to the ability to correctly predict movements in and the direction of currency exchange rates, interest rates and public security prices. In addition, the degree of correlation between price movements of the instruments used in a hedging strategy and price movements in the portfolio positions being hedged may vary. Moreover, for a variety of reasons, the Fund may not seek to establish a perfect correlation between Hedging Instruments and the portfolio positions being hedged. This imperfect correlation may prevent the Fund from achieving the intended hedge or exposure to risk of loss. The making of short sales exposes the Fund to the risk of liability for the market value of the security that is sold, which is an unlimited risk due to the lack of upper limit on the price to which a security may rise. In addition, because the Fund may hold securities indirectly through UCITS and Other UCIs, there can be no assurance that securities necessary to cover a short position will be available for purchase. In addition, it is not possible to hedge fully or perfectly against currency fluctuations affecting the value of securities denominated in currencies that are different from the Sub-Fund Currency because the value of those securities is likely to fluctuate as a result of independent factors not related to currency fluctuations. Currency hedging instruments may not be available in certain currencies or may not have a duration that matches the long term nature of the underlying principal investment. The ability to trade in or exercise options may be restricted in the event that trading in the underlying securities becomes restricted. In addition, these types of hedge transactions also limit the opportunity for gain if the value of the portfolio position should increase. The successful use of these hedging strategies depends upon the availability of a liquid market and appropriate Hedging Instruments and there can be no assurance that the Fund will be able to close out a position when deemed advisable by the Management Company or the Portfolio Manager. No assurance can be given that a liquid market will exist for any particular futures contract at any particular time. Hedging transactions also involve additional costs and expenses, which may adversely affect the overall performance of the Fund. There can be no assurance that the Fund will engage in hedging transactions at any given time or from time to time, or that these transactions, if available, will be effective.

Use of CoCos

CoCos are debt instruments convertible into equity if a pre-specified trigger event occurs. Many of the larger financial institutions have lately embraced the use of CoCos as a cost effective way of meeting the level of going-concern capital required by Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms (the "CRR") in addition to the Common Equity Tier 1 capital as defined in the CRR (the "CET1"). The CRR allows a financial institution to issue Additional Tier 1 ("AT1") securities in non-CET1 capital but in the form of CoCos. To qualify as AT1s the CoCos need to be able to be written down or converted into equity when a certain trigger CET1 is reached or when the relevant regulatory authority deems the issuer being non-viable under the Bank Recovery and Resolution Directive 2014/59/EU of the European Parliament and of the Council of 15 May 2014.

Investors should fully understand and consider the risks of CoCos.

Valuation Risk

To correctly value the instruments the Fund needs to evaluate the probability of activating the trigger, the extent and probability of any losses upon trigger conversion (not only from write-downs of their principal value but also from unfavourably timed conversion to equity) and the likelihood of cancellation of coupons. These risks may be highly challenging to model. Though certain risk factors are transparent, e.g., trigger level, coupon frequency, leverage, credit spread of the issuer, and rating of instrument, if any, other factors are discretionary or difficult to estimate, e.g. individual regulatory requirements relating to the capital buffer, the issuers' future capital position, issuers' behaviour in relation to coupon payments on AT1 CoCos, and any risks of contagion. Importantly, as one descends down the capital structure to sub-investment grade where the majority of CoCos sit, the level of precision in estimating value when compared to more highly rated instruments, deteriorates.

Capital structure inversion risk

Contrary to classic capital hierarchy, CoCo investors may suffer a loss of capital when equity holders do not. In certain scenarios, holders of CoCos will suffer losses ahead of equity holders, e.g., when a high trigger principal write-down CoCo is activated. This cuts against the normal order of capital structure hierarchy where equity holders are expected to suffer the first loss. This is less likely with a low trigger CoCo when equity holders will already have suffered loss. Moreover, high trigger Tier 2 CoCos may suffer losses not at the point of gone concern but conceivably in advance of lower trigger AT1s and equity.

<u>Trigger risk</u>

In the event that (i) the issuer falls below pre-determined capital ratio threshold levels or (ii) at the request of a financial regulator with supervisory authority causing CoCos to convert into equity or to be permanently written down. In the first case, the trigger event calculations may also be affected by changes in applicable accounting rules, the accounting policies of the issuer or its group and the application of these policies. In the event of a security being converted to equity, investors may suffer a loss depending on the conversion rate. Were the securities to be written down, the principal may be fully lost with no payment to be recovered. Some CoCos may be written back up to par over time, but the issuer may be under no obligation to fully do so. Following a trigger event, losses may not reflect the waterfall of subordination and in some circumstances CoCo bond holders may suffer losses prior to investors in the same financial institution holding equity or bonds ranking pari passu or junior to the CoCo instruments. Independent from the trigger risk, a financial regulator with supervisory authority may at any time deem the issuer to have reached a point of non-viability, meaning that public intervention would be needed to keep the issuer out of bankruptcy, causing losses across the capital structure for equity and bondholders alike. Under these circumstances CoCo bondholders would suffer losses in line with the subordination of the CoCo host instrument.

Coupon cancelation risk

CoCos issued in Additional Tier 1 format give the issuer an option to cancel any payment of interest any time at its sole discretion. In addition, the issuer may be required by the regulator to cancel the coming interest payments. Coupon cancellation will also be a subject of issuer breaching a certain capital ratio threshold. Any cancellation of interest represents a forgone coupon payment and will not be reimbursed, in case the issuer decides to resume interest payments at a later stage.

<u>Unknown risk</u>

The structure of the investments in CoCos is innovative and has not been fully tested as of today.

<u>Liquidity risk</u>

CoCos may entail a liquidity risk, meaning that under certain conditions it may be difficult to sell them. If the relevant market for a specific CoCo is illiquid, it may not be possible to liquidate a position at all or at an acceptable price. This risk generally increases the more likely it gets that the pre-specified trigger event of a given CoCo occurs.

Call extension risk

Redemption rights of CoCos' holders depend on the CoCos' issuer's competent authority approval

Extension risk

As there may be no incentive, in the form of a coupon step-up, for the issuer to redeem the securities issued, this would cause the securities' duration to lengthen and to expose investors to higher interest rate risk.

Yield/ Valuation risk

CoCos may have an attractive yield which may be viewed as a complexity premium.

Net Asset Value

Finally, when CoCos are written down, the Net Asset Value of the Fund may significantly decrease.

Risks associated with the terms and conditions of the Fund

Liquidity of the Fund's investments

The investments of the Fund generally will be long-term and some of them may be less liquid. As a result, the Fund may not have control over when it will have assets to distribute.

Dilution from subsequent subscriptions

Shareholders subscribing for Shares will participate in existing investments of the Fund, diluting the interest of existing Shareholders.

Shareholders bear all fees and costs of the Fund

Shareholders will pay all the fees and costs of the Fund, as disclosed herein. This may result in a higher expense for Shareholders than if Shareholders invested directly in the underlying assets of the Fund.

Business Dependent upon Key Individuals

The success of the Fund is significantly dependent upon the expertise of the Portfolio Manager and its members.

Past Performance is not an Indication of Future Results

There can be no assurance that the Fund or any Sub-Fund will achieve its investment objective. The past investment performance of the Portfolio Manager cannot be construed as an indication of the future results of an investment in the Fund or any Sub-Fund.

Effects of Redemptions

Large redemptions of Shares within a limited period of time could require the Fund to liquidate positions more rapidly than would otherwise be desirable, adversely affecting the value of both the Shares being redeemed and the outstanding Shares. In addition, regardless of the period of time over which redemptions occur, the resulting reduction in a Sub-Fund's Net Asset Value could make it more difficult for the Portfolio Manager to generate profits or recover losses. Early investors may account for a significant portion of the Fund's capital during its early life. While there can be no assurance that seed

capital will be invested, a redemption of any such seed capital may adversely affect a Sub-Fund's liquidity and diversification and may cause the Portfolio Manager to liquidate assets at inopportune times, which could adversely affect a Sub-Fund's Net Asset Value.

Taxation

The proceeds from the sale of securities in some jurisdictions or the receipt of any dividends or other income may be or may become subject to tax, levies, duties or other fees or charges imposed by the authorities in that market, including taxation levied by withholding at source. Tax law and practice in certain countries into which the Fund invests or may invest in the future is not clearly established. It is possible therefore that the current interpretation of the law or understanding of practice might change, or that the law might be changed with retrospective effect. It is therefore possible that the Fund could become subject to additional taxation in such countries that is not anticipated either at the date of the Prospectus or when investments are made, valued or disposed of.

Market Risk

A Sub-Fund is subject to market risk, which is the risk that the market values of the securities and FDIs held in its portfolio may move up or down, sometimes rapidly and unpredictably. Security values and values of FDIs fluctuate based on many factors including changes in interest rates, market conditions, investor confidence and announcements of economic, political or financial information. Equity securities and commodity-linked securities and FDIs related to these generally have greater price volatility than fixed income securities and fixed income related FDIs.

Fixed income securities include, but are not limited to:

- securities issued or guaranteed by governments, their agencies or governmentsponsored enterprises;
- corporate debt securities, including convertible securities and corporate commercial paper;
- mortgage-related and other asset-backed securities;
- inflation-indexed bonds issued both by governments and corporations;
- structured notes, including hybrid or "indexed" securities, event-linked bonds and loan participations;
- bank certificates of deposit, fixed time deposits and bankers' acceptances;
- repurchase agreements and reverse repurchase agreements;
- debt securities issued by states or local governments, their agencies and other government-sponsored enterprises; and
- obligations of international agencies or supranational entities.

OTC Derivative Instrument Transactions

The Fund may invest a portion of its assets in investments which are not traded on organised exchanges and as such are not standardised. Such transactions are known as over-the-counter or "OTC" transactions and may include forward contracts, options, swaps or other derivatives. Whilst some OTC markets are highly liquid, transactions in OTC derivatives may involve greater risk than investing in exchange traded derivatives because there is no exchange market on which to close out an open position. It may be impossible to liquidate an existing position, to assess the value of the position arising from an off-exchange transaction or to assess the exposure to risk. Bid and offer prices need not be quoted and, even where they are, they will be established by dealers in these instruments and consequently it may be difficult to establish what is a fair price. In respect of such trading, the Fund is subject to the risk of counter-party failure or the inability or refusal by a counter-party to perform with respect to such contracts or redeliver cash or securities delivered by the Fund to support such contracts. Market illiquidity or disruption could result in major losses to the Fund.

Interest Rate Risk

A Sub-Fund may be subject to interest rate risk. As nominal interest rates rise, the value of fixed income securities held by a Sub-Fund is likely to decrease. Securities with longer durations and FDIs related to these securities tend to be more sensitive to changes in interest rates, usually making them more volatile than securities and FDIs with shorter durations. A nominal interest rate can be described as the sum of a real interest rate and an expected inflation rate. Inflation-indexed securities and FDIs, including treasury inflation-protected securities, decline in value when real interest rates are rising faster than nominal interest rates, inflation-protected securities and FDIs may experience greater losses than other fixed income securities and FDIs with similar durations.

Credit Risk

A Sub-Fund could lose money if the issuer or guarantor of a fixed income security, or the counterparty to a derivatives contract, repurchase agreement or a loan of portfolio securities, is unable or unwilling to make timely principal and/or interest payments, or to otherwise honour its obligations. All securities are subject to varying degrees of credit risk, which may not always be wholly reflected in credit ratings. In addition, the Sub-Funds may purchase unrated securities, thus relying on the Portfolio Manager's credit analysis, possibly increasing or incurring other risks.

Foreign Exchange/Currency Risk

Although Shares of the different Classes within a Sub-Fund may be denominated in different currencies, the Sub-Funds may invest the assets related to a Class in securities

denominated in a wide range of other currencies. The Net Asset Value of the relevant Class of the relevant Sub-Fund as expressed in its Reference Currency will consequently fluctuate in accordance with the changes in foreign exchange rate between the Reference Currency and the currencies in which the Sub-Funds' investments are denominated.

In addition, there is a risk that foreign exchange controls may be modified by foreign governments which may have an adverse effect on the Shares.

The Sub-Fund may therefore be exposed to a foreign exchange/currency risk. However, these risks generally depend on factors outside of the Fund's control such as financial, economic, military and political events and the supply and demand for the relevant currencies in the global markets. It may not be possible or practicable to hedge against the consequent foreign exchange/currency risk exposure.

Debt Securities Risk

Debt securities, such as notes and bonds, are subject to credit risk and interest rate risk. Credit risk is the possibility that an issuer of an instrument will be unable to make interest payments or repay principal when due. Changes in the financial strength of an issuer or changes in the credit rating of a security may affect its value. Interest rate risk is the risk that interest rates may increase, which tends to reduce the resale value of certain debt securities. Debt securities with longer maturities are generally more sensitive to interest rate changes than those with shorter maturities. Changes in market interest rates do not affect the rate payable on an existing debt security, unless the instrument has adjustable or variable rate features, which can reduce its exposure to interest rate risk. Changes in market interest rates may also extend or shorten the duration of certain types of instruments, thereby affecting their value and the return on an investment in a Sub-Fund.

Depositary Risk and Sub-Custodial Risk

Assets of the Fund are safe kept by the Depositary and Shareholders are exposed to the risk of the Depositary not being able to fully meet its obligation to restitute in a short timeframe all of the assets of the Fund in the case of bankruptcy of the Depositary. The assets of the Fund will be identified in the Depositary's books as belonging to the Fund. Securities and debt obligations (including loan assignments and loan participations) held by the Depositary will be segregated from other assets of the Depositary which mitigates but does not exclude the risk of non-restitution in case of bankruptcy. However, no such segregation applies to cash which increases the risk of non-restitution in case of bankruptcy. The Depositary does not keep all the assets of the Fund itself but uses a network of sub-custodians which are not part of the same group of companies as the Depositary. Shareholders are also exposed to the risk of bankruptcy of the sub-custodians.

The Fund may be required to place assets outside the Depositary's and the sub-depositary's safekeeping network in order for the Fund to trade in certain markets. In such circumstances, the Depositary remains in charge of monitoring where and how such assets are held. In such markets, Shareholders should note that there may be delays in settlement and/or uncertainty in relation to the ownership of a Sub-Fund's investments which could affect the Sub-Fund's liquidity, and which could lead to investment losses.

Valuation Risk

The Fund may consult with the Management Company and the Portfolio Manager with respect to the valuation of investments. There is a possible conflict of interest because of the Management Company and the Portfolio Manager's role in determining the valuation of a Sub-Fund's investments and the fact that the Portfolio Manager receives a fee that increases as the value of the Sub-Fund increases.

Derivatives Risk

A Sub-Fund may be subject to risk associated with FDIs. FDIs are considered for these purposes to consist of securities or other instruments whose value is derived from or related to the value of some other instrument, asset, rate or index, and not to include those securities whose payment of principal and/or interest depends upon cash flows from underlying assets, such as mortgage-related or asset-backed securities. As such, these instruments may be particularly sensitive to changes in the market value of the related instruments or assets. In addition, FDIs may be particularly sensitive to changes in prevailing interest rates. Unexpected changes in interest rates may adversely affect the value of a Sub-Fund's investments, particularly FDIs. FDIs also involve the risk of mispricing and the risk that changes in the value of the derivative may not correlate perfectly with the underlying asset, rate or index

Regulatory Risk

The Sub-Funds must comply with various legal requirements, including securities laws and tax laws as imposed by the jurisdictions under which they operate. Should any of those laws change over the life of the Sub-Funds, the legal requirement to which the Sub-Funds and their Shareholders may be subject could differ materially from current requirements.

Counterparty Risk

A Sub-Fund will be subject to the risk of the inability of any counterparty to perform with respect to transactions, whether due to insolvency, bankruptcy or other causes. In particular, it should be noted that transactions may not always be delivery versus payment, and this may expose a Sub-Fund to greater counterparty risk. Generally, the Portfolio Manager will assess the counterparty's creditworthiness before entering into a transaction with the counterparty.

Issuer Risk

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

Liquidity Risk

Liquidity risk exists when particular investments are difficult to purchase or sell. A Sub-Fund's investments in illiquid securities or FDIs may reduce the returns of the Sub-Fund because it may be unable to sell the illiquid securities or FDIs at an advantageous time or price. Sub-Funds with principal investment strategies that involve foreign securities, derivatives or securities with substantial market and/or credit risk as well as Sub-Funds with investment strategies that involve a smaller number of portfolio positions and which invest in small-capitalization companies tend to have the greatest exposure to liquidity risk.

Concentration of Investments

Although the Sub-Funds will diversify their portfolio in accordance with the investment restrictions set out under "Investment Restrictions" and the relevant Appendix, a Sub-Fund may permanently or on a temporary basis hold a smaller number of portfolio positions. Investments may be weighted to certain asset types, in certain specific markets and/or in certain geographic regions, and there can be no guarantees as to the diversification of a Sub-Fund's assets. Events that impact a specific investment, asset type, market or geographic region may have an impact on a Sub-Fund's performance. The Sub-Fund could be subject to significant losses if it holds a large position in a particular investment that declines in value or is otherwise adversely affected, including as a consequence of the default of the issuer. Consequently, a loss in any such position could result in a proportionately higher reduction in the net asset value of the Sub-Fund than if the Sub-Fund had invested in a wider number of positions.

Equity Risk

The values of equity securities and equity related FDIs may decline due to factors related to a particular company but also due to general market conditions which are not specifically related to a particular company, such as real or perceived adverse economic conditions, changes in the general outlook for corporate earnings, changes in interest or currency rates or adverse investor sentiment generally. They may also decline due to factors which affect a particular industry or industries, such as labour shortages or increased production costs and competitive conditions within an industry. Equity securities and equity related FDIs generally have greater price volatility than fixed income securities and fixed income related FDIs.

Operational Risk

The Fund or any of its Sub-Funds may be exposed to operational risks, being the risk that operational processes, including those related to the safekeeping of assets, valuation and transaction processing may fail, resulting in losses. Potential causes of failure may arise from human errors, physical and electronic system failures and other business execution risks as well as external events.

Collateral Risk

Counterparty risk arising from investments in OTC derivatives and efficient portfolio management techniques is generally mitigated by the transfer or pledge of collateral in favor of a particular Sub-Fund.

However, transactions may not be fully collateralized. Fees and returns due to a Sub-Fund may not be collateralized. If a counterparty defaults, the Sub-Fund may need to sell non-cash collateral received at prevailing market prices. In such a case a Sub-Fund could realize a loss due, inter alia, to inaccurate pricing or monitoring of the collateral, adverse market movements, deterioration in the credit rating of issuers of the collateral or illiquidity of the market on which the collateral is traded. Difficulties in selling collateral may delay or restrict a Sub-Fund's ability to meet redemption requests. A Sub-Fund may also incur a loss in reinvesting cash collateral received, where permitted. Such a loss may arise due to a decline in the value of the investments made. A decline in the value of such investments would reduce the amount of collateral available to be returned by a Sub-Fund to the counterparty as required by the terms of the transaction. A Sub-Fund would be required to cover the difference in value between the collateral originally received and the amount available to be returned to the counterparty, thereby resulting in a loss to the Sub-Fund.

Economic Dislocation Risk

The financial sector may experience periods of substantial dislocation and the impacts of that dislocation are difficult to predict. Imbalances in trade and finance may lead to sudden shocks. Moreover, the evolution of economies and financial systems may result in the shifting of the perceived risks in recent historical periods, for example between what have been seen as emerging and developed markets. For example, the failure Lehman Brothers was seen by many as unlikely, and the impact of that failure was not generally well understood in advance. More recently, European financial markets have experienced volatility and have been adversely affected by concerns about high government debt levels, credit rating downgrades, and possible default on or further restructuring of government debt. Holders of Euro-denominated sovereign debt, including banks and other financial institutions, could be adversely affected by weakness in sovereign borrowers, which in turn may have less ability to support the financial system. It is possible that countries that have already adopted the Euro could abandon the Euro and return to a national currency or that the Euro will cease to exist as a single currency in its current form. The effects of voluntary or involuntary abandonment of the Euro on that country, the rest of the countries using the Euro, and global markets are unknown, but are likely to be negative. In addition, under these circumstances, it may be difficult to value investments denominated in Euro or in a replacement currency.

Smaller Company Risk

The general risks associated with equity and fixed income securities are particularly pronounced for securities issued by companies with smaller market capitalisations. These companies may have limited product lines, markets or financial resources or they may depend on a few key employees. As a result, they may be subject to greater levels of credit, market and issuer risk. Securities of smaller companies may trade less frequently and in lesser volumes than more widely held securities and their values may fluctuate more sharply than other securities. Companies with medium-sized market capitalisations may have risks similar to those of smaller companies.

Risks Associated with the Use of Leverage

A Sub-Fund may use leverage as part of its investment strategy by entering into certain transactions, including futures contracts and taking short positions in financial instruments. Leverage can magnify the effects of changes in the value of the Sub-Fund's investments and make the Sub-Fund more volatile. Leverage creates a risk of loss of value on a larger pool of assets than the Sub-Fund would otherwise have had, potentially resulting in the loss of all assets. The Sub-Fund may also have to sell assets at inopportune times to satisfy its obligations in connection with such transactions.

Risk Associated with Synthetic Short Selling

Synthetic short sales (through the use of FDIs) are considered a speculative investment practice. The Portfolio Manager may attempt to limit a Sub-Fund's exposure to a possible market decline in the value of its portfolio securities through synthetic short sales of securities that the Portfolio Manager believes possess volatility characteristics similar to those being hedged. In addition, the Portfolio Manager may use synthetic short sales for non-hedging purposes to pursue their investment objectives. For example, the Portfolio Manager may effect a synthetic short sale of a security if, in the Portfolio Manager's view, the security is over-valued in relation to the issuer's prospects for growth.

A synthetic short sale of a security involves the risk of an unlimited increase in the market price of the security which could result in an inability to cover the short position and thus a theoretically unlimited loss. Synthetic short sales may also subject a Sub-Fund to leverage risk (i.e., the risk that losses could well exceed a Sub-Fund's investment). There can be no assurance that securities necessary to cover a short position will be available for purchase.

Risks Associated with Securities Financing Transactions

Use of securities financing transactions involves certain risks, some of which are listed in the following paragraphs, and there can be no assurance that the objective sought to be obtained from such use will be achieved.

Although a Sub-Fund entering into securities financing transactions may receive collateral to reduce its counterparty exposure, there is no requirement for such counterparty exposure be fully covered by collateral. This leaves room for the Sub-Funds to be exposed to a net counterparty risk and investors should be aware of the possible resulting loss in case of default of the relevant counterparty.

Repurchase transactions

In relation to reverse repurchase transactions and sale with right of repurchase transactions in which a Sub-Fund acts as purchaser and in the event of the failure of the counterparty from whom securities have been purchased, investors should note that:

- 1) there is the risk that the value of the securities purchased may yield less than the cash originally paid, whether because of inaccurate pricing of such securities, an adverse market value evolution, a deterioration in the credit rating of the issuers of such securities, or the illiquidity of the market in which these are traded; and
- 2) locking cash in transactions of excessive size or duration, and/or delays in recovering cash at maturity may restrict the ability of the Sub-Fund to meet redemption requests, security purchases or, more generally, reinvestment.

In relation to repurchase transactions and sale with right of repurchase transactions in which a Sub-Fund acts as seller and in the event of the failure of the counterparty to which securities have been sold, investors should note that:

- there is the risk that the value of the securities sold to the counterparty is higher than the cash originally received, whether because of a market appreciation of the value of such securities or an improvement in the credit rating of their issuer; and
- 2) locking investment positions in transactions of excessive size or duration, and/or delays in recovering, at maturity, the securities sold, may restrict the ability of the Sub-Fund to meet delivery obligations under security sales or payment obligations arising from redemption requests.

Securities lending

In relation to securities lending transactions, investors should note that:

- 1) if the borrower of securities lent by a Sub-Fund fails to return these, there is a risk that the collateral received may be realised at a value lower than the value of the securities lent, whether due to inaccurate pricing of the collateral, adverse market movements in the value of the collateral, a deterioration in the credit rating of the collateral issuer, or the illiquidity of the market in which the collateral is traded; and
- 2) in case of reinvestment of cash collateral, such reinvestment may:
 - introduce market exposures inconsistent with the objectives of the Sub-Fund; or
 - yield a sum less than the amount of collateral to be returned; and
- 3) delays in the return of securities on loans may restrict the ability of a Sub-Fund to meet delivery obligations under security sales or payment obligations arising from redemption requests.

In case of default of a securities borrower, the Securities Lending Agent has the obligation to purchase for the account of the Sub-Fund replacement securities identical to the loaned securities or to indemnify the Sub-Fund for the amount equal to the difference between the market value of the loaned securities and the market value of the collateral held against such loaned securities.

Anti-Money Laundering

In an effort to deter money laundering and terrorism financing, the Fund, the Management Company, the Portfolio Manager, any distributor, and the Central Administrator must comply with all applicable international and Luxembourg laws and circulars regarding the prevention of money laundering and terrorism financing and in particular with the Luxembourg law dated 12 November 2004 against money laundering and terrorism financing, as amended from time to time. To that end, the Fund, the Management Company, the Portfolio Manager, any distributor, and the Central Administrator may request information necessary to establish the identity of a potential investor and the origin of subscription proceeds.

If the Fund, the Central Administrator or any governmental agency believes that the Fund has accepted subscriptions for Shares by, or is otherwise holding assets of, any person or entity that is acting, directly or indirectly, in violation of any anti-money laundering laws, rules regulations, treaties or other restrictions, or on behalf of any suspected terrorist or terrorist organisation, the Fund or such governmental agency may freeze the assets of such person or entity invested in the Fund or suspend their withdrawal rights. The Fund may also be required to remit or transfer those assets to a governmental agency.

Cross-Sub-Fund Liability

Each Sub-Fund will be deemed to be a separate entity with, but not limited to, its own contributions, redemptions, capital gains, losses, charges and expenses. Thus, liabilities of an individual Sub-Fund which remain undischarged will neither attach to the Fund as a whole, nor to other Sub-Funds. However, while Luxembourg law states that, unless otherwise provided for in the constituent documentation of the Fund, there is no cross-liability, there can be no assurance that such provisions of Luxembourg law will be recognized and effective in other jurisdictions.

Cross Class Liability

The Classes within a Sub-Fund are not separate legal entities. Thus, all of the assets of a Sub-Fund are available to meet all the liabilities of such Sub-Fund. In practice, cross-class liability will only arise where any Class becomes insolvent and is unable to meet all its liabilities. In this case, all of the assets of a Sub-Fund may be applied to cover the liabilities of the insolvent Class.

Epidemics and Other Health Risks

Many countries have experienced outbreaks of infectious illnesses in recent decades, including swine flu, avian influenza, SARS and Covid-19 (the "**Coronavirus**"). In December 2019, an initial outbreak of the Coronavirus was reported in Hubei, China. Since then, a large and growing number of cases have been confirmed around the world. The Coronavirus outbreak has resulted in numerous deaths and the imposition of both local and more widespread "work from home" and other quarantine measures, border closures and other travel restrictions, causing social un-rest and commercial disruption on a global scale. The World Health Organization has declared the Coronavirus outbreak a pandemic.

The ongoing spread of the Coronavirus has had, and will continue to have, a material adverse impact on local economies in the affected jurisdictions and also on the global economy, as cross border commercial activity and market sentiment are increasingly impacted by the outbreak and government and other measures seeking to contain its spread. In addition to these developments having adverse consequences for certain issuers in or through which the Sub-Funds may invest and the value of the Sub-Funds' investments therein, the operations of the Portfolio Manager and other service providers of the Fund have been, and could continue to be, adversely impacted, including through quarantine measures and travel restrictions imposed on Portfolio Manager personnel or service providers based or temporarily located in affected countries, or any related health issues of such personnel or service providers. Any of the foregoing events could materially and adversely affect the Sub-Funds' ability to source, manage and divest their investments and their ability to fulfil their investment objectives. Similar consequences could arise with respect to other comparable infectious diseases.

The foregoing list of risk factors does not purport to be an exhaustive list of all the risk factors relating to investments in any particular Sub-Fund. Various other risks may apply. Prospective investors should consult with their own professional advisors before deciding to subscribe.

TO THE PROSPECTUS OF MANDATUM SICAV-UCITS

1. Name

Mandatum SICAV-UCITS – Mandatum European Small & Midcap Equity Fund (the "Mandatum European Small & Midcap Equity Fund").

2. Sub-Portfolio Manager

Fourton Oy has been appointed sub-portfolio manager by the Portfolio Manager.

3. Reference Currency

The Reference Currency of the Mandatum European Small & Midcap Equity Fund is the Euro.

4. Investment Objective and Policy

The Mandatum European Small & Midcap Equity Fund aims to achieve long-term capital growth by investment in European equities and equity-related securities of small and mid-capitalization companies which typically are companies with market capitalization below EUR 10 billion. Due to general market conditions or company specific factors, such as low free-float, the Mandatum European Small & Midcap Equity Fund may from time to time also invest in European companies with higher market capitalizations. The Mandatum European Small & Midcap Equity Fund may from time to time also invest in European companies with higher market capitalizations. The Mandatum European Small & Midcap Equity Fund seeks to achieve returns in excess of its Benchmark Index primarily through its active selection of investments. The Portfolio Manager has adopted a Responsible Investment Policy and the investment process of the Mandatum European Small & Midcap Equity Fund encompasses the consideration of environmental, social and governance (ESG) factors. Details can be found under the heading "RESPONSIBLE INVESTMENT POLICY".

The Mandatum European Small & Midcap Equity Fund may also invest in UCITS (including ETFs) and other UCIs (subject to the 10% limit set forth in section VI. (1) under the heading "INVESTMENT RESTRICTIONS") as part of its investment strategy and for liquidity management purposes.

The Mandatum European Small & Midcap Equity Fund is entering into securities lending and borrowing transactions on a continuous basis for a purpose of efficient portfolio management and revenue optimisation. The securities lending activity should not result in a change of the declared investment objective of the Mandatum European Small & Midcap Equity Fund. Between 0% to 40% of the net asset value of available instruments in the Mandatum European Small & Midcap Equity Fund may be subject to securities lending or borrowing transactions. It is typically expected that securities lending and borrowing transactions will not exceed 25% of the net asset value of the Mandatum European Small & Midcap Equity Fund except where the Mandatum European Small & Midcap Equity Fund is entitled at all times to the cancellation of the contract and the restitution of the securities. Only in exceptional market conditions, in which there are no demand to lend out any securities, the Mandatum European Small & Midcap Equity Fund is not entering into securities lending and borrowing transactions. The Mandatum European Small & Midcap Equity Fund shall ensure that the volume of the securities lending transactions is kept at an appropriate level or that it is entitled to request the return of the securities lent in a manner that enables it, at all times, to meet its redemption obligations and that these transactions do not jeopardise the management of the Mandatum European Small & Midcap Equity Fund's assets in accordance with its investment policy.

The Mandatum European Small & Midcap Equity Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy.

The Mandatum European Small & Midcap Equity Fund may invest in fixed-income and Money Market Instruments only for liquidity management purposes.

5. Benchmark Index

Index	Index calculation currency	Weight
Stoxx Europe Small 200	EUR	100%

The Benchmark Index is a benchmark within the meaning of the Benchmark Regulation. The administrator of the benchmark is STOXX Ltd. and is included in the register of administrators established and maintained by ESMA.

According to Article 29(1) of the Benchmark Regulation, the Mandatum European Small & Midcap Equity Fund may use the benchmark as it is provided by an administrator included in the above-mentioned register as a third-country administrator in accordance with Article 32 of the Benchmark Regulation.

6. Pre-contractual Sustainability Disclosure Pursuant to Article 8 of SFDR

The Mandatum European Small & Midcap Equity Fund qualifies as a financial product under Article 8 of SFDR.

The information to be disclosed pursuant to Article 8(1), (2) and (2a) SFDR as well as information about the environmental or social characteristics is available at the end of this Appendix I to the Prospectus.

7. Classes

Class	Reference Currency	Minimum Subscription Amount in the Reference Currency of the Class	Management Fee p.a.	Performance Fee
D1 EUR cap.	EUR	None	0.75 %	No
D2 EUR cap.	EUR	5,000,000	0.50 %	No
F1 EUR cap. perf.	EUR	None	0.60 %	Yes
F2 EUR cap. perf.	EUR	5,000,000	0.50 %	Yes
F3 EUR cap. perf.	EUR	20,000,000	0.50 %	Yes
FS I EUR cap.	EUR	40,000,000	0.50 %	No
FS I EUR distr.	EUR	40,000,000	0.50 %	No
G EUR cap.	EUR	None	0.03 %	No
S1 EUR cap.	EUR	None	1.50 %	No
S1B EUR cap.	EUR	1,000,000	1.00 %	No
S2 EUR cap.	EUR	5,000,000	0.75 %	No
S2B EUR cap.	EUR	10,000,000	0.65 %	No
S3 EUR cap.	EUR	20,000,000	0.55 %	No
X EUR cap.	EUR	None	None	No

Currently, Shares of the Mandatum European Small & Midcap Equity Fund are issued in the following Classes:

The Mandatum European Small & Midcap Equity Fund offers Class D, Class F, Class FS, Class G, Class S and Class X Shares with different characteristics, including management fees, minimum subscription amounts, performance fees, currencies, distribution policies and hedging. Please visit the Website for a complete list of Classes available in the Mandatum European Small & Midcap Equity Fund.

Each Class will be offered during its Initial Offering Period at a fixed price in the respective currency of this Class as determined at the absolute discretion of the Board of Directors.

Class D1 and D2 Shares

Class D1 and D2 Shares are available exclusively for specified intermediaries who, within the scope of the services they provide, are not allowed to accept and retain fees, commissions or any monetary or non-monetary benefits (except for minor non-monetary benefits) that are paid or provided by any third party or a person acting on behalf of a third party, be this (i) due to legal requirements or (ii) due to the fact that they have concluded a contractual agreement with their customers (e.g., individual discretionary portfolio management or advisory agreements with separate fee arrangements or other agreements) which exclude such payments.

Class F1, F2 and F3 Shares

Class F1, F2 and F3 Shares are available for subscription to all investors.

Class FS I Shares

Class FS I Shares are reserved for Institutional Investors.

Class G Shares

Class G Shares are reserved for companies that qualify as Institutional Investors belonging to the Mandatum group, as defined by the Board of Directors from time to time.

Class S1, S1B, S2, S2B and S3 Shares

Class S1, S1B, S2, S2B and S3 Shares are available for subscription to all investors.

Class X Shares

Class X Shares are reserved for Institutional Investors who have entered into a specific agreement with the Fund, the Management Company or the Portfolio Manager. Investment into Class X Shares shall be at the absolute discretion of the Board of Directors.

8. Minimum Initial Subscription, Holding, Subsequent Subscription and Redemption Amounts

The minimum initial subscription amounts are shown in the table in Section 7.

There are no minimum holding, subsequent subscription or redemption amounts.

The Board of Directors may in its absolute discretion decide to waive the minimum initial subscription, and set a minimum holding, subsequent subscription and/or redemption amount.

9. Subscription, Redemption and Conversion Fees

A. Subscription Fee

No subscription fee will be levied.

B. Redemption Fee

No redemption fee will be levied.

C. Conversion Fee

No conversion fee will be levied.

10. Fees

A. Management Fee

The Management Fees for each Class are shown in the table in Section 7.

B. Portfolio Management Fee

The Management Company will pay the fees of the Portfolio Manager.

C. Sub-Portfolio Management Fee

The Portfolio Manager will pay the fees of the Sub-Portfolio Manager.

D. Performance Fee

Class F1, F2 and F3 EUR cap. perf. Shares

The Performance Index for Class F1, F2 and F3 EUR cap. perf. Shares is the Benchmark Index (please see 5 above).

The Performance Rate for Class F1 EUR cap. perf. Shares is 10%, Class F2 EUR cap. perf. Shares 8% and Class F3 EUR cap. perf. Shares 5%, i.e. the Performance Fee is 10%, 8% and 5% of the excess return compared to the Performance Index of each Class, respectively.

The Performance Fee calculations for all Performance Fee Classes of Mandatum European Small & Midcap Equity Fund will be made as set out below:

Performance Fee = Number of Shares \times Performance Rate \times MAX(0, NAV_T - NAVadjusted_T)

 $NAVadjusted_{T} = NAV_{CRYST} \times \frac{Performance Index_{T}}{Performance Index_{CRYST}} \times FlowAdj_{T}$

<u>Where</u> Performance Rate	Please see above.
NAVT	Net Asset Value per Share of the relevant Class on Val- uation Date T.
NAVCRYST	Net Asset Value per Share previously achieved in the relevant Class when a Performance Fee was crystal- lized. The NAV _{CRYST} at the end of the Initial Offering Period was the NAV _{CRYST} of the merging unit class of the merging Fourton Odysseus fund.

Performance Index⊤	Value of the Performance Index on Valuation Date T.
Performance IndexCRYST	Value of the Performance Index on NAV _{CRYST} 's Valua- tion Date.
FlowAdj⊤	Adjustment taking into account the effect of new sub- scriptions received and redemptions requested since the start of the financial year.

Shareholders are informed that a Performance Fee may be paid even if the absolute performance is negative when the performance of the Performance Fee Class has been less negative than the absolute performance of the Performance Index (please see below example "Outperforming the Performance Index: negative absolute return").

The table below provides examples of how the Performance Fee will be calculated under different performance scenarios.

	Outperforming the Performance Index	Outperforming the Performance In- dex: uncovered past underperfor- mance	Outperforming the Performance In- dex: negative ab- solute return
NAV_{CRYST} at the beginning of a year	100	120	100
Net Asset Value at the beginning of a year	100	100	100
Return of the Performance Fee Class, net of all fees	10 %	10 %	-5 %
Return of the Performance Index	5 %	5 %	-10 %
Outperformance	5 %	5 %	5 %
Performance Rate	10 %	10 %	10 %
NAVadjusted at the end of a year	105	126	90
Net Asset Value at the end of a year	110	110	95
NAVadjusted	105	126	90
Performance Fee per Share	0,50	0,00	0,50
NAV _{CRYST} at the end of a year	110	120	95
NAVadjusted at the beginning of a next year	110	126	95

11. Global Exposure Calculation Methodology

The global exposure will be calculated by using the commitment approach.

12. Leverage

In managing the Mandatum European Small & Midcap Equity Fund, the Portfolio Manager may invest a maximum of 125 % of the net assets of the Mandatum European Small & Midcap Equity Fund in the European equity markets.

13. Risk Factors

The Mandatum European Small & Midcap Equity Fund is primarily subject to the risks described under the "RISK FACTORS ANNEX" of the Prospectus.

14. Profile of the Typical Investor

The Mandatum European Small & Midcap Equity Fund is suitable for investors who seek to invest selectively in European small & midcap companies, seek higher returns than those of fixed income investments and accept the risks associated with equity investments. The recommended investment period is 5 years.

15. Listing

The Shares of the Mandatum European Small & Midcap Equity Fund are currently not listed on any stock exchange. The Board of Directors may, in its sole discretion, make an application for the listing of the Shares on the Luxembourg Stock Exchange or any other stock exchange.

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



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

Taxonomy or not.

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

The Mandatum European Small & Midcap Equity Fund promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics and the companies in which the investments are made follow good governance practices pursuant to article 8 of SFDR. This product promotes environmental and/or social characteristics in three main ways:

- Due diligence: this product considers compliance with international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises as part of its due diligence when making investments.
- 2. ESG risk: When analysing the risks of an investment object, the Management Company considers environmental, social and governance factors as an integral part of the risk management process. The ESG risk rating of an external service provider is also used to quantify the extent to which a risk related to ESG criteria may affect the company's value. Companies are divided into four risk categories based on the ESG risk rating. Depending on the risk category, further measures are

required from the Portfolio Manager before making the investment. If the risk category of an investment included in the portfolio changes, the investment will be reassessed.

3. Investment selection: as part of the investment selection process, this product uses sensitive sector / norm-based screening to select investments with better ESG performance than other investments in the product's investible universe. It also uses a negative screening strategy to exclude potential investments in certain economic activities which the Mandatum Group considers exhibit negative ESG externalities.

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

The ESG characteristics promoted by the Mandatum European Small & Midcap Equity Fund are measured and monitored through ESG risk rating, sensitive sector / norm-based screening and carbon footprint. Investments are monitored on a quarterly basis. The Mandatum European Small & Midcap Equity Fund's investments are divided into four ESG risk categories based on Sustainalytics ESG Risk Rating. The carbon footprint (financed emissions and carbon intensity) of investments is measured and disclosed annually.

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

The Mandatum European Small & Midcap Equity Fund is not making sustainable investments within the meaning of art. 2 (17) of SFDR.

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

The Mandatum European Small & Midcap Equity Fund is not making sustainable investments within the meaning of art. 2 (17) of SFDR.

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

The Management Company has evaluated possible sustainability risks and adverse sustainability impacts that occur in different industries. As an outcome, the Management Company uses its exclusion criteria to restrict the investment universe of the Mandatum European Small & Midcap Equity Fund to avoid industries in which companies are typically more exposed to adverse impacts on sustainability factors. The Management Company divides the restricted industries into three tolerance groups set according to assessed adverse impacts on sustainability factors. The company is eliminated from the investment universe when the share of revenues from the restricted industry, either directly or indirectly exceeds the limit of the respective tolerance group:

- 1. Zero tolerance: No direct or indirect sales from the industry.
- 2. Low tolerance: Direct sales are not allowed, but indirect is limited to a maximum of 50% of sales.
- 3. Partial tolerance: The industry must not be the investee's main business, meaning more than 50% of sales either directly or indirectly.

The applied exclusion list is available on the Website. Positive screening methods are also used which further reduce the exposure to principal adverse impacts.

Principal adverse impacts as measured by fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons and the other restricted/excluded industries are considered in the initial investment stage. In addition, exposure to these matters in investments is monitored quarterly. Carbon footprint and GHG intensity are monitored annually.

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

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

The Mandatum European Small & Midcap Equity Fund is not making investments within the meaning of art. 2(17) of SFDR.

The investments of the Mandatum European Small & Midcap Equity Fund are monitored on, inter alia, the basis of OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights on a quarterly basis. If abuses or breaches related to these standards are observed, the issue will be investigated on a case-by-case basis. Therefore, the investments of the Mandatum European Small & Midcap Equity Fund are aligned with these guidelines and principles. The UNGC/OECD norm violations are also screened in the pre-trade phase to secure the alignment.

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

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

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



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

- Yes, this financial product measures and monitors the following principal adverse impacts: Carbon footprint, GHG intensity, fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons
 - (1) The impacts of fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons and the other restricted/excluded industries are considered in the initial investment stage. In addition, exposure to these matters in investments is monitored quarterly. Carbon footprint and GHG intensity are monitored annually
 - (2) The information is available in the products' bi-annual sustainability reports as well as in the periodic reports required by the SFDR (all reports available on the Website).

No



What investment strategy does this financial product follow?

The Mandatum European Small & Midcap Equity Fund aims to achieve long-term capital growth by investment in European equities and equity-related securities of small and mid-capitalization companies which typically are companies with market capitalization below EUR 10 billion. Due to general market conditions or company specific factors, such as low free-float, the Mandatum European Small & Midcap Equity Fund may from time to time also invest in European companies with higher market capitalizations. The Mandatum European Small & Midcap Equity Fund seeks to achieve returns in excess of its Benchmark Index primarily through its active selection of investments. The Mandatum European Small & Midcap Equity Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy. The Mandatum European Small & Midcap Equity Fund may invest in fixed income and money market securities only for liquidity management.

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

Good governance

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



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.

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

The Mandatum European Small & Midcap Equity Fund employs binding elements by implementing certain exclusion criteria as defined in the Mandatum Group's Responsible Investment Policy (available on https://www.mandatumlife.fi/en/wealth-management/responsible-investing-mandatum-life/). These include restrictions for investments in certain industries, which are considered to carry more sustainability risks and cause adverse sustainability impacts than others, such as controversial weapons, coal mining, tobacco, adult entertainment, gambling, defence materiel, fossil oil- and coal-based energy.

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

The Mandatum European Small & Midcap Equity Fund is committed to implement the binding elements described above, which reduce the investment universe by approximately 4% measured by market capitalization.

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

At the due diligence stage and during the holding period, the investments of the Mandatum European Small & Midcap Equity Fund are screened on the basis of international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises. The UN Global Compact principles are based on international standards concerning human rights, labour rights, the environment and corruption. If abuses or breaches related to the standards are observed in the investee company, the incident is investigated, and measures are taken on a case-by-case basis. Depending on the severity, nature and extent of the breach, the portfolio management measures may consist of direct dialogue with the company's executive management, an engagement action or, as a last resort, selling the investment if the engagee company does not respond to the engagement efforts and does not take measures to prevent the abuse or breach within a reasonable time frame.

What is the asset allocation planned for this financial product?

All investments, covering more than 95% of the total assets, are aligned with E/S characteristics and are monitored through ESG risk rating and sector/norms-based screening. The category #2 Other includes cash and hedging instruments which are subject to minimum safeguards as described below



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#20ther includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

• The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.
How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Mandatum European Small & Midcap Equity Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy. No financial derivatives linked to individual companies are used and as such the use of derivatives does not have an effect on the E/S factors promoted by the Mandatum European Small & Midcap Equity Fund.

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

0%.

The purpose of the Mandatum European Small & Midcap Equity Fund's investment strategy is not to make sustainable investments with an environmental objective aligned with the EU Taxonomy. The Mandatum European Small & Midcap Equity Fund may make investments that are defined sustainable under the EU Taxonomy, provided the investments meet the investment criteria of the Mandatum European Small & Midcap Equity Fund, but does not target any specific allocation.

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.



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

0%.

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

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

0%.

0%.

What is the minimum share of socially sustainable investments?

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

"#2 Other" includes cash and derivatives held by the Mandatum European Small & Midcap Equity Fund ensuring its smooth operation when fulfilling its investment strategy. The Mandatum European Small & Midcap Equity Fund employs the minimum safeguards by screening for compliance with the



Enabling

jective.

ties directly enable other activities to

make a substantial contribution to an

environmental ob-

Transitional activ-

ities are activities

for which low-car-

bon alternatives are

not yet available

and among others

have greenhouse gas emission levels corresponding

the best

mance.

to

perfor-

activi-

international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises.



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

No. The Mandatum European Small & Midcap Equity Fund has a benchmark but the benchmark index is not aligned with the E/S characteristics that it promotes.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial prouct?

Not applicable.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

Not applicable.

How does the designated index differ from a relevant broad market index?

Not applicable.

Where can the methodology used for the calculation of the designated index be found?

Not applicable.



Where can I find more product specific information online?

More product-specific information can be found on the website: <u>Mandatum Fund Management</u> <u>S.A. - Mandatum Asset Management (mandatumam.com)</u>

Reference

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

TO THE PROSPECTUS OF MANDATUM SICAV-UCITS

1. Name

Mandatum SICAV-UCITS – Mandatum Stamina Equity Fund (the "Mandatum Stamina Equity Fund").

2. Sub-Portfolio Manager

Fourton Oy has been appointed sub-portfolio manager by the Portfolio Manager.

3. Reference Currency

The Reference Currency of the Mandatum Stamina Equity Fund is the Euro.

4. Investment Objective and Policy

The Mandatum Stamina Equity Fund aims to achieve long-term capital growth by investing mainly in equity and equity related securities issued by Western or Central European companies or by companies listed in a Western or Central European country but can also invest in Nordic stocks. The targets are mid-sized and slightly smaller companies in sectors that are relatively stable and less vulnerable to economic swings than the stock markets in general. Such sectors include, but are not limited to, health care, pharmaceuticals, various services, consumer-orientable businesses and infrastructure. The Portfolio Manager has adopted a Responsible Investment Policy and the investment process of the Mandatum Stamina Equity Fund encompasses the consideration of environmental, social and governance (ESG) factors. Details can be found under the heading "RESPONSIBLE INVESTMENT POLICY".

The Mandatum Stamina Equity Fund may also invest in UCITS (including ETFs) and other UCIs (subject to the 10% limit set forth in section VI. (1) under the heading "IN-VESTMENT RESTRICTIONS") as part of its investment strategy and for liquidity management purposes.

The Mandatum Stamina Equity Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy.

The Mandatum Stamina Equity Fund may invest in fixed-income and Money Market Instruments only for liquidity management purposes.

The Mandatum Stamina Equity Fund will not enter into securities financing transactions within the meaning of the SFT Regulations.

5. Pre-contractual Sustainability Disclosure Pursuant to Article 8 of SFDR

The Mandatum Stamina Equity Fund qualifies as a financial product under Article 8 of SFDR.

The information to be disclosed pursuant to Article 8(1), (2) and (2a) SFDR as well as information about the environmental or social characteristics is available at the end of this Appendix II to the Prospectus.

6. Classes

Currently, Shares of the Mandatum Stamina Equity Fund are issued in the following Classes:

Class	Reference Cur- rency	Minimum Subscription Amount in the Reference Cur- rency of the Class	Management Fee p.a.	Performance Fee
D1 EUR cap.	EUR	None	0.75 %	No
D2 EUR cap.	EUR	5,000,000	0.50 %	No
F1 EUR cap. perf.	EUR	None	0.60 %	Yes
F2 EUR cap. perf.	EUR	5,000,000	0.50 %	Yes
F3 EUR cap. perf.	EUR	20,000,000	0.50 %	Yes
FS I EUR cap.	EUR	40,000,000	0.50 %	No
FS I EUR distr.	EUR	40,000,000	0.50 %	No
S1 EUR cap.	EUR	None	1.50 %	No
S2 EUR cap.	EUR	5,000,000	0.75 %	No
S3 EUR cap.	EUR	20,000,000	0.60 %	No
X EUR cap.	EUR	None	None	No

The Mandatum Stamina Equity Fund offers Class D, Class F, Class FS, Class S and Class X Shares with different characteristics, including management fees, minimum subscription amounts, performance fees, currencies, distribution policies and hedging. Please visit the Website for a complete list of Classes available in the Mandatum Stamina Equity Fund.

Each Class will be offered during its Initial Offering Period at a fixed price in the respective currency of this Class as determined at the absolute discretion of the Board of Directors.

Class D1 and D2 Shares

Class D1 and D2 Shares are available exclusively for specified intermediaries who, within the scope of the services they provide, are not allowed to accept and retain fees, commissions or any monetary or non-monetary benefits (except for minor non-monetary benefits) that are paid or provided by any third party or a person acting on behalf of a third party, be this (i) due to legal requirements or (ii) due to the fact that they have concluded a contractual agreement with their customers (e.g., individual discretionary

portfolio management or advisory agreements with separate fee arrangements or other agreements) which exclude such payments.

Class F1, F2 and F3 Shares

Class F1, F2 and F3 Shares are available for subscription to all investors.

Class FS I Shares

Class FS I Shares are reserved for Institutional Investors.

Class S1, S2 and S3 Shares

Class S1, S2 and S3 Shares are available for subscription to all investors.

<u>Class X Shares</u>

Class X Shares are reserved for Institutional Investors who have entered into a specific agreement with the Fund, the Management Company or the Portfolio Manager. Investment into Class X Shares shall be at the absolute discretion of the Board of Directors.

7. Minimum Initial Subscription, Holding, Subsequent Subscription and Redemption Amounts

The minimum initial subscription amounts are shown in the table in Section 6.

There are no minimum holding, subsequent subscription or redemption amounts.

The Board of Directors may in its absolute discretion decide to waive the minimum initial subscription, and set a minimum holding, subsequent subscription and/or redemption amount.

8. Prior Notice for Redemptions

No application for redemption will be accepted unless the written application is received by the Central Administrator at the latest at 2 p.m. CET five (5) Business Days before the relevant Valuation Date (or in such form and by such earlier or later date and/or time as the Board of Directors may in its discretion determine, provided that all redemption applications are received prior to the relevant Valuation Date). Applications for redemption received after such deadline will be dealt with on the following Valuation Date.

9. Subscription, Redemption and Conversion Fees

A. Subscription Fee

No subscription fee will be levied.

B. Redemption Fee

No redemption fee will be levied.

C. Conversion Fee

No conversion fee will be levied.

10. Fees

A. Management Fee

The Management Fees for each Class are shown in the table in Section 6.

B. Portfolio Management Fee

The Management Company will pay the fees of the Portfolio Manager.

C. Sub-Portfolio Management Fee

The Portfolio Manager will pay the fees of the Sub-Portfolio Manager.

D. Performance Fee

Class F1, F2 and F3 EUR cap. perf. Shares

The Performance Rate for Class F1 EUR cap. perf. Shares is 10%, Class F2 EUR cap. perf. Shares 8% and Class F3 EUR cap. perf. Shares 5%, i.e. the Performance Fee is 10%, 8% and 5% of the excess return compared to the Hurdle Rate of 3 per cent per annum of each Class, respectively.

Performance Fee calculations for all Performance Fee Classes of Mandatum Stamina Equity Fund will be made as set out below:

Performance Fee = Number of Shares \times Performance Rate \times MAX(0, NAV_T - NAVadjusted_T)

NAVadjusted_T = HWM_{T-1} × (1 + HurdleRate × (actual days/365)) × FlowAdj_T

<u>Where</u>

Performance Rate	Please see above.
NAVT	Net Asset Value per Share of the relevant Class on Val- uation Date T.
HWM⊤	Net Asset Value per Share previously achieved in the relevant Class when a Performance Fee was crystal- lized. The high water mark at the end of the Initial Of- fering Period was the high water mark of the merging unit class of the merging Fourton Stamina fund.
Hurdle Rate	Minimum fixed rate of return of 3 per cent per annum.
FlowAdj⊤	Adjustment taking into account the effect of new sub- scriptions received and redemptions requested since the start of the financial year.

The table below provides examples of how the Performance Fee will be calculated under different performance scenarios.

	Positive perfor- mance exceeding hurdle rate	Positive perfor- mance exceeding hurdle rate: un- covered past losses	Performance lower than the hurdle rate
High water mark at the beginning of a year	100	110	100
Net Asset Value at the beginning of a year	100	100	100
Return of the Performance Fee Class, net of all fees	5 %	5 %	1 %
HurdleRate	3 %	3 %	3 %
Outperformance	2 %	2 %	-2 %
Performance Rate	10 %	10 %	10 %
NAVadjusted at the end of a year	103	113	103
Net Asset Value at the end of a year	105	105	101
Performance Fee per Share	0,20	0,00	0,00
High water mark at the end of a year	105	110	100
NAVadjusted at the beginning of a next year	105	113	103

11. Global Exposure Calculation Methodology

The global exposure will be calculated by using the commitment approach.

12. Leverage

In managing the Mandatum Stamina Equity Fund, the Portfolio Manager does not currently intend to utilize leverage.

13. Risk Factors

The Mandatum Stamina Equity Fund is primarily subject to the risks described under the "RISK FACTORS ANNEX" of the Prospectus.

14. Profile of the Typical Investor

The Mandatum Stamina Equity Fund is suitable for investors who seek to invest selectively in mid-sized and slightly smaller companies in sectors that are relatively stable and less vulnerable to economic swings than the stock markets in general, seek higher returns than those of fixed income investments and accept the risks associated with equity investments. The recommended investment period is 5 years.

15. Listing

The Shares of the Mandatum Stamina Equity Fund are currently not listed on any stock exchange. The Board of Directors may, in its sole discretion, make an application for the listing of the Shares on the Luxembourg Stock Exchange or any other stock exchange.

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

Environmental and/or social characteristics

Product name: Mandatum Stamina Equity Fund Legal entity identifier: 549300LHU45E3PRNPS23

Sustainable

in-

vestment means an investment in an economic activity that contributes to an environmental or objective, social 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 sosustainable cially economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective? [tick and fill in as relevant, the percentage figure represents the minimum commitment to sustainable investments] Yes x No It will make a minimum of It promotes Environmental/Social (E/S) sustainable investments with characteristics and while it does not have as its objective a sustainable investment, it will an environmental objective: have a minimum proportion of ___% of % sustainable investments in economic activities that with an environmental objective in qualify as environmentally economic activities that qualify as sustainable under the EU environmentally sustainable under the EU Taxonomy Taxonomy in economic activities that do with an environmental objective in not qualify as economic activities that do not qualify as environmentally sustainable environmentally sustainable under the under the EU Taxonomy EU Taxonomy with a social objective It will make a minimum of It promotes E/S characteristics, but will not sustainable investments with a make any sustainable investments social objective: %



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?

Mandatum Stamina Equity Fund promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics and the companies in which the investments are made follow good governance practices pursuant to article 8 of SFDR. This product promotes environmental and/or social characteristics in three main ways:

- 1. Due diligence: this product considers compliance with international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises as part of its due diligence when making investments.
- 2. ESG risk: When analysing the risks of an investment object, the Management Company considers environmental, social and governance factors as an integral part of the risk management process. The ESG risk rating of an external service provider is also used to quantify the extent to which a risk related to ESG criteria may affect the company's value. Companies are divided into four risk categories based on the ESG risk rating. Depending on the risk category, further measures are

required from the Portfolio Manager before making the investment. If the risk category of an investment included in the portfolio changes, the investment will be reassessed.

3. Investment selection: as part of the investment selection process, this product uses sensitive sector / norm-based screening to select investments with better ESG performance than other investments in the product's investible universe. It also uses a negative screening strategy to exclude potential investments in certain economic activities which the Mandatum Group considers exhibit negative ESG externalities.

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

The ESG characteristics promoted by the Mandatum Stamina Equity Fund are measured and monitored through ESG risk rating, sensitive sector / norm-based screening and carbon footprint. Investments are monitored on a quarterly basis. The Mandatum Stamina Equity Fund's investments are divided into four ESG risk categories based on Sustainalytics ESG Risk Rating. The carbon footprint (financed emissions and carbon intensity) of investments is measured and disclosed annually.

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

The Mandatum Stamina Equity Fund is not making sustainable investments within the meaning of art. 2 (17) of SFDR.

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

The Mandatum Stamina Equity Fund is not making sustainable investments within the meaning of art. 2 (17) of SFDR.

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

The Management Company has evaluated possible sustainability risks and adverse sustainability impacts that occur in different industries. As an outcome, the Management Company uses its exclusion criteria to restrict the investment universe of the Mandatum Stamina Equity Fund to avoid industries in which companies are typically more exposed to adverse impacts on sustainability factors. The Management Company divides the restricted industries into three tolerance groups set according to assessed adverse impacts on sustainability factors. The company is eliminated from the investment universe when the share of revenues from the restricted industry, either directly or indirectly exceeds the limit of the respective tolerance group:

- 1. Zero tolerance: No direct or indirect sales from the industry.
- 2. Low tolerance: Direct sales are not allowed, but indirect is limited to a maximum of 50% of sales.
- 3. Partial tolerance: The industry must not be the investee's main business, meaning more than 50% of sales either directly or indirectly.

The applied exclusion list is available on the Website. Positive screening methods are also used which further reduce the exposure to principal adverse impacts.

Principal adverse impacts as measured by fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons and the other restricted/excluded industries are considered in the initial investment stage. In addition, exposure to these matters in investments is monitored quarterly. Carbon footprint and GHG intensity are monitored annually.

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

The Mandatum Stamina Equity Fund is not making sustainable investments within the meaning of art. 2 (17) of the SFDR.

The investments of the Mandatum Stamina Equity Fund are monitored on, inter alia, the basis of OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights on a quarterly basis. If abuses or breaches related to these standards are observed, the issue will be investigated on a case-by-case basis. Therefore, the investments of the Mandatum Stamina Equity Fund are aligned with these guidelines and principles. The UNGC/OECD norm violations are also screened in the pre-trade phase to secure the alignment.

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

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

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



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

Yes, this financial product measures and monitors the following principal adverse impacts: Carbon footprint, GHG intensity, fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons

(1) The impacts of fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons and the other restricted/excluded industries are considered in the initial investment stage. In addition, exposure to these matters in investments is monitored quarterly. Carbon footprint and GHG intensity are monitored annually.

(2) The information is available in the products' bi-annual sustainability reports as well as in the periodic reports required by the SFDR (all reports available on the Website).

No



What investment strategy does this financial product follow?

The Mandatum Stamina Equity Fund aims to achieve long-term capital growth by investing mainly in equity and equity related securities issued by Western or Central European companies or by companies listed in a Western or Central European country but can also invest in Nordic stocks. The targets are mid-sized and slightly smaller companies in sectors that are relatively stable and less vulnerable to economic swings than the stock markets in general. Such sectors include, but are not limited to, health care, pharmaceuticals, various services, consumer-orientable businesses and infrastructure.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance. **Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

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

The Mandatum Stamina Equity Fund employs binding elements by implementing certain exclusion criteria as defined in the Mandatum Group's Responsible Investment Policy (available on

https://www.mandatumlife.fi/en/wealth-management/responsible-investing-mandatum-life/). These include restrictions for investments in certain industries, which are considered to carry more sustainability risks and cause adverse sustainability impacts than others, such as controversial weapons, coal mining, tobacco, adult entertainment, gambling, defence materiel, fossil oil- and coal-based energy.

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

The Mandatum Stamina Equity Fund is committed to implementing the binding elements described above, which reduce the investment universe by approximately 7% measured by market capitalization.

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

At the due diligence stage and during the holding period, the investments of the Mandatum Stamina Equity Fund are screened on the basis of international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises. The UN Global Compact principles are based on international standards concerning human rights, labour rights, the environment and corruption. If abuses or breaches related to the standards are observed in the investee company during the holding period, the incident is investigated, and measures are taken on a case-by-case basis. Depending on the severity, nature and extent of the breach, the portfolio management measures may consist of direct dialogue with the company's executive management, an engagement action or, as a last resort, selling the investment if the engagee company does not respond to the engagement efforts and does not take measures to prevent the abuse or breach within a reasonable time frame.

What is the asset allocation planned for this financial product?

All investments, covering more than 95% of the total assets, are aligned with E/S characteristics and are monitored through ESG risk rating and sector/norms based screening. The category #2 Other includes cash and hedging instruments which are subject to minimum safeguards as described below.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#20ther includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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.

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

Transitional

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



Taxonomy.

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

The Mandatum Stamina Equity Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy. No financial derivatives linked to individual companies are used and as such the use of derivatives does not have an effect on the E/S factors promoted by the Mandatum Stamina Equity Fund.

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

0%.

The purpose of the Mandatum Stamina Equity Fund's investment strategy is not to make sustainable investments with an environmental objective aligned with the EU Taxonomy. The Mandatum Stamina Equity Fund may make investments that are defined sustainable under the EU Taxonomy, provided the investments meet the investment criteria of the Mandatum Stamina Equity Fund, but does not target any specific allocation.

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



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

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

0%

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

0%

What is the minimum share of socially sustainable investments?

0%



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

"#2 Other" includes cash and derivatives held by the Mandatum Stamina Equity Fund ensuring its smooth operation when fulfilling its investment strategy. The Mandatum Stamina Equity Fund employs the minimum safeguards by screening for compliance with the international norms and -~~?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote. standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises.

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

No, the Mandatum Stamina Equity Fund does not have a benchmark index aligned with the E/S characteristics that it promotes.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?"

Not applicable.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

Not applicable.

- How does the designated index differ from a relevant broad market index? Not applicable.
 - Where can the methodology used for the calculation of the designated index be found?

Not applicable.



Where can I find more product specific information online?

More product-specific information can be found on the website: <u>Mandatum Fund Management</u> <u>S.A. - Mandatum Asset Management (mandatumam.com)</u>

TO THE PROSPECTUS OF MANDATUM SICAV-UCITS

1. Name

Mandatum SICAV-UCITS – Mandatum Nordic High Yield Total Return Fund (the "Mandatum Nordic High Yield Total Return Fund").

2. Reference Currency

The Reference Currency of the Mandatum Nordic High Yield Total Return Fund is the Euro.

3. Investment Objective and Policy

The Mandatum Nordic High Yield Total Return Fund seeks long-term returns which exceed typical returns of medium-term fixed income investments. The Mandatum Nordic High Yield Total Return Fund aims to achieve these returns through investing in subinvestment grade bonds in the Nordic area. The Portfolio Manager has adopted a Responsible Investment Policy and the investment process of the Mandatum Nordic High Yield Total Return Fund encompasses the consideration of environmental, social and governance (ESG) factors. Details can be found under the heading "RESPONSIBLE INVESTMENT POLICY".

The Mandatum Nordic High Yield Total Return Fund is an actively managed fund, which invests mainly in the Nordic Corporate Bond markets.

The Mandatum Nordic High Yield Total Return Fund invests in high yield Nordic Corporate Bonds. High yield corporate bonds are bonds that are unrated or have a credit rating at or below BB+ (Standard & Poor's) or Ba1 (Moody's) or BB+ (Fitch). The Mandatum Nordic High Yield Total Return Fund may also invest up to 20% of its assets in high yield European corporate bonds outside of the Nordic area in order to benefit from industry diversification or to replace individual Nordic investments, and thus achieve a greater risk / reward ratio.

¹In addition, the Mandatum Nordic High Yield Total Return Fund may cumulatively invest up to 20% of its assets in investment grade rated corporate bonds and bonds issued by financial companies such as banks and insurance companies, including so called CoCos. Investment grade rated bonds are bonds that have a credit rating above BB+ (Standard & Poor's) or Ba1 (Moody's) or BB+ (Fitch). For the avoidance of doubt,

¹ This paragraph will become effective as from 22 January 2023.

bonds issued by financial companies may be unsubordinated, subordinated bonds, investment grade rated, high yield rated or unrated.

The Mandatum Nordic High Yield Total Return Fund may additionally invest in other publicly traded debt securities, deposits, Money Market Instruments, UCITS (including ETFs) and Other UCIs (subject to the 10% limit set forth in section VI. (1) under the heading "INVESTMENT RESTRICTIONS") investing in fixed income or Money Market Instruments as part of its investment strategy and for liquidity management purposes.

In addition, the Mandatum Nordic High Yield Total Return Fund may use interest rate, foreign exchange, credit and other derivative instruments for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy.

The Mandatum Nordic High Yield Total Return Fund will not enter into securities financing transactions within the meaning of the SFT Regulations.

4. Pre-contractual Sustainability Disclosure Pursuant to Article 8 of SFDR

The Mandatum Nordic High Yield Total Return Fund qualifies as a financial product under Article 8 of SFDR.

The information to be disclosed pursuant to Article 8(1), (2) and (2a) SFDR as well as information about the environmental or social characteristics is available at the end of this Appendix III to the Prospectus.

5. Classes

Currently, Shares of the Mandatum Nordic High Yield Total Return Fund are issued in the following Classes:

Class	Reference Cur- rency	Minimum Subscription Amount in the Reference Currency of the Class	Management Fee p.a.	Performance Fee
A EUR cap.	EUR	None	1.00 %	No
A SEK cap. (hedged)	SEK	None	1.00 %	No
A USD cap. (hedged)	USD	None	1.00 %	No
A NOK cap. (hedged)	NOK	None	1.00 %	No
B EUR cap.	EUR	5,000,000	0.70 %	No
B EUR distr.	EUR	5,000,000	0.70 %	No
B SEK cap. (hedged)	SEK	50,000,000	0.70 %	No
B USD cap. (hedged)	USD	5,000,000	0.70 %	No
B NOK cap. (hedged)	NOK	50,000,000	0.70 %	No
C EUR cap.	EUR	10,000,000	0.60 %	No
C EUR distr.	EUR	10,000,000	0.60 %	No
C SEK cap. (hedged)	SEK	100,000,000	0.60 %	No
C USD cap. (hedged)	USD	10,000,000	0.60 %	No
C NOK cap. (hedged)	NOK	100,000,000	0.60 %	No
D1 EUR cap.	EUR	None	0.50 %	No

D2 EUR cap.	EUR	5,000,000	0.35 %	No
G EUR cap.	EUR	None	0.03 %	No
I EUR cap.	EUR	15,000,000	0.50 %	No
I EUR distr.	EUR	15,000,000	0.50 %	No
I SEK cap. (hedged)	SEK	150,000,000	0.50 %	No
I SEK distr. (hedged)	SEK	150,000,000	0.50 %	No
I USD cap. (hedged)	USD	15,000,000	0.50 %	No
I NOK cap. (hedged)	NOK	150,000,000	0.50 %	No
I NOK distr. (hedged)	NOK	150,000,000	0.50 %	No
I2 EUR cap.	EUR	30,000,000	0.45 %	No
I2 SEK cap. (hedged)	SEK	300,000,000	0.45 %	No
I2 USD cap. (hedged)	USD	30,000,000	0.45 %	No
I2 NOK cap. (hedged)	NOK	300,000,000	0.45 %	No
X EUR cap.	EUR	None	None	No
X SEK cap. (hedged)	SEK	None	None	No
X NOK cap. (hedged)	NOK	None	None	No

The Mandatum Nordic High Yield Total Return Fund offers Class A, Class B, Class C, Class D, Class G, Class I and Class X Shares with different characteristics, including management fees, minimum subscription amounts, performance fees, currencies, distribution policies and hedging. Please visit the Website for a complete list of Classes available in the Mandatum Nordic High Yield Total Return Fund.

Each Class will be offered during its Initial Offering Period at a fixed price in the respective currency of this Class as determined at the absolute discretion of the Board of Directors.

Class A Shares

Class A Shares are available for subscription to all investors.

Class B Shares

Class B Shares are available for subscription to all investors.

Class C Shares

Class C Shares are available for subscription to all investors.

Class D1 and D2 Shares

Class D1 and D2 Shares are available exclusively for specified intermediaries who, within the scope of the services they provide, are not allowed to accept and retain fees, commissions or any monetary or non-monetary benefits (except for minor non-monetary benefits) that are paid or provided by any third party or a person acting on behalf of a third party, be this (i) due to legal requirements or (ii) due to the fact that they have concluded a contractual agreement with their customers (e.g., individual discretionary

portfolio management or advisory agreements with separate fee arrangements or other agreements) which exclude such payments.

Class G Shares

Class G Shares are reserved for companies that qualify as Institutional Investors belonging to the Mandatum group, as defined by the Board of Directors from time to time.

Class I and Class I2 Shares

Class I and Class I2 Shares are reserved for Institutional Investors.

Class X Shares

Class X Shares are reserved for Institutional Investors who have entered into a specific agreement with the Fund, the Management Company or the Portfolio Manager. Investment into Class X Shares shall be at the absolute discretion of the Board of Directors.

6. Minimum Initial Subscription, Holding, Subsequent Subscription and Redemption Amounts

The minimum initial subscription amounts are shown in the table in Section 5.

There are no minimum holding, subsequent subscription or redemption amounts.

The Board of Directors may in its absolute discretion decide to waive the minimum initial subscription, and set a minimum holding, subsequent subscription and/or redemption amount.

7. Subscription, Redemption and Conversion Fees

A. Subscription Fee

No subscription fee will be levied.

B. Redemption Fee

No redemption fee will be levied.

C. Conversion Fee

No conversion fee will be levied.

8. Fees

A. Management Fee

The Management Fees for each Class are shown in the table in Section 5.

B. Portfolio Management Fee

The Management Company will pay the fees of the Portfolio Manager.

C. Performance Fee

No performance fee will be levied.

9. Global Exposure Calculation Methodology

The global exposure will be calculated by using the commitment approach.

10. Leverage

In managing the Mandatum Nordic High Yield Total Return Fund, the Portfolio Manager does not currently intend to utilize leverage but may hedge foreign exchange, interest rate and credit risk exposures using FDIs which, depending on calculation method, may be regarded as leverage even though the FDIs are used to reduce various risk exposures.

11. Risk Factors

The Mandatum Nordic High Yield Total Return Fund is primarily subject to the risks described under the "RISK FACTORS ANNEX" of the Prospectus.

12. Profile of the Typical Investor

The Mandatum Nordic High Yield Total Return Fund is particularly suitable for investors who seek returns in excess of typical fixed income investments and are willing to accept a higher risk level that is associated with such returns. The recommended investment period is 3 years.

13. Listing

The Shares of the Mandatum Nordic High Yield Total Return Fund are currently not listed on any stock exchange. The Board of Directors may, in its sole discretion, make an application for the listing of the Shares on the Luxembourg Stock Exchange or any other stock exchange.

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

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: Mandatum Nordic High Yield Total Return Fund **Legal entity identifier:** 549300Z2AZUL1O6T1816

Environmental and/or social characteristics

Does this financial product have a service relevant, the percentage figure represents the model of Yes	ustainable investment objective? [tick and fill in as inimum commitment to sustainable investments] No
It will make a minimum of sustainable investments with an environmental objective: % in economic activities that qualify as environmentally sustainable under the EU Taxonomy in economic activities that do not qualify as	 It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of% of sustainable investments with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy with an environmental objective in economic activities that do not qualify as
It will make a minimum of sustainable investments with a social objective:%	 environmentally sustainable under the EU Taxonomy with a social objective It promotes E/S characteristics, but will not make any sustainable investments



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

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

Mandatum Nordic High Yield Total Return Fund promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics and the companies in which the investments are made follow good governance practices pursuant to article 8 of SFDR. This product promotes environmental and/or social characteristics in three main ways:

- 1. Due diligence: this product considers compliance with international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises as part of its due diligence when making investments.
- 2. ESG risk: When analysing the risks of an investment object, the Management Company considers environmental, social and governance factors as an integral part of the risk management process. The ESG risk rating of an external service provider is also used to quantify the extent to which a risk related to ESG criteria may affect the company's value. Companies are divided into four risk categories based on the ESG risk rating. Depending on the risk category, further measures are

required from the Portfolio Manager before making the investment. If the risk category of an investment included in the portfolio changes, the investment will be reassessed.

3. Investment selection: as part of the investment selection process, this product uses sensitive sector / norm-based screening to select investments with better ESG performance than other investments in the product's investible universe. It also uses a negative screening strategy to exclude potential investments in certain economic activities which the Mandatum Group considers exhibit negative ESG externalities.

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

The ESG characteristics promoted by the Mandatum Nordic High Yield Total Return Fund are measured and monitored through ESG risk rating, sensitive sector / norm-based screening and carbon footprint. The Mandatum Nordic High Yield Total Return Fund's investments are monitored on a quarterly basis. The Mandatum Nordic High Yield Total Return Fund's investments are divided into four ESG risk categories based on Sustainalytics ESG Risk Rating. The carbon footprint (financed emissions and carbon intensity) of investments is measured and disclosed annually.

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

The Mandatum Nordic High Yield Total Return Fund is not making sustainable investments within the meaning of art. 2 (17) of SFDR.

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

The Mandatum Nordic High Yield Total Return Fund is not making sustainable investments within the meaning of art. 2 (17) of SFDR.

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

The Management Company has evaluated possible sustainability risks and adverse sustainability impacts that occur in different industries. As an outcome, the Management Company uses its exclusion criteria to restrict the investment universe of the Mandatum Nordic High Yield Total Return Fund to avoid industries in which companies are typically more exposed to adverse impacts on sustainability factors. The Management Company divides the restricted industries into three tolerance groups set according to assessed adverse impacts on sustainability factors. The company is eliminated from the investment universe when the share of revenues from the restricted industry, either directly or indirectly exceeds the limit of the respective tolerance group:

- 1. Zero tolerance: No direct or indirect sales from the industry.
- 2. Low tolerance: Direct sales are not allowed, but indirect is limited to a maximum of 50% of sales.
- 3. Partial tolerance: The industry must not be the investee's main business, meaning more than 50% of sales either directly or indirectly.

The applied exclusion list is available on the Website. Positive screening methods are also used which further reduce the exposure to principal adverse impacts.

Principal adverse impacts as measured by fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons and the other restricted/excluded industries are considered in the initial investment stage. In addition, exposure to these matters in investments is monitored quarterly. Carbon footprint and GHG intensity are monitored annually.

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

The Mandatum Nordic High Yield Total Return Fund is not making sustainable investments within the meaning of art. 2 (17) of the SFDR.

The investments of the Mandatum Nordic High Yield Total Return Fund are monitored on, inter alia, the basis of OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights on a quarterly basis. If abuses or breaches related to these standards are observed, the issue will be investigated on a case-by-case basis. Therefore, the investments of the Mandatum Nordic High Yield Total Return Fund are aligned with these guidelines and principles. The UNGC/OECD norm violations are also screened in the pre-trade phase to secure the alignment.

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

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

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



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

- Yes, this financial product measures and monitors the following principal adverse impacts: × Carbon footprint, GHG intensity, fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons
 - The impacts of fossil fuel sector activity, UNGC/OECD norm violations and involvement (1) in controversial weapons and the other restricted/excluded industries are considered in the initial investment stage. In addition, exposure to these matters in investments is monitored guarterly. Carbon footprint and GHG intensity are monitored annually.
 - The information is available in the products' bi-annual sustainability reports as well as in (2) the periodic reports required by the SFDR (all reports available on the Website).

No

What investment strategy does this financial product follow?

The Mandatum Nordic High Yield Total Return Fund seeks long-term returns which exceed typical returns of medium-term fixed income investments. The Mandatum Nordic High Yield Total Return Fund aims to achieve these returns through investing in sub-investment grade bonds in the Nordic area. The Mandatum Nordic High Yield Total Return Fund is an actively managed fund, which invests mainly in the Nordic Corporate Bond markets. The Mandatum Nordic High Yield Total Return Fund invests in high yield Nordic Corporate Bonds. High yield corporate bonds are bonds that are unrated or have a credit rating at or below BB+ (Standard & Poor's) or Ba1 (Moody's) or similar credit rating from other credit rating agencies. The Mandatum Nordic High Yield Total Return Fund may also invest up to 20% of its assets in high yield European corporate bonds outside of the Nordic area in order to benefit from industry diversification or to replace individual Nordic investments, and thus achieve a greater risk / reward ratio. In addition, the Mandatum Nordic High Yield Total Return Fund may cumulatively invest up to 20% of its assets in investment grade rated corporate bonds and bonds issued by financial companies such as banks and insurance companies, including so called CoCos.

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

The Mandatum Nordic High Yield Total Return Fund employs binding elements by implementing certain exclusion criteria as defined in the Mandatum Group's Responsible Investment Policy (available on https://www.mandatumlife.fi/en/wealth-management/responsible-investing-mandatumlife/). These include restrictions for investments in certain industries, which are considered to carry more sustainability risks and cause adverse sustainability impacts than others, such as controversial weapons, coal mining, tobacco, adult entertainment, gambling, defence materiel, fossil oil- and coal-based energy.

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

The Mandatum Nordic High Yield Total Return Fund is committed to implementing the binding elements described above, which reduce the investment universe by approximately 10% measured by market capitalization.

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

At the due diligence stage and during the holding period, the investments of the Mandatum Nordic High Yield Total Return Fund are screened on the basis of international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises. The UN Global Compact principles are based on international standards concerning human rights, labour rights, the environment and corruption. If abuses or breaches related to the standards are observed in the investee company during the holding period, the incident is investigated, and measures are taken on a case-by-case basis. Depending on the severity, nature and extent of the breach, the portfolio management measures may consist of direct dialogue with the company's executive management, an engagement action or, as a last resort, selling the investment if the engagee company does not respond to the engagement efforts and does not take measures to prevent the abuse or breach within a reasonable time frame.

What is the asset allocation planned for this financial product?

All investments, covering more than 90% of the total assets, are aligned with E/S characteristics and are monitored through ESG risk rating and sector/norms-based screening. The category #2 Other includes cash and hedging instruments which are subject to minimum safeguards as described below.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#20ther includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

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



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.

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

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

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

The Mandatum Nordic High Yield Total Return Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy. No financial derivatives linked to individual companies are used and as such the use of derivatives does not have an effect on the E/S factors promoted by the Mandatum Nordic High Yield Total Return

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

0%.

The purpose of the Mandatum Nordic High Yield Total Return Fund's investment strategy is not to make sustainable investments with an environmental objective aligned with the EU Taxonomy. The Mandatum Nordic High Yield Total Return Fund may make investments that are defined sustainable under the EU Taxonomy, provided the investments meet the investment criteria of the Mandatum Nordic High Yield Total Return Fund, but does not target any specific allocation.

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



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

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

0 %

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

0 %

0%

What is the minimum share of socially sustainable investments?

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

"#2 Other" includes cash and derivatives held by the Mandatum Nordic High Yield Total Return Fund ensuring its smooth operation when fulfilling its investment strategy. The Mandatum Nordic



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

are

High Yield Total Return Fund employs the minimum safeguards by screening for compliance with the international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises.



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

No, the Mandatum Nordic High Yield Total Return Fund does not have a benchmark index aligned with the E/S characteristics that it promotes.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

Not applicable.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

Not applicable.

How does the designated index differ from a relevant broad market index?"

Not applicable.

Where can the methodology used for the calculation of the designated index be found?

Not applicable.



Where can I find more product specific information online?

More product-specific information can be found on the website: <u>Mandatum Fund Management</u> S.A. - Mandatum Asset Management (mandatumam.com)

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

TO THE PROSPECTUS OF MANDATUM SICAV-UCITS

1. Name

Mandatum SICAV-UCITS – Mandatum Fixed Income Total Return Fund (the "Mandatum Fixed Income Total Return Fund").

2. Reference Currency

The Reference Currency of the Mandatum Fixed Income Total Return Fund is the Euro.

3. Investment Objective and Policy

The Mandatum Fixed Income Total Return Fund seeks a level of returns that is typical for medium-term fixed income investments and aims to achieve this through a diversified portfolio with moderate risks. The Portfolio Manager has adopted a Responsible Investment Policy and the investment process of the Mandatum Fixed Income Total Return Fund encompasses the consideration of environmental, social and governance (ESG) factors. Details can be found under the heading "RESPONSIBLE INVESTMENT POLICY".

The Mandatum Fixed Income Total Return Fund is an actively managed fund, which invests globally in corporate and government bond markets. The Mandatum Fixed Income Total Return Fund manages investment risks through a careful selection process of investments.

The Mandatum Fixed Income Total Return Fund may invest up to 20% of its assets in so called CoCos.

The Mandatum Fixed Income Total Return Fund may use interest rate, foreign exchange, credit and other derivative instruments for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy.

The Mandatum Fixed Income Total Return Fund may also invest in deposits, Money Market Instruments, UCITS (including ETFs) and Other UCIs (subject to the 10% limit set forth in section VI. (1) under the heading "INVESTMENT RESTRICTIONS") as part of its investment strategy and for liquidity management purposes.

The Mandatum Fixed Income Total Return Fund is entering into securities lending and borrowing transactions on a continuous basis for a purpose of efficient portfolio management and revenue optimisation. In addition, the Mandatum Fixed Income Total Return Fund will only enter into repurchase agreements on its investments on a temporary basis. The securities lending activity should not result in a change of the declared investment objective of the Mandatum Fixed Income Total Return Fund. Between 0% to 40% of the net asset value of available instruments in the Mandatum Fixed Income Total Return Fund may be subject to securities lending or borrowing transactions. It is typically expected that securities lending and borrowing transactions will not exceed 25% of the net asset value of the Mandatum Fixed Income Total Return Fund except where the Mandatum Fixed Income Total Return Fund is entitled at all times to the cancellation of the contract and the restitution of the securities. Only in exceptional market conditions, in which there are no demand to lend out any securities, the Mandatum Fixed Income Total Return Fund is not entering into securities lending and borrowing transactions. The Mandatum Fixed Income Total Return Fund shall ensure that the volume of the securities lending transactions is kept at an appropriate level or that it is entitled to request the return of the securities lent in a manner that enables it, at all times, to meet its redemption obligations and that these transactions do not jeopardise the management of the Mandatum Fixed Income Total Return Fund's assets in accordance with its investment policy. The market value of repurchase agreements may not exceed 10% of the net assets of the Mandatum Fixed Income Total Return Fund. The aggregate collateral requirement for derivatives contracts, repurchase agreements and securities lending may not exceed 75% of the net asset value of the Mandatum Fixed Income Total Return Fund

The Mandatum Fixed Income Total Return Fund manages its duration risk by active use of derivative instruments, such as but not limited to, listed bond futures, options on these futures and / or interest rate swaps or swaptions. The duration hedges may result in the Mandatum Fixed Income Total Return Fund entering into positions in futures and / or options for which the Mandatum Fixed Income Total Return Fund does not own or plan to own the underlying instruments. The positions used for duration management may either increase or decrease the overall duration of the Mandatum Fixed Income Total Return Fund. The duration management may result in the Mandatum Fixed Income Total Return Fund. The duration management may result in the Mandatum Fixed Income Total Return Fund. The duration management may result in the Mandatum Fixed Income Total Return Fund. The duration management may result in the Mandatum Fixed Income Total Return Fund. The duration management may result in the Mandatum Fixed Income Total Return Fund having risk exposure of up to 100% of the net asset value in interest rate derivatives.

4. Pre-contractual Sustainability Disclosure Pursuant to Article 8 of SFDR

The Mandatum Fixed Income Total Return Fund qualifies as a financial product under Article 8 of SFDR.

The information to be disclosed pursuant to Article 8(1), (2) and (2a) SFDR as well as information about the environmental or social characteristics is available at the end of this Appendix IV to the Prospectus.

5. Classes

Currently, Shares of the Mandatum Fixed Income Total Return Fund are issued in the following Classes:

Class	Reference Cur- rency	Minimum Subscription Amount in the Reference Currency of the Class	Management Fee p.a.	Performance Fee
A EUR cap.	EUR	None	0.75 %	No
A SEK cap. (hedged)	SEK	None	0.75 %	No
A USD cap. (hedged)	USD	None	0.75 %	No
B EUR cap.	EUR	5,000,000	0.55 %	No
B SEK cap. (hedged)	SEK	50,000,000	0.55 %	No
B USD cap. (hedged)	USD	5,000,000	0.55 %	No
C EUR cap.	EUR	10,000,000	0.45 %	No
C SEK cap. (hedged)	SEK	100,000,000	0.45 %	No
C USD cap. (hedged)	USD	10,000,000	0.45 %	No
D1 EUR cap.	EUR	None	0.375 %	No
D2 EUR cap.	EUR	5,000,000	0.275 %	No
G EUR cap.	EUR	None	0.03 %	No
I EUR cap.	EUR	15,000,000	0.40 %	No
I SEK cap. (hedged)	SEK	150,000,000	0.40 %	No
I USD cap. (hedged)	USD	15,000,000	0.40 %	No
I EUR distr.	EUR	15,000,000	0.40 %	No
I SEK distr. (hedged)	SEK	150,000,000	0.40 %	No
I2 EUR cap.	EUR	30,000,000	0.30 %	No
I2 SEK cap. (hedged)	SEK	300,000,000	0.30 %	No
I2 USD cap. (hedged)	USD	30,000,000	0.30 %	No
X EUR cap.	EUR	None	None	No

The Mandatum Fixed Income Total Return Fund offers Class A, Class B, Class C, Class D, Class G, Class I and Class X Shares with different characteristics, including management fees, minimum subscription amounts, performance fees, currencies, distribution policies and hedging. Please visit the Website for a complete list of Classes available in the Mandatum Fixed Income Total Return Fund.

Each Class will be offered during its Initial Offering Period at a fixed price in the respective currency of this Class as determined at the absolute discretion of the Board of Directors.

Class A Shares

Class A Shares are available for subscription to all investors.

Class B Shares

Class B Shares are available for subscription to all investors.

Class C Shares

Class C Shares are available for subscription to all investors.

Class D1 and D2 Shares

Class D1 and D2 Shares are available exclusively for specified intermediaries who, within the scope of the services they provide, are not allowed to accept and retain fees, commissions or any monetary or non-monetary benefits (except for minor non-monetary benefits) that are paid or provided by any third party or a person acting on behalf of a third party, be this (i) due to legal requirements or (ii) due to the fact that they have concluded a contractual agreement with their customers (e.g., individual discretionary portfolio management or advisory agreements with separate fee arrangements or other agreements) which exclude such payments.

Class G Shares

Class G Shares are reserved for companies that qualify as Institutional Investors belonging to the Mandatum group, as defined by the Board of Directors from time to time.

Class I and Class I2 Shares

Class I and Class I2 Shares are reserved for Institutional Investors.

Class X Shares

Class X Shares are reserved for Institutional Investors who have entered into a specific agreement with the Fund, the Management Company or the Portfolio Manager. Investment into Class X Shares shall be at the absolute discretion of the Board of Directors.

6. Minimum Initial Subscription, Holding, Subsequent Subscription and Redemption Amounts

The minimum initial subscription amounts are shown in the table in Section 5.

There are no minimum holding, subsequent subscription or redemption amounts.

The Board of Directors may in its absolute discretion decide to waive the minimum initial subscription, and set a minimum holding, subsequent subscription and/or redemption amount.

7. Subscription, Redemption and Conversion Fees

A. Subscription Fee

No subscription fee will be levied.

B. Redemption Fee

No redemption fee will be levied.

C. Conversion Fee

No conversion fee will be levied.

8. Fees

A. Management Fee

The Management Fees for each Class are shown in the table in Section 5.

B. Portfolio Management Fee

The Management Company will pay the fees of the Portfolio Manager.

C. Performance Fee

No performance fee will be levied.

9. Global Exposure Calculation Methodology

The global exposure will be calculated by using the absolute VaR approach.

10. Leverage

Depending on the market environment and at the discretion of the Portfolio Manager, the Mandatum Fixed Income Total Return Fund may employ leverage in the portfolio construction. Leverage is mainly employed using FDIs when hedging the investment portfolio's foreign exchange, interest rate and credit exposures.

The level of leverage for the Mandatum Fixed Income Total Return Fund is typically expected to range from 0% to 400% of its Net Asset Value. However, the Mandatum Fixed Income Total Return Fund's leverage may increase to, but will not exceed, 500%, for example when exposures to interest rate, foreign exchange and credit risk are hedged using non-linear FDIs.

Leverage is calculated as the sum of the notionals of the FDIs used. It should be noted that due the leverage calculation method the actual risk arising from the FDIs may significantly differ from the calculated leverage, especially as the FDIs are mainly used to reduce risk exposures.

11. Risk Factors

The Mandatum Fixed Income Total Return Fund is primarily subject to the risks described under the "RISK FACTORS ANNEX" of the Prospectus.

12. Profile of the Typical Investor

The Mandatum Fixed Income Total Return Fund is suitable for investors who appreciate stable returns and low volatility of returns.

13. Listing

The Shares of the Mandatum Fixed Income Total Return Fund are currently not listed on any stock exchange. The Board of Directors may, in its sole discretion, make an application for the listing of the Shares on the Luxembourg Stock Exchange or any other stock exchange.

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

vestment 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 Taxon-

Sustainable in-

omy 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: Mandatum Fixed Income Total Return Fund Legal entity identifier: 549300412LRI4E7JFG18

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective? [tick and fill in as relevant, the percentage figure represents the minimum commitment to sustainable investments] Yes No				
It will make a minimum of sustainable investments with an environmental objective: %	It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of% of sustainable investments			
in economic activities that qualify as environmentally sustainable under the EU Taxonomy in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	 with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy 			
It will make a minimum of sustainable investments with a social objective:%	 with a social objective It promotes E/S characteristics, but will not make any sustainable investments 			

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

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

Mandatum Fixed Income Total Return Fund promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics and the companies in which the investments are made follow good governance practices pursuant to article 8 of SFDR. This product promotes environmental and/or social characteristics in three main ways:

- 1. Due diligence: this product considers compliance with international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises as part of its due diligence when making investments.
- 2. ESG risk: When analysing the risks of an investment object, the Management Company considers environmental, social and governance factors as an integral part of the risk management process. The ESG risk rating of an external service provider is also used to

quantify the extent to which a risk related to ESG criteria may affect the company's value. Companies are divided into four risk categories based on the ESG risk rating. Depending on the risk category, further measures are required from the Portfolio Manager before making the investment. If the risk category of an investment included in the portfolio changes, the investment will be reassessed.

- 3. Investment selection: as part of the investment selection process, this product uses sensitive sector / norm-based screening to select investments with better ESG performance than other investments in the product's investible universe. It also uses a negative screening strategy to exclude potential investments in certain economic activities which the Mandatum Group considers exhibit negative ESG externalities.
- What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

The ESG characteristics promoted by the Mandatum Fixed Income Total Return Fund are measured and monitored through ESG risk rating, sensitive sector / norm-based screening and carbon footprint. Investments are monitored on a quarterly basis. The Mandatum Fixed Income Total Return Fund's investments are divided into four ESG risk categories based on Sustainalytics ESG Risk Rating. The carbon footprint (financed emissions and carbon intensity) of investments is measured and disclosed annually.

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

The Mandatum Fixed Income Total Return Fund is not making sustainable investments within the meaning of art. 2 (17) of SFDR.

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

The Mandatum Fixed Income Total Return Fund is not making sustainable investments within the meaning of art. 2 (17) of SFDR.

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

The Management Company has evaluated possible sustainability risks and adverse sustainability impacts that occur in different industries. As an outcome, the Management Company uses its exclusion criteria to restrict the investment universe of the Mandatum Fixed Income Total Return Fund to avoid industries in which companies are typically more exposed to adverse impacts on sustainability factors. The Management Company divides the restricted industries into three tolerance groups set according to assessed adverse impacts on sustainability factors. The company is eliminated from the investment universe when the share of revenues from the restricted industry, either directly or indirectly exceeds the limit of the respective tolerance group:

- 1. Zero tolerance: No direct or indirect sales from the industry.
- 2. Low tolerance: Direct sales are not allowed, but indirect is limited to a maximum of 50% of sales.
- 3. Partial tolerance: The industry must not be the investee's main business, meaning more than 50% of sales either directly or indirectly.

The applied exclusion list is available on the Website. Positive screening methods are also used which further reduce the exposure to principal adverse impacts.

Principal adverse impacts as measured by fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons and the other restricted/excluded industries are considered in the initial investment stage. In addition, exposure to these matters in investments is monitored quarterly. Carbon footprint and GHG intensity are monitored annually.

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

The Mandatum Fixed Income Total Return Fund is not making sustainable investments within the meaning of art. 2 (17) of the SFDR.

The investments of the Mandatum Fixed Income Total Return Fund are monitored on, inter alia, the basis of OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights on a quarterly basis. If abuses or breaches related to these standards are observed, the issue will be investigated on a case-by-case basis. Therefore, the investments of the Mandatum Fixed Income Total Return Fund are aligned with these guidelines and principles. The UNGC/OECD norm violations are also screened in the pre-trade phase to secure the alignment.

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

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

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



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

- Yes, this financial product measures and monitors the following principal adverse impacts: Carbon footprint, GHG intensity, fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons
 - (1) The impacts of fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons and the other restricted/excluded industries are considered in the initial investment stage. In addition, exposure to these matters in investments is monitored quarterly. Carbon footprint and GHG intensity are monitored annually.
 - (2) The information is available in the products' bi-annual sustainability reports as well as in the periodic reports required by the SFDR (all reports available on the Website).

No



What investment strategy does this financial product follow?

The Mandatum Fixed Income Total Return Fund seeks a level of returns that is typical for mediumterm fixed income investments and aims to achieve this through a diversified portfolio with moderate risks. The Mandatum Fixed Income Total Return Fund is an actively managed fund, which invests globally in corporate and government bond markets. The Mandatum Fixed Income Total Return Fund manages investment risks through a careful selection process of investments. The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

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



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

The Mandatum Fixed Income Total Return Fund employs binding elements by implementing certain exclusion criteria as defined in the Mandatum Group's Responsible Investment Policy (available on https://www.mandatumlife.fi/en/wealth-management/responsible-investing-mandatum-life/). These include restrictions for investments in certain industries, which are considered to carry more sustainability risks and cause adverse sustainability impacts than others, such as controversial weapons, coal mining, tobacco, adult entertainment, gambling, defence materiel, fossil oil- and coal-based energy.

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

The Mandatum Fixed Income Total Return Fund is committed to implementing the binding elements described above, which reduce the investment universe by approximately 4% measured by market capitalization.

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

At the due diligence stage and during the holding period, the investments of the Mandatum Fixed Income Total Return Fund are screened on the basis of international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises. The UN Global Compact principles are based on international standards concerning human rights, labour rights, the environment and corruption. If abuses or breaches related to the standards are observed in the investee company, the incident is investigated, and measures are taken on a case-by-case basis. Depending on the severity, nature and extent of the breach, the portfolio management measures may consist of direct dialogue with the company's executive management, an engagement action or, as a last resort, selling the investment if the engagee company does not respond to the engagement efforts and does not take measures to prevent the abuse or breach within a reasonable time frame.

What is the asset allocation planned for this financial product?

All investments, covering more than 90% of the total assets, are aligned with E/S characteristics and are monitored through ESG risk rating and sector/norms-based screening. The category #2 Other includes cash and hedging instruments which are subject to minimum safeguards as described below.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#20ther includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

The Mandatum Fixed Income Total Return Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy. No

financial derivatives linked to individual companies are used and as such the use of derivatives does not have an effect on the E/S factors promoted by the Mandatum Fixed Income Total Return Fund.



Enabling activi-

ties directly enable other activities

to make a sub-

stantial contribu-

tion to an environ-

Transitional activities are activities

for which low-car-

bon alternatives are

not yet available

and among others

have greenhouse

gas emission levels corresponding

best perfor-

the

mance.

to

are

mental objective.

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

0%.

The purpose of the Mandatum Fixed Income Total Return Fund's investment strategy is not to make sustainable investments with an environmental objective aligned with the EU Taxonomy. The Mandatum Fixed Income Total Return Fund may make investments that are defined sustainable under the EU Taxonomy, provided the investments meet the investment criteria of the Mandatum Fixed Income Total Return Fund, but does not target any specific allocation.

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



0%

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

0%

0%

What is the minimum share of socially sustainable investments?



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

"#2 Other" includes cash and derivatives held by the Mandatum Fixed Income Total Return Fund ensuring its smooth operation when fulfilling its investment strategy. The Mandatum Fixed Income Total Return Fund employs the minimum safeguards by screening for compliance with the international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises.



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




Reference benchmarks are

indexes to measure whether the financial product attains the environmental or social characteristics that they promote. Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No, the Mandatum Fixed Income Total Return Fund does not have a benchmark index aligned with the E/S characteristics that it promotes.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

Not applicable.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

Not applicable.

How does the designated index differ from a relevant broad market index?"

Not applicable.

Where can the methodology used for the calculation of the designated index be found?

Not applicable.



Where can I find more product specific information online?

More product-specific information can be found on the website: Mandatum Fund Management S.A. - Mandatum Asset Management (mandatumam.com)

TO THE PROSPECTUS OF MANDATUM SICAV-UCITS

1. Name

Mandatum SICAV-UCITS – Mandatum Slim Tail US Long/Short Equity Fund (the "Mandatum Slim Tail US Long/Short Equity Fund").

2. Reference Currency

The Reference Currency of the Mandatum Slim Tail US Long/Short Equity Fund is the USD.

3. Investment Objective and Policy

The Mandatum Slim Tail US Long/Short Equity Fund aims to achieve long-term capital growth by investing in U.S. equity index instruments such as but not limited to equity index futures. The Mandatum Slim Tail US Long/Short Equity Fund seeks to achieve positive absolute returns primarily through its active time series momentum based meth-odologies. As a consequence of the time series momentum based investment strategy, the Mandatum Slim Tail US Long/Short Equity Fund may at times be partially or fully invested in Money Market Instruments and thus not have any exposure to U.S. equity index instruments. The Mandatum Slim Tail US Long/Short Equity markets based on estimates of future capital flows into and out from the US equity markets. Thus, the Mandatum Slim Tail US Long/Short Equity Fund will take a long position in the US equity index instruments when expected US equity market returns are positive and a short position in the US equity index instruments when expected US equity market returns are negative. Long positions benefit from an increase in price of the underlying instrument, while short positions benefit from a decrease in price of the underlying instrument.

The Portfolio Manager may in general invest from - 50 % to 100 % of the net assets of the Mandatum Slim Tail US Long/Short Equity Fund in US equity index instruments. The Mandatum Slim Tail US Long/Short Equity Fund will have either long or short positions in U.S. equity index instruments. As a consequence, at any given time, the Mandatum Slim Tail US Long/Short Equity Fund will not have simultaneous long and short positions in U.S. equity index instruments.

The Mandatum Slim Tail US Long/Short Equity Fund may invest in UCITS (including ETFs and money market funds that comply with ESMA's Guidelines on a Common Definition of European Money Market Funds) and Other UCIs (subject to the 10% limit set forth in section VI. (1) under the heading "INVESTMENT RESTRICTIONS"), fixed-

income instruments and Money Market Instruments as part of its investment strategy and for liquidity management purposes.

The Mandatum Slim Tail US Long/Short Equity Fund will only enter into securities lending and borrowing transactions on a temporary basis for a purpose of efficient portfolio management and revenue optimisation. The securities lending activity should not result in a change of the declared investment objective of the Mandatum Slim Tail US Long/Short Equity Fund. Between 0% to 40% of the net asset value of available instruments in the Mandatum Slim Tail US Long/Short Equity Fund may be subject to securities lending or borrowing transactions. It is typically expected that securities lending and borrowing transactions will not exceed 25% of the net asset value of the Mandatum Slim Tail US Long/Short Equity Fund except where the Mandatum Slim Tail US Long/Short Equity Fund is entitled at all times to the cancellation of the contract and the restitution of the securities.

The Mandatum Slim Tail US Long/Short Equity Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implement-ing its investment strategy.

4. Pre-contractual Sustainability Disclosure Pursuant to Article 6 of SFDR

The investment decisions made for the Mandatum Slim Tail US Long/Short Equity Fund do not currently take into account "sustainability risks" (as defined in SFDR). The Mandatum Slim Tail US Long/Short Equity Fund's investment objective is pursued through investing in equity index instruments. This investment strategy does not provide scope for the Portfolio Manager to integrate sustainability risks into investment decisions as the Portfolio Manager does not have discretion over the contents of the relevant indexes. As such, the integration of sustainability risks into the investment decisions of the Mandatum Slim Tail US Long/Short Equity Fund would not be consistent with its investment objectives and would therefore not be in the best interests of the Mandatum Slim Tail US Long/Short Equity Fund's investors

As the Portfolio Manager does not consider sustainability risks when making investment decisions for the Mandatum Slim Tail US Long/Short Equity Fund, no further assessment of the likely impacts of sustainability risks on the returns of the Mandatum Slim Tail US Long/Short Equity Fund has been carried out other than to note that any environmental, social or governance event or condition, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

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

The Management Company in conjunction with the Portfolio Manager does not consider principal adverse impacts on the basis that, in the context of the investment strategy of the Mandatum Slim Tail US Long/Short Equity Fund, it is not possible to conduct detailed diligence on the principal adverse impacts of the Management Company's investment decisions on sustainability factors.

5. Classes

Currently, Shares of the Mandatum Slim Tail US Long/Short Equity Fund are issued in the following Classes:

Class	Reference Currency	Minimum Subscription Amount in the Reference Currency of the Class	Management Fee p.a.	Performance Fee
A USD cap.	USD	None	1.50 %	No
A USD cap. perf.	USD	None	1.00 %	Yes
A SEK cap. (hedged)	SEK	None	1.50 %	No
A SEK cap. perf. (hedged)	SEK	None	1.00 %	Yes
A2 USD cap.	USD	3,000,000	1.20 %	No
A2 USD cap. perf.	USD	3,000,000	0.70 %	Yes
A2 SEK cap. (hedged)	SEK	30,000,000	1.20 %	No
A2 SEK cap. perf. (hedged)	SEK	30,000,000	0.70 %	Yes
B USD cap.	USD	5,000,000	0.90 %	No
B USD cap. perf.	USD	5,000,000	0.60 %	Yes
B SEK cap. (hedged)	SEK	50,000,000	0.90 %	No
B SEK cap. perf. (hedged)	SEK	50,000,000	0.60 %	Yes
C USD cap.	USD	10,000,000	0.80 %	No
C USD cap. perf.	USD	10,000,000	0.40 %	Yes
C SEK cap. (hedged)	SEK	100,000,000	0.80 %	No
C SEK cap. perf. (hedged)	SEK	100,000,000	0.40 %	Yes
D1 USD cap.	USD	None	0.75 %	No
D2 USD cap.	USD	3,000,000	0.50 %	No
G USD cap.	USD	None	0.03 %	No
I USD cap.	USD	30,000,000	0.50 %	No
I USD distr.	USD	30,000,000	0.50 %	No
I SEK cap. (hedged)	SEK	300,000,000	0.50 %	No
I EUR cap. (hedged)	EUR	30,000,000	0.50 %	No
S USD cap.	USD	None	0.40 %	No
X USD cap.	USD	None	None	No

The Mandatum Slim Tail US Long/Short Equity Fund offers Class A, Class B, Class C, Class D, Class G, Class I, Class S and Class X Shares with different characteristics, including management fees, minimum subscription amounts, performance fees, currencies, distribution policies and hedging. Please visit the Website for a complete list of Classes available in the Mandatum Slim Tail US Long/Short Equity Fund.

Each Class will be offered during its Initial Offering Period at a fixed price in the respective currency of this Class as determined at the absolute discretion of the Board of Directors.

Class A and A2 Shares

Class A Shares are available for subscription to all investors.

Class B Shares

Class B Shares are available for subscription to all investors.

Class C Shares

Class C Shares are reserved for Institutional Investors.

Class D1 and D2 Shares

Class D1 and D2 Shares are available exclusively for specified intermediaries who, within the scope of the services they provide, are not allowed to accept and retain fees, commissions or any monetary or non-monetary benefits (except for minor non-monetary benefits) that are paid or provided by any third party or a person acting on behalf of a third party, be this (i) due to legal requirements or (ii) due to the fact that they have concluded a contractual agreement with their customers (e.g., individual discretionary portfolio management or advisory agreements with separate fee arrangements or other agreements) which exclude such payments.

Class G Shares

Class G Shares are reserved for companies that qualify as Institutional Investors belonging to the Mandatum group, as defined by the Board of Directors from time to time.

Class I Shares

Class I Shares are reserved for Institutional Investors.

Class S Shares

Class S Shares are reserved for Institutional Investors. Investment into Class S Shares shall be at the absolute discretion of the Board of Directors.

Class X Shares

Class X Shares are reserved for Institutional Investors who have entered into a specific agreement with the Fund, the Management Company or the Portfolio Manager. Investment into Class X Shares shall be at the absolute discretion of the Board of Directors.

6. Minimum Initial Subscription, Holding, Subsequent Subscription and Redemption Amounts

The minimum initial subscription amounts are shown in the table in Section 5.

There are no minimum holding, subsequent subscription or redemption amounts.

The Board of Directors may in its absolute discretion decide to waive the minimum initial subscription, and set a minimum holding, subsequent subscription and/or redemption amount.

7. Subscription, Redemption and Conversion Fees

A. Subscription Fee

No subscription fee will be levied.

B. Redemption Fee

No redemption fee will be levied.

C. Conversion Fee

No conversion fee will be levied.

8. Fees

A. Management Fee

The Management Fees for each Class are shown in the table in Section 5.

B. Portfolio Management Fee

The Management Company will pay the fees of the Portfolio Manager.

C. Performance Fee

The Performance Fee Classes are shown in the table in Section 5.

The Performance Index of the Performance Fee Classes is the ICE BofA Merrill Lynch US Dollar 1-Month Deposit Offered Rate Constant Maturity Index (LUS1).

The Performance Fee calculations for all Performance Fee Classes of Mandatum Slim Tail US Long/Short Equity Fund will be made as set out below:

Performance Fee = Number of Shares \times Performance Rate \times MAX(0, NAV_T - NAVadjusted_T)

 $NAVadjusted_{T} = NAV_{CRYST} \times \frac{Performance Index_{T}}{Performance Index_{CRYST}} \times FlowAdj_{T}$

<u>Where</u>	
Performance Rate	10 %, i.e. the Performance Fee is 10 % of the excess return compared to the Performance Index.
NAVT	Net Asset Value per Share of the relevant Class on Val- uation Date T.
NAVCRYST	The Net Asset Value per Share previously achieved in the relevant Class when a Performance Fee was crys- tallized; or the Initial Offering Price if no Performance Fee has been paid.
Performance Index _T	Value of the Performance Index on Valuation Date T.
Performance Index _{CRYST}	Value of the Performance Index on NAV _{CRYST} 's Valua- tion Date.
FlowAdj⊤	Adjustment taking into account the effect of new sub- scriptions received and redemptions requested since the start of the financial year.

Shareholders are informed that a Performance Fee may be paid even if the absolute performance is negative when the performance of the Performance Fee Class has been less negative than the absolute performance of the Performance Index (please see below example "Outperforming the Performance Index: negative absolute return").

The table below provides examples of how the Performance Fee will be calculated under different performance scenarios.

Outperforming the Performance Index		Outperforming the Performance In- dex: negative ab- solute return
	mance	

NAV _{CRYST} at the beginning of a year	100	120	100
Net Asset Value at the beginning of a year	100	100	100
Return of the Performance Fee Class, net of all fees	10 %	10 %	-5 %
Return of the Performance Index	5 %	5 %	-10 %
Outperformance	5 %	5 %	5 %
Performance Rate	10 %	10 %	10 %
NAVadjusted at the end of a year	105	126	90
Net Asset Value at the end of a year	110	110	95
Performance Fee per Share	0,50	0,00	0,50
NAV _{CRYST} at the end of a year	110	120	95
NAVadjusted at the beginning of a next year	110	126	95

9. Benchmark Regulation

The Performance Index is a third-country benchmark within the meaning of the Benchmark Regulation. The administrator of the benchmark is ICE Benchmark Administration Limited and, as of the date this Prospectus, has not applied for recognition or endorsement under the Benchmark Regulation. The administrator has until 31 December 2023 to apply for recognition or endorsement under the Benchmark Regulation.

10. Global Exposure Calculation Methodology

The global exposure will be calculated by using the commitment approach.

11. Leverage

In managing the Mandatum Slim Tail US Long/Short Equity Fund, the Portfolio Manager may in general invest from - 50 % to 100 % of the net assets of the Mandatum Slim Tail US Long/Short Equity Fund in the US equity index instruments.

12. Risk Factors

The Mandatum Slim Tail US Long/Short Equity Fund is primarily subject to the risks described under the "RISK FACTORS ANNEX" of the Prospectus.

The Mandatum Slim Tail US Long/Short Equity Fund uses mainly listed equity futures in pursuing its investment strategy and is thus more exposed to the risks of FDIs than typical equity funds.

The Mandatum Slim Tail US Long/Short Equity Fund uses synthetic short sales in its investment strategy, and it may therefore be exposed to the risk of an unlimited increase in the market price of the shorted security (and thus to the risk to lose the entire investment). The use of shorting increases exposure to risks associated with FDIs.

13. Profile of the Typical Investor

The Mandatum Slim Tail US Long/Short Equity Fund is suitable for investors who seek to generally have exposure to US equities via U.S. equity index instruments but accept that the Mandatum Slim Tail US Long/Short Equity Fund may at times have no exposure to US equity markets. Suitable investors should be willing to accept risks typically associated with equity investments and specifically to risk factors listed under section 12 above. The recommended investment period is 5 years.

14. Listing

The Shares of the Mandatum Slim Tail US Long/Short Equity Fund are currently not listed on any stock exchange. The Board of Directors may, in its sole discretion, make an application for the listing of the Shares on the Luxembourg Stock Exchange or any other stock exchange.

TO THE PROSPECTUS OF MANDATUM SICAV-UCITS

1. Name

Mandatum SICAV-UCITS – Mandatum Slim Tail World Equity Fund (the "Mandatum Slim Tail World Equity Fund").

2. Reference Currency

The Reference Currency of the Mandatum Slim Tail World Equity Fund is the USD.

3. Investment Objective and Policy

The Mandatum Slim Tail World Equity Fund aims to achieve long-term capital growth by investing globally in equity index instruments such as but not limited to equity index futures. The Mandatum Slim Tail World Equity Fund seeks to achieve equity like returns with limited negative returns primarily through its active time series momentum based methodologies. As a consequence of the time series momentum based investment strategy, the Mandatum Slim Tail World Equity Fund may at times be partially or fully invested in Money Market Instruments and thus not have any exposure to equity index instruments.

The Mandatum Slim Tail World Equity Fund may invest in UCITS (including ETFs and money market funds that comply with ESMA's Guidelines on a Common Definition of European Money Market Funds) and Other UCIs (subject to the 10% limit set forth in section VI. (1) under the heading "INVESTMENT RESTRICTIONS"), fixed-income instruments and Money Market Instruments as part of its investment strategy and for liquidity management purposes.

The Mandatum Slim Tail World Equity Fund will only enter into securities lending and borrowing transactions on a temporary basis for a purpose of efficient portfolio management and revenue optimisation. The securities lending activity should not result in a change of the declared investment objective of the Mandatum Slim Tail World Equity Fund. Between 0% to 40% of the net asset value of available instruments in the Mandatum Slim Tail World Equity Fund may be subject to securities lending or borrowing transactions. It is typically expected that securities lending and borrowing transactions will not exceed 25% of the net asset value of the Mandatum Slim Tail World Equity Fund except where the Mandatum Slim Tail World Equity Fund Equity Fund is entitled at all times to the cancellation of the contract and the restitution of the securities.

The Mandatum Slim Tail World Equity Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy.

4. Pre-contractual Sustainability Disclosure Pursuant to Article 6 of SFDR

The investment decisions made for the Mandatum Slim Tail World Equity Fund do not currently take into account "sustainability risks" (as defined in SFDR). The Mandatum Slim Tail World Equity Fund's investment objective is pursued through investing in equity index instruments. This investment strategy does not provide scope for the Portfolio Manager to integrate sustainability risks into investment decisions as the Portfolio Manager does not have discretion over the contents of the relevant indexes. As such, the integration of sustainability risks into the investment decisions of the Mandatum Slim Tail World Equity Fund would not be consistent with its investment objectives and would therefore not be in the best interests of the Mandatum Slim Tail World Equity Fund's investors

As the Portfolio Manager does not consider sustainability risks when making investment decisions for the Mandatum Slim Tail World Equity Fund, no further assessment of the likely impacts of sustainability risks on the returns of the Mandatum Slim Tail World Equity Fund has been carried out other than to note that any environmental, social or governance event or condition, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

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

The Management Company in conjunction with the Portfolio Manager does not consider principal adverse impacts on the basis that, in the context of the investment strategy of the Mandatum Slim Tail World Equity Fund, it is not possible to conduct detailed diligence on the principal adverse impacts of the Management Company's investment decisions on sustainability factors.

5. Classes

Currently, Shares of the Mandatum Slim Tail World Equity Fund are issued in the following Classes:

Class	Reference Cur- rency	Minimum Subscription Amount in the Reference Cur- rency of the Class	Management Fee p.a.	Performance Fee
A USD cap.	USD	None	1.50 %	No
A USD cap. perf.	USD	None	1.00 %	Yes
A2 USD cap.	USD	3,000,000	1.00 %	No
A2 USD cap. perf.	USD	3,000,000	0.70 %	Yes
B USD cap.	USD	5,000,000	0.90 %	No

B USD cap. perf.	USD	5,000,000	0.60 %	Yes
C USD cap.	USD	10,000,000	0.60 %	No
C USD cap. perf.	USD	10,000,000	0.40 %	Yes
D1 USD cap.	USD	None	0.75 %	No
D2 USD cap.	USD	3,000,000	0.50 %	No
G USD cap.	USD	None	0.03 %	No
I EUR cap. (hedged)	EUR	30,000,000	0.50 %	No
I SEK cap. (hedged)	SEK	300,000,000	0.50 %	No
I USD cap.	USD	30,000,000	0.50 %	No
I USD distr.	USD	30,000,000	0.50 %	No
S USD cap.	USD	None	0.40 %	No
X USD cap.	USD	None	None	No

The Mandatum Slim Tail World Equity Fund offers Class A, Class B, Class C, Class D, Class G, Class I, Class S and Class X Shares with different characteristics, including management fees, minimum subscription amounts, performance fees, currencies, distribution policies and hedging. Please visit the Website for a complete list of Classes available in the Mandatum Slim Tail World Equity Fund.

Each Class will be offered during its Initial Offering Period at a fixed price in the respective currency of this Class as determined at the absolute discretion of the Board of Directors.

Class A Shares

Class A Shares are available for subscription to all investors.

Class B Shares

Class B Shares are available for subscription to all investors.

Class C Shares

Class C Shares are reserved for Institutional Investors.

Class D1 and D2 Shares

Class D1 and D2 Shares are available exclusively for specified intermediaries who, within the scope of the services they provide, are not allowed to accept and retain fees, commissions or any monetary or non-monetary benefits (except for minor non-monetary benefits) that are paid or provided by any third party or a person acting on behalf of a third party, be this (i) due to legal requirements or (ii) due to the fact that they have concluded a contractual agreement with their customers (e.g., individual discretionary portfolio management or advisory agreements with separate fee arrangements or other agreements) which exclude such payments.

Class G Shares

Class G Shares are reserved for companies that qualify as Institutional Investors belonging to the Mandatum group, as defined by the Board of Directors from time to time.

Class I Shares

Class I Shares are reserved for Institutional Investors.

Class S Shares

Class S Shares are reserved for Institutional Investors. Investment into Class S Shares shall be at the absolute discretion of the Board of Directors.

Class X Shares

Class X Shares are reserved for Institutional Investors who have entered into a specific agreement with the Fund, the Management Company or the Portfolio Manager. Investment into Class X Shares shall be at the absolute discretion of the Board of Directors.

6. Minimum Initial Subscription, Holding, Subsequent Subscription and Redemption Amounts

The minimum initial subscription amounts are shown in the table in Section 5.

There are no minimum holding, subsequent subscription or redemption amounts.

The Board of Directors may in its absolute discretion decide to waive the minimum initial subscription, and set a minimum holding, subsequent subscription and/or redemption amount.

7. Subscription, Redemption and Conversion Fees

A. Subscription Fee

No subscription fee will be levied.

B. Redemption Fee

No redemption fee will be levied.

C. Conversion Fee

No conversion fee will be levied.

8. Fees

A. Management Fee

The Management Fees for each Class are shown in the table in Section 5.

B. Portfolio Management Fee

The Management Company will pay the fees of the Portfolio Manager.

C. Performance Fee

The Performance Fee Classes are shown in the table in Section 5.

The Performance Index of the Performance Fee Classes is the Stoxx Global Total Market USD (Net Return) Index.

The Performance Fee calculations for all Performance Fee Classes of Mandatum Slim Tail World Equity Fund will be made as set out below:

Performance Fee = Number of Shares \times Performance Rate \times MAX(0, NAV_T - NAVadjusted_T)

$$NAVadjusted_{T} = NAV_{CRYST} \times \frac{Performance Index_{T}}{Performance Index_{CRYST}} \times FlowAdj_{T}$$

<u>Where</u>	
Performance Rate	10 %, i.e. the Performance Fee is 10 % of the excess return compared to the Performance Index.
NAVT	Net Asset Value per Share of the relevant Class on Val- uation Date T.
NAVCRYST	The Net Asset Value per Share previously achieved in the relevant Class when a Performance Fee was crys- tallized; or the Initial Offering Price if no Performance Fee has been paid.
Performance Index⊤	Value of the Performance Index on Valuation Date T.
Performance Index _{CRYST}	Value of the Performance Index on NAV _{CRYST} 's Valua- tion Date.
FlowAdj⊤	Adjustment taking into account the effect of new sub- scriptions received and redemptions requested since the start of the financial year.

Shareholders are informed that a Performance Fee may be paid even if the absolute performance is negative when the performance of the Performance Fee Class has been less negative than the absolute performance of the Performance Index (please see below example "Outperforming the Performance Index: negative absolute return").

Outperforming the Outperforming Outperforming the the Performance Performance In-Performance In-Index dex: uncovered dex: negative abpast underperforsolute return mance 100 NAV_{CRYST} at the beginning of a year 120 100 Net Asset Value at the beginning of 100 100 100 a year Return of the Performance Fee 10 % 10 % -5 % Class, net of all fees 5 % 5 % -10 % Return of the Performance Index Outperformance 5 % 5 % 5 % Performance Rate 10 % 10 % 10 % NAVadjusted at the end of a year 105 126 90 Net Asset Value at the end of a 110 110 95 year Performance Fee per Share 0.50 0.00 0.50 NAV_{CRYST} at the end of a year 110 120 95 NAVadjusted at the beginning of a 110 126 95 next year

The table below provides examples of how the Performance Fee will be calculated under different performance scenarios.

9. Benchmark Regulation

The Performance Index is a benchmark within the meaning of the Benchmark Regulation. The administrator of the benchmark is STOXX Ltd. and is included in the register of administrators established and maintained by ESMA.

According to Article 29(1) of the Benchmark Regulation, the Mandatum Slim Tail World Equity Fund may use the benchmark as it is provided by an administrator included in the above-mentioned register as a third-country administrator in accordance with Article 32 of the Benchmark Regulation.

10. Global Exposure Calculation Methodology

The global exposure will be calculated by using the commitment approach.

11. Leverage

In managing the Mandatum Slim Tail World Equity Fund, the Portfolio Manager may invest a maximum of 125 % of the net assets of the Mandatum Slim Tail World Equity Fund in the global equity markets.

12. Risk Factors

The Mandatum Slim Tail World Equity Fund is primarily subject to the risks described under the "RISK FACTORS ANNEX" of the Prospectus.

The Mandatum Slim Tail World Equity Fund uses mainly listed equity futures in pursuing its investment strategy and is thus more exposed to the risks of FDIs as typical equity funds.

The Mandatum Slim Tail World Equity Fund may use leverage in its investment strategy and it may therefore experience more volatile returns than typical equity funds. The use of leverage increases exposure to risks associated with equities and FDIs.

13. Profile of the Typical Investor

The Mandatum Slim Tail World Equity Fund is suitable for investors who seek to generally have exposure to global equities but accept that the Mandatum Slim Tail World Equity Fund may at times have no exposure to global equity markets or may have exposure only to the equity markets of a certain geographic area. Suitable investors should be willing to accept risks typically associated with equity investments and specifically to risk factors listed under section 12 above. The recommended investment period is 5 years.

14. Listing

The Shares of the Mandatum Slim Tail World Equity Fund are currently not listed on any stock exchange. The Board of Directors may, in its sole discretion, make an application for the listing of the Shares on the Luxembourg Stock Exchange or any other stock exchange.

TO THE PROSPECTUS OF MANDATUM SICAV-UCITS

1. Name

Mandatum SICAV-UCITS – Mandatum Managed Futures Fund (the "Mandatum Managed Futures Fund").

2. Reference Currency

The Reference Currency of the Mandatum Managed Futures Fund is the USD.

3. Investment Objective and Policy

The Mandatum Managed Futures Fund aims to achieve long-term positive absolute returns by investing in liquid futures using long/short strategies.

The Mandatum Managed Futures Fund seeks to achieve its investment objective primarily through its systematic momentum based methodologies. As a consequence of the momentum based investment strategy, the Mandatum Managed Futures Fund's exposure to various financial markets, such as but not limited to, equity, fixed income, foreign exchange, money markets and commodity indices, may change significantly over time and at times the Mandatum Managed Futures Fund may not be exposed to any market risks other than money markets. The Mandatum Managed Futures Fund is managed with a systematic approach that alters exposure to various financial markets primarily based on momentum signals over various time horizons. Thus, the Mandatum Managed Futures Fund will take long positions in financial instruments that are expected to yield positive returns and short positions in financial instruments with negative return expectations. Long positions benefit from an increase in price of the underlying instrument, while short positions benefit from a decrease in price of the underlying instrument. In addition, the Mandatum Managed Futures Fund may use synthetic short sales for the purpose of hedging and efficient portfolio management.

The Portfolio Manager aims to implement the investment strategy mainly by investments in FDIs and more specifically listed futures. As a consequence, the Mandatum Managed Futures Fund may use significant leverage in implementing its investment strategy.

As part of implementing the investment strategy the Mandatum Managed Futures Fund may seek exposure to commodities through financial indices, commodity index –linked certificates or commodity index – linked structured financial instruments. The components of such instruments may include (either directly or indirectly) long or short exposures to commodities. Investments in commodity indices will be made in accordance with the provisions of Circular 14/592 and ESMA Guidelines 2014/937. The Portfolio Manager will invest a portion of the net assets of the Mandatum Managed Futures Fund, which may vary over time, in short-term money market securities issued or guaranteed by a Member State, by its local authorities or agencies, by another member State of the OECD, by public international bodies of which one or more Member States are members, such as but not limited to, US Treasury Bills. Such investments will be used primarily to finance the Mandatum Managed Futures Fund's investments in futures and secondarily, to provide the Mandatum Managed Futures Fund with incremental income and liquidity.

The Mandatum Managed Futures Fund may invest in UCITS (including ETFs and money market funds that comply with ESMA's Guidelines on a Common Definition of European Money Market Funds) and Other UCIs (subject to the 10% limit set forth in section VI. (1) under the heading "INVESTMENT RESTRICTIONS"), fixed-income instruments and Money Market Instruments as part of its investment strategy and for liquidity management purposes.

The Mandatum Managed Futures Fund will only enter into securities lending and borrowing transactions on a temporary basis for a purpose of efficient portfolio management and revenue optimisation. The securities lending activity should not result in a change of the declared investment objective of the Mandatum Managed Futures Fund. Between 0% to 40% of the net asset value of available instruments in the Mandatum Managed Futures Fund may be subject to securities lending or borrowing transactions. It is typically expected that securities lending and borrowing transactions will not exceed 25% of the net asset value of the Mandatum Managed Futures Fund except where the Mandatum Managed Futures Fund is entitled at all times to the cancellation of the contract and the restitution of the securities.

The Mandatum Managed Futures Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy.

4. Pre-contractual Sustainability Disclosure Pursuant to Article 6 of SFDR

The investment decisions made for the Mandatum Managed Futures Fund do not currently take into account "sustainability risks" (as defined in SFDR). The Mandatum Managed Futures Fund's investment strategy is implemented mainly by investments in FDIs and more specifically listed futures (as described above). As such, the Portfolio Manager only invests in securities of companies through investing in equity index instruments. This investment strategy does not provide scope for the Portfolio Manager to integrate sustainability risks into investment decisions as the Portfolio Manager does not have discretion over the contents of the relevant indexes. The integration of sustainability risks into the investment decisions of the Mandatum Managed Futures Fund would not be consistent with its investment objectives and would therefore not be in the best interests of the Mandatum Managed Futures Fund's investors.

As the Portfolio Manager does not consider sustainability risks when making investment decisions for the Mandatum Managed Futures Fund, no further assessment of the likely impacts of sustainability risks on the returns of the Mandatum Managed Futures Fund has been carried out other than to note that any environmental, social or governance event or condition, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

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

The Management Company in conjunction with the Portfolio Manager does not consider principal adverse impacts on the basis that, in the context of the investment strategy of the Mandatum Managed Futures Fund, it is not possible to conduct detailed diligence on the principal adverse impacts of the Management Company's investment decisions on sustainability factors.

5. Classes

Currently, Shares of the Mandatum Managed Futures Fund are issued in the following Classes:

Class	Reference Currency	Minimum Subscription Amount in the Reference Currency of the Class	Management Fee p.a.	Performance Fee
A USD cap. perf.	USD	None	1.50 %	Yes
A EUR cap. perf.(hedged)	EUR	None	1.50 %	Yes
A SEK cap. perf.(hedged)	SEK	None	1.50 %	Yes
B USD cap. perf.	USD	1,000,000	1.40 %	Yes
B EUR cap. perf.(hedged)	EUR	1,000,000	1.40 %	Yes
B SEK cap. perf.(hedged)	SEK	10,000,000	1.40 %	Yes
D1 USD cap. perf.	USD	None	0.75 %	Yes
D2 USD cap. perf.	USD	5,000,000	0.50 %	Yes
G USD cap.	USD	None	0.03 %	No
I 1 USD cap. perf.	USD	20,000,000	1.20 %	Yes
I 1 EUR cap. perf.(hedged)	EUR	20,000,000	1.20 %	Yes
I 1 SEK cap. perf. (hedged)	SEK	200,000,000	1.20 %	Yes
I 2 USD cap. perf.	USD	50,000,000	0.80 %	Yes
I 2 EUR cap. perf.(hedged)	EUR	50,000,000	0.80 %	Yes
I 2 SEK cap. perf. (hedged)	SEK	500,000,000	0.80 %	Yes
X USD cap.	USD	None	None	No
X EUR cap. perf (hedged)	EUR	None	None	Yes

The Mandatum Managed Futures Fund offers Class A, Class B, Class D, Class G, Class I and Class X Shares with different characteristics, including management fees, minimum subscription amounts, performance fees, currencies, distribution policies and hedging. Please visit the Website for a complete list of Classes available in the Mandatum Managed Futures Fund.

Each Class will be offered during its Initial Offering Period at a fixed price in the respective currency of this Class as determined at the absolute discretion of the Board of Directors.

Class A Shares

Class A Shares are available for subscription to all investors.

Class B Shares

Class B Shares are available for subscription to all investors.

Class D1 and D2 Shares

Class D1 and D2 Shares are available exclusively for specified intermediaries who, within the scope of the services they provide, are not allowed to accept and retain fees, commissions or any monetary or non-monetary benefits (except for minor non-monetary benefits) that are paid or provided by any third party or a person acting on behalf of a third party, be this (i) due to legal requirements or (ii) due to the fact that they have concluded a contractual agreement with their customers (e.g., individual discretionary portfolio management or advisory agreements with separate fee arrangements or other agreements) which exclude such payments.

Class G Shares

Class G Shares are reserved for companies that qualify as Institutional Investors belonging to the Mandatum group, as defined by the Board of Directors from time to time.

<u>Class I Shares</u>

Class I Shares are reserved for Institutional Investors.

Class X Shares

Class X Shares are reserved for Institutional Investors who have entered into a specific agreement with the Fund, the Management Company or the Portfolio Manager. Investment into Class X Shares shall be at the absolute discretion of the Board of Directors.

6. Minimum Initial Subscription, Holding, Subsequent Subscription and Redemption Amounts

The minimum initial subscription amounts are shown in the table in Section 6.

There are no minimum holding, subsequent subscription or redemption amounts.

The Board of Directors may in its absolute discretion decide to waive the minimum initial subscription, and set a minimum holding, subsequent subscription and/or redemption amount.

7. Subscription, Redemption and Conversion Fees

A. Subscription Fee

No subscription fee will be levied.

B. Redemption Fee

No redemption fee will be levied.

C. Conversion Fee

No conversion fee will be levied.

8. Fees

A. Management Fee

The Management Fees for each Class are shown in the table in Section 6.

B. Portfolio Management Fee

The Management Company will pay the fees of the Portfolio Manager.

C. Performance Fee

The Performance Fee Classes are shown in the table in Section 6.

The Performance Fee calculations for all Performance Fee Classes of Mandatum Managed Futures Fund will be made will be made as set out below:

Performance Fee = Number of Shares \times Performance Rate \times MAX(0, NAV_T - NAVadjusted_T)

$$NAVadjusted_{T} = HWM_{T-1} \times FlowAdj_{T}$$

<u>Where</u> Performance Rate

15% (or such other percentage set out in the specific remuneration agreement for Class X EUR cap. perf. (hedged) Shares where the Performance Rate is set

	out in the specific remuneration agreement with the Fund, the Management Company or the Portfolio Manager entered into by the investor wishing to subscribe in Class X EUR cap. perf. (hedged) Shares) of the return exceeding the high water mark.
ΝΑντ	Net Asset Value per Share of the relevant Class on Val- uation Date T.
HWM _{T-1}	Net Asset Value per Share previously achieved in the relevant Class when a Performance Fee was crystal- lized; or the Initial Offering Price if no Performance Fee has been paid.
FlowAdj⊤	Adjustment taking into account the effect of new sub- scriptions received and redemptions requested since the start of the financial year.

The table below provides examples of how the Performance Fee will be calculated under different performance scenarios.

	Positive per- formance	Positive perfor- mance: uncovered past losses	Negative perfor- mance
High water mark at the beginning of a year	100	110	100
Net Asset Value at the beginning of a year	100	100	100
Return of the Performance Fee Class, net of all fees	5 %	5 %	-3 %
Performance Rate	10 %	10 %	10 %
NAVadjusted at the end of a year	100	110	100
Net Asset Value at the end of a year	105	105	97
Performance Fee per Share	0,50	0,00	0,00
High water mark at the end of a year	105	110	100

9. Global Exposure Calculation Methodology

The global exposure will be calculated using the absolute VaR approach.

10. Leverage

Depending on the market environment and at the discretion of the Portfolio Manager, the Mandatum Managed Futures Fund may employ leverage in the portfolio construction.

The level of leverage for the Mandatum Managed Futures Fund is typically expected to range from 0% to 500% of its Net Asset Value. However, the Mandatum Managed Futures Fund's leverage may increase to, but will not exceed 700%, for example during a low volatility market environment.

Leverage is calculated as the sum of the notionals of the FDIs used.

11. Risk Factors

The Mandatum Managed Futures Fund is primarily subject to the risks described under the "RISK FACTORS ANNEX" of the Prospectus.

The Mandatum Managed Futures Fund uses mainly listed futures in pursuing its investment strategy and is thus more exposed to the risks of FDIs as typical funds.

The Mandatum Managed Futures Fund uses significant leverage in its investment strategy and it may therefore experience more volatile returns than for example typical equity funds. The use of leverage increases exposure to risks associated with FDIs.

The Mandatum Managed Futures Fund may use synthetic short sales in its investment strategy and it may therefore be exposed to the risk of an unlimited increase in the market price of the shorted security. The use of shorting increases exposure to risks associated with FDIs.

The Portfolio Manager may use systematic trading strategies to select investments. Investments selected using systematic trading strategies may perform differently from the market as a whole or from their expected performance for many reasons, including factors used in building the quantitative analytical framework, the weights placed on each factor, and changing sources of market returns, among others. Any errors or imperfections in quantitative analyses or models, or in the data on which they are based, could adversely affect the ability of the Portfolio Manager to use such analyses or models effectively, which in turn could adversely affect the performance of the Mandatum Managed Futures Fund. There can be no assurance that these methodologies will help the Mandatum Managed Futures Fund to achieve its investment objective.

12. Profile of the Typical Investor

The Mandatum Managed Futures Fund is suitable for medium to long-term investors seeking risk-controlled returns. Given the high level of risk involved, the Mandatum Managed Futures Fund is only suitable for investors able to sustain significant short-term loss and willing to accept risks typically associated with FDIs and specifically risk factors listed under section 11 above. The recommended investment period is 5 years.

13. Listing

The Shares of the Mandatum Managed Futures Fund are currently not listed on any stock exchange. The Board of Directors may, in its sole discretion, make an application for the listing of the Shares on the Luxembourg Stock Exchange or any other stock exchange.

TO THE PROSPECTUS OF MANDATUM SICAV-UCITS

1. Name

Mandatum SICAV-UCITS – Mandatum Nordic Active Ownership Equity Fund (the "Mandatum Nordic Active Ownership Equity Fund").

2. Reference Currency

The Reference Currency of the Mandatum Nordic Active Ownership Equity Fund is the Euro.

3. Investment Objective and Policy

The Mandatum Nordic Active Ownership Equity Fund aims to achieve long-term capital growth by investing in Nordic equities and equity related securities with an active ownership approach. The investment objective of the Mandatum Nordic Active Ownership Equity Fund is to invest in companies whose boards are able to create long term sustainable value and are able to support the management team. Active ownership is conducted through having an active dialogue with the management of target companies and exercising the voting rights. On top of ongoing active dialogue with both management and board members, the Mandatum Nordic Active Ownership Equity Fund may participate in nomination committees with a task of preparing the election of board members and board remunerations, and actively encourages companies to set-up committees. The Mandatum Nordic Active Ownership Equity Fund engages the boards privately, not publicly. The investments in the investee companies shall be limited to ensure that, in accordance with Section V. (1) of the Investment Restrictions, the Mandatum Nordic Active Ownership Equity Fund's voting rights are not enabling it to exercise significant influence over the management of investee companies. In addition, the Portfolio Manager shall manage the Mandatum Nordic Active Ownership Equity Fund in accordance with the engagement principles of the Portfolio Manager (which are available on the following website: https://www.mandatumam.com/497441/globalassets/mam/pdf/mandatum-asset-management-engagement-principles 2021.pdf) in order to mitigate any conflicts of interest arising from the exercise of the voting rights.

The Mandatum Nordic Active Ownership Equity Fund is having more concentrated portfolio than a standard equity fund due to its active ownership approach. The number of investee companies will vary over time depending on the market conditions and is typically expected to be between 20 and 40 companies. Whereas the number of investee companies will only be at the lower end of such range in case the liquidity profile of the Mandatum Nordic Active Ownership Equity Fund allows for such reduction, the number of investee companies may be higher than 40 when the Portfolio Manager considers this to be in the best interest of the investors and/or to be necessary in order to ensure that the liquidity profile of the Mandatum Nordic Active Ownership Equity Fund is sufficient to comply with redemption requests of investors. The portfolio of the Mandatum Nordic Active Ownership Equity Fund will always be compliant with the concentration limits in accordance with the Law of 2010 as well as Section III (1) and Section III (2) of the Investment Restrictions. Due to the smaller number of companies in which the Mandatum Nordic Active Ownership Equity Fund invests, the Mandatum Nordic Active Ownership Equity Fund is more exposed to liquidity and concentration risks than Sub-Funds investing in a wider number of companies as further described in the risk factors "Liquidity Risk" and "Concentration of Investments" in the "RISK FACTORS ANNEX" of the Prospectus.

The Mandatum Nordic Active Ownership Equity Fund is focused on small and mid-capitalization companies which typically are companies with a market capitalization below 1.0% of the total market capitalization in Nordic countries. The Nordic market total capitalization is measured using STOXX Nordic Total Market index which at the end of May 2022 meant a market capitalization of up to EUR 20.8 billion. Due to general market conditions (such as market liquidity) or company specific factors, such as low free float, the Mandatum Nordic Active Ownership Equity Fund may from time to time also invest in Nordic companies with higher market capitalization. It is typically expected that the investments in higher market capitalization Nordic companies will not exceed 20% of the net asset value of the Mandatum Nordic Active Ownership Equity Fund.

The small-capitalization companies in which the Mandatum Nordic Active Ownership Equity Fund invests are more exposed to smaller company risk and liquidity risk than larger companies as further described in the risk factors "Liquidity Risk" and "Smaller Company Risk" in the "RISK FACTORS ANNEX" of the Prospectus. In order to ensure that the liquidity profile of the Mandatum Nordic Active Ownership Equity Fund is satisfactory, the Mandatum Nordic Active Ownership Equity Fund will not acquire shares of companies with a market capitalization of less than EUR 150 million when the investments in companies with a market capitalization of less than EUR 150 million (at the time the investment being made) would exceed 15% of the net asset value of the Mandatum Nordic Active Ownership Equity Fund, including such acquisition. In addition, the Mandatum Nordic Active Ownership Equity Fund will not acquire shares of companies with a market capitalization of less than the envest ments in companies made) would exceed 15% of the net asset value of the Mandatum Nordic Active Ownership Equity Fund, including such acquisition. In addition, the Mandatum Nordic Active Ownership Equity Fund will not acquire shares of companies with a market capitalization of less than EUR 50 million (at the time the investment being made).

The Mandatum Nordic Active Ownership Equity Fund seeks to achieve returns in excess of its Benchmark Index through its active selection of investments. The Mandatum Nordic Active Ownership Equity Fund is actively managed, and its investment decision are not affected by the Benchmark Index weights. Target companies are selected based on the investment criteria focusing mostly on companies with a good structural underlying growth outlook, and fundamental analysis. The Portfolio Manager has adopted a Responsible Investment Policy and the investment process of the Mandatum Nordic Active Ownership Equity Fund encompasses the consideration of environmental, social and governance (ESG) factors. Details can be found under the heading "RESPONSI-BLE INVESTMENT POLICY".

The Mandatum Nordic Active Ownership Equity Fund may also invest in UCITS (including ETFs) and other UCIs (subject to the 10% limit set forth in section VI. (1) under the heading "INVESTMENT RESTRICTIONS") as part of its investment strategy and for liquidity management purposes.

The Mandatum Nordic Active Ownership Equity Fund is entering into securities lending and borrowing transactions on a continuous basis for a purpose of efficient portfolio management and revenue optimisation. The securities lending activity should not result in a change of the declared investment objective of the Mandatum Nordic Active Ownership Equity Fund. Between 0% to 40% of the net asset value of available instruments in the Mandatum Nordic Active Ownership Equity Fund may be subject to securities lending or borrowing transactions. It is typically expected that securities lending and borrowing transactions will not exceed 25% of the net asset value of the Mandatum Nordic Active Ownership Equity Fund except where the Mandatum Nordic Active Ownership Equity Fund is entitled at all times to the cancellation of the contract and the restitution of the securities. Only in exceptional market conditions, in which there are no demand to lend out any securities, the Mandatum Nordic Active Ownership Equity Fund is not entering into securities lending and borrowing transactions. The Mandatum Nordic Active Ownership Equity Fund shall ensure that the volume of the securities lending transactions is kept at an appropriate level or that it is entitled to request the return of the securities lent in a manner that enables it, at all times, to meet its redemption obligations and that these transactions do not jeopardise the management of the Mandatum Nordic Active Ownership Equity Fund's assets in accordance with its investment policy.

The Mandatum Nordic Active Ownership Equity Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy.

The Mandatum Nordic Active Ownership Equity Fund may invest in fixed-income and Money Market Instruments only for liquidity management purposes.

4. Benchmark Index

Combination of the following indices:

Index	Index calculation currency	Weight
Stoxx Nordic Mid (Net Return)	EUR	50%
Stoxx Nordic Small (Net Return)	EUR	50%

The Benchmark Index is a benchmark within the meaning of the Benchmark Regulation. The administrator of the benchmark is STOXX Ltd. and is included in the register of administrators established and maintained by ESMA.

According to Article 29(1) of the Benchmark Regulation, the Mandatum Nordic Active Ownership Equity Fund may use the benchmark as it is provided by an administrator included in the above-mentioned register as a third-country administrator in accordance with Article 32 of the Benchmark Regulation.

5. Pre-contractual Sustainability Disclosure Pursuant to Article 8 of SFDR

The Mandatum Nordic Active Ownership Equity Fund qualifies as a financial product under Article 8 of SFDR.

The information to be disclosed pursuant to Article 8(1), (2) and (2a) SFDR as well as information about the environmental or social characteristics is available at the end of this Appendix VIII to the Prospectus.

6. Classes

Currently, Shares of the Mandatum Nordic Active Ownership Equity Fund are issued in the following Classes:

Class	Reference Currency	Minimum Subscription Amount in the Reference Currency of the Class	Management Fee p.a.	Performance Fee
A1 EUR cap.	EUR	125,000	1.80 %	No
A2 EUR cap. perf.	EUR	125,000	1.40 %	Yes
B1 EUR cap.	EUR	1,000,000	1.30 %	No
B2 EUR cap. perf.	EUR	1,000,000	1.00 %	Yes
C1 EUR cap.	EUR	5,000,000	1.10 %	No
C2 EUR cap. perf.	EUR	5,000,000	0.90 %	Yes
G EUR cap.	EUR	None	0.03 %	No
I EUR cap.	EUR	15,000,000	0.90 %	No
X EUR cap.	EUR	None	None	No

The Mandatum Nordic Active Ownership Equity Fund offers Class A, Class B, Class C, Class G, Class I and Class X Shares with different characteristics, including management fees, minimum subscription amounts, performance fees, currencies, distribution policies and hedging. Please visit the Website for a complete list of Classes available in the Mandatum Nordic Active Ownership Equity Fund.

Each Class will be offered during its Initial Offering Period at a fixed price in the respective currency of this Class as determined at the absolute discretion of the Board of Directors.

Class A Shares

Class A Shares are available for subscription to all investors.

Class B Shares

Class B Shares are available for subscription to all investors.

Class C Shares

Class C Shares are reserved for Institutional Investors.

Class I Shares

Class I Shares are reserved for Institutional Investors.

Class G Shares

Class G Shares are reserved for companies that qualify as Institutional Investors belonging to the Mandatum group, as defined by the Board of Directors from time to time.

Class X Shares

Class X Shares are reserved for Institutional Investors who have entered into a specific agreement with the Fund, the Management Company or the Portfolio Manager. Investment into Class X Shares shall be at the absolute discretion of the Board of Directors.

7. Minimum Initial Subscription, Holding, Subsequent Subscription and Redemption Amounts

The minimum initial subscription amounts are shown in the table in Section 6 above.

There are no minimum holding, subsequent subscription or redemption amounts.

The Board of Directors may in its absolute discretion decide to waive the minimum initial subscription, and set a minimum holding, subsequent subscription and/or redemption amount.

8. Prior Notice for Redemptions

No application for redemption will be accepted unless the written application is received by the Central Administrator at the latest at 2 p.m. CET five (5) Business Days before the relevant Valuation Date (or in such form and by such earlier or later date and/or time as the Board of Directors may in its discretion determine, provided that all redemption applications are received prior to the relevant Valuation Date). Applications for redemption received after such deadline will be dealt with on the following Valuation Date.

9. Subscription, Redemption and Conversion Fees

A. Subscription Fee

No subscription fee will be levied.

B. Redemption Fee

No redemption fee will be levied.

C. Conversion Fee

No conversion fee will be levied.

10.Fees

A. Management Fee

The Management Fees for each Class are shown in the table in Section 6 above.

B. Portfolio Management Fee

The Management Company will pay the fees of the Portfolio Manager.

C. Performance Fee

The Performance Fee Classes are shown in the table in Section 6 above.

The Performance Index of the Performance Fee Classes is the Benchmark Index (please see 4 above).

The Performance Fee calculations for all Performance Fee Classes of Mandatum Nordic Active Ownership Equity Fund will be made as set out below:

Performance Fee = Number of Shares × Performance Rate × MAX(0, NAV_T - NAVadjusted_T)

NAVadjusted_T = NAV_{CRYST} ×
$$\frac{\text{Performance Index}_{T}}{\text{Performance Index}_{CRYST}}$$
 × FlowAdj_T

<u>Where</u>	
Performance Rate	20%, i.e. the Performance Fee is 20% of the excess return compared to the Performance Index.
NAVT	Net Asset Value per Share of the relevant Class on Val- uation Date T.
NAVCRYST	The Net Asset Value per Share previously achieved in the relevant Class when a Performance Fee was crys- tallized; or the Initial Offering Price if no Performance Fee has been paid.
Performance Index $_{T}$	Value of the Performance Index on Valuation Date T.
Performance IndexCRYST	Value of the Performance Index on NAV _{CRYST} 's Valua- tion Date.
FlowAdj⊤	Adjustment taking into account the effect of new sub- scriptions received and redemptions requested since the start of the financial year.

Shareholders are informed that a Performance Fee may be paid even if the absolute performance is negative when the performance of the Performance Fee Class has been less negative than the absolute performance of the Performance Index (please see below example "Outperforming the Performance Index: negative absolute return").

The table below provides examples of how the Performance Fee will be calculated under different performance scenarios.

	Outperforming the Performance Index	Outperforming the Performance In- dex: uncovered past underperfor- mance	Outperforming the Performance In- dex: negative ab- solute return
NAV _{CRYST} at the beginning of a year	100	120	100
Net Asset Value at the beginning of a year	100	100	100
Return of the Performance Fee Class, net of all fees	10 %	10 %	-5 %
Return of the Performance Index	5 %	5 %	-10 %
Outperformance	5 %	5 %	5 %
Performance Rate	10 %	10 %	10 %
NAVadjusted at the end of a year	105	126	90
Net Asset Value at the end of a year	110	110	95
Performance Fee per Share	0,50	0,00	0,50
NAV _{CRYST} at the end of a year	110	120	95
NAVadjusted at the beginning of a next year	110	126	95

11. Global Exposure Calculation Methodology

The global exposure will be calculated by using the commitment approach.

12. Leverage

In managing the Mandatum Nordic Active Ownership Equity Fund, the Portfolio Manager does not currently intend to utilize leverage.

13. Risk Factors

The Mandatum Nordic Active Ownership Equity Fund is primarily subject to the risks described under the "RISK FACTORS ANNEX" of the Prospectus.

14. Profile of the Typical Investor

The Mandatum Nordic Active Ownership Equity Fund is suitable for investors who seek to invest selectively in Nordic small and mid-capitalization companies, seek higher returns than those of fixed income investments and accept the risks associated with equity investments. The recommended investment period is 5 years.

15. Listing

The Shares of the Mandatum Nordic Active Ownership Equity Fund are currently not listed on any stock exchange. The Board of Directors may, in its sole discretion, make an application for the listing of the Shares on the Luxembourg Stock Exchange or any other stock exchange.

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

in-Sustainable vestment means an investment in an economic activity that contributes to an environmental or objective, social 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.

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

Product name: Mandatum Nordic Active Ownership Equity Fund Legal entity identifier: 391200ML0OAXLNP5SF95

Environmental and/or social characteristics

Does this financial product have a survey relevant, the percentage figure represents the mine Yes	Istainable investment objective? [tick and fill in as nimum commitment to sustainable investments] Image: State of the sta
It will make a minimum of sustainable investments with an environmental objective:% in economic activities that qualify as environmentally sustainable under the EU Taxonomy in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of% of sustainable investments with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy with a social objective
It will make a minimum of sustainable investments with a social objective:%	It promotes E/S characteristics, but will not make any sustainable investments

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

The Mandatum Nordic Active Ownership Equity Fund promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics and the companies in which the investments are made follow good governance practices pursuant to Article 8 of SFDR. This product promotes environmental and/or social characteristics in three main ways:

- 1. Due diligence: this product considers compliance with international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises as part of its due diligence when making investments.
- 2. ESG risk: When analysing the risks of an investment object, the Management Company considers environmental, social and governance factors as an integral part of the risk management process. The ESG risk rating of an external service provider is also used to quantify the extent to which a risk related to ESG criteria may affect the company's value. Companies are divided into four risk categories based on the ESG risk rating. Depending on the risk category, further measures are required from the Portfolio Manager before making the investment. If the risk category of an investment included in the portfolio changes, the investment will be reassessed.

3. Investment selection: as part of the investment selection process, this product uses sensitive sector / norm-based screening to select investments with better ESG performance than other investments in the product's investible universe. It also uses a negative screening strategy to exclude potential investments in certain economic activities which the Mandatum Group considers exhibit negative ESG externalities.

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

The ESG characteristics promoted by the Mandatum Nordic Active Ownership Equity Fund are measured and monitored through ESG risk rating, sensitive sector / norm-based screening and carbon footprint. Investments are monitored on a quarterly basis. The Mandatum Nordic Active Ownership Equity Fund's investments are divided into four ESG risk categories based on Sustainalytics ESG Risk Rating. The carbon footprint (financed emissions and carbon intensity) of investments is measured and disclosed annually.

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

The Mandatum Nordic Active Ownership Equity Fund is not making sustainable investments within the meaning of art. 2 (17) of SFDR.

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

The Mandatum Nordic Active Ownership Equity Fund is not making sustainable investments within the meaning of art. 2 (17) of SFDR.

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

The Management Company has evaluated possible sustainability risks and adverse sustainability impacts that occur in different industries. As an outcome, the Management Company uses its exclusion criteria to restrict the investment universe of the Mandatum Nordic Active Ownership Equity Fund to avoid industries in which companies are typically more exposed to adverse impacts on sustainability factors. The Management Company divides the restricted industries into three tolerance groups set according to assessed adverse impacts on sustainability factors. The company is eliminated from the investment universe when the share of revenues from the restricted industry, either directly or indirectly exceeds the limit of the respective tolerance group:

- 1. Zero tolerance: No direct or indirect sales from the industry.
- 2. Low tolerance: Direct sales are not allowed, but indirect is limited to a maximum of 50% of sales.
- 3. Partial tolerance: The industry must not be the investee's main business, meaning more than 50% of sales either directly or indirectly.

The applied exclusion list is available on the Website. Positive screening methods are also used which further reduce the exposure to principal adverse impacts.

Principal adverse impacts as measured by fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons and the other restricted/excluded industries are considered in the initial investment stage. In addition, exposure to these matters in investments is monitored quarterly. Carbon footprint and GHG intensity are monitored annually.

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

The Mandatum Nordic Active Ownership Equity Fund is not making sustainable investments within the meaning of art. 2 (17) of the SFDR.

The investments of the Mandatum Nordic Active Ownership Equity Fund are monitored on, inter alia, the basis of OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights on a quarterly basis. If abuses or breaches related to these standards are observed, the issue will be investigated on a case-by-case basis. Therefore, the investments of the Mandatum Nordic Active Ownership Equity Fund are aligned with these guidelines and principles. The UNGC/OECD norm violations are also screened in the pre-trade phase to secure the alignment.

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

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

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



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

- ✗ Yes, this financial product measures and monitors the following principal adverse impacts: Carbon footprint, GHG intensity, fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons
 - (1) The impacts of fossil fuel sector activity, UNGC/OECD norm violations and involvement in controversial weapons and the other restricted/excluded industries are considered in the initial investment stage. In addition, exposure to these matters in investments is monitored quarterly. Carbon footprint and GHG intensity are monitored annually.
 - (2) The information is available in the products' bi-annual sustainability reports as well as in the periodic reports required by the SFDR (all reports available on the Website).





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

What investment strategy does this financial product follow?

The Mandatum Nordic Active Ownership Equity Fund aims to achieve long-term capital growth by investing in Nordic equities and equity related securities with an active ownership approach and a concentrated portfolio. Active ownership is conducted through having an active dialogue with the management of target companies and exercising the voting rights. The Mandatum Nordic Active Ownership Equity Fund is focused on small and mid-capitalization companies which typically are companies with a market capitalization below 1.0% of the total market capitalization in Nordic countries. The Mandatum Nordic Active Ownership Equity Fund seeks to achieve returns in excess of its Benchmark Index through its active selection of investments. The Mandatum Nordic Active Ownership Equity Fund is actively managed, and its investment decision are not affected by the Benchmark Index weights. Target companies are selected based on the investment criteria focusing mostly on companies with a good structural underlying growth outlook, and fundamental analysis.

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?

The Mandatum Nordic Active Ownership Equity Fund employs binding elements by implementing certain exclusion criteria as defined in the Mandatum Group's Responsible Investment Policy (available on https://www.mandatumlife.fi/en/wealth-management/responsible-investing-mandatumlife/). These include restrictions for investments in certain industries, which are considered to carry more sustainability risks and cause adverse sustainability impacts than others, such as controversial weapons, coal mining, tobacco, adult entertainment, gambling, defence materiel, fossil oil- and coal-based energy.

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

The Mandatum Nordic Active Ownership Equity Fund is committed to implement the binding elements described above. As of January 31, 2022, the binding elements reduced the investment universe by 6.1% measured by market capitalization.

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

The Mandatum Nordic Active Ownership Equity Fund has an active ownership approach meaning that the portfolio manager of the Mandatum Nordic Active Ownership Equity Fund actively meets the management as well as engages with the boards, and that way ensures that companies are adhering to good governance practices. At the due diligence stage and during the holding period, the investments are screened on the basis of international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises. The UN Global Compact principles are based on international standards concerning human rights, labour rights, the environment and corruption. If abuses or breaches related to the standards are observed in the investee company during the holding period, the incident is investigated, and measures are taken on a case-by-case basis. Depending on the severity, nature and extent of the breach, the portfolio management measures may consist of direct dialogue with the company's executive management, an engagement action or, as a last resort, selling the investment if the engagee company does not respond to the engagement efforts and does not take measures to prevent the abuse or breach within a reasonable time frame.

Asset allocation describes are r the share of in-

tion 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.

What is the asset allocation planned for this financial product?

All investments, covering more than 95% of the total assets, are aligned with E/S characteristics and are monitored through ESG risk rating and sector/norms-based screening. The category #2 Other includes cash and hedging instruments which are subject to minimum safeguards as described below.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#20ther includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

- operational expenditure (OpEx) reflecting green operational activities of investee companies.



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

The Mandatum Nordic Active Ownership Equity Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy. No financial derivatives linked to individual companies are used and as such the use of derivatives does not have an effect on the E/S factors promoted by the Mandatum Nordic Active Ownership Equity Fund.

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

0%.

The purpose of the Mandatum Nordic Active Ownership Equity Fund's investment strategy is not to make sustainable investments with an environmental objective aligned with the EU Taxonomy. The Mandatum Nordic Active Ownership Equity Fund may make investments that are defined sustainable under the EU Taxonomy, provided the investments meet the investment criteria of the Mandatum Nordic Active Ownership Equity Fund, but does not target any specific allocation.

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.



exposures

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

0 %



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

0 %

What is the minimum share of socially sustainable investments?

0%

ties directly enable other activities to make a substantial contribution to an environmental objective. Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels

to

perfor-

Enabling activi-

corresponding

the best

mance



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

"#2 Other" includes cash and derivatives held by the Mandatum Nordic Active Ownership Equity Fund ensuring its smooth operation when fulfilling its investment strategy. The Mandatum Nordic Active Ownership Equity Fund employs the minimum safeguards by screening for compliance with the international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises.

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

No. The Mandatum Nordic Active Ownership Equity Fund has a benchmark but the benchmark index is not aligned with the E/S characteristics that it promotes.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

Not applicable.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

Not applicable.

How does the designated index differ from a relevant broad market index?

Not applicable.

Where can the methodology used for the calculation of the designated index be found?

Not applicable.



Where can I find more product specific information online?

More product-specific information can be found on the website: <u>Mandatum Fund Management</u> <u>S.A. - Mandatum Asset Management (mandatumam.com)</u>



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