2026/4396-O174-0-PC
2026-04-17

WILLERFUNDS

LUXEMBOURG MUTUAL INVESTMENT FUND
WITH MULTIPLE SUB-FUNDS

PROSPECTUS

April 2026

IMPORTANT INFORMATION

The present Prospectus must be accompanied by the latest available annual report as well as the latest semi-annual report in the event the latter is published after the last annual report. These reports form part of the present Prospectus.

No information other than that contained in this Prospectus, in the Key Information Documents (the "**KIDs**"), the Management Regulations, the periodic financial reports, as well as in any other documents mentioned in the Prospectus and which may be consulted by the public, may be given in connection with the offer.

In addition to the full Prospectus, the Management Company has issued a KID that contains fundamental information in reference to WILLERFUNDS, in particular on the performance of each sub-fund, the description of the risk profile of each sub-fund and information on the risk profile of a typical investor. The KID must be offered free of charge to each subscriber before the entering into the contract. The KID may be obtained free of charge at the registered office of the Management Company, of the Administrator and from the paying agent in Italy.

This Prospectus does not constitute an offer or solicitation by anyone in any jurisdiction in which such offer is unlawful or in which the person making such offer or solicitation is not qualified to do so or to anyone to whom it is unlawful to make such offer or solicitation.

Specifically, the information provided is not intended for distribution, and does not amount to an offer for sale or a solicitation to buy any securities whatsoever in the United States of America or for the benefit of entities based there (residents of the United States or corporations organised in accordance with the laws of the United States of America or of any of its States, territories or possessions). Units of Willerfunds shall not be purchased or held, directly or indirectly, by investors who are citizens or residents of the United States of America or their sovereign territories; in addition, the transfer of Willerfunds' units to such persons is not authorized.

The units of Willerfunds are not listed on the Luxembourg Stock Exchange.

Units of certain sub-funds of the Willerfunds are intended for retail and/or Institutional Investors whereas units of certain other sub-funds are intended exclusively for Institutional Investors. Investors should understand that their investment is not secured against any possible loss.

The Board of Directors of the Management Company has taken all reasonable care to ensure that the facts stated herein are true and accurate in all material respects and that there are no other material facts, the omission of which would make misleading any statement herein whether of fact or opinion. All the Directors accept responsibility accordingly.

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GLOSSARY

2010 Law	The Law of 17 December 2010 regarding undertakings for collective investment, as amended.
Articles of Incorporation	The Management Company's articles of incorporation, as may be amended from time to time.
Benchmark	An index which represents the performance and structure of certain areas of the financial markets. The benchmark may be used for the portfolio construction, performance measurement of the sub-funds or performance fee calculation. The sub-funds are actively managed and do not aim at tracking the benchmark. The benchmark index may be used for the screening process and the portfolio construction, but investments outside the benchmark are possible. The objective of the sub-funds is always, without guarantee, to outperform the benchmark. For each sub-fund the relative risk to the benchmark and the positioning relative to the benchmark are monitored, as well as the performance against the benchmark. In certain circumstances the sub-fund composition and its performance can be closer to the benchmark than in normal circumstances, while maintaining an active management style.
Board of Directors	The Management Company's board of directors.
Business Day	Every bank business day in Luxembourg.
Calculation Day	The first Business Day (other than days when the calculation of the Net Asset Value is suspended) following the Valuation Day, on which the Net Asset Value is calculated by the Administrator on the basis of the prices on the Valuation Day, unless otherwise specified in the Sub-Fund Particular.
Cash	The concept of cash, as included in the investment policies and objectives of each Sub-fund specifically includes term or sight deposits and money-market instruments with a maturity of less than 12 months, issued by top-tier entities, including OECD Member States and entities of those States.
Cash and Quasi-Cash Securities	Cash, bank deposits, short-term deposits or other short-term instruments (including money-market UCIs) and money-market instruments issued by sovereign issuers or companies with a residual maturity not exceeding 397 days. Floating-rate bonds where the coupon is reset frequently, i.e. once a year or more often, will be considered as a passive alternative to short-term instruments, on condition that their maximum residual maturity is 762 days.
CSSF	*Commission de Surveillance du Secteur Financier*, the Luxembourg supervisory authority.
Depositary Bank	State Street Bank International GmbH, Luxembourg Branch.
Director	A member of the Fund Management Company’s Board of Directors.

EUR or Euro	The currency of European Union Member Countries that are part of the single currency.
ESMA	The European Securities and Markets Authority.
Fund	Short term used in the text to refer to WILLERFUNDS, a mutual investment fund with multiple sub-funds.
Initial Payment	Payment carried out with the initial subscription of an investment in WILLERFUNDS.
Initial Subscription Period	The initial launch period for the sub-fund in question, as defined by the Fund Management Company's Board of Directors, during which the Units are offered for subscription at the price determined in the Prospectus.
Investor	Means the owner of Units of the Fund.
Institutional Investor(s)	Institutional investor(s) within the meaning of Article 174 of the 2010 Law, as interpreted by the CSSF.
Management Company	Fideuram Asset Management (Ireland) dac, the Fund's management company.
Management Regulations	Means the management regulations of the Fund, as may be amended from time to time and available on the website of the Management Company at https://www.fideuramassetmanagement.ie/
Member State	Means a Member State of the European Union. The States that are contracting parties to the Agreement creating the European Economic Area other than the Member States of the European Union, within the limits set forth by this Agreement and related acts, are considered as equivalent to Member States of the European Union.
Mémorial	Mémorial C, Recueil des Sociétés et Associations.
Net Asset Value	Indicates, for each class of each Sub-fund, the value, expressed in EURO, of the respective Units. This value is made available in accordance with the Management Regulations and the Prospectus and is available each Business day at the registered office of the Depositary Bank and on the website of the Management Company at https://www.fideuramassetmanagement.ie/ and at the registered offices of the various Sale Agents.
OECD	Organisation for Economic Cooperation and Development.
Prospectus	The Fund's Prospectus, as periodically amended.

Redemption Day	The day when Units in the Fund may be redeemed, as determined in the sub-fund's investment policy.
Reference Currency	The currency in which the accounts of each sub-fund are held, as specified in the Sub-Fund Particulars.
Regulated Market	According to Directive 2014/65/EC, as amended (MiFID), a multilateral system operated and/or managed by a market operator, which brings together or facilitates the bringing together of multiple third party buying and selling interests in financial instruments in the system and in accordance with its nondiscretionary rules in a way that results in a contract, in respect of the financial instruments admitted to trading under its rules and/or systems, and which is authorised and functions regularly and in accordance with Title III of MiFID. The list of regulated markets recognized by the Management Company is composed by the following sub-lists: - the official list published in the MiFID database; - the list of exchanges which participate to the World Federation of Exchanges; - the list of exchanges maintained by the Italian association of investment managers Assogestioni; - any other market listed in the Fund's Prospectus which complies with the principles listed in Title III of MiFID.
RESA	*Recueil Electronique des Sociétés et Associations.*
Sales Agents	The sales agents in charge of the placement of the Units.
SFDR	Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector, as amended from time to time.
Sub-funds	The Management Company may create various sub-funds within the Fund, which amount to separate pools of assets and liabilities, and which primarily differ due to a different investment objective or policy and/or to a different reference currency.
Sub-Fund Particular	Part of the Prospectus containing information relating to each Sub-Fund.
Sustainability Factors	Means environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters, such in accordance with SFDR.
Sustainability Risks	Has the meaning given to it by article 2(22) of the SFDR and as further outlined in section "Risks relating to an investment in the Fund".
Switch	Transaction carried out by the Investor that modifies the composition of the investment amongst the various sub-funds of the Fund or that moves from one Class of Units to another.

Taxonomy Regulation	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, as amended from time to time.
UCI	Undertaking for collective investment.
UCITS	Undertaking for collective investment in transferable securities governed by Directive 2009/65/EC, as amended.
Unit	A unit within each sub-fund issued in registered form, has no nominal value, and makes up the Fund's capital.
Unit Classes or Classes	The Management Company may issue one or several unit classes that display one or several characteristic features that are different from that or those of the other classes, like, for instance, a specific sale or redemption fee structure, a specific advisory or management fee structure, a policy to hedge or not to hedge currency risk, a specific distribution policy, the fact that some unitholders will benefit from a Guarantee, or any other criterion, as specified in the "How to Invest in the Fund" Chapter and in the Sub-Fund Particulars.
Valuation Day	Every Business Day.

1) ORGANISATION

MANAGEMENT COMPANY

FIDEURAM ASSET MANAGEMENT (IRELAND) DESIGNATED ACTIVITY COMPANY,
in abbreviation "Fideuram Asset Management (Ireland) dac"
2nd Floor, International House
3 Harbourmaster Place, IFSC
Dublin 1, D01 K8F1
IRELAND

COMPOSITION OF THE BOARD OF DIRECTORS OF THE MANAGEMENT COMPANY

1. Victoria PARRY
   Irish Independent Director
   Ireland
   Chair of the Board of Directors

2. Matteo CATTANEO
   CEO and Managing Director – Fideuram Asset Management (Ireland) dac
   Ireland
   Director

3. Clara DUNNE
   Irish Independent Director
   Ireland
   Director

4. William MANAHAN
   Irish Independent Director
   Ireland
   Director

5. Elisabetta PAGNINI
   Group General Counsel, Head of Group Legal – Intesa Sanpaolo
   Italy
   Director

6. Giuseppe RUSSO
   Economist
   Italy
   Director

7. Davide ELLI
   Co-General Manager and Head of Investment Center Fideuram Intesa Sanpaolo Private Banking S.P.Ac
   Italy
   Director

DEPOSITARY BANK

STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch
49, Avenue J.F. Kennedy
L–1855 Luxembourg
GRAND DUCHY OF LUXEMBOURG

ADMINISTRATOR PAYING AGENT

STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch
49, Avenue J.F. Kennedy
L–1855 Luxembourg
GRAND DUCHY OF LUXEMBOURG

INVESTMENT MANAGERS

For WILLERFUNDS – PRIVATE SUITE – FIDELITY FLEXIBLE SHORT DURATION:

FIL Pensions Management
Beech Gate Millfield Lane
Lower Kingswood
Tadworth, Surrey
KT20 6RP
UNITED KINGDOM

For WILLERFUNDS – PRIVATE SUITE – SCHRODER GLOBAL CLIMATE CHANGE until 30 January 2026, renamed WILLERFUNDS - PRIVATE SUITE - SCHRODER GLOBAL LEADERS as from 31 January 2026:

Schroder Investment Management (Europe) S.A.
5, Hohenhof
L-1736 Senningerberg
GRAND DUCHY OF LUXEMBOURG

For WILLERFUNDS – PRIVATE SUITE – BNY MELLON GLOBAL REAL RETURN:

Newton Investment Management Limited
The Bank of New York Mellon Centre
160, Queen Victoria Street
London, EC4V 4LA
UNITED KINGDOM

For WILLERFUNDS – PRIVATE SUITE – BLACKROCK BALANCED ESG:

BlackRock Investment Management (UK) Limited
12, Throgmorton Avenue
London, C2N 2DL
UNITED KINGDOM

For WILLERFUNDS – PRIVATE SUITE – PICTET HEALTH INNOVATION TRENDS:

Pictet Asset Management S.A.
60, route des Acacias
1211 Geneva 73
SWITZERLAND

For WILLERFUNDS – PRIVATE SUITE – LOMBARD ODIER NATURAL CAPITAL:

Lombard Odier Asset Management (Europe) Limited
Queensberry House
3, Old Burlington Street
London, W1S 3AB
UNITED KINGDOM

For WILLERFUNDS – PRIVATE SUITE – JANUS HENDERSON STRATEGIC BOND:

Henderson Global Investors Limited
201, Bishopsgate
London, EC2M 3AE
UNITED KINGDOM

For WILLERFUNDS – PRIVATE SUITE – JPM EUROPE EQUITY:

J.P. Morgan Asset Management (UK) Limited
25 Bank Street, Canary Wharf
London, E14 5JP
UNITED KINGDOM

For WILLERFUNDS – PRIVATE SUITE – VONTOBEL EQUITY GLOBAL IMPACT:

Vontobel Asset Management AG
43, Gotthardstrasse
8002 Zürich
SWITZERLAND

For WILLERFUNDS – PRIVATE SUITE – WELLINGTON EQUITY GLOBAL RESEARCH:

Wellington Management International Ltd
Cardinal Place, 80 Victoria Street
London, SW1E 5JL
UNITED KINGDOM

For WILLERFUNDS – PRIVATE SUITE – EURIZON MULTI-ASSET CIRCULAR ECONOMY:

Eurizon Capital SGR S.p.A.
22, via Melchiorre Gioia
20124 Milan
ITALY

For WILLERFUNDS – PRIVATE SUITE – ASTERIA – MAN FLEXIBLE ALLOCATION:

Man Asset Management (Ireland) Limited
70, Sir John Rogerson's Quay
Dublin, D02 R296
IRELAND

For WILLERFUNDS – PRIVATE SUITE – FRANKLIN EMERGING CORPORATE BOND:

Franklin Templeton International Services S.à r. l.
8A, rue Albert Borschette
L-1246 Luxembourg
GRAND DUCHY OF LUXEMBOURG

For WILLERFUNDS – PRIVATE SUITE – T. ROWE PRICE EQUITY US RESEARCH:

T. Rowe Price International Ltd
Warwick Court
5, Paternoster Square
London, EC4M 7DX
UNITED KINGDOM

For WILLERFUNDS – PRIVATE SUITE – INVESCO EURO CORPORATE BOND:

Invesco Asset Management Limited
Perpetual Park, Perpetual Park Drive
Henley-on-Thames, Oxfordshire RG9 1HH
UNITED KINGDOM

For WILLERFUNDS – PRIVATE SUITE – PIMCO EUROPEAN INCOME BOND:

PIMCO Europe GmbH
Seidlstrasse 24 – 24a
Munich, 80335
GERMANY

For WILLERFUNDS – PRIVATE SUITE – JPM GLOBAL AGGREGATE BOND:

JPMorgan Asset Management (UK) Limited
25 Bank Street, Canary Wharf
London, E14 5JP
UNITED KINGDOM

For WILLERFUNDS - PRIVATE SUITE – FIDELITY GLOBAL EQUITY INCOME:

FIL Pensions Management
Beech Gate Millfield Lane
Lower Kingswood
Tadworth, Surrey
KT20 6RP
UNITED KINGDOM

For WILLERFUNDS - PRIVATE SUITE - M&G EUROPEAN STRATEGIC VALUE:

M&G Investment Management Limited
10 Fenchurch Avenue
London, EC3M 5AG
UNITED KINGDOM

SUB-INVESTMENT MANAGERS

For WILLERFUNDS – PRIVATE SUITE – FIDELITY FLEXIBLE SHORT DURATION:

FIL Investments International
Beech Gate Millfield Lane
Lower Kingswood
Tadworth, Surrey
KT20 6RP
UNITED KINGDOM

Fidelity Investments Canada ULC
483 Bay Street, Suite 300
Toronto ON M5G 2N7
CANADA

For WILLERFUNDS – PRIVATE SUITE – SCHRODER GLOBAL CLIMATE CHANGE until 30 January 2026, renamed WILLERFUNDS - PRIVATE SUITE - SCHRODER GLOBAL LEADERS as from 31 January 2026:

Schroder Investment Management Limited
1, London Wall Place
London, EC2Y 5AU
UNITED KINGDOM

For WILLERFUNDS – PRIVATE SUITE – BLACKROCK BALANCED ESG:

Until 1 February 2026:
BlackRock Investment Management, LLC
1 University Square Drive Princeton
08540, New Jersey
UNITED STATES OF AMERICA

As from 2 February 2026:
BlackRock Investment Management, LLC
1 University Square Drive Princeton
08540, New Jersey
UNITED STATES OF AMERICA

BlackRock Financial Management Inc.
251 Little Falls Drive
Wilmington, DE 19808
UNITED STATES OF AMERICA

For WILLERFUNDS – PRIVATE SUITE – WELLINGTON EQUITY GLOBAL RESEARCH:

Wellington Management Company LLP
280, Congress Street
MA 02210, Boston
UNITED STATES OF AMERICA

For WILLERFUNDS – PRIVATE SUITE – ASTERIA – MAN FLEXIBLE ALLOCATION:

Man Solutions Limited
Riverbank House, 2 Swan Lane
London, EC4R 3AD
UNITED KINGDOM

Asteria Investment Managers SA
Rue de Lausanne 15
1201, Geneva
SWITZERLAND

For WILLERFUNDS – PRIVATE SUITE – FRANKLIN EMERGING CORPORATE BOND:

Franklin Templeton Investment Management Limited
Cannon Place, 78 Cannon Street
London, EC4N 6HL
UNITED KINGDOM

Franklin Templeton Investments (ME) Limited
Unit 2, Level 2, Gate Building
Dubai International Financial Centre
UNITED ARAB EMIRATES

For WILLERFUNDS – PRIVATE SUITE – T. ROWE PRICE EQUITY US RESEARCH:

T. Rowe Price Associates, Inc.
100 East Pratt Street
Baltimore, MD 21202
UNITED STATES OF AMERICA

For WILLERFUNDS – PRIVATE SUITE - PIMCO EUROPEAN INCOME BOND:

PIMCO Europe Ltd
11 Baker Street
London, W1U 3AH
UNITED KINGDOM

For WILLERFUNDS – PRIVATE SUITE – JPM GLOBAL AGGREGATE BOND:

J.P. Morgan Investment Management Inc.;
383 Madison Ave
New-York
NY 10179
UNITED STATES OF AMERICA

JPMorgan Asset Management (Asia Pacific) Limited
19/F Chater House
8 Connaught Road Central
Hong-Kong
CHINA

For WILLERFUNDS – PRIVATE SUITE – FIDELITY GLOBAL EQUITY INCOME:

FIL Investments International
Beech Gate Millfield Lane
Lower Kingswood
Tadworth, Surrey
KT20 6RP
UNITED KINGDOM

AUDITOR FOR THE FUND

Ernst & Young
35E, Avenue J.F. Kennedy
L-1855 Luxembourg
GRAND DUCHY OF LUXEMBOURG

AUDITOR FOR THE MANAGEMENT COMPANY

Ernst & Young
Harcourt Centre, Harcourt Street
Dublin 2
IRELAND

PAYING AGENT IN ITALY

State Street Bank GmbH – Succursale Italia
10, Via Ferrante Aporti
20125 Milan
ITALY

REPRESENTATIVE AND PAYING AGENT IN SWITZERLAND

REYL & Cie Ltd
Rue du Rhône 4
1204 Geneva
SWITZERLAND

LEGAL ADVISERS

- ***For the Management Company and Irish matters:***

A&L Goodbody
IFSC, North Wall Quay
Dublin 1
IRELAND

- ***For the Fund and Luxembourg matters:***

Elvinger Hoss Prussen, *société anonyme*
2, place Winston Churchill
L-1340 Luxembourg
GRAND DUCHY OF LUXEMBOURG

2) WHAT IS THE FUND

Willerfunds is a mutual transferable securities investment fund governed by Section I of the 2010 Law.

The Fund was incorporated for an indefinite period according to initial Management Regulations dated 16 December 1985 by Willerfunds Management Company S.A., at the initiative of Banque Morval S.A. (now REYL & Cie Ltd). These Management Regulations were subsequently amended and deposited with the Register of Commerce and Companies of Luxembourg (the "**RCS**"), where they may be inspected and copies may be obtained.

The Fund is registered with the RCS under number K1279.

The Fund is a vehicle with multiple sub-funds, in accordance with the provisions of Article 181 of the 2010 Law. The Board of Directors is in a position to make several investment portfolios, which represent separate groups of assets, each of which has a specific investment policy, available to Investors.

The Management Company may at any time resolve to set up new sub-fund(s) and/or create within each sub-fund one or more Classes. The Management Company may also at any time resolve to close a sub-fund, or one or more Classes within a sub-fund, to further subscriptions.

The Fund constitutes a single legal entity, but the assets of each sub-fund are segregated from those of the other sub-fund(s) in accordance with the provisions of Article 181 of the 2010 Law (segregation of liabilities and receivables). This means that the assets of each sub-fund shall be invested for the unitholders of the corresponding sub-fund and that the assets of a specific sub-fund are solely accountable for the liabilities, commitments and obligations of that sub-fund.

These assets are separate from those of the Management Company, and amount to the joint and several properties of the unitholders in the various sub-funds, who benefit from equal rights in proportion to the number of Units that they hold. Different Unit Classes may be issued within each sub-fund, where the assets will be invested in accordance with the specific investment policy of the sub-fund concerned, although they may have a specific expense and fee scale, and a specific currency or other specific characteristic features, as detailed below.

The Fund's consolidation currency is the EUR.

There are no limits on the amount of the net assets or on the number of Units that represent the Fund's assets.

3) HOW THE FUND IS MANAGED

The Fund is managed by a duly authorized and regulated Irish Management Company that pursues this activity under the freedom to provide services, not only for this Fund but also for other UCITS in Luxembourg (Fideuram Fund, Interfund, Ailis and Fonditalia).

Fideuram Asset Management (Ireland) dac is a management company duly authorized in accordance with the Directive 2009/65/ EC, as amended.

The objective of the Fund is to increase over time the value of the invested capital of the Investors.

This goal is pursued by the Management Company - according to criteria of diligence and by comparison with financial market evolution - through the investment of the assets of each sub-fund in transferable securities issued or traded on the respective market of reference or in other financial liquid assets.

The Fund offers the public the opportunity to invest in a selection of transferable securities and/or other liquid financial assets, in accordance with the provisions of Part I of the Law, with a view to achieving capital appreciation combined with highly liquid investments.

The aim sought by the fixed income sub-funds is to turn a high and regular income level into capital appreciation.

The sub-funds' main objective is the realisation of capital gains.

Sustainability and Responsible Policy:

The Management Company adopted a Sustainable and Responsible Investment Policy (the "**Policy**") which integrates environmental, social and governance ("**ESG**") and sustainability risks as well as factors and opportunities into research, analysis and investment decision-making processes.

The Management Company considers the integration of sustainability risks as well as of ESG and sustainability factors in its own investment process as crucial, believing that these elements besides facilitating a sustainable economic and social development, can positively contribute to the financial results of the Fund's sub-funds, while reducing their risks.

The integration of sustainability risks as well as of ESG and sustainability factors within the investment processes may generate sustainable profits over time and, consequently, originate a solid prospective of value creation for all stakeholders. This also allows for a more efficient management of risks, including environmental, social and reputational risks, which might have a negative impact on the evaluation of issuers.

To this end, the Management Company adopts exclusion criteria of issuers operating in non-socially responsible sectors, and / or having high ESG and sustainability risks exposure, which may generate a negative impact on the sub-fund's performances, as well as the engagement and stewardship activities. In addition, the Management Company combines the financial analysis on third-party asset managers and funds with ESG or SRI considerations with regards to the adoption of policies on the integration of sustainability risks under the SFDR and verifying the ESG investment policies of the single sub-fund.

The Management Company's approach to sustainable and responsible investment is inspired by the principles included in documents among which: UN Global Compact Principles (UNGC), UN Guiding Principles on Business and Human Rights (UNGPs), OECD Guidelines for multinational enterprises, International Labour Organization Conventions, United Nations Convention Against Corruption (UNCAC).

The Policy is reviewed and updated at least on an annual basis or whenever required due to changes of general principles set out in the Policy or in case of regulatory changes. Further information on Management Company's Sustainable and Responsible Investment Policy are available at https://www.fideuramassetmanagement.ie/ in the Policy section.

As at the date of this Prospectus, all SFDR article 6 sub-funds do not consider principal adverse impacts on sustainability factors within the investment processes applicable to these sub-funds as the investment policies of those sub-funds do not promote any environmental and/or social characteristics. The situation may however be reviewed going forward.

Each sub-fund that has environmental and/or social characteristics or has the objective of sustainable investment discloses whether it considers principal adverse impacts on sustainability factors and how in the pre-contractual disclosures for each sub-fund in the Appendix to the Prospectus.

Sustainability classification:

In accordance with the provisions of the SFDR, the sub-funds can be classified in one of the below three categories:

- "Neutral Strategy" approach:

A sub-fund qualified as Neutral Strategy is a sub-fund which does not have a Sustainable Objective nor an ESG Promotion Strategy approach. The investments underlying of these sub-funds do not take into account the EU criteria for environmentally sustainable economic activities set out in the Taxonomy Regulation, and the ESG aspects are not binding for these sub-funds' investment decision process.

- "Promotion of environmental or social characteristics" or "ESG Promotion Strategy" approach:

A sub-fund qualified as ESG Promotion Strategy is a sub-fund that (i) does not have a Sustainable Objective, (ii) that promotes ESG and Sustainability Factors, which shall be a binding elements for the securities selection and investment decision making process, and (iii) the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with **article 8 of the SFDR**.

- "Sustainable Objective" approach:

A sub-fund qualified as Sustainable Objective is a sub-fund that (i) has a sustainable investment as its objective and (ii) the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with **article 9 of the SFDR**.

In accordance with article 2(17) of the SFDR, a "sustainable investment" means "an investment in an economic activity that contributes to an environmental objective, as measured, for example, by key resource efficiency indicators on the use of energy, renewable energy, raw materials, water and land, on the production of waste, and greenhouse gas emissions, or on its impact on biodiversity and the circular economy, or an investment in an economic activity that contributes to a social objective, in particular an investment that contributes to tackling inequality or that fosters social cohesion, social integration and labour relations, or an investment in human capital or economically or socially disadvantaged communities, provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance."

More information relating to the environmental and social characteristics or sustainable investment objective (as applicable) of the sub-funds is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

At the date of the Prospectus, the sub-funds have been classified as follows:

Sustainable Objective sub-fund(s)	Willerfunds – Private Suite – Lombard Odier Natural Capital; Willerfunds – Private Suite – Vontobel Equity Global Impact; Willerfunds – Private Suite – Eurizon Multi-Asset Circular Economy;
ESG Promotion Strategy sub-fund(s)	Willerfunds – Private Suite – Fidelity Flexible Short Duration; Willerfunds – Private Suite – Schroder Global Climate Change until 30 January 2026, renamed Willerfunds - Private Suite - Schroder Global Leaders as from 31 January 2026; Willerfunds – Private Suite – BNY Mellon Global Real Return; Willerfunds – Private Suite – Millennials Equity;

	Willerfunds – Private Suite – BlackRock Balanced ESG; Willerfunds – Private Suite – Pictet Health Innovation Trends; Willerfunds – Private Suite – Janus Henderson Strategic Bond; Willerfunds – Private Suite – JPM Europe Equity; Willerfunds – Private Suite – Wellington Equity Global Research; Willerfunds – Private Suite – Fidelity Global Equity Income; Willerfunds – Private Suite – FAMI Euro Short Term; Willerfunds – Private Suite – Franklin Emerging Corporate Bond; Willerfunds – Private Suite – T. Rowe Price Equity US Research; Willerfunds – Private Suite – Invesco Euro Corporate Bond; Willerfunds – Private Suite – PIMCO European Income Bond; Willerfunds – Private Suite – JPM Global Aggregate Bond.
Neutral Strategy sub-fund(s)	Willerfunds – Willerequity Switzerland; Willerfunds – Willer Flexible Financial Bond; Willerfunds – Private Suite – Asteria – Man Flexible Allocation; Willerfunds - Private Suite - M&G European Strategic Value.

Unless otherwise provided in the Appendix to the Prospectus in respect of each sub-fund that has environmental and/or social characteristics or has the objective of sustainable investment:

- the investments underlying the ESG Promotion Strategy and Neutral Strategy sub-fund(s) mentioned above, do not take into account the EU criteria for environmentally sustainable economic activities, as set out in the Taxonomy Regulation;

- the Sustainable Objective sub-fund(s) mentioned above do not aim to invest in economic activities that contribute to the environmental objectives of climate change mitigation and/or climate change adaptation. Thus, at the date of the Prospectus, article 5 of the Taxonomy Regulation does not apply.

However, due to the current lack of available and reliable data, the Management Company cannot exclude the sub-funds' exposure to sustainable investments.

4) RISKS RELATING TO AN INVESTMENT IN THE FUND

The assets of each sub-fund are subject to the fluctuations of financial markets and to the risks inherent in any investment in financial assets. The diversification of the sub-funds' portfolios and the conditions and limits set out in the Prospectus aim to manage and limit these risks, without, however, excluding them. The Management Company cannot guarantee that the sub-fund's objective will be achieved and that the amount of their initial investment will be returned to Investors.

Sustainability Risks

Sustainability risk refers to "an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment", in accordance with article 2 (22) of the SFDR.

The sustainability risk can affect the value of financial instruments and contribute to its major fluctuations due to different situations including the involvement of the issuer in controversies and investments in sectors with high environmental and social risks. Some of these factors would reduce the investor confidence and consequently the market value of the financial instrument.

Sustainability risks, if not properly managed, may affect companies in which the sub-fund invests, potentially causing different negative consequences, like lower revenues, higher costs, damages and reduction in the value of assets, as well as regulatory risks.

Consequently, unmanaged or unmitigated sustainability risks can distress returns of the investment in financial instruments of issuers that do not comply with ESG standards, causing potential reductions on the value of the investments.

The integration of the sustainability risk in the sub-funds' investment and risk monitoring processes on a continuous basis, as described in the Sustainable and Responsible Investment Policy adopted by the Management Company, can led to the mitigation of the negative impacts of the risk and positively contribute to the investor long-term returns.

Sustainability risks are integrated into the decision making and risk monitoring processes to the extent that they represent a potential or actual material risk and/or opportunities to maximize the long term returns.

Counterparty Risk

Sub-funds of the Fund may invest in instruments, such as derivatives, or may use efficient portfolio management techniques, by entering into contracts with first class financial counterparties specialized in this type of transaction, and in doing so exposes themselves to the risk that these said counterparties may generate financial damage to the relevant sub-fund(s) by not fulfilling their obligations in the future, exposing the relevant sub-funds to financial losses in the process.

In the event of default, the counterparties would forfeit the collateral on the transaction. However if a transaction is not fully collateralised, the collateral may not cover the credit exposure to the counterparty. Collateral may be held either by the Depositary or by a third party custodian and there is a risk of loss if the Depositary or third party custodian are negligent or become insolvent.

To reduce counterparty risks, all financial assets talking apart in the EMT program are required to be over-collateralized, taking into account appropriate haircut levels, where applicable.

Furthermore, the relevant sub-funds may be exposed to finance sector companies in their role as service providers and in times of extreme market volatility such companies might be adversely affected which in turn could have a harmful effect on the activities of the relevant sub-fund.

Collateral Management risk

Collateral is used to mitigate counterparty risks. There is a risk that the collateral taken, especially where it is in the form of securities, when realized does not raise sufficient cash to settle the counterparty's liability. This may be due to factors including risk of pricing volatility (mitigated to a reasonable degree by the application of appropriate haircuts, requiring the counterparty posting assets of greater value than the economic exposure), adverse market movements in the value of collateral, a deterioration in the credit rating of the issuer of the collateral, or the illiquidity of the market in which the collateral is traded.

Where a particular sub-fund is in turn required to post collateral with a counterparty, there is a risk that the value of the collateral placed is higher than the cash or investments received by the sub-fund. In either case, where there are delays or difficulties in recovering assets or cash, collateral posted with counterparties, or realising collateral received from counterparties, the sub-fund may face difficulties in meeting redemption or purchase requests or in meeting delivery or purchase obligations under other contracts.

Cash Collateral Reuse risk

Cash received as collateral may be reused and reinvested, in compliance with the diversification rules specified in the CSSF's Circular 14/592. There is a risk that the value on return of the reinvested cash collateral may not be sufficient to cover the amount required to be repaid to the counterparty. In this circumstance, the relevant sub-fund would be required to cover the shortfall.

Re-invested cash collateral may also expose the sub-fund to a risk of failure or default of the issuer of the relevant security in which the cash collateral has been invested.

Liquidity Risk

In periods of political instability, during financial crises (especially credit crises), and during economic downturns, financial markets are usually characterised by significant falls in market values, increased price volatility, and a deterioration in liquidity conditions. Usually, the increased volatility and the deterioration in liquidity conditions more specifically affect so-called "emerging"

markets, financial assets issued by small companies, and small bond issues. When such exceptional events occur, the Fund may be required to realise assets at a price that does not reflect their intrinsic value (liquidity risk), and Investors may incur the risk of heavy losses.

Despite the heavy volume of trading in securities, the markets for some securities have limited liquidity and depth. This is particularly the case for developing markets which, while generally growing in volume, have, for the most part, substantially less volume than more developed markets, and securities of many companies are less liquid and their prices more volatile than securities of comparable companies in more sizable markets. This lack of depth could be a disadvantage to the concerned sub-fund of the Fund, both in the realization of the prices which are quoted and in the execution of orders at desired prices.

Risks relating to equity investments

The risks relating to investments in equities and other securities similar to equities involve price fluctuations that may be significant at times, prolonged falls in the price of these equities depending on general economic and political circumstances or on the situation specific to each issuer, and even the loss of the capital invested in the financial asset in the event that the issuer defaults (market risk).

Risks relating to investments in bonds

Investments in bonds are subject to the risk that the issuer cannot meet their obligations in terms of paying the interest and/or redeeming the principal on maturity (credit risk). The market's perception of an increase in the likelihood of this risk occurring for a given issuer results in a decrease in the market value of the bond, which may sometimes be significant. In addition, bonds are exposed to the risk of their market value decreasing following an increase in the Benchmark interest rate (interest-rate risk).

Risks linked to non-investment grade bonds (High-yield bonds)

Certain high-yielding bonds are very speculative and involve comparatively greater risks than higher quality securities. Compared to higher-rated securities, lower-rated high yield price fluctuations are larger and high yield securities prices are more affected by changes in the financial condition of their issuers; besides, high yield bonds have a higher incidence of default and they are less liquid.

Risks linked to investments in hybrid securities

Hybrid securities combine generally both debt and equity characteristics. “Equity” features can be (i) no final maturity; (ii) no on-going payment that could lead to default if missed; and (iii) loss absorption in the case of a bankruptcy. “Debt” features can be instead a schedule of regular coupons and, often, the presence of a call option by which the issuer can redeem the security at a certain time.

Risks linked to CLOs, CDOs, CMOs and CBOs

Investments in Collateralised Debt Obligation (“CDOs”), Collateralised Loan Obligation (“CLOs”), Collateralised Bond Obligation (“CBOs”)

CDOs: A structured financial product that pools together cash flow-generating assets and repackages this asset pool into discrete tranches that can be sold to Investors. A CDO is so-called because the pooled assets, such as mortgages, bonds and loans, are essentially debt obligations that serve as collateral for the CDO. The tranches in a CDO vary substantially in their risk profile. The senior tranches are relatively safer because they have first priority on the collateral in the event of default. As a result, the senior tranches of a CDO generally have a higher credit rating and offer lower coupon rates than the junior tranches, which offer higher coupon rates to compensate for their higher default risk. CDOs include Collateralised Bond Obligation (“CBOs”), CLOs and Collateralised Mortgage Obligation (“CMOs”).

CLOs: A security backed by a pool of bank (commercial or personal) loans (often low-rated corporate loans) structured so that there are several classes of bondholders with varying credit qualities called tranches.

CBOs: Bonds backed by a collection of low-grade debt securities (such as junk bonds); CBOs are separated into tranches based on various levels of credit risk (called tiers) that are determined by the quality of bonds involved. When issuing CBO, the issuer can post more collateral than necessary in an attempt to obtain a better debt rating from a credit rating agency (overcollateralization).

CMOs: A type of MBS created by redirecting the cash flows from underlying pools of mortgages to different classes of bonds called tranches. The redistribution of scheduled principal, unscheduled principal and interest from the underlying mortgage pool to different tranches creates securities with different coupon rates, average lives and price sensitivities. Consequently, these instruments can be used to match an investor's particular risk and return objectives more closely.

Risks linked to CLOs, CDOs, CMOs and CBOs:
Classes or tranches may be specially structured in a manner that provides any of a wide variety of investment characteristics, such as yield, effective maturity and interest rate sensitivity. As market conditions change, however, and especially during periods of rapid or unanticipated changes in market interest rates, the attractiveness of some CDO classes and the ability of the structure to provide the anticipated investment characteristics may be significantly reduced. These changes can result in volatility in the market value, and in some instances reduced liquidity, of the CDO classes. Certain classes of CMOs are structured in a manner that makes them extremely sensitive to changes in prepayments rates. IO (Interest Only) and PO (Principal Only) classes are examples of this. IO classes are entitled to receive all or a portion of the interest, but none (or only a nominal amount) of the principal payments, from the underlying mortgage assets. If the mortgage assets underlying an IO experience greater than anticipated principal prepayments, than the total amount of interest payments allocable to the IO class, and therefore the yield to Investors, generally will be reduced. In some instances, an investor in an IO may fail to recoup all of his or her initial investment, even if the securities are government guaranteed or considered to be of the highest quality (rated AAA or the equivalent). Conversely, PO classes are entitled to receive all or a portion of the principal payments, but none of the interest, from the underlying mortgage assets. PO classes are purchased at substantial discounts from par, and the yield to Investors will be reduced if principal prepayments are slower than expected. Some IOs and POs, as well as other CMO classes, are structured to have special protections against the effect of prepayments. These structural protections, however, normally are effective only within certain ranges of prepayments rates and thus will not protect Investors in all circumstances. Inverse floating rate CMO classes also may be extremely volatile. These classes pay interest at a rate that decreases when a specified index of market rates increases.

Risks linked to Contingent Convertible Bonds investments ("CoCos")

CoCos are a form of contingent hybrid securities, usually subordinated, that behave like debt securities in normal circumstances but which either convert to equity securities or have write down (full or partial, permanent or temporary) loss absorption mechanisms on the occurrence of a particular "trigger" event. A write down means that some or all of the principal amount of the CoCo bond will be written down. The trigger events may, for example, be based on a mechanical rule (e.g. the issuer's regulatory capital ratios) or a regulatory supervisor's discretion (e.g. the relevant regulatory authority deems the banking institution to be non-viable).

CoCos are innovative and complex; investing in such securities may expose the sub-fund to different risks. The main risks linked to CoCos investments are:

(i) ***Conversion risk****:*
In case of conversion into equity, there may be the need to sell these new equity shares because of the investment policy of the sub-fund that does not allow equity in its portfolio. This forced sale may itself lead to liquidity issue for the related sub-fund's shares.

(ii) ***Trigger level event risk****:*
Trigger levels (as determined in the issuing document of each relevant CoCo) differ and determine exposure to conversion risk depending on the distance of capital ratio of the issuing institution to the trigger level. Trigger event may lead to a partial or even total loss of capital for CoCos' holders. The investor needs an ongoing understanding of the capital ratio of the issuing institution has in place relative to the trigger level. The capital ratio of the issuing institution varies depending on the issuer while trigger levels differ depending on the specific terms of issuance. The trigger could be activated either through a material loss in capital as represented in the numerator or an increase in risk weighted assets as measured in the denominator. Transparency is critical to mitigating the risk.

(iii) ***Coupon Cancellation****:*
For some Cocos, coupons' payments are entirely discretional and may be cancelled by the issuer of the CoCos at any point, for any reason, and for any length of time. Cancelled payments do not accumulate and are instead written off. This significantly increases uncertainty in the valuation of such type of CoCos and may lead to mispricing of risk.

(iv) ***Call extension risk****:*
Certain CoCos are issued as perpetual instruments, callable at pre-determined levels only with the approval of the competent authority. It cannot be assumed that the perpetual CoCos will be called on call date. The investor may not receive return of principal if expected on call date or indeed at any date,

(v) ***Capital structure inversion risk****:*
Contrary to classic capital hierarchy, holders of CoCos may suffer a loss of capital when equity holders do not. In certain scenarios, holders of CoCos will suffer losses ahead of equity holders. These cuts against the normal order of capital structure hierarchy where equity holders are expected to suffer the first loss.

(vi) ***Unknown risk****:*
The structure of CoCos is innovative yet untested. In a stressed environment, when the underlying features of these instruments will be put to the test, it is uncertain how they will perform. In the event a single issuer activates a trigger or suspends coupons, will the market view the issue as an idiosyncratic event or systemic. In the latter case, potential price contagion and volatility to the entire asset class is possible. This risk may in turn be reinforced depending on the level of underlying instrument arbitrage. Furthermore in an illiquid market, price formation may be increasingly stressed.

(vii) ***Industry concentration risk****:*
CoCos are issued by banking/insurance institutions. If a sub-fund invests significantly in CoCos, its performance will depend to a greater extent on the overall condition of the financial services industry than a sub-fund following a more diversified strategy.

(viii) ***Yield/ Valuation risk:***
CoCos may have an attractive yield which may be viewed as a complexity premium. The sub-fund is also exposed to liquidity risk and concentration risk as described above in the present section.

(ix) ***Write down risk:***
CoCos may be written down upon the occurrence of a pre-determined trigger event (the trigger events may, for example, be based on a mechanical rule (e.g. the issuer's regulatory capital ratios) or a regulatory supervisor's discretion (e.g. the relevant regulatory authority deems the banking institution to be non-viable), as determined in the issuing document of each CoCo.

Risks linked to distressed securities' investments

Although investment in distressed securities may result in significant returns for a sub-fund, it involves a substantial degree of risk. The level of analytical sophistication, both financial and legal, necessary for successful investment in distressed securities is unusually high. Troubled company investments required active monitoring. There is no assurance that the Investment Manager will correctly evaluate the value of any company. The sub-fund may lose its entire investment.

Risks linked to default securities' investments

Although investment in default securities may result in significant returns for a sub-fund, it involves a substantial risk of liquidity.

The risk of loss due to default may be considerably greater with lower-quality securities because they are generally unsecured and are often subordinated to other creditors of the issuer. If the issuer of a security in a sub-fund's portfolio defaults, the sub-fund may have unrealised losses on the security, which may lower the sub-fund's Net Asset Value. Defaulted securities tend to lose much of their value before they default. Thus, the sub-fund's Net Asset Value may be adversely affected before an issuer defaults. In addition, the sub-fund may incur additional expenses if it must try to recover principal or interest payments on a defaulted security.

Risks linked to asset backed securities - mortgage backed securities

Securitization is the process of creating securities by pooling together various cash-flow producing financial assets. Any asset may be securitized as long as it is cash-flow producing. The terms asset-backed security ("**ABS**") and mortgage-backed security ("**MBS**") refers to the underlying assets in the security.

An asset-backed security or a mortgage-backed security are generic terms for debt securities issued by corporations or other entities (including public or local authorities) backed or collateralized by the income stream from an underlying pool of assets. The underlying assets typically include the following:

Consumer loans and receivables:
- Mortgage loans;
- Home-equity loans;
- Manufacturing housing contracts;
- Student loans;
- Credit Card receivables;
- Auto, boat, recreational vehicle loans.

Business receivable:
- Trade receivables;
- Equipment leases.

ABS/MBS are usually issued in a number of different classes with varying characteristics depending on the riskiness of the underlying assets assessed by reference to their credit quality and term and can be issued at a fixed or a floating rate. The higher the risk contained in the class, the more the asset-backed security pays by way of income. The obligations associated with these securities may be subject to greater credit, liquidity and interest rate risk compared to other fixed income securities such as government issued bonds. The average life of each individual security may be affected by a large number of factors such as the existence and frequency of exercise of any optional redemption and mandatory prepayment, the prevailing level of interest rates, the actual default rate of the underlying assets, the timing of recoveries and the level of rotation in the underlying assets.

ABS and MBS are often exposed to two relevant risk factors: (i) Extension risk: The risk of a security's expected maturity lengthening in duration due to the deceleration of prepayments. Extension risk is mainly the result of rising interest rates. As interest rates may rise due to different economic factors, the likelihood of prepayment decreases as people will be less likely to refinance their Real Estate Investment, (ii) Prepayment Risk: The risk associated with the early unscheduled return of principal on a fixed-income security. On a mortgage/asset-backed security, the higher the interest rate relative to current interest rates, the higher the probability that the underlying mortgages will be refinanced. Investors who pay a premium for a callable bond with a high interest rate take on prepayment risk. In addition to being highly correlated with falling interest rates, mortgage prepayments are highly correlated with rising home values, as rising home values provide incentive for borrowers to trade up in homes or use cash-out re-finances, both leading to mortgage prepayments.

Total Return Swap and/or Excess Return Swap

Some sub-funds may enter into a total return swap/and or excess return swap in which one party receives payments on a reference asset plus any capital gains and losses over the payment period, while the other receives a specified fixed and/or floating cash flow unrelated to the performance of the reference asset. Where a sub-fund uses total return swaps or a similar type of instrument for investment purposes, the strategy and the underlying to which the sub-fund takes exposure are those described in the investment strategy of the relevant sub-fund.

Legal Risks

There is a risk that agreements, securities lending, repurchase agreements and derivatives techniques are terminated due, for instance, to bankruptcy, supervening illegality or change in tax or accounting laws. In such circumstances, a sub-fund may be required to cover any losses incurred.

Furthermore, certain transactions are entered into on the basis of complex legal documents. Such documents may be difficult to enforce or may be the subject of a dispute as to interpretation in certain circumstances. Whilst the rights and obligations of the parties to a legal document may be governed by Luxembourg law, in certain circumstances (for example insolvency proceedings) other legal systems may take priority which may affect the enforceability of existing transactions.

Operational risk

The sub-funds' operations (including investment management, derivatives techniques, securities lending and repurchase agreements) are carried out by the service providers mentioned in this Prospectus. In the event of a bankruptcy or insolvency of a service provider, Investors could experience delays (for example, delays in the processing of subscriptions, conversions and redemption of Units) or other disruptions.

Custody risk

The sub-funds' assets (including collateral) are held in custody by the Depositary Bank or agents, which exposes the sub-funds to custodian risk. This means that the sub-funds are exposed to the risk of loss of assets placed in custody as a result of insolvency, negligence or fraudulent trading by the Depositary Bank.

Securities lending risk

The principal risk when engaging in securities lending transactions is the risk of default by a counterparty who has become insolvent or is otherwise unable or refuses to honor its obligations to return securities or cash to the sub-fund as required by the terms of the transaction. Counterparty risk is mitigated by the transfer or pledge of collateral in favor of the sub-fund.

Securities lending transactions also entail operational risks such as the non-settlement or delay in settlement of instructions and legal risks related to the documentation used in respect of such transactions.

Repurchase / reverse repurchase agreements risk

The principal risk when engaging in repurchase/reverse repurchase transactions is the risk of default by a counterparty who has become insolvent or is otherwise unable or refuses to honor its obligations to return securities or cash to the sub-fund as required by the terms of the transaction. Counterparty risk is mitigated by the transfer or pledge of collateral in favor of the sub-fund.

Although repurchase agreements are over collateralized, the sub-fund could incur a loss if the value of the securities sold has increased in value relative to the value of the cash or margin held by the sub-fund; while in a reverse repurchase transaction, the sub-fund could incur a loss if the value of the purchased securities has decreased in value relative to the value of the cash or margin held by the sub-fund.

Risks relating to investments in the units of UCIs

The investments made by the Fund in the units of UCIs (including investments made by certain of the Fund's sub-funds in the units of other Fund sub-funds) expose the Fund to the risks relating to the financial instruments that these UCIs hold in their portfolio, and which are described above. However, some risks are specific to the Fund holding units in UCIs. Some UCIs may resort to leverage, either via the use of derivatives, or via recourse to borrowings. The use of leverage increases the volatility of these UCIs' prices, and therefore the risk of a capital loss. Most UCIs also provide for the possibility of temporarily suspending redemptions in particular circumstances of an exceptional nature. This means that investments in the units of UCIs may therefore involve a higher liquidity risk than a direct investment in a portfolio of transferable securities. Conversely, investing in the units of UCIs enables the Fund to gain access to various professional management styles, and to diversify its investments in a flexible and efficient way. A sub-fund that primarily invests via UCIs shall ensure that its UCI portfolio displays appropriate liquidity characteristics, in order to enable it to meet its own redemption obligations.

There shall be duplication of management fees and other operating fund related expenses, each time the Fund invests in other UCIs and/or UCITS. The maximum proportion of management fees charged both to the Fund itself and to the UCIs and/or UCITS in which the Fund invests shall be disclosed in the annual report of the Fund.

Specific Risks for Master/Feeder structure

ESG risks

ESG Promotion Strategy or Sustainable Objective sub-funds use ESG criteria and sustainability factors as binding component of their investment strategy, as set out in their respective investment policies.

By way of integration within the investment process, ESG and sustainability factors are assessed for each issuer of the target investment. Such assessment is performed on an ongoing basis in order to ensure the sub-fund(s)' continuous compliance with the sub-fund(s)' binding specific strategy.

In evaluating an issuer of a security based on the ESG and sustainability factors, the Management Company or the Investment Manager may perform an ESG assessment based on data sources provided by external ESG research providers. Given the evolving nature of ESG, neither the Management Company nor the Investment Manager make any representation or warranty, express or implied, with respect to the accuracy or completeness of such ESG assessment.

The integration in the investment process of ESG and sustainability factors with wider monitoring and engagement activities, may have an impact on the value of investments and, therefore, on returns.

Investments in the People's Republic of China (PRC)

Investing in the PRC is subject to the risks of investing in emerging markets and additional risks, which are specific to the PRC market.

The economy of the PRC is in a state of transition from a planned economy to a more market oriented economy and investments may be sensitive to changes in law and regulation together with political, social or economic policy which includes possible government intervention.

In extreme circumstances, the sub-funds may incur losses due to limited investment capabilities, or may not be able to fully implement or pursue its investment objectives or strategy, due to local investment restrictions, illiquidity of the Chinese domestic securities market, and/or delay or disruption in execution and settlement of trades.

Shanghai-Hong Kong Stock Connect

The Shanghai-Hong Kong Stock Connect program is a securities trading and clearing linked program developed by Hong Kong Exchanges and Clearing Limited ("HKEx"), the Hong Kong Securities Clearing Company Limited ("HKSCC"), Shanghai Stock Exchange ("SSE") and China Securities Depository and Clearing Corporation Limited ("ChinaClear") with an aim to achieve mutual stock market access between mainland China and Hong Kong. This program will allow foreign Investors to trade certain SSE listed China A-Shares through their Hong Kong based brokers.

The sub-funds seeking to invest in the domestic securities markets of the PRC may use the Shanghai-Hong Kong Stock Connect and, thus, are subject to the following additional risks:

General Risk: The relevant regulations are untested and subject to change. There is no certainty as to how they will be applied which could adversely affect the sub-funds. The program requires use of new information technology systems, which may be subject to operational risk due to its cross-border nature. If the relevant systems fail to function properly, trading in both Hong Kong and Shanghai markets through the program could be disrupted.

Clearing and Settlement Risk: The HKSCC and ChinaClear have established the clearing links and each will become a participant of each other to facilitate clearing and settlement of cross-boundary trades. For cross-boundary trades initiated in a market, the clearing house of that market

will on one hand clear and settle with its own clearing participants, and on the other hand undertake to fulfil the clearing and settlement obligations of its clearing participants with the counterparty clearing house.

Legal/Beneficial Ownership: Where securities are held in custody on a cross-border basis, there are specific legal/beneficial ownership risks linked to compulsory requirements of the local central securities depositories, HKSCC and ChinaClear.

As in other emerging and less developed markets, the legislative framework is only beginning to develop the concept of legal/formal ownership and of beneficial ownership or interest in securities. In addition, HKSCC, as nominee holder, does not guarantee the title to Shanghai-Hong Kong Stock Connect securities held through it and is under no obligation to enforce title or other rights associated with ownership on behalf of beneficial owners. Consequently, the courts may consider that any nominee or depositary bank as registered holder of Shanghai-Hong Kong Stock Connect securities would have full ownership thereof, and that those Shanghai-Hong Kong Stock Connect securities would form part of the pool of assets of such entity available for distribution to creditors of such entities and/or that a beneficial owner may have no rights whatsoever in respect thereof. Consequently, the sub-funds and the depository cannot ensure that the sub-funds ownership of these securities or title thereto is assured.

To the extent that HKSCC is deemed to be performing safekeeping functions with respect to assets held through it, it should be noted that the depository and the sub-funds will have no legal relationship with HKSCC and no direct legal recourse against HKSCC in the event that the sub-funds suffer losses resulting from the performance or insolvency of HKSCC.

In the event ChinaClear defaults, HKSCC's liabilities under its market contracts with clearing participants will be limited to assisting clearing participants with claims. HKSCC will act in good faith to seek recovery of the outstanding stocks and monies from ChinaClear through available legal channels or the liquidation of ChinaClear. In this event, the sub-funds may not fully recover their losses or their Shanghai-Hong Kong Stock Connect securities and the process of recovery could also be delayed.

Operational Risk: The HKSCC provides clearing, settlement, nominee functions and other related services of the trades executed by Hong Kong market participants. PRC regulations, which include certain restrictions on selling and buying will apply to all market participants. In the case of sale, some operating models could require pre-delivery of shares to the broker, increasing counterparty risk. Because of such requirements, the sub-funds may not be able to purchase and/or dispose of holdings of China A-Shares in a timely manner.

Quota Limitations: The program is subject to quota limitations, which may restrict the sub-funds ability to invest in China A-Shares through the program on a timely basis.

Investor Compensation: The sub-fund will not benefit from local investor compensation schemes.

Shanghai-Hong Kong Stock Connect will only operate on days when both the PRC and Hong Kong markets are open for trading and when banks in both markets are open on the corresponding settlement days. There may be occasions when it is a normal trading day for the PRC market but the sub-funds cannot carry out any China A-Shares trading. The sub-funds may be subject to risks of price fluctuations in China A-Shares during the time when Shanghai-Hong Kong Stock Connect is not trading as a result.

Currency Risk: Investing in products/shares denominated in Renminbi- the Chinese currency ("RMB") involves currency risk. Fluctuation in the exchange rate of RMB may result in losses in the event that the customer subsequently converts RMB into another currency. Exchange controls imposed by the relevant authorities may also adversely affect the applicable exchange rate. RMB is currently not freely convertible and conversion of RMB may be subject to certain policy, regulatory requirements and/or restrictions (which are subject to changes from time to time without notice). The actual conversion arrangement will depend on the policy, regulatory requirements and/or restrictions prevailing at the relevant time.

CNH is the offshore RMB, accessible outside the PRC and traded primarily in Hong Kong.

CNY is the Chinese onshore RMB accessible within the PRC.

Investments through Stock Connect are quoted in CNY (onshore RMB) whereas the settlement currency is CNH (offshore RMB).

The convertibility from CNH (offshore RMB) to CNY (onshore RMB) is a managed currency process subject to foreign exchange control policies of and repatriation restrictions. The conversion rate between CNH (offshore RMB) and CNY (Onshore RMB) is currently 1 (one) but there is no guarantee that this rate remains unchanged. Any potential conversion costs would be supported by the Investors. It is possible that the availability of CNH (offshore RMB) to meet redemption payments immediately may be reduced and such payments may be delayed.

China Interbank Bond Market (the "CIBM")

The CIBM is an OTC market established in 1997, executing the majority of CNY (Onshore RMB) bond trading. The main products traded in this market include government bonds, central bank papers, policy bank bonds and corporate bonds. The CIBM is in a stage of development and the market capitalisation and trading volume may be lower than those of the more developed markets. Market volatility and potential lack of liquidity due to low trading volume may result in prices of debt securities traded on such market fluctuating significantly. The sub-fund investing in such market is therefore subject to liquidity and volatility risks and may suffer losses in trading Mainland China bonds. The bid and offer spreads of the prices of the Mainland China bonds may be large, and the relevant sub-fund may therefore incur significant trading and realization costs and may even suffer losses when selling such investments. The CIBM is also subject to regulatory risks. Due to irregularities in the CIBM trading activities, the China Government Securities Depository Trust & Clearing Co. (the central clearing entity) suspended new account opening on the CIBM for specific types of products. Although investment funds that are mutual funds offered to the public were not affected, there is no assurance that future regulatory actions will not affect such funds. If accounts are suspended, or cannot be opened, the sub-fund's ability to invest in the CIBM will be limited and it may suffer substantial losses as a result.

Bond Connect Program

Bond connect is a cross-border bond trading and settlement scheme that provides a link between the Mainland China central securities depositories, China Central Depository & Clearing Co., Ltd ("CCDC") and Shanghai Clearing House ("SHCH"), and the Central Moneymarkets Unit in Hong Kong ("CMU"), allowing Investors from Mainland China and overseas to trade in each other's bond markets through connection between the Mainland and Hong Kong financial infrastructure institutions.

Investments made through the Bond Connect program are subject to the following risks:

Regulatory risk: Any laws, rules, regulations, policies, notices, circulars or guidelines published or applied by any of the Bond Connect Authorities (as defined below) are subject to change from time to time in respect of Bond Connect or any activities arising from Bond Connect (the "Applicable Bond Connect Laws and Rules") and there can be no assurance that Bond Connect will not be abolished. Investments through Bond Connect may be adversely affected as a result of any change in the Applicable Bond Connect Laws and Rules. "Bond Connect Authorities" refers to the exchanges, trading systems, settlement systems, governmental, regulatory or tax bodies which provide services and/or regulate Bond Connect and activities relating to Bond Connect, including, without limitation, the People's Bank of China ("PBOC"), the Hong Kong Monetary Authority ("HKMA"), the Hong Kong Exchanges and Clearing Limited, the China Foreign Exchange Trading System ("CFETS"), the CMU, the CCDC and SHCH and any other regulator, agency or authority with jurisdiction, authority or responsibility in respect of Bond Connect.

Taxation risk: PRC tax applicable are subject to uncertainties.

Liquidity risk: investments may be subject to liquidity risk.

No off-market transfer: Pursuant to the Applicable Bond Connect Laws and Rules, the transfer of Bond Connect Securities between two (2) members of CMU and between two (2) CMU sub-accounts of the same CMU Member is not allowed.

No amendment of orders, limited cancellation of orders: Pursuant to the Applicable Bond Connect Laws and Rules, instructions relating to sell and buy orders for Bond Connect Securities may only be cancelled in limited circumstances pursuant to the Applicable Bond Connect Laws and Rules and that instructions may not be amended.

Investment in CIBM via Northbound Trading Link under Bond Connect

Under the prevailing regulations in Mainland China, eligible foreign Investors will be allowed to invest in the bonds circulated in the CIBM through the northbound trading of Bond Connect ("Northbound Trading Link"). There will be no investment quota for Northbound Trading Link. Under the Northbound Trading Link, eligible foreign Investors are required to appoint the CFETS or other institutions recognised by the PBOC as registration agents to apply for registration with the PBOC.

Pursuant to the prevailing regulations in Mainland China, an offshore custody agent recognised by the Hong Kong Monetary Authority (currently, the Central Moneymarkets Unit) shall open omnibus nominee accounts with the onshore custody agent recognised by the PBOC (currently, the China Securities Depository & Clearing Co., Ltd and Interbank Clearing Company Limited). All bonds traded by eligible foreign Investors will be registered in the name of Central Moneymarkets Unit, which will hold such bonds as a nominee owner. For investments via Bond Connect, the relevant filings, registration with PBOC and account opening have to be carried out via an onshore settlement agent, offshore custody agent, registration agent or other third parties (as the case may be). As such, the concerned sub-fund is subject to the risks of default or errors on the part of such third parties. Investing in the CIBM via Bond Connect is subject to the risks mentioned above in relation to Bond Connect and notably to regulatory risks. The relevant rules and regulations on these regimes are subject to change which may have potential retrospective effect. In the event that the relevant Mainland Chinese authorities suspend account opening or trading on the CIBM, the sub-fund's ability to invest in the CIBM will be adversely affected. In such event, the sub-fund's ability to achieve its investment objective will be negatively affected.

Risks linked to the investments in Emerging Markets

Potential investors should note that investments in emerging markets carry risks additional to those inherent in other investments. In particular, potential investors should note that investment in any emerging market carries a higher risk than investment in a developed market; emerging markets may afford a lower level of legal protection to Investors; some countries may place controls on foreign ownership; and some countries may apply accounting standards and auditing practices which do not necessarily conform with internationally accepted accounting principles.

Conflicts of interest

The Management Company and any Investment Manager, the Sales Agents, the Administrator, the Depositary Bank may from time to time act as management company, investment manager or adviser, Sales Agent, administrator, registrar and transfer agent or depositary bank in relation to, or be otherwise involved in, other funds or collective investment schemes which have similar investment objectives to those of the Fund or any sub-fund. It is therefore possible that any of them may, in the due course of their business, have potential conflicts of interest with the Fund or any sub-fund.

In such event, each will at all times have regard to its obligations under any agreements to which it is party or by which it is bound in relation to the Fund or any sub-fund. In particular, but without limitation to its obligations to act in the best interests of the unitholders when undertaking any dealings or investments where conflicts of interest may arise, each will respectively endeavour to ensure that such conflicts are resolved fairly.

There is no prohibition on the Fund entering into any transactions with any specific sub-fund Investment Manager, the Sales Agents, the Administrator, the Depositary Bank or with any of their affiliates, or investing the assets of or reinvest the cash collateral received by any sub-fund in any investment products or funds managed, launched or offered by any of the above-mentioned entities, provided that such transactions are carried out as if effected on normal commercial terms negotiated at arm's length. The Investment Managers or any affiliates acting in a fiduciary capacity with respect to client accounts may recommend to or direct clients to buy and sell Units of the Fund.

Specific limitations regarding the transactions of the Management Company are provided in order to limit:

- the possible realization of conflicts of interest, i.e. the possibility that the Management Company has a direct or indirect interest in the investments carried out by the Fund;
- the concentration of risks arising from a reduced geographical diversification or from investment of a too extensive portion of the assets in securities of the same type;
- the acquisition by the Fund of a control participation in the issuing entities of the securities in which the Fund invests;
- the use for purely speculative purposes of financial derivative instruments (options, futures, swaps).

All the above risks are correctly identified and monitored according to CSSF's Circular 11/512 and 14/592 and ESMA Guidelines 2014/937. The use of efficient portfolio management techniques will not result in a change to the investment policy of a sub-fund and should not add substantial supplementary risk to the original risk policy of the relevant sub-fund.

In order to follow the evolution of the management of the Fund, the net asset value of the Units of each Class of each sub-fund is made available in accordance with section "Net Asset Value and Dealing Prices" of the Prospectus. In exceptional cases (closing of the markets, impossibility of carrying out the valuation of the Fund, other events of force majeure), the calculation of the net asset value, the subscriptions and redemptions can be suspended as set out in the sub-section "Suspensions" of the section "Net Asset Value and Dealing Prices".

The Fund offers Investors a choice of portfolios that may involve different levels of risk, and therefore, in principle, overall long-term return prospects that correspond to the level of risk accepted.

Investors will find the risk/return profile for each Unit Class offered in the KID.

The higher the level of risk, the more Investors must have a long-term investment horizon, and be ready to accept the loss of a significant portion of the capital invested. A sub-fund with a high level of risk must not account for a substantial portion of an investor's financial wealth.

In the event of any doubt regarding the risks relating to an investment in the Fund's Units, or the appropriateness of a sub-fund for an investor's risk profile in view of their personal situation, we recommend that the investor contacts their financial adviser in order to determine whether an investment in the Fund is appropriate.

5) HOW TO INVEST IN THE FUND

THE SUBSCRIPTIONS, REDEMPTIONS AND SWITCHES ARE CARRIED OUT AT UNKOWN NET ASSET VALUE.

THE MANAGEMENT COMPANY DOES NOT AUTHORIZE PRACTICES ASSOCIATED WITH MARKET TIMING AND THE MANAGEMENT COMPANY RESERVES THE RIGHT TO REJECT SUBSCRIPTION AND SWITCH ORDERS COMING FROM AN INVESTOR THAT THE MANAGEMENT COMPANY SUSPECTS TO EMPLOY SUCH PRACTICES AND TO TAKE, IN SUCH A CASE, THE NECESSARY MEASURES TO PROTECT THE OTHER INVESTORS OF THE FUND. FACED WITH A REDEMPTION ORDER OF AN INVESTOR SUSPECTED OF PRACTICING MARKET TIMING, THE MANAGEMENT COMPANY RESERVES THE RIGHT TO REJECT ANY SUBSEQUENT SUBSCRIPTION ORDER OF THIS INVESTOR.

The quality as a unitholder in a sub-fund of the Fund is determined by nominative registration in the unitholders' register or by nominative registration in the register held by the Paying Agent whenever, based on an agreement between the Management Company and the Paying Agent, which may coincide with the Sales Agent, the latter acting as a nominee. On the request of a unitholder, a written confirmation of the registration shall be sent to the unitholder.

The Management Company acting on behalf of the Fund no longer issues bearer units; however, there may still remain holders of bearer certificates some sub-funds. Bearer units which have not been deposited have been automatically cancelled and their counter value have been deposited in

escrow with the Caisse de Consignation and the beneficial owners must prove their rights in front of it in the terms foreseen by the Luxembourg law.

THE CLASSES OF UNITS

The Units are issued in registered form only. Unitholders receive a confirmation of their holdings.

The Fund may issue fractions of Units. The issuance of these fractions is authorised up to one thousandth of a Unit (three figures after the decimal place). These fractions of Units shall represent a portion of the Net Asset Value, and shall grant entitlement to the dividend that the Fund may pay as well as to the liquidation proceeds of the Fund, on a proportional basis.

The Management Company may issue one or several Unit Classes within each sub-fund, where the assets will be invested in accordance with the specific investment policy of the sub-fund concerned, although they may have a specific expense and fee scale, a specific currency or other specific characteristic features.

The Management Company shall issue different Classes of Units in each sub-fund:

Classes	Description
Class D	The Units of Class D are capitalisation Class Units, are available only via automatic conversion of G Class Units after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's D Class Units.
Class DH	The Units of Class DH are hedged to Euro capitalisation Class Units, are available only via automatic conversion of G Class Units after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's D Class Units.
Class DS	The Units of Class DS are distribution Class Units, are available only via automatic conversion of GS Class Units after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's DS Class Units.
Class DSH	The Units of Class DSH are hedged to Euro distribution Class Units, are available only via automatic conversion of GS Class Units after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's DS Class Units.
Class G	The Units of Class G are capitalisation Class Units, are intended for any potential investor. The minimum initial investment is 5.000 Euro (or equivalent in USD and CHF) and the minimum additional payment is 2.500 Euro (or equivalent in USD and CHF).
Class GH	The Units of Class GH are hedged to Euro capitalisation Class Units, are intended for any potential investor. The minimum initial investment is 5.000 Euro (or equivalent in USD and CHF) and the minimum additional payment is 2.500 Euro (or equivalent in USD and CHF).
Class GS	The Units of Class GS are are distribution Class Units, are intended for any potential investor. The minimum initial investment is 5.000 Euro (or equivalent in USD and CHF) and the minimum additional payment is 2.500 Euro (or equivalent in USD and CHF).
Class GSH	The Units of Class GSH are are hedged to Euro distribution Class Units, are intended for any potential investor. The minimum initial investment is 5.000 Euro (or equivalent in USD and CHF) and the minimum additional payment is 2.500 Euro (or equivalent in USD and CHF).

Classes	Description
Class I	The Units of Class I are capitalisation Class Units, may be subscribed by any investor whose the Value of contract is at least of 2,000,000.- EURO (or equivalent in USD and CHF) and to which reduced rates of management fee will apply.
Class IH	The Units of Class IH are hedged to Euro capitalisation Class Units, may be subscribed by any investor whose the Value of contract is at least of 2,000,000.- EURO (or equivalent in USD and CHF) and to which reduced rates of management fee will apply.
Class P	The Units of Class P issued before 20 November 2009 have been renamed "P" Class Units, which are capitalisation Class Units, and are intended for any potential investor.
Class P1	The Units of Class P1 are capitalisation Class Units, are intended for any potential investor.
Class S	The Units of Class S are distribution Class Units, are intended for any potential investor.
Class S1	The Units of Class S1 are distribution Class Units, are intended for any potential investor.

"**Value of contract**" means the countervalue of the Units subscribed with the same contract, determined on the basis of the last known net asset value increased by any possible payment being executed.

CO-OWNERSHIP

The quality of holder of Units or fractions of Units confers on the assets of the sub-fund a right of co-ownership proportional to the number of Units or fractions held.

Fractions of Units may be issued until a thousandth of unit.

The unitholder, his heirs or his successors in title, trustees, managers or legal representatives cannot require the dissolution nor the division of the Fund.

If one or more Units are jointly owned by several persons, they must be represented by a single person in their relations with the Management Company or the Depositary Bank.

ISSUE PRICE OF THE UNITS

The issue price for the Units in a sub-fund is equal to the Net Asset Value on the Valuation Day, as calculated on the Calculation Day following the date when the subscription request is received. Unless otherwise specified in the Sub-Fund Particulars, or with reference to the Willerfunds – Private Suite sub-funds, the Sales Agent may withhold on the gross amount paid by the investor a Subscription fee amounting to:

- a maximum of 2.00% of the Net Asset Value for the equity sub-funds and assimilated sub-funds;
- a maximum of 1.50% of the Net Asset Value for the bond sub-funds and assimilated sub-funds.

Any taxes, stamp duties and levies potentially payable in the various countries of issuance or subscription shall automatically be added to the issuance price.

With reference to the Willerfunds – Private Suite, upon purchase of Gold Units Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at Net Asset Value. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G, GH, GS and GSH Class Units are automatically

exchanged, value for value, into respectively D, DH, DS and DSH Class Units of the same sub-fund. The placement fee is used to remunerate the distributor.

The date for conversion to D, DH, DS and DSH Class Units and the daily deductions of the placement fee are unaffected by any exchange of G, GH, GS and GSH Units from one sub-fund to another. The residual placement fee and related amortisation is transferred to the acquired sub-fund.

Unitholders who redeem G, GH, GS and/or GSH Class Units before the end of the 3-year period, will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for other unitholders.

SUBSCRIPTIONS

Subscription of Units may be performed either by means of:

(i) a single payment which provides for the possibility, in addition to an initial payment, of additional payments of a certain size, or;

(ii) if available in the country of subscription, through a Pluri-annual Investment Plan which provides for a plan for the spreading out of payments.

Moreover, the Fund may issue Units as consideration for a contribution in kind of securities in compliance with the conditions set forth by Luxembourg law, in particular the obligation to obtain a valuation report from an auditor.

Subscriptions requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch no later than 2.00 pm (Luxembourg time) in order to be dealt with on the basis of the Net Asset Value calculated on that Business Day. Any applications received after the applicable deadline will be deemed to be received on the next Business Day. Payment for subscribed Units has to be made no later than 2 Business Days after receipt of such order.

In order to limit the market timing risk, subscription requests received for the following sub-funds (defined as "APAC sub-funds") will be dealt with on the basis of the Net Asset Value of the following Business Day:

- Willerfunds - Private Suite - Franklin Emerging Corporate Bond.

Payment for subscribed Units for these sub-funds has to be made no later than 3 Business Days after receipt of such order.

The minimum relevant subscription amounts for "P" Class Units, "P1" Class Unit, "I" Class Units, "IH" Class Units, "S" Class Units, "S1" Class Units, "G" Class Units, "GS" Class Units, "D" Class Units, "DS" Class Units, "GH" Class Units, "GSH" Class Units, "DH" Class Units and "DSH" Class Units are set out in the various Sub-Fund's investment policy.

The subscription price must be paid in exchange for a payment or transfer in the reference currency of the sub-fund or the Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch.

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

The Fund reserves the right to accept or refuse at its own discretion any Unit Classes subscription in whole or in part.

6) REDEMPTION OF UNITS

Unitholders may ask to redeem their Units at any time.

Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch no later than 2.00 pm CET in order to be dealt with on the basis of the Net Asset Value calculated on that Business Day. Any applications received after the applicable deadline will be deemed to be received on the next Business Day. Payment for redeemed Units has to be made no later than 2 Business Days after the receipt of such order.

In order to limit the market timing risk, requests received for the following APAC sub-funds will be dealt with on the basis of the Net Asset Value of the following Business Day:

- Willerfunds - Private Suite - Franklin Emerging Corporate Bond.

Payment for redeemed Units for these sub-funds has to be made no later than 3 Business Days after receipt of such order.

The redemption price shall be paid by transfer in the reference currency of the sub-fund or the Unit Class concerned.

Subscription and redemption orders may also be sent directly to the Management Company's registered office within the timeframes provided for above.

REDEMPTION FEE

The redemption price for the Units in a sub-fund is equal to the Net Asset Value on the Valuation Day, as calculated on the Calculation Day following the date when the redemption request is received. No Redemption fee will be charged, unless otherwise specified in each specific Sub-Fund's investment policy.

Any potential taxes, levies, stamp duty and other charges due in relation to the redemption of Units payable on this occasion are borne exclusively by the unitholder and shall be deducted from the product of redemption.

REDEMPTION GATE

If any application for redemption or conversion is received in respect of any one Valuation Day, which either singly or when aggregated with other such applications so received, represents more than 25% of the total net assets of any one sub-fund, the Management Company, in accordance with its internal procedures and governance, reserves the right, in its sole and absolute discretion and without liability (and in the reasonable opinion that to do so is in the best interests of the remaining unitholders), to scale down pro rata each application with respect to such Valuation Day so that no more than 25% of the total net assets of the relevant sub-fund be redeemed or converted on such Valuation Day.

To the extent that any application for redemption or conversion is not given full effect on such Valuation Day by virtue of the exercise by the Management Company of its power to pro-rate applications, such application shall be treated with respect to the unsatisfied balance thereof as if a further request had been made by the unitholder in question in respect of the next Valuation Day and, if necessary, subsequent Valuation Days, until such application shall have been satisfied in full.

With respect to any application for redemption or conversion received in respect of such Valuation Day, to the extent that subsequent applications shall be received in respect of following Valuation Days, such later applications shall be postponed in priority to the satisfaction of applications relating to such first Valuation Day, but subject thereto shall be dealt with as set out above.

7) SWITCH OF UNITS

Unitholders may convert the Units that they hold in one sub-fund into Units in another sub-fund except for the "P" and "S" Unit Classes of the Willer Flexible Financial Bond sub-fund, for which Switch in and out requests are not allowed.

Conversion instructions must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch no later than 2.00 pm (Luxembourg time) in order to be dealt with on the basis of the Net Asset Value calculated on that Business Day. Any conversion instruction received after the applicable deadline will be deemed to be received on the next Business Day. Settlement of conversion instructions shall be no later than 2 Business Days after the receipt of such requests.

In order to limit the market timing risk, conversion instructions received involving the following APAC sub-funds will be as a whole dealt with on the basis of the Net Asset Value calculated on the following Business Day:

- Willerfunds - Private Suite - Franklin Emerging Corporate Bond.

Settlement for such conversion instructions for these sub-funds shall be no later than 3 Business Days after the receipt of such requests.

With reference to the Willerfunds – Private Suite sub-funds, conversion of Gold Class Units are permitted only into Gold Class Units of other sub-funds. Conversions of Diamond Class Units are permitted only into Diamond Class Units of other sub-funds.

Gold Class Units cannot be voluntarily converted into Diamond Class Units. Conversions of Gold Class Units into Diamond Class Units will take place only automatically after a 3 year holding period.

The conversion shall not take place if the calculation of the Net Asset Value for Units in one of the sub-funds in question is suspended.

The number of Units allocated in the new sub-fund shall be established according to the following formula:

$$A = \frac{B \times C \times D}{E}$$

where:

A = is the number of Units allocated in the new sub-fund;

B = is the number of Units presented for conversion;

C = is the Net Asset Value of one Unit in the sub-fund where the Units are presented for conversion on the day of the transaction;

D = is the exchange rate applicable between the currencies of the two sub-funds concerned on the day of the transaction. If the denomination currency for the two sub-funds is identical, the price shall be equal to 1;

E = is the Net Asset Value for the Unit in the new sub-fund on the day of the transaction.

If A is not a whole number, A will be rounded up or down to the third decimal place.

Conversion commission may apply to these requests as further disclosed in the relevant Sub-fund's investment policy for the benefit of the Sales Agents. Sales Agents may decide to waive, at their discretion, the conversion commission, in whole or in part.

8) DISTRIBUTIONS

For “P”, “P1”, “I”, “IH”, “G”, “GH”, “D” and “DH” Unit Classes: The Management Company's intention is to conduct an investment policy based on capital gains. The net income from assets, together with the gains realised, shall be reinvested in the sub-fund concerned, and shall not be distributed.

For “S”, “S1”, “GS”, “GSH”, “DS” and “DSH” Unit Class: The Management Company, referring to the first working day in Luxembourg following the 15th day of March, June, September and December of each year, shall execute calculation and accrual of the amount to be distributed to unitholders, in proportion to the number of Units held, referring to the previous quarter of the Fiscal Year, which is ending on 31 August.

This amount will be defined taking into account the Net Incomes (as defined below) matured by the sub-fund from the beginning of the relevant Fiscal Year to the end of the quarter preceding the above indicated dates and net of what already distributed in the same relevant Fiscal Year.

The Management Company reserves the possibility to distribute even if the Net Income is negative or to not distribute any Net Income due to market conditions.

Net Incomes means the combination of all accrued and realized incomes and interests, realized and unrealized capital gains/losses of the sub-fund, net of all operational and management costs and taxes, as resulting from the sub-fund’s accounting reports.

The unitholders entitled to the distribution of proceeds are those resulting from the unit register on the working day in Luxembourg previous to the day of reference used to make the calculation and accrual to be distributed, as indicated above. Any payment of the Net Incomes will be published as foreseen in the Prospectus and marketed countries’ sale documents.

Distributed Net Incomes will be paid by the Depositary Bank or, upon instructions from the same, by the marketed countries’ local Paying Agent within fifteen (15) days from the day when the calculation and accrual to be distributed are executed, and with the procedure specified in each marketed country’s sale documents.

No distribution may be made as a result of which the total net assets of the Fund would fall below 1,250,000.- EURO. Distributed Net Incomes remaining unclaimed for five (5) years after their availability, will be forfeited and reverted to the relevant Class of Units of the relevant Sub-fund.

9) CHARGES AND EXPENSES BORNE BY THE UNITHOLDERS

a) Faced with a subscription, the Management Company has the right to recoup:

• in some sub-funds, on the amount of any payment, including the payments carried out by means of “switch”, a placement fee, as disclosed in section “issue price of the Units” and in the Sub-Fund Particulars.

b) For the switch of units of the Fund, the Management Company has the right to retain:

• for D and DS Unit Classes, a maximum switch fee of 0.40% of the Net Asset Value of units to be switched.

c) In both cases, the Management Company has the right to recoup:

• the administrative expenses relating to the subscription, repurchase and switch confirmations;

• the possible tax expenses related to those confirmations.

10) CHARGES AND EXPENSES BORNE BY THE FUND

The charges and expenses borne by each sub-fund of the Fund are:

a) **the management fee** which remunerates the activities of the Management Company and calculated on the basis of the daily total net assets attributable to the relevant Class of *Units* valued in Euro and payable monthly in arrears.

The management fee owed to the Management Company is calculated daily on the global net value of each sub-fund and deducted from the net assets of each sub-fund at the beginning of the following month.

The annual management fee is equal to:

sub-funds	**"P" Class Units**	**"P1" Class Units**	**"I" Class Units**	**"S" Class Units**	**"S1" Class Units**
Willerfunds - Willerequity Switzerland	Up to 1.55%	-	Up to 1.30%	-	-
Willerfunds - Willer Flexible Financial Bond	Up to 1.20%	Up to 1.20%	Up to 0.65%	Up to 1.20%	Up to 1.20%

With reference to the Willerfunds – Private Suite sub-funds, the annual management fee is equal to:

sub-funds	**"G" Class Unit**	**"GS" Class Unit**	**"GH" Class Unit**	**"GSH" Class Unit**	**"D" Class Unit**	**"DS" Class Unit**	**"DH" Class Unit**	**"DSH" Class Unit**	**"I" Class Unit**	**"IH" Class Unit**
Willerfunds – Private Suite – Fidelity Flexible Short Duration	Up to 0.20%	Up to 0.20%	-	-	Up to 0.80%	Up to 0.80%	-	-	Up to 0.40%	-
Willerfunds – Private Suite – Schroder Global Climate Change until 30 January 2026 2026, renamed Willerfunds - Private Suite - Schroder Global Leaders as from 31 January 2026	Up to 1.25%	-	-	-	Up to 1.85%	Up to 1.85%	-	-	Up to 0.90%	-
Willerfunds – Private Suite – BNY Mellon Global Return	Up to 1.10%	Up to 1.10%	-	-	Up to 1.70%	Up to 1.70%	-	-	Up to 0.85%	-
Willerfunds – Private Suite – Millennials Equity	Up to 1.40%	-	-	-	Up to 2.00%	-	-	-	-	-
Willerfunds – Private Suite – BlackRock Balanced ESG	Up to 1.10%	Up to 1.10%	-	-	Up to 1.70%	Up to 1.70%	-	-	Up to 0.85%	-
Willerfunds – Private Suite – Pictet Health Innovation Trends	Up to 1.40%	-	-	-	Up to 2.00%	-	-	-	Up to 1.00%	-
Willerfunds – Private Suite – Lombard Odier Natural Capital	Up to 1.25%	-	-	-	Up to 1.85%	-	-	-	Up to 0.90%	-

Willerfunds – Private Suite – Janus Henderson Strategic Bond	Up to 0.70%	Up to 0.70%	-	-	Up to 1.30%	Up to 1.30%	-	-	Up to 0.70%	-
Willerfunds – Private Suite – JPM Europe Equity	Up to 1.25%	-	-	-	Up to 1.85%	-	-	-	Up to 0.85%	-
Willerfunds – Private Suite – Vontobel Equity Global Impact	Up to 1.25%	-	-	-	Up to 1.85%	-	-	-	Up to 0.85%	-
Willerfunds – Private Suite – Wellington Equity Global Research	Up to 1.25%	-	-	-	Up to 1.85%	-	-	-	Up to 0.85%	-
Willerfunds – Private Suite – Eurizon Multi-Asset Circular Economy	Up to 1.10%	Up to 1.10%	-	-	Up to 1.70%	Up to 1.70%	-	-	Up to 0.80%	-
Willerfunds – Private Suite – Fidelity Global Equity Income	Up to 1.20%	Up to 1.20%	-	-	Up to 1.80%	Up to 1.80%	-	-	Up to 0.80%	-
Willerfunds – Private Suite – FAMI Euro Short Term	Up to 0.20%	Up to 0.20%	-	-	Up to 0.80%	Up to 0.80%	-	-	Up to 0.35%	-
Willerfunds – Private Suite – Asteria – Man Flexible Allocation	Up to 0.90%	Up to 0.90%	-	-	Up to 1.50%	Up to 1.50%	-	-	Up to 0.50%	-
Willerfunds – Private Suite – Franklin Emerging Corporate Bond	Up to 0.80%	Up to 0.80%	Up to 0.80%	Up to 0.80%	Up to 1.40%	Up to 1.40%	Up to 1.40%	Up to 1.40%	Up to 0.70%	Up to 0.70%
Willerfunds – Private Suite – T. Rowe Price Equity US Research	Up to 1.25%	-	-	-	Up to 1.85%	-	-	-	Up to 0.85%	-
Willerfunds – Private Suite – PIMCO European Income Bond	Up to 0.60%	Up to 0.60%	-	-	Up to 1.20%	Up to 1.20%	-	-	Up to 0.45%	-
Willerfunds – Private Suite – Invesco Euro Corporate Bond	Up to 0.40%	Up to 0.40%	-	-	Up to 1.00%	Up to 1.00%	-	-	Up to 0.40%	-
Willerfunds – Private Suite – JPM Global Aggregate Bond	Up to 0.50%	Up to 0.50%	-	-	Up to 1.10%	Up to 1.10%	-	-	Up to 0.40%	-
Willerfunds – Private Suite – M&G European Strategic Value	Up to 1.15%	Up to 1.15%			Up to 1.75%	Up to 1.75%			Up to 0.75%	

When the Fund invests in a UCITS and/or other UCIs that are managed, directly or by delegation, by the same Management Company or by any other management company with which the Management Company is linked by common management or control or by a substantial direct or indirect holding, no subscription or redemption fees may be charged to the Fund on account of these investments in other UCITS and/or other UCIs.

With respect to investments of a sub-fund in other UCITS and/or other UCIs, the maximum level of management fees that may be charged both to each sub-fund of the Fund and to the other UCITS and/or other UCIs in which it intends to invest, may not exceed 5% of the net assets of each sub-fund.

The Fund shall indicate in its annual report the maximum percentage of management fees charged both at the level of each sub-fund and at the level of the UCITS and/or other UCIs in which each sub-fund has invested during the relevant Fiscal Year.

b) **the performance fee for Relative Return sub-funds:**

The Management Company also receives a performance fee in remuneration for its management of certain relative return sub-funds listed below, paid annually at the end of the calendar year, if the difference between the performance of the sub-fund (at a Unit Class level) and that of its Benchmark index over the calendar year is positive, subject to claw back as define below. The Benchmark (used as reference indicator) and the performance fee rate is determined for each sub-fund concerned in the relevant table hereafter.

The performance fee of a sub-fund is calculated on the NAV per Unit after deduction of all expenses, liabilities and management fees (excluding the performance fee), and is adjusted to take account of all subscriptions and redemptions, and distribution of dividends where applicable.

A performance fee could also be payable in case a sub-fund has over-performed the reference Benchmark but had a negative performance. While, if any underperformance has been incurred, the Management Company applies a five (5) years rolling window starting from the 1st of January 2022 to claw it back before a performance fee becomes payable.

The performance fee shall be calculated and accrued each day. Crystallization will happen yearly, at the last Business Day of the calendar year, and when it is due, the performance fee shall be paid to the Management Company and retained on the net assets of the sub-fund on the 10th Business Day following the end of the calendar year which the performance refers to.

With reference to the sub-funds delegated to an external Investment Manager, in the event of a change of the Investment Manager at a date different from a calculation date of the performance fee, the performance fee will be crystallized at the date of termination of the investment management agreement.

Relative return sub-fund that charges performance fee	**Reference Benchmark**	**Performance fee Rate**
Willerequity Switzerland	Official Benchmark as disclosed in the sub-fund's investment policy.	20%

Performance fee calculation example:

This example represents how performance fee is calculated in order to provide Investors with a better understanding of the performance fee model. However, such example is illustrative only and does not intend to reflect any potential future performance or past performance.

Performance fee	20%
Total Assets (EUR)	10,000,000.00

Year	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**
NAV per unit	100	97	99	105	102	110	103	105
NAV performance		-3.0%	2.1%	6.1%	-2,9%	7.8%	-6,4%	1.9%
Benchmark	200	202	203	199	193	203	205	205
Benchmark's performance		1.0%	0.5%	-2.0%	-3.0%	5.2%	1.0%	0.0%
Relative performance	0.0%	-4.0%	1.6%	8.0%	0.2%	2.7%	-7.3%	1.9%
Underperformance to be clawed back	0.0%	-4.0%	-2.4%	0.0%	0.0%	0.0%	-7.3%	-5.4%

Final relative performance after claw back		-4.0%	-2.4%	5.6%	0.2%	2.7%	-7.3%	-5.4%
Performance fee amount (EUR)	**-**	**-**	**-**	**111,957**	**3,159**	**53,236**	**-**	**-**

c) **the fee of 0.135 % per year**, due to the Management Company for the activity of Administrator calculated on the basis of the month end net assets value of each sub-fund valued in Euro and payable monthly in arrears;

d) **the Depositary Bank fee** payable for the safekeeping of the assets of sub-funds, will not exceed 0.045 % per year (excluded VAT), calculated on the basis of the month end net assets value of each sub-fund valued in Euro and payable monthly in arrears. The fee is not inclusive of the costs related to the transaction fees and any applicable value added tax undertook by the Depositary Bank in relation with depositary activities;

e) the Fund is subject to **the subscription tax** of 0.05 % per year payable quarterly and calculated on the basis of the net assets of each sub-fund of the Fund payable quarterly and calculated on the basis of the net assets of each sub-fund of the Fund at the end of each quarter. A reduced subscription tax of 0.01% per year applies to Unit Classes which are reserved Institutional Investors;

Within the delays and in accordance with the modalities provided for by the Italian regulations in force, shall be paid to the Italian provincial taxes services the taxes proportionally to the Units placed on the Italian territory.

Moreover, each sub-fund shall bear the following fees and expenses:

f) all taxes payable on the assets and income of the Fund;

g) standard brokerage and bank fees originating from the Fund's transactions; customary custody rights;

h) publication fees relating to the press releases;

i) printing fees of the Prospectus, Management Regulations and KIDs, publication and distribution costs of periodic information on the Fund;

j) other operation expenses, including without limitation administrative, legal and audit expenses, fees payable to service providers (e.g. OTC derivatives evaluation and collateral management);

k) all the costs related to securities lending and/or repo/reverse repo transactions (e.g. agency fees and transaction costs);

The expenses relating to the marketing and the commercialization of the Fund are borne by the Management Company or the Sales Agent;

All periodic expense shall be directly charged on the assets of the Fund. The non-periodic expenses may be amortized over a period of five (5) years.

All expenses directly and exclusively attributable to a certain sub-fund of the Fund shall be borne by that particular sub-fund. If it cannot be established that the expenses are directly and exclusively attributable to a certain sub-fund, they will be borne proportionally by each sub-fund.

The actual fees are disclosed in the annual and semi-annual financial reports.

The formation costs of the sub-funds shall be borne by the Management Company.

The necessary sums to cover the expenses aforementioned shall be paid by the Management Company by way of withdrawal from the account of the Fund.

The Management Company and/or the Investment Managers may be entitled to receive soft commissions in the form of supplemental goods and services such as consultancy and research, information-technology material associated with specialist software, performance methods and instruments for setting prices, subscriptions to financial information or pricing providers. Brokers who provide supplemental goods and services to the Management Company and/or the Investment Managers may receive orders for transactions by the Fund. The following goods and services are expressly excluded from the soft commissions: travel, accommodation costs, entertainment, current goods and services connected with the management, the offices, the office equipment, staff costs, clerical salaries and all financial charges. Soft commission services so received by the Management Company and/or the Investment Managers will be in addition to and not in lieu of the services required to be performed by the Management Company and/or the Investment Managers and the fees of the Management Company and/or the Investment Managers will not be reduced as a result of the receipt of such soft commissions. The Management Company and/or the Investment Managers, in using a broker who provides soft commission services, will do so only on the basis that the broker is not a physical person and will execute the relevant transactions on a best execution basis and that there will be no comparative price disadvantage in using that broker. The Management Company and/or the Investment Managers or anyone connected to them shall not personally benefit from any financial return on the commissions collected by brokers or dealers. The Management Company and/or the Investment Managers will provide the Fund with the details of the soft commissions effectively received on an annual basis.

11) INVESTOR'S RIGHTS

The Fund is open-ended, which means that new unitholders may purchase Units in one or several of the Fund's sub-funds at any time, while other unitholders may exit the Fund at any time by requesting the redemption of their Units. However, the Management Company is authorised to refuse or restrict the issuance of Units in one or several sub-funds if it believes that such a measure is in the interests of the existing unitholders.

By purchasing Units in one or several sub-funds, unitholders agree to all the clauses in the Management Regulations and the Prospectus. The assets in each of the Fund's sub-funds are the joint and several property of the unitholders in the sub-fund. Each unitholder has a joint and several interest in the assets, which is proportional to the number of Units that they hold.

Unitholders in one or several sub-funds have the option to obtain the redemption of their Units at the redemption price, as determined below.

The Management Regulations do not provide for holding a General Meeting of unitholders.

Unitholders have the right to request conversion of their Units held in one or more sub-funds or Classes into Units of different sub-funds or Classes provided that the conditions of the concerned Class of Units are fulfiled.

Units in the Fund are not offered in order to enable frequent transactions that aim to take advantage of short-term fluctuations on the markets concerned. The Fund shall not be managed, and shall not be used as a vehicle that encourages such transactions. This type of management activity, which is considered as "market timing", could potentially harm the Fund's unitholders. As a result, the Fund may reject any Unit subscription or conversion transaction that the Management Company considers in good faith as potentially amounting to a "market timing" activity involving the Fund's assets.

The price of the Units is determined on a forward basis. This means that it is not possible to know in advance the Net Asset Value at which Units can be bought or sold (exclusive of any subscription or redemption fee).

Late trading is to be understood as the acceptance of subscription, conversion or redemption orders after the time limit fixed for accepting orders ("cut-off time") on the relevant day and the execution of such orders at the price based on the Net Asset Value applicable to that same day.

The Fund considers that the practice of late trading is not acceptable as it violates the provisions of the Prospectus which provide that an order received after the cut-off time is dealt with at a price based on the next applicable Net Asset Value. As a result, subscriptions, conversions and

redemptions of Units shall be dealt with at an unknown Net Asset Value. The cut-off time for subscriptions, conversions and redemptions is set out in the relevant Sub-Fund Particulars.

The Management Company draws Investors' attention to the fact that any investor shall only be able to exercise their full rights as an investor directly where Fund is concerned in the event that the actual investor appears in the unitholder register under their name. In the event that an investor invests in the Fund via an intermediary investing in the Fund in their name but on behalf of the investor, (i) some rights attached to the capacity of unitholder may not necessarily be directly exercised by the investor in respect of the Fund and (ii) investors' rights to indemnification in the event of errors/non-compliance within the meaning of CSSF Circular 24/856 may be impacted. Investors are recommended to enquire about their rights.

12) MANAGEMENT COMPANY

The Management Company of the Fund is Fideuram Asset Management (Ireland) dac (the "**Management Company**"), a designated activity company limited by shares under Irish law, incorporated in Dublin, on October 18, 2001 and authorized as a management company, since May 15, 2013, by the Central Bank of Ireland under the European Communities UCITS Regulations, 2011. Its capital is at 1,000,000 EURO. The registered office is in Ireland, D01 K8F1 - Dublin 1, 2nd Floor, International House, 3 Harbourmaster Place, IFSC.

Fideuram Asset Management (Ireland) dac is a management company duly authorized in accordance with the Directive 2009/65/EC, as amended. Fideuram Asset Management (IRELAND) dac is active in the management of UCITS and other UCIs.

The list of other UCIs managed by the Management Company is available upon request at the registered office of the Management Company.

Its object is the constitution, the administration and the management of UCIs and the distribution of those undertakings under its management, as well as the provision of administrative services to UCIs.

The Management Company is responsible for the daily management of the investments of each sub-fund of the Fund. The Management Company may at its own costs and under its own control and its own responsibility, appoint one or several advisers and/or investment managers.

The Management Company is authorized to delegate certain functions to third parties and it retains the responsibility for the supervision on the delegated entities in respect of the activities carried out by the latter on its behalf.

The accounts of the Management Company are supervised by an auditor, namely Ernst & Young, Ireland.

The Management Company may be advised under the responsibility of the Board of Directors, for its choices, by an investment committee or external advisors.

The Management Company will monitor on a continued basis the activities of the third parties to which it has delegated functions. The agreements entered into between the Management Company and such third parties provide that the Management Company can give instructions to such third parties, and that it can withdraw their mandate with immediate effect if this is in the interest of the holders of Units. The Management Company's liability towards the holders of Units of the Fund is not affected by the fact that it has delegated certain functions to third parties.

The Management Company shall also ensure compliance with the investment restrictions and make sure that the sub-funds' investment strategies and policies are implemented.

The Management Company will receive periodic reports from the Investment Manager detailing the relevant sub-fund's performance and analysing its investment portfolio. The Management Company will receive similar reports from the relevant sub-fund's other services providers in relation to the services provided by them.

The Management Company has established and applies a remuneration policy in accordance with the principles set out under Directive 2014/91/EU of the European Parliament and of the Council amending Directive 2009/65/EC on the coordination of laws, regulations and administrative provisions relating to UCITS as regards depositary functions, remuneration policies and sanctions (UCITS V) and any related legal and regulatory provisions applicable in Luxembourg (the "**Remuneration Policy**").

The Remuneration Policy is aligned with the business strategy, objectives, values and interests of the Management Company and the UCITS that it manages and of the Investors in such UCITS, and which includes, inter alia, measures to avoid conflicts of interest; and it is consistent with and promotes sound and effective risk management and does not encourage risk taking which is inconsistent with the risk profiles, rules or instruments of incorporation of the UCITS that the Management Company manages.

The Remuneration Policy includes fixed and variable components of salaries and applies to those categories of staff, including senior management, risk takers, control functions and any employee whose professional activities have a material impact on the risk profiles of the Management Company, the Fund or the sub-funds.

The Remuneration Policy is in line with the business strategy, objectives, values and interests of the Management Company, the Fund and the Investors. The Management Company's policies include measures to avoid conflicts of interest.

In particular, the Management Company will ensure that:

(a) the assessment of performance is set in a multi-year framework in order to ensure that the assessment process is based on the long-term performance of the Fund and its investment risks and that the actual payment of performance-based components of remuneration is spread over the same period;

(b) the 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 details of the up-to-date Remuneration Policy of the Management Company, including, but not limited to, a description of how the remuneration and benefits are calculated and the associated governance arrangements, are available at: https://www.fideuramassetmanagement.ie/en/policy/.

A paper version of the summarised Remuneration Policy is made available free of charge to Investors at the Management Company's registered office.

13) DEPOSITARY BANK, ADMINISTRATOR AND PAYING AGENT

The Depositary Bank

STATE STREET BANK INTERNATIONAL GmbH, acting through its Luxembourg Branch, is acting as the depositary bank of the Fund as from April 1, 2021 (the "**Depositary Bank**").

STATE STREET BANK INTERNATIONAL GmbH is a limited liability company organized under the laws of Germany, having its registered office at Brienner Str. 59, 80333 München, Germany and registered with the commercial register court, Munich under number HRB 42872. It is a credit institution supervised by the European Central Bank (ECB), the German Federal Financial Services Supervisory Authority (BaFin) and the German Central Bank.

STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch is authorized by the CSSF in Luxembourg to act as depositary and is specialized in depositary, fund administration, and related services.

STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch is registered in the Luxembourg Commercial and Companies' Register (RCS) under number B 148 186.

STATE STREET BANK INTERNATIONAL GmbH is a member of the State Street group of companies having as their ultimate parent State Street Corporation, a US publicly listed company.

The relationship between the Management Company acting on behalf of the Fund and the Depositary Bank is subject to the terms of the Depositary Bank Agreement.

Depositary Bank's functions

Under the terms of the Depositary Bank Agreement, the Depositary Bank is entrusted with following main functions:

- ensuring that the sale, issue, repurchase, redemption and cancellation of Units are carried out in accordance with applicable law, the Prospectus and the Management Regulations;
- ensuring that the value of the Units is calculated in accordance with applicable law, the Prospectus and the Management Regulations;
- carrying out the instructions of the Management Company unless they conflict with applicable law, the Prospectus and the Management Regulations;
- ensuring that in transactions involving the assets of the Fund any consideration is remitted within the usual time limits;
- ensuring that the income of the Fund is applied in accordance with applicable law, the Prospectus and the Management Regulations;
- monitoring of the Fund's cash and cash flows;
- safekeeping of financial instruments to be held in custody and ownership verification and record keeping in relation to other assets.

The Depositary Bank has the function to keep the securities and other values in which the assets of the Fund are invested and to carry out the instructions of the Management Company, by making sure that the Prospectus, the Management Regulations and the standards in force are complied with.

Furthermore, the Depositary Bank shall, on instructions received from the Management Company and insofar as there are available funds, make payments on behalf of the sub-funds.

The Depositary Bank shall also receive, collect and deposit in the sub-funds' accounts all revenue, interest and other payments relating to the transferable securities held by the Depositary Bank and payments made by Investors for the sub-funds' Units, to this extent the Depositary Bank shall deliver certificates of ownership for tax purposes within the framework of collecting interest on the assets and shall also carry out any other necessary duties for their collection, receipt and deposit.

In carrying out its duties, the Depositary Bank shall act honestly, fairly, professionally, independently and solely in the interests of the Fund and its unitholders.

Depositary Bank's liability

In the event of a loss of a financial instrument held in custody, determined in accordance with the UCITS Directive, and in particular article 18 of the Commission Delegated Regulation (EU) 2016/438 with regard to obligations of depositaries (the "**UCITS Regulation**"), the Depositary Bank shall return financial instruments of identical type or the corresponding amount to the Management Company acting on behalf of the Fund without undue delay.

The Depositary Bank shall not be liable if it can prove that the loss of a financial instrument held in custody has arisen as a result of an external event beyond its reasonable control, the consequences of which would have been unavoidable despite all reasonable efforts to the contrary pursuant to the UCITS Directive.

In case of a loss of financial instruments held in custody, the unitholders may invoke the liability of the Depositary Bank directly or indirectly through the Management Company provided that this does not lead to a duplication of redress or to unequal treatment of the unitholders.

The Depositary Bank is indemnified by the Fund against all liabilities suffered or incurred by the Depositary Bank by reason of the proper performance of the Depositary Bank's duties under the terms of the Depositary Bank Agreement save where any such liabilities arise as a result of the

Depositary Bank's negligence, fraud, bad faith, wilful default or recklessness of the Depositary Bank or the loss of financial instruments held in custody.

The Depositary Bank will be liable to the Fund for all other losses suffered by the Fund as a result of the Depositary Bank's negligent or intentional failure to properly fulfil its obligations pursuant to the UCITS Directive.

The Depositary Bank shall not be liable for consequential or indirect or special damages or losses, arising out of or in connection with the performance or non-performance by the Depositary Bank of its duties and obligations.

Delegation

The Depositary Bank has full power to delegate the whole or any part of its safekeeping functions, but its liability will not be affected by the fact that it has entrusted to a third party some or all of the assets in its safekeeping. The Depositary Bank's liability shall not be affected by any delegation of its safe-keeping functions under the Depositary Bank Agreement.

The Depositary Bank has delegated those safekeeping duties set out in article 22(5)(a) of the UCITS Directive to State Street Bank and Trust Company with registered office at Congress Street, Suite 1, Boston, Massachusetts 02114-2016, United States of America, with an office at 20 Churchill Place, Canary Wharf, London E14 5HJ, United Kingdom, whom it has appointed as its global sub-custodian. State Street Bank and Trust Company as global sub-custodian has appointed local sub-custodians within the State Street Global Custody Network.

Information about the safe-keeping functions which have been delegated and the identification of the relevant delegates and sub-delegates are available at the following internet site: http://www.statestreet.com/about/office-locations/luxembourg/subcustodians.html.

Conflicts of Interest

The Depositary Bank is part of an international group of companies and businesses ("State Street") that, in the ordinary course of their business, act simultaneously for a large number of clients, as well as for their own account, which may result in actual or potential conflicts. Conflicts of interest arise where the Depositary Bank or its affiliates engage in activities under the Depositary Bank Agreement or under separate contractual or other arrangements.

Such activities may include:
(i) providing nominee, administration, registrar and transfer agency, research, agent securities lending, investment management, financial advice and/or other advisory services to the Fund;
(ii) engaging in banking, sales and trading transactions including foreign exchange, derivative, principal lending, broking, market making or other financial transactions with the Fund either as principal and in the interests of itself, or for other clients.

In connection with the above activities the Depositary Bank or its affiliates:
(i) will seek to profit from such activities and are entitled to receive and retain any profits or compensation in any form and, except as required by law, the Depositary Bank is not bound to disclose to the Fund any such profits or compensation in any form earned by affiliates of the Depositary Bank or the Depositary Bank when acting in any other capacity;
(ii) may buy, sell, issue, deal with or hold, securities or other financial products or instruments as principal acting in its own interests, the interests of its affiliates or for its other clients;
(iii) may trade in the same or opposite direction to the transactions undertaken, including based upon information in its possession that is not available to the Fund;
(iv) may provide the same or similar services to other clients including competitors of the Fund and the fee arrangements it has in place will vary;
(v) may be granted creditors' and other rights by the Fund, e.g. indemnification which it may exercise in its own interest. In exercising such rights the Depositary Bank or its affiliates may have the advantage of an increased knowledge about the affairs of the Fund relative to third party creditors thus improving its ability to enforce and may exercise such rights in a way that may conflict with the Fund's strategy.

The Fund may use an affiliate of the Depositary Bank to execute foreign exchange, spot or swap transactions for the account of the Fund. In such instances the affiliate shall be acting in a principal capacity and not as a broker, agent or fiduciary of the Fund. The affiliate will seek to profit from these transactions and is entitled to retain any profit. The affiliate shall enter into such transactions on the terms and conditions agreed with the Fund. The Depositary Bank will not, except as required by law, disclose any profit made by such affiliates.

Where cash belonging to the Fund is deposited with an affiliate being a bank, cash is not segregated from its own assets and a conflict arises in relation to the interest (if any) which the affiliate may pay or charge to such account and the fees or other benefits which it may derive from holding such cash as banker.

The Management Company may also be a client or counterparty of the Depositary Bank or its affiliates and a conflict may arise where the Depositary Bank refuses to act if the Management Company directs or otherwise instructs the Depositary Bank to take certain actions that might be in direct conflict with the interests of the Investors.

The types and levels of risk that the Depositary Bank is willing to accept may conflict with the Fund's preferred investment policy and strategy.

Conflicts that may arise in the Depositary Bank's use of sub-custodians include the following broad categories:
(i) the global custodian and sub-custodians seek to make a profit as part of or in addition to their custody services. Examples include profit through the fees and other charges for the services, profit from deposit taking activities, revenue from sweeps and repo arrangements, foreign exchange transactions, contractual settlement, error correction (where consistent with applicable law) and commissions for sale of fractional shares;
(ii) the Depositary Bank will typically only provide depositary services where global custody is delegated to an affiliate of the Depositary Bank. The global custodian in turn appoints a network of affiliated and non-affiliated sub-custodians. Multiple factors influence the determination of our global custodian to engage a particular sub-custodian or allocate assets to them, including their expertise and capabilities, financial condition, service platforms and commitment to the custody business as well as the negotiated fee structure (which may include terms that result in fee reductions or rebates to the global custodian), significant business relationships and competitive considerations;
(iii) sub-custodians, both affiliated and non-affiliated, act for other clients and in their own proprietary interest, which might conflict with clients' interests and the fee arrangements they have in place will vary;
(iv) sub-custodians, both affiliated and non-affiliated, have only indirect relationships with clients and look to the Depositary Bank as its counterparty, which might create incentive for the Depositary Bank to act in its self-interest, or other clients' interests to the detriment of clients; and
(v) sub-custodians may have creditors' rights against client assets and other rights that they have an interest in enforcing.

In carrying out its duties, the Depositary Bank shall act honestly, fairly, professionally, independently and solely in the interests of the Fund and its unitholders.

The Depositary Bank has functionally and hierarchically separated the performance of its depositary tasks from its other potentially conflicting tasks. The system of internal controls, the different reporting lines, the allocation of tasks and the management reporting allow potential conflicts of interest to be properly identified, managed and monitored.

Additionally, in the context of the Depositary Bank's use of sub-custodians, the Depositary Bank imposes contractual restrictions to address some of the potential conflicts and maintains due diligence and oversight of sub-custodians. The Depositary Bank makes available frequent reporting on clients' activity and holdings, with the underlying sub-custodians subject to internal and external control audits. Finally, the Depositary Bank segregates the Fund's assets from the Depositary Bank's proprietary assets and follows a Standard of Conduct that requires employees to act ethically, fairly and transparently with clients.

Global Conflicts of Interest policy

State Street has implemented a global policy laying down the standards required for identifying, assessing, recording and managing all conflicts of interest which may arise in the course of business. Each State Street business unit, including the Depositary Bank, is responsible for establishing and maintaining a Conflicts of Interest Program for the purpose of identifying and managing organizational conflicts of interest that may arise within the business unit in connection with providing services to its clients or in delivering its functional responsibilities.

Up-to-date information on the Depositary Bank, its duties, any conflicts that may arise, the safe-keeping functions delegated by the Depositary Bank, the list of delegates and sub-delegates and any conflicts of interest that may arise from such a delegation will be made available to unitholders on request.

The Administrator and Paying Agent

The Management Company has appointed STATE STREET BANK INTERNATIONAL GMBH, acting through its Luxembourg Branch, as the administrator and paying agent of the Fund as from April 1, 2021 (the "**Administrator** and **Paying Agent**").

STATE STREET BANK INTERNATIONAL GMBH, Luxembourg Branch is authorised by the CSSF in Luxembourg to act as administrator of UCITS and AIFs.

The Administrator is responsible for all administrative duties required in respect of the Fund by Luxembourg law, including calculation of the Net Asset Value and accounting function, registrar function (including notably the processing of issue, redemption, transfer of Units) and client communication function, in accordance with the Administration Agreement.

The Administrator shall not, in the absence of fraud, negligence or willful default, be liable to the Fund or any unitholders for any act or omission in the course of or in connection with the discharge by the Administrator of its duties. The Fund has agreed to indemnify the Administrator or any persons appointed by it from and against any and all liabilities, obligations, losses, damages, penalties, actions, judgments, suits, costs, expenses or disbursements of any kind or nature whatsoever (other than those resulting from the fraud, negligence or willful default on the part of the Administrator), which may be imposed on, incurred by or asserted against the Administrator in performing its obligations or duties hereunder.

The Administrator will have no decision-making discretion relating to the Fund's investments.

The Administrator is a service provider to the Fund and is not responsible for the preparation of the Fund's Prospectus and Management Regulations or the activities of the Fund and therefore accepts no responsibility for the accuracy of any information contained in the Fund's Prospectus and Management Regulations.

The Administration Agreement may be terminated by either the Management Company or the Administrator giving not less than three (3) months' notice or such shorter notices as the parties may agree in writing (or earlier on certain breaches of the Administration Agreement including the insolvency of any of them).

The Administrator is responsible for handling the processing of subscriptions for Units and dealing with any transfers or redemptions of Units, in each case in accordance with the Fund's Prospectus and Management Regulations.

STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch, in its capacity as Administrator will furthermore accept transfers of funds, maintain the register of unitholders, organize the mailing of statements, reports, notices and other documents to the unitholders, and maintain the records of the commitments and the contributed capital in relation to each unit class.

As Paying Agent in Luxembourg, STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch is responsible for the payment of dividends (if any) to the unitholders.

14) DISTRIBUTORS

The Management Company may engage local distributors, platforms or other agents in certain countries or markets. In some countries, use of an agent is mandatory, and the agent may not merely facilitate transactions but may hold units in its own name non behalf of investors. Fees of distributors and agents are paid out of the placements fee and management fee.

Distributors can act as nominees, which may affect your rights as an investor.

The Fund is intended to be exclusively distributed by Intesa Sanpaolo Group entities or by other distributors that are authorized by Intesa Sanpaolo Group.

15) SALES AGENTS

The Sales Agents in charge in Italy are indicated in the sales documents.

The Sales Agents in Italy are in charge of the placement of the Units and assume the responsibility of all related administrative duties regarding this function, such as for example:
- to receive subscriptions of the Italian Investors;
- to receive Switch and redemption requests;
- to send confirmations of the execution of the operations, if not sent by the local Paying Agent in Italy.

The Management Company in its capacity of distributor may reallocate a portion of its fees to distributors, dealers, other intermediaries or entities with whom it has a distribution agreement, or to or for the benefit of a unitholder or prospective investor.

The Management Company in its capacity of distributor may also on a negotiated basis enter into private arrangements with a distributor, dealer, other intermediary, entity, unitholder or prospective investor under which the Management Company in its capacity of distributor is authorized to make payments to or for the benefit of such distributor, dealer, other intermediary, entity, unitholder or prospective investor which represent a retrocession of, or a rebate on, all or part of the fees received in its capacity of distributor.

16) INVESTMENT MANAGERS, SUB-INVESTMENT MANAGERS

The Management Company has designated several companies as investment managers (hereafter the "**Investment Managers**") for the performance of investment management activity in relation to specific sub-funds, as specified in section "Organisation" of the Prospectus.

Under the investment management agreements, each Investment Manager will be responsible for the management of the assets of the specific sub-funds for which it is appointed as investment manager. Each Investment Manager undertakes to manage the investment and the reinvestment of the assets of the relevant sub-fund under the control and responsibility of the Management Company.

Each Investment Manager will determine which investments can be bought, sold or exchanged as well as what portion of the assets of relevant sub-fund is held in transferable securities and other financial liquid instruments in compliance with the provisions of the Prospectus and the Management Regulations in force.

In consideration for its services, each Investment Manager shall receive a fee paid by the Management Company.

17) NET ASSET VALUE AND DEALING PRICES

NET ASSET VALUE CALCULATION

The net asset value ("Net Asset Value") per unit of co-ownership of each class and each sub-fund shall be determined on each Valuation Day.

The Net Asset Value per unit of each class of units in each sub-fund will be expressed in the reference currency of the relevant sub-fund. The Board of Directors may however decide to calculate the Net Asset Value per unit for certain sub-funds/classes of units in in another denomination currency, in which case the Prospectus will be amended accordingly. The Net Asset Value calculated in the other denomination currency is the equivalent of the Net Asset Value in the reference currency of the sub-fund converted at the prevailing exchange rate.

The Net Asset Value per unit of each class of units in each sub-fund on any Valuation Day is determined by dividing the value of the total assets of that sub-fund properly allocable to such class less the liabilities of such sub-fund properly allocable to such class by the total number of units of such class outstanding on such Valuation Day. The resulting sum may be rounded to the nearest three decimal places.

The subscription price and the redemption price of the different classes of units will differ within each sub-fund as a result of the differing fee structure and/or distribution policy for each class.

The Board of Directors of the Management Company reserves the right to allow the Net Asset Value per Unit of each class to be calculated more frequently than once daily or to otherwise alter dealing arrangements on a permanent or a temporary basis, for example, where the Board of Directors of the Management Company considers that a material change to the market value of the investments in one or more sub-funds so demands. The Prospectus will be amended, following any such permanent alteration, and unitholders will be informed accordingly.

The valuation of the Net Asset Value of the different classes of units shall be made in the following manner:
The assets of the Fund shall include:

(1) all cash on hand or on deposit, including any interest accrued thereon;
(2) all bills and demand notes payable and accounts receivable (including proceeds of securities sold but not delivered);
(3) all bonds, time notes, certificates of deposit, shares, stock, debentures, debenture stocks, subscription rights, warrants, options and other securities, financial instruments and similar assets owned or contracted for by the Fund (provided that the Management Company acting on behalf of the Fund may make adjustments in a manner not inconsistent with paragraph (1) below with regards to fluctuations in the market value of securities caused by trading ex-dividends, ex-rights, or by similar practices);
(4) all stock dividends, cash dividends and cash distributions receivable by the Fund to the extent information thereon is reasonably available to the Fund;
(5) all interest accrued on any interest bearing assets owned by the Fund except to the extent that the same is included or reflected in the principal amount of such asset;
(6) the preliminary expenses of the Fund, including the cost of issuing and distributing units of the Fund, insofar as the same have not been written off;
(7) the liquidating value of all forward contracts, swaps, and all call or put options the Fund has an open position in;
(8) all other assets of any kind and nature including expenses paid in advance.

The value of such assets shall be determined as follows and the assets denominated in a currency other than EURO shall be converted on the basis of the last known market rate.

The selected methodologies for each asset category are listed below:

a) Securities which are listed or traded on a regulated market where the market price is significant/representative.

Listed instruments include all instruments which are regularly traded on regulated markets or MTFs for which a significant and publicly available price is formed at least on a daily basis as a result of trading activity. These instruments are valued with market approach at closing or last known market price. This price can assume the form of closing bid, last bid, the last traded price, closing mid-market price, latest mid-market price, or the official closing price published by an exchange.

Where a security is listed on several exchanges, the relevant market shall be the one:

- Which constitutes the primary market, or
- The one which the Management Company and the Administrator determine it provides the fairest criteria in a value for the security.

Securities listed or traded on a regulated market, but acquired or traded at a premium or at a discount outside or off the relevant market may be valued taking into account the level of premium or discount at the date of the valuation, where it is considered more representative.

b) Securities which are listed or traded on a regulated market where the market price is unrepresentative or not available and unlisted securities

Due to the absence of representative quotation, these securities shall be valued on the basis of the last known commercial value or, in the absence thereof, on the basis of the probable realisation value, which is assessed with diligence and in good faith by the Administrator.

c) Collective investment schemes

Valuation is based on the latest published net asset value. The use of market prices may be appropriate where the collective investment scheme in which the investment is made is listed on a regulated market, in accordance with point a).

Amortized cost may be used to price holdings in funds which are categorized as Public Debt Constant Net Asset Value (all holdings) or Low Volatility Net Asset Value under the Money Market Regulation.

Feeder UCITS investments into Master UCITS will be valued at the latest available net asset value per share as published by the Master UCITS

d) Cash (in hand or deposit)

Value is the nominal/face value plus accrued interest.

e) Exchange traded futures and options contracts, including index futures

Valuation is based on the settlement price (market approach) as determined by the market in question. If a settlement price is not available, they may be valued in accordance with b) like Income approach.

f) Over-the-counter (OTC) derivative contracts

OTC derivatives can only be negotiated with brokers that can perform a daily valuation of the contracts and that are part of Management Company's Authorised Broker List.

The Management Company may choose to value an OTC derivative using either the counterparty valuation or an alternative valuation, such as valuation calculated by the Risk Management Desk of the Management Company or an adequate independent pricing vendor.

Where the counterparty valuation is used, the following requirements apply:

- The valuation must be approved or verified by a party who is approved for the purpose and who is independent of the counterparty.
- The independent verification must be carried out at least weekly.

Where an alternative valuation method is used, the following requirements apply:

- The valuation follows the international best practice and adhere to the principles established by bodies such as IOSCO and AIMA.

- The alternative valuation is provided by a competent figure appointed by the Management Company or a valuation by any other means provided that the value is approved by the Management Company.
- The alternative valuation must be reconciled to the counterparty valuation on a monthly basis. Where significant differences arise, these must be promptly investigated and explained.

Fair value of OTC derivatives is subject to validation. Validation methodologies are selected by the Risk Management Desk of the Management Company proportionately to the nature and complexity of the OTC derivatives.

g) Forward foreign exchange and interest rate swap contracts

Valuation of these OTC derivative contracts can be performed in accordance with point (f) or, if strong non-arbitrage relationships exist, with point (a).

In the presence of stressed market conditions and less liquid assets, the Management Company performs an additional quality check on the applied methodology and in case deemed necessary, the Management Company chooses an alternative valuation methodology which is more representative of the fair value.

(1) the Net Asset Value per unit of any sub-fund of the Fund may be determined by using an amortised cost method for all investments with a known short term maturity date. This involves valuing an investment at its cost and thereafter assuming a constant amortisation to maturity of any discount or premium, regardless of the impact of fluctuating interest rates on the market value of the investments. While this method provides certainty in valuation, it may result in periods during which value, as determined by amortisation cost, is higher or lower than the price such sub-fund would receive if it sold the investment. The Board of Directors of the Management Company will continually assess this method of valuation and recommend changes, where necessary, to ensure that the relevant sub-fund's investments will be valued at their fair value as determined in good faith by the Board of Directors. If the Board of Directors of the Management Company believes that a deviation from the amortized cost per unit may result in material dilution or other unfair results to unitholders, the Board of Directors shall take such corrective action, if any, as they deem appropriate to eliminate or reduce, to the extent reasonably practicable, the dilution or unfair results.
(2) the relevant sub-fund shall, in principle, keep in its portfolio the investments determined by the amortisation cost method until their respective maturity date.
(3) interest rate swaps will be valued at their market value established by reference to the applicable interest rates curve. Index and financial instruments related swaps will be valued at their market value established by reference to the applicable index or financial instrument. The valuation of the index or financial instrument related swap agreement shall be based upon the market value of such swap transaction established in good faith pursuant to procedures established by the Board of Directors of the Management Company.
(4) all other assets will be valued at fair market value as determined in good faith pursuant to procedures established by the Board of Directors of the Management Company;
(5) the Board of Directors of the Management Company, in its discretion, may permit some other method of valuation to be used if it considers that such valuation better reflects the fair value of any asset of the Fund.

The liabilities of the Fund shall include:
(1) all loans, bills and accounts payable;
(2) all accrued interest on loans of the Fund (including accrued fees for commitment for such loans);
(3) all accrued or payable administrative expenses (including the aggregate fee and any other third party fees);
(4) all known liabilities, present and future, including all matured contractual obligations for payment of money or property, including the amount of any unpaid dividends declared by the Fund;
(5) an appropriate provision for future taxes based on capital and income to the relevant Valuation Date, as determined from time to time by the Fund, and other reserves, if any, authorized and approved by the Board of Directors of the Management Company; and
(6) all other liabilities of the Fund of whatsoever kind and nature except liabilities represented by units of the Fund. In determining the amount of such liabilities, the Fund shall take into account all expenses payable and all costs incurred by the Fund, which shall comprise the management fee, the management company, investment advisors (if any), investment or sub-investment

managers, accountants, the Depositary Bank, the administrative agent, corporate agents, domiciliary agents, paying agents, registrars, transfer agents, permanent representatives in places of registration, distributors, trustees, fiduciaries, correspondent banks and any other agent employed by the Management Company acting on behalf of the Fund, fees for legal and auditing services, costs of any proposed listings and of maintaining such listings, promotion, printing, reporting and publishing expenses (including reasonable marketing and advertising expenses and costs of preparing, translating and printing in different languages) of prospectuses, KID, addenda, explanatory memoranda, registration statements, annual reports and semi-annual reports, all taxes levied on the assets and the income of the Fund (in particular, the «*taxe d'abonnement*» and any stamp duties payable), registration fees and other expenses payable to governmental and supervisory authorities in any relevant jurisdictions, insurance costs, costs of extraordinary measures carried out in the interests of unitholders (in particular, but not limited to, arranging expert opinions and dealing with legal proceedings) and all other operating expenses, including the cost of buying and selling assets, customary transaction fees and charges charged by depositary banks or their agents (including free payments and receipts and any reasonable out-of-pocket expenses, i.e. stamp taxes, registration costs, scrip fees, special transportation costs, etc.), customary brokerage fees and commissions charged by banks and brokers for securities transactions and similar transactions, interest and postage, telephone, facsimile, telex charges and all the costs related to securities lending transactions (agency fees and transactions costs). The Management Company acting on behalf of 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.

The net assets of the Fund are at any time equal to the total of the net assets of the various sub-funds.

In determining the Net Asset Value per units, income and expenditure are treated as accruing daily.

SWING PRICING

In order to protect existing unitholders from dilution of value caused by trading costs incurred as a result of subscription, redemption or conversion activity on a sub-fund on a particular Valuation Day, the Management Company has adopted a swing pricing mechanism that allows price adjustments as part of the regular daily valuation process.

Trading costs are defined as explicit transaction costs, which are directly borne by a sub-fund for the acquisition or disposal of assets and usually are stable in amount and quantifiable in advance of the transaction and implicit transaction costs borne indirectly by a sub-fund upon acquisition or disposal of assets, which primarily arise from the bid-ask spread and market impact. Those implicit transaction costs may vary depending on the type of underlying assets and market conditions.

This mechanism is implemented at fund level across all of the sub-funds' unit classes and is not tailored to individual investor circumstances.

The mechanism consists in the application of a swing factor to the original Net Asset Value, which will be swung upwards when the net aggregate transactions result in net subscriptions flows and downwards when the net aggregate transactions result in net redemption flows. The adjusted asset value will be applicable to all transactions on that Valuation Day.

The calibration of the swing factor is carried out in accordance with the internal procedures of the Management Company.

On any given Valuation Day, this swing factor generally does not exceed 2,50% of the NAV. However, the Board of Directors of the Management Company may authorize a higher swing factor in abnormal market conditions (e.g. high net dealings, significant market volatility, market disruption or significant economic contraction) to protect unitholder interests. In such a case, a communication to investors will be published on the Management Company's website https://www.fideuramassetmanagement.ie/.

The Management Company is responsible for ordinary swing pricing decisions and reviews them regularly in line with its internal processes.

The mechanism implemented by the Management Company is partial swing pricing. In partial swing pricing adjustment, the pricing adjustment may be triggered when the difference between subscriptions and redemptions, as a percentage of the sub-fund's Net Asset Value, exceeds the threshold on any particular dealing day. Until the threshold rate is triggered, no swing factor is applied and the transaction costs will be borne by the sub-fund. This will result in a dilution (reduction in the Net Asset Value per Unit) to existing unitholders. The threshold is set by the Management Company taking into account factors such as the prevailing market conditions, including any significant market impact of the trades. Partial swing pricing will be triggered mechanically and on a consistent basis.

For the avoidance of doubt, it is clarified that fees other than the sales charge will continue to be calculated on the basis of the unswung Net Asset Value.

SUSPENSIONS

The Management Company may suspend or defer the determination of the Net Asset Value per Unit of one or more sub-funds and the issue, redemption and conversion of any Classes of Units in the following circumstances:

a. during any period when any of the principal stock exchanges or other markets on which a substantial portion of the investments of the Fund attributable to such sub-fund from time to time is quoted or dealt in is closed otherwise than for ordinary holidays, or during which dealings therein are restricted or suspended, provided that such restriction or suspension affects the valuation of the investments of the Fund attributable to such sub-fund quoted thereon;

b. during any period when the determination of the Net Asset Value per Unit of and/or the redemptions in the underlying Investment Funds representing a material part of the assets of the relevant sub-fund is suspended;

c. during the existence of any state of affairs which constitutes an emergency in the opinion of the Board of Directors of the Management Company as a result of which disposal or valuation of assets owned by the Fund attributable to such sub-fund would be impracticable;

d. during any breakdown in the means of communication or computation normally employed in determining the price or value of any of the investments of such sub-fund or the current price or value on any stock exchange or other market in respect of the assets attributable to such sub-fund;

e. during any period when the Fund is unable to repatriate funds for the purpose of making payments on the redemption of Units of such sub-fund or during which any transfer of funds involved in the realization or acquisition of investments or payments due on redemption of Units cannot, in the opinion of the Board of Directors of the Management Company, be effected at normal rates of exchange;

f. 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;

g. if the Fund or a sub-fund is being or may be wound up or put into;

h. when the Board of Directors of the Management Company has determined that there has been a material change in the valuations of a substantial proportion of the investments of the Fund attributable to a particular sub-fund in the preparation or use of a valuation or the carrying out of a later or subsequent valuation;

i. during any other circumstance or circumstances where a failure to do so might result in the Fund or its unitholders incurring any liability to taxation or suffering other pecuniary

disadvantages or any other detriment, which the Fund or its unitholders might so otherwise have suffered; or

j. during any period where circumstances exist that would justify the suspension for the protection of unitholders in accordance with the law.

In case of master-feeder structure adopted by the Fund, if the Master UCITS temporarily suspends the repurchase, redemption or subscription of its shares, whether at its own initiative or at the request of its supervisory authority, each of its Feeder UCITS will be entitled to suspend the repurchase, redemption or subscription of its Units within the same period of time as the Master UCITS.

The suspension of a sub-fund shall have no effect on the determination of the Net Asset Value per Unit or on the issue, redemption and conversion of Units of any other sub-fund that is not suspended.

Any request for subscription, redemption or conversion shall be irrevocable except in the event of a suspension of the determination of the Net Asset Value per Unit.
Moreover, in accordance with the provisions on mergers of the 2010 Law, the Management Company may temporarily suspend the subscription, the redemption or the repurchase of Units, provided that any such suspension is justified for the protection of unitholders.

Unitholders will be informed of any suspension as appropriate. The Luxembourg regulatory authority, and the relevant authorities of any member states of the European Union in which Units of the Fund are marketed, will be informed of any such suspension.

In accordance with the 2010 Law, the issue and redemption of Units shall be prohibited:
(i) during any period where the Fund has no management company or depositary; and
(ii) where the Management Company or the Depositary Bank is put into liquidation or declared bankrupt or seeks an arrangement with the creditors, a suspension of payment or a controlled management or is the subject of similar proceedings.

PRICES

The issue price per unit of a sub-fund is determined by STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch in its role as Administrator on behalf of the Management Company:

- for daily calculated NAV: on the basis of the net asset value calculated on the day of the settlement of the corresponding amounts;

To determine the issue price, it may be added to the net asset value as referred to above, charges, taxes and stamp duties required, as the case may be.

Units will be redeemed at a price based on the NAV calculated for the relevant valuation date less any applicable redemption charge.

Data relating to the determination of the net asset value as well as to the issue, redemption and Switch prices and potential suspension of net asset value are made available every Business Day in Luxembourg at the office of the Depositary Bank and on the website of the Management Company at https://www.fideuramassetmanagement.ie/en/products/funds/. The Management Company may discontinue such publication or undertake publications in other media at its sole discretion.

Historical performance is available at the registered office of the Management Company during normal business hours.

18) DATA PROTECTION

In accordance with the provisions of the personal data protection laws (Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (or "**GDPR**"), entered into force on May 25, 2018, and any Luxembourg relevant laws), Investors are informed that the Management Company collects, uses, stores and

otherwise processes personal data as described in the Information Notice with respect to natural persons pursuant to Articles 13 and 14 of the GDPR available on https://www.fideuramassetmanagement.ie/en/policy/.

More information about how personal data are processed, as well as the relevant contact details, are disclosed in the Subscription Form from each authorized distributor.

19) BENCHMARK REGULATION

The Board of Directors decides the investment policy of each sub-fund, taking into account for certain of them, specific reference parameters (referred to as "**benchmark**"), mentioned in the investment policy, made up of an index worked out by widely recognized providers allocated to most of the sub-funds.

When mentioned in the investment policy unless otherwise specified, the benchmark is used for both performance measurement and portfolio construction of the relevant sub-funds as further described in the investment policy.

In respect of those sub-funds that track a benchmark index, or are managed by reference to a benchmark index, or use a benchmark index to compute a performance fee if applicable, the benchmark administrators providing benchmark indices to the relevant sub-funds may be located outside the European Union (the "**Non-EU Benchmark Administrators**") and thus are required to be registered in accordance with articles 32 to 33 of the Regulation (EU) 2016/1011 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds (the "**Benchmark Regulation**") and to be included in the third country benchmark register maintained by ESMA (the "**ESMA Register**").

The regulation (EU) 2021/168 of the European Parliament and of the Council of 10 February 2021 modified article 51 of the Benchmark Regulation, allowing Non-EU Benchmarks Administrators to register in the ESMA Register before December 31, 2025 (the "**Extended Transitional Period**"). Unless otherwise disclosed in this Prospectus, the indices or benchmarks used within the meaning of the Benchmark Regulation by the sub-funds are, as at the date of this Prospectus, provided by benchmark administrators who either appear on the ESMA Register or benefit from the Extended Transitional Period and accordingly may not appear yet on the ESMA Register.

At the date of the Prospectus, the administrators of benchmarks used by the Fund and who have been included in the ESMA Register pursuant to the Benchmark Regulation are as follows:

Benchmark administrators	**Location**	**Sub-fund**
S&P Dow Jones Indices LLC	United States of America	WILLERFUNDS – PRIVATE SUITE – T. ROWE PRICE EQUITY US RESEARCH
MSCI Limited	United Kingdom	WILLERFUNDS – PRIVATE SUITE – WILLEREQUITY SWITZERLAND; WILLERFUNDS – PRIVATE SUITE – MILLENNIALS EQUITY; WILLERFUNDS – PRIVATE SUITE – LOMBARD ODIER NATURAL CAPITAL; WILLERFUNDS – PRIVATE SUITE – JPM EUROPE EQUITY; WILLERFUNDS – PRIVATE SUITE – VONTOBEL EQUITY GLOBAL IMPACT; WILLERFUNDS – PRIVATE SUITE – FIDELITY GLOBAL EQUITY INCOME;

		WILLERFUNDS – PRIVATE SUITE – M&G EUROPEAN STRATEGIC VALUE.

The below mentioned Non-EU Benchmark Administrators benefit from the Extended Transitional Period to registered in accordance with the Benchmark Regulation and to be included in the ESMA Register:

- Bloomberg Index Services Limited;
- FTSE International Limited;
- ICE Data Indices LLC.

The Management Company will monitor that the applicable benchmark administrators register within the Extended Transitional Period and will update accordingly and as appropriate this Prospectus and Management Regulations.

In accordance with the Benchmark Regulation, the Management Company has put in place a plan setting out the actions to be followed in the event that a benchmark materially changes or ceases to be provided ("**Benchmark Continuity Plan**").

Details of the Benchmark Continuity Plan are available on the website: https://www.fideuramassetmanagement.ie/en/policy/

With the purpose of optimizing the management of these sub-funds, the Management Company may substitute the benchmark already allocated with another one linked to the same investment policy.

20) MONEY LAUNDERING PREVENTION AND BENEFICIAL OWNERS

ANTI-MONEY LAUNDERING AND PREVENTION OF TERRORIST FINANCING

In accordance with international regulations and Luxembourg laws and regulations (including, but not limited to, the Law of 12 November 2004 on the fight against money laundering and financing of terrorism, as amended the Grand Ducal Regulation dated 1 February 2010, CSSF Regulation 12-02 of 14 December 2012, CSSF Circulars 13/556 and 15/609 concerning the fight against money laundering and terrorist financing, and any respective amendments or replacements) (the "**AML Rules**"), obligations are imposed inter alia on the Fund, the Management Company and its service providers as applicable (the "**AML Obligations**"). Each of them have in place their AML policy.

In accordance with the AML Rules and AML policy, a "responsable du contrôle du respect des obligations" (the "**RC**") is appointed to ensure the compliance of the Fund with the AML Rules.

The AML Obligations include among others, identification procedure which will be apply by STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch in its capacity of Administrator Paying Agent in the case of subscriptions received by the Administrator and Paying Agent, and in the case of subscriptions received by the distributors, the Sales Agents or the Paying Agent or by any intermediary.

The Administrator and Paying Agent may request any such additional documents, as it deems necessary to establish the identity of Investors or beneficial owners.

Any information provided to the Management Company, the Administrator, the Paying Agent, the Sales Agents or the authorized distributors in this context is collected for anti-money laundering compliance purposes only.

LUXEMBOURG REGISTER OF BENEFICIAL OWNERS

The Luxembourg law of 13 January 2019 creating a register of beneficial owners (the "RBO Law") entered into force on 1 March 2019. According to the provisions of the RBO Law, each entity registered in Luxembourg with the Luxembourg companies register (Registre de Commerce et des Sociétés), including the Fund, has to identify its beneficial owners ("Beneficial Owners"). The Fund

must register Beneficial Owner-related information with the Luxembourg register of beneficial owners, which is established under the authority of the Luxembourg Ministry of Justice.

The RBO Law broadly defines a Beneficial Owner as any natural person(s) who ultimately owns or controls the relevant entity through direct or indirect ownership of a sufficient percentage of the Units (more than 25%) or voting rights or ownership interests in the entity (as applicable), or through control via other means, other than a company listed on a Regulated Market that is subject to disclosure requirements consistent with European Union law or subject to equivalent international standards which ensure adequate transparency of ownership information.

In case the Beneficial Owner criteria are fulfilled by an investor with regard to the Fund, this investor and/or nominee is obliged by the RBO Law to provide the required supporting documentation and information necessary for the Fund to fulfil its obligations under the RBO Law.

Failure by the Fund and the relevant Beneficial Owners to comply with their respective obligations deriving from the RBO Law will be subject to criminal fines.

Pursuant to judgments of the European Court of Justice in Joined Cases C-37/20 and C-601/20, access to the website of the register of beneficial owners has been removed for the general public. Certain professionals (as defined in the RBO Law), as well as certain other persons with a legitimate interest (such as certain journalists) shall continue to have access to such information through the website of the register of beneficial owners, to the extent required by and subject to the conditions of Luxembourg anti-money laundering laws and regulations.

21) TAXATION

The following information is based on the laws, regulations, decisions and practice currently in force in Luxembourg and is subject to changes therein, possibly with retrospective effect. This tax section is a short summary of certain Luxembourg tax principles that may be or may become relevant with respect to the investments in the Fund. IT DOES NOT PURPORT TO BE A COMPREHENSIVE DESCRIPTION OF ALL LUXEMBOURG TAX LAWS AND CONSIDERATIONS THAT MAY BE RELEVANT TO A DECISION TO INVEST IN, OWN, HOLD, OR DISPOSE OF UNITS. IT DOES NOT CONSTITUTE AND SHOULD NOT BE CONSIDERED AS TAX ADVICE TO ANY PARTICULAR INVESTOR OR POTENTIAL INVESTOR. Prospective Investors should consult their own professional advisers as to the implications of buying, holding or disposing of Units and to the provisions of the laws of the jurisdiction in which they are subject to tax. This summary does not describe any tax consequences arising under the laws of any state, locality or other taxing jurisdiction other than Luxembourg.

A) CONCERNING THE FUND

- in the Grand Duchy of Luxembourg:

The Fund is, in principle, only subject to a subscription tax (taxe d'abonnement) levied at the rate of 0.05% per annum based on its net asset value at the end of the relevant quarter, calculated and paid quarterly.

A reduced subscription tax rate of 0.01% per annum is applicable to:

- the Fund or individual sub-funds provided that are authorised as money market funds in accordance with Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017 on money market funds;
- the Fund's sub-funds or Classes of Units where the Units of those sub-funds or Classes are only held by one or more Institutional Investors.

As from 1 January 2021, the Fund or its sub-funds, may benefit from reduced subscription tax rates depending on the value of its net assets invested in economic activities that qualify as environmentally sustainable within the meaning of Article 3 of EU Regulation 2020/852 of 18 June 2020 (the "**Qualifying Activities**") except for the proportion of net assets of the Fund or of an sub-fund invested in economic activities as referred to in sections 4.26, 4.27, 4.28, 4.29, 4.30, 4.31 of

the annexes I and II to Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852. The reduced subscription tax rates would be of:

- 0.04% if at least 5% of the total net assets of the Fund, or of its sub-fund, are invested in Qualifying Activities;
- 0.03% if at least 20% of the total net assets of the Fund, or of its sub-fund, are invested in Qualifying Activities;
- 0.02% if at least 35% of the total net assets of the Fund, or of its sub-fund, are invested in - Qualifying Activities; and
- 0.01% if at least 50% of the total net assets of the Fund, or of its sub-fund, are invested in Qualifying Activities.

The subscription tax rates mentioned above would only apply to the net assets invested in Qualifying Activities.

A subscription tax exemption applies to:
- the portion of the Fund's assets (pro rata) invested in a Luxembourg UCI subject itself to the subscription tax;
- the Fund and its sub-funds where (i) the securities are only held by Institutional Investor(s), and (ii) that are authorised as short-term money market funds in accordance with Regulation (EU) 2017/1131, and (iii) the securities have obtained the highest possible rating from a recognised rating agency. If several Classes of Units are in issue in the Fund or relevant sub-funds, only those Classes of Units meeting (i) above will benefit from this exemption;
- the Fund and its sub-funds whose securities are reserved for (i) institutions for occupational retirement pension or similar investment vehicles, set up on one or more employers' initiative for the benefit of their employees and (ii) companies of one or more employers investing funds they hold, to provide retirement benefits to their employees and (iii) savers in the framework of a pan-European personal pension product governed by Regulation (EU) 2019/1238 on a pan-European Personal Pension Product. Where several Classes of Units are in issue in the Fund or sub-fund, the exemption shall only apply to Classes whose securities are reserved for the Investors referred to in points (i), (ii) and (iii);
- the Fund as well as its sub-funds if their main objective is the investment in microfinance institutions;
- the Fund as well as its sub-funds if (i) the securities issued by the Fund or its sub-funds are listed or traded on at least one stock exchange or another Regulated Market operating regularly, recognized and open to the public and (ii) their exclusive object is to replicate the performance of one or more indices. If several Classes of Units are in issue in the Fund or sub-fund meeting (ii) above, only those Classes of Units meeting (i) above will benefit from this exemption; and
- the Fund and its sub-funds that are authorised as European long-term investment funds within the meaning of Regulation (EU) 2015/760 of the European Parliament and of the Council of 29 April 2015 on European long-term investment funds.

Withholding Tax

Investor withholding tax

Distributions made by the Fund as well as capital gains realised on a disposal or a redemption of Units are not subject to withholding tax in Luxembourg.

Withholding tax in source countries

Interest and dividend income received by the Fund may be subject to non-recoverable withholding tax in the source countries. Furthermore, realised or unrealised capital appreciation of the Fund's assets may be subject to tax in the countries of origin. However, as a result of the tax transparency of the Fund, an exemption or a reduced tax rate may be available based on the double tax treaty entered into between the countries of the Investments and the Investor's tax residence.

- in other countries:

The Fund is subject, in the countries where it is authorized to place its shares, to the tax regime applicable to mutual investment funds; the Fund receives the benefits deriving from securities in its portfolio, net of any possible taxation at source in the various countries.

B) CONCERNING THE INVESTOR

- Luxembourg Resident Investors:

Individual Investors

A Luxembourg resident individual Investor is in principle subject to Luxembourg personal income tax levied at progressive rates in respect of his/her share of profits in the Fund.

However, as a result of the tax transparency of the Fund, dividends received through the Fund may benefit from a 50% exemption if such dividends are paid by a fully taxable company resident in a European Union (EU) Member State or a State that has concluded a tax treaty with Luxembourg.

Capital gains realised by a resident individual Investor who acts in the course of the management of his/her private wealth upon the disposal (i) of Units or (ii) by the Fund of a participation, are not subject to income tax, unless said capital gains qualify either as speculative gains or as gains on a substantial participation:

- Speculative gains are subject to income tax at progressive rates if the Units are disposed of within six (6) months after their acquisition.

- Capital gains realised on a substantial participation more than six (6) months after the acquisition thereof are taxed at half the average combined tax rate.

Corporate Investors

A resident corporate Investor will in principle be subject to corporate income tax, municipal business tax and an employment fund surcharge at ordinary rates ("**Corporation Taxes**"), in respect of its share of profits in the Fund.

However, as a result of the tax transparency of the Fund, dividends received from entities held through the Fund or gains realised on the sale of participations held through the Fund may benefit from a full exemption from Corporations Taxes if the conditions of the Luxembourg participation exemption as set forth in Article 166 of the Luxembourg income tax law and Article 1 of the Grand Ducal Decree dated 21 December 2001 are met. Dividends may otherwise benefit from a 50% exemption if such dividends are paid through the Fund by a fully taxable company resident in a EU Member State or a State that has concluded a tax treaty with Luxembourg.

Luxembourg corporate resident Investors which benefit from a special tax regime, such as, for example, (i) UCI subject to the 2010 Law, (ii) specialized investment funds subject to the law of 13 February 2007 relating to specialized investment funds, (iii) reserved alternative investment funds subject to the law of 23 July 2016 relating to reserved alternative investment funds, (not opting for the treatment as a venture capital vehicle for Luxembourg tax purposes) or (iv) family wealth management companies subject to the law of 11 May 2007 related to family wealth management companies, are exempt from Corporation Taxes in Luxembourg and are instead subject to an annual subscription tax (taxe d'abonnement).

The assets held through the Fund shall be part (pro rata) of the taxable net wealth of the Luxembourg resident corporate Investor subject to net wealth tax levied on a yearly basis at a rate of 0.5%. A reduced rate of 0.05% is available for the part of the net wealth exceeding EUR 500,000,000.

Participations held through the Fund may be exempt from net wealth tax subject to the participation exemption conditions set forth by Paragraph 60 of the Law of 16 October, 1934 on the valuation of assets (Bewertungsgesetz).

Investors which are amongst others (i) UCI subject to the 2010 Law, (ii) a vehicle governed by the law of 22 March 2004 on securitisation, (iii) companies governed by the law of 15 June 2004 on venture capital vehicles, (iv) specialized investment funds subject to the law of 13 February 2007 relating to specialized investment funds, (v) reserved alternative investment funds subject to the law of 23 July 2016, relating to reserved alternative investment funds, (vi) family wealth management companies subject to the law of 11 May 2007 related to family wealth management companies or (vii) professional pension institutions governed by the law of 13 July 2005 on institutions for

occupational retirement provision in the form of pension savings companies with variable capital and pension savings associations, are exempt from net wealth tax.

A minimum net wealth tax may however be due under certain circumstances by certain resident corporate Investors.

- Non-Resident Investors

Non-resident Investors without a permanent establishment, a permanent representative, or a fixed place of business in Luxembourg to which the Units are attributable, are not, in principle, subject to any capital gains tax, income tax, withholding tax or net wealth tax in Luxembourg.

As a result of the tax transparency of the Fund, a non-resident Investor could, however, be subject to Luxembourg taxation on capital gains (unless a tax treaty provides otherwise) if such an Investor holds a substantial participation through the Fund in a Luxembourg company which is transferred or redeemed (i) less than six (6) months after its acquisition or (ii) more than six (6) months after its acquisition, and where the Investor has been a Luxembourg resident taxpayer for more than fifteen (15) years but became a non-resident taxpayer fewer than five (5) years before the transfer/redemption took place.

Residence

An Investor will not become resident, or deemed to be resident, in Luxembourg by reason only of holding the Units.

Foreign Account Tax Compliance Act

The Foreign Account Tax Compliance Act ("**FATCA**") requires financial institutions outside the U.S. ("foreign financial institutions" or "**FFIs**") to pass information about "Financial Accounts" held by "Specified U.S. Persons", directly or indirectly, to the U.S. tax authorities (the Internal Revenue Service, "**IRS**") on an annual basis. A 30% withholding tax is imposed on certain U.S. source income of any FFI that fails to comply with this requirement.

On 28 March 2014, the Grand Duchy of Luxembourg entered into a Model 1 Intergovernmental Agreement ("**Luxembourg IGA**") with the United States of America and a memorandum of understanding in respect thereof. The Fund would hence have to comply with this Luxembourg IGA as implemented into Luxembourg law by the Law of 24 July 2015 relating to FATCA ("**FATCA Law**") in order to comply with the provisions of FATCA rather than directly complying with the U.S. Treasury Regulations implementing FATCA. Under the FATCA Law and the Luxembourg IGA, the Fund may be required to collect information aiming to identify its financial account holders (including certain entities and their controlling persons) that are Specified U.S. Persons for FATCA purposes ("**FATCA Reportable Accounts**"). Any such information on FATCA Reportable Accounts provided to the Fund will be shared with the Luxembourg tax authorities (Administration des Contributions Directes) which will exchange that information on an automatic basis with the IRS.

The Fund intends to comply with the provisions of the FATCA Law and the Luxembourg IGA to be deemed compliant with FATCA and will thus not be subject to the 30% withholding tax with respect to its share of any such payments attributable to actual and deemed U.S. investments of the Fund. The Fund will continually assess the extent of the requirements that FATCA, and notably the FATCA Law, place upon it.

To ensure the Fund's compliance with FATCA, the FATCA Law and the Luxembourg IGA in accordance with the foregoing, the Management Company, in its capacity as the Fund's management company, may:

a) request information or documentation, including W-9 or W-8 tax forms, a Global Intermediary Identification Number, if applicable, or any other valid evidence of an Investor's FATCA registration with the IRS or a corresponding exemption, in order to ascertain that Investor's FATCA status;

b) report information concerning an Investor and his/her/its account holding in the Fund to the Luxembourg tax authorities (Administration des Contributions Directes) if such account is deemed a FATCA Reportable Account under the FATCA Law and the Luxembourg IGA;

c) deduct applicable U.S. withholding taxes from certain payments made to an Investor by or on behalf of the Fund in accordance with FATCA, the FATCA Law and the Luxembourg IGA; and
d) divulge any such personal information to any immediate payer of certain U.S. source income as may be required for withholding and reporting to occur with respect to the payment of such income.

By investing in the Fund, the Investors acknowledge that (i) the Fund is responsible for the treatment of the personal data provided for in the FATCA Law; (ii) the personal data will inter alia be used for the purposes of the FATCA Law; (iii) the personal data may be communicated to the Luxembourg tax authorities (Administration des Contributions Directes) and to the IRS; (iv) responding to FATCA-related questions is mandatory; and (v) the Investors have a right of access to and rectification of the data communicated to the Luxembourg tax authorities (Administration des Contributions Directes).

The Management Company, in its capacity as the Fund's management company, reserves the right to refuse any subscription for Units if the information provided or not provided does not satisfy the requirements under FATCA, the FATCA Law and the Luxembourg IGA.

Prospective Investors should consult their professional advisor on the individual impact of FATCA.

Automatic Exchange of Information

CRS

The Organisation for Economic Co-operation and Development ("**OECD**") has developed a common reporting standard ("**CRS**") to achieve a comprehensive and multilateral automatic exchange of information on a global basis.

On 29 October 2014, Luxembourg signed the OECD's multilateral competent authority agreement ("**Multilateral Agreement**") to automatically exchange information under the CRS. On 9 December 2014, Council Directive 2014/107/EU amending Directive 2011/16/EU as regards mandatory automatic exchange of information in the field of taxation ("**DAC2**") was adopted to implement the CRS among the EU Member States. The CRS and the DAC2 were implemented into Luxembourg law by the law of 18 December 2015 on the automatic exchange of financial account information in the field of taxation ("**CRS Law**").

The CRS Law requires Luxembourg financial institutions to identify their financial account holders (including certain entities and their controlling persons) and establish if they are fiscally resident in (i) an EU Member State other than Luxembourg or (ii) a jurisdiction which has signed the Multilateral Agreement and which is identified in the list of reportable jurisdictions published by Grand Ducal Decree ("**CRS Reportable Accounts**"). The first official list of CRS reportable jurisdictions was published on 24 March 2017 and is updated from time to time. Luxembourg financial institutions will then report the information on such CRS Reportable Accounts to the Luxembourg tax authorities (Administration des Contributions Directes), which will thereafter automatically transfer this information to the competent foreign tax authorities on a yearly basis.
Accordingly, the Management Company, in its capacity as the Fund's management company, may require its Investors to provide information or documentation in relation to the identity and fiscal residence of financial account holders (including certain entities and their controlling persons) in order to ascertain their CRS status; and report information regarding an Investor and his/her/its account holding in the Fund to the Luxembourg tax authorities (Administration des Contributions Directes) if such an account is deemed a CRS Reportable Account under the CRS Law.

By investing in the Fund, the Investors acknowledge that (i) the Fund is responsible for the treatment of the personal data provided for in the CRS Law; (ii) the personal data will inter alia be used for the purposes of the CRS Law; (iii) the personal data may be communicated to the Luxembourg tax authorities (Administration des Contributions Directes) and to the tax authorities of CRS reportable jurisdictions; (iv) responding to CRS-related questions is mandatory; and (v) the Investors have a right of access to and rectification of the data communicated to the Luxembourg tax authorities (Administration des Contributions Directes).

The Management Company, in its capacity as the Fund's management company, reserves the right to refuse any subscription for Units if the information provided or not provided does not satisfy the requirements under the CRS Law.

Prospective Investors should consult their professional advisor on the individual impact of the CRS.

DAC6

On 25 May 2018, the EU Council adopted a directive (2018/822 amending Directive 2011/16/EU as regards mandatory automatic exchange of information in the field of taxation) that imposes a reporting obligation on parties involved in transactions that may be associated with aggressive tax planning ("**DAC6**"). DAC6 has been implemented in Luxembourg by the law of 25 March 2020 (the "**DAC6 Law**").

More specifically, the reporting obligation will apply to cross-border arrangements that, among others, meet one or more "hallmarks" provided for in the DAC6 Law that is coupled in certain cases, with the main benefit test (the "**Reportable Arrangements**").

In the case of a Reportable Arrangement, the information that must be reported includes inter-alia the name of all relevant taxpayers and intermediaries as well as an outline of the Reportable Arrangement, the value of the Reportable Arrangement and identification of any Member State likely to be concerned by the Reportable Arrangement.

The reporting obligation in principle rests with the persons that design, market, organise make available for implementation or manage the implementation of the Reportable Arrangement or provide assistance or advice in relation thereto (the so-called "intermediaries"). However, in certain cases, the taxpayer itself can be subject to the reporting obligation.

Starting from January 1, 2021, Reportable Arrangements must be reported within thirty (30) days from the earliest of (i) the day after the Reportable Arrangement is made available for implementation or (ii) the day after the Reportable Arrangement is ready for implementation or (iii) the day when the first step in the implementation of the Reportable Arrangement has been made.

The information reported will be automatically exchanged between the tax authorities of all Member States.
In light of the broad scope of the DAC6 Law, transactions carried out by the Fund may fall within the scope of the DAC6 Law and thus be reportable.

22) FISCAL YEAR AND REPORTS

Financial periods of the Fund end on 31 August in each year.

The accounts of the Fund shall be audited by Ernst & Young, *société anonyme*, 35E, Avenue John F. Kennedy, L–1855 Luxembourg, Grand Duchy of Luxembourg.

For the establishment of the consolidated accounts, which shall be expressed in EURO, the assets of the sub-funds in their reference currency shall be converted into EURO.

The audited annual report published within four (4) months following the end of the fiscal year, as well as all semi-annual reports, published within two (2) months following the end of the concerned period, will be available to the unitholders at the registered offices of STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch in its role as Administrator, and of all Sales Agents.

23) INFORMATION AVAILABLE TO UNITHOLDERS

The following documents shall be filed at the registered office of the Management Company and at the registered office of STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch, in its role as Administrator of the Fund, where they may be consulted:

- the articles of incorporation of the Management Company;
- the Management Regulations;
- the KID;
- the agreement between the Management Company and the Depositary Bank;
- the agreements between the Management Company and the Administrator, Paying Agent;
- the agreements between the Management Company and the Investment Managers;
- the agreements between the Management Company and other Paying Agents or Sales Agents, which may be appointed from time to time; and
- the periodic financial reports.

Copies of the Management Regulations, the KID for the sub-funds and or Unit Classes, and the latest annual and half-yearly reports can be obtained free of charge at the registered office of STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch, in its role as Administrator of the Fund and at the Fund's representatives and at the Management Company's registered offices. Copies of the other documents mentioned above can be obtained from the same registered offices free of charge.

In accordance with the legal and regulatory provisions in effect, additional information is available to unitholders at the Management Company's registered office, on request. This information primarily concerns the procedures in place for handling complaints, the strategy implemented regarding the exercise of voting rights by the Management Company, the policies for placing trades with other entities on behalf of the Fund, and for best execution or safeguarding the Fund's interests.

Persons who wish to receive further information regarding the Fund or to raise a complaint regarding the Fund are invited to contact the Management Company's registered office.

Notices to unitholders are sent to the unitholders, published on a website or in newspapers, if necessary or as required.
Data relating to the determination of the Net Asset Value as well as to the issue, redemption and Switch prices and potential suspension of Net Asset Value are made available every Business Day in Luxembourg at the office of the Depositary Bank and on the website of the Management Company at https://www.fideuramassetmanagement.ie/en/products/funds/.

INFORMATION FOR INVESTORS IN SWITZERLAND

1. Representative & Paying Agent

The representative and paying agent in Switzerland is:

REYL & Cie Ltd, rue du Rhône, 4, CH-1204 Geneva, Switzerland

2. Location where the relevant documents may be obtained

The Fund's Prospectus, the KID, the consolidated Management Regulations, and the Fund's annual report and half-yearly report may be obtained from the representative in Switzerland free of charge.

3. Publications

Publications concerning the Fund shall be published in Switzerland on the electronic platform of FE-Fundinfo (www.fundinfo.com).

The issue and redemption prices or the Net Asset Values together with a reference stating "excluding commissions" of all relevant Units Classes are published daily on the www.fundinfo.com website.

4. Payment of retrocessions and rebates

The Management Company and its agents may pay retrocessions as remuneration for distribution activity in respect of Fund Units in Switzerland. This remuneration may be deemed payment for the following services, including, but not limited to:

- investor onboarding, suitability assessment and know-your-customer procedures;
- provision of pre-contractual documents, information and assistance to Investors;
- placement of sub-funds' Units;
- after-sales assistance.

Retrocessions are not deemed to be rebates even if they are ultimately passed on, in full or in part, to the Investors.

Disclosure of the receipt of retrocessions is based on the applicable provisions of the Financial Services Act (FinSA).

In the case of distribution activity in Switzerland, the Management Company and its agents may, upon request, pay rebate directly to Investors. The purpose of rebates is to reduce the fees or costs incurred by the investor in question. Rebates are permitted provided that:

- they are paid from fees received by the Management Company and therefore do not represent an additional charge on the Fund assets;
- they are granted on the basis of objective criteria;
- all Investors who meet these objective criteria and demand rebates are also granted;
- these within the same timeframe and to the same extent.

The objective criteria for the granting of rebates by the Management Company are as follows:

- the volume subscribed by the investor or the total volume they hold in the collective investment scheme or, where applicable, in the product range of the promoter;
- the amount of the fees generated by the investor;
- the investment behavior shown by the investor (e.g. expected investment period);
- the investor's willingness to provide support in the launch phase of a collective investment scheme.

At the request of the investor, the Management Company must disclose the amounts of such rebates free of charge.

5. Place of performance and jurisdiction

In respect of the Units offered in Switzerland, the place of performance is the registered office of the representative in Switzerland. The place of jurisdiction is at the registered office of the representative in Switzerland or at the registered office/place of residence of the investor.

6. Miscellaneous

The risks relating to the Fund are measured at the level of each sub-fund on an individual basis, according to the so-called "commitment approach" or the "Value-at-Risk" methodology as the case may be.

24) DISSOLUTION OF THE FUND – DISSOLUTION OF SUB-FUNDS – MERGER OF SUB-FUNDS

The Fund is established for an unlimited duration; it may be dissolved at any time with the mutual approval of the Management Company and the Depositary Bank.

Moreover, the Fund shall be liquidated in the cases provided for in Article 22 of the 2010 Law.

The event, which entails the state of liquidation, shall be published by the Management Company in the RESA. It shall also be published in at least two (2) newspapers with adequate circulation, one of which at least shall be a Luxembourg newspaper.

No unit shall be issued, redeemed or switched as from the occurrence of the event giving rise to the state of liquidation of the Fund.

The Management Company shall dispose of the assets of the Fund in the best interest of the unitholders, and the Depositary Bank shall distribute the net liquidation proceeds to the unitholders, after deducting charges and expenses for the liquidation. Such proceeds shall be distributed proportionally to the Units, in accordance with the instructions of the Management Company. The net liquidation proceeds that are not distributed to the unitholders at the closing of the liquidation shall be deposited with the Caisse de Consignations in Luxembourg until the end of the period of the legal prescription.

The Management Company may decide to liquidate a sub-fund in case of events which are out of its control, such as changes in the political, economic or monetary situation affecting the Fund or when the net asset of a sub-fund falls below 25,000,000.- EURO (twenty-five million EURO).

When the Management Company decides to liquidate a sub-fund, no Units of this sub-fund shall be issued.

In waiting for the implementation of the decision of liquidation, the Management Company shall continue to redeem Units of the concerned sub-fund. To do so, the Management Company shall base the redemption on the Net Asset Value established in order to take into account the liquidation expenses but without deduction of redemption fees. The Management Company shall redeem the Units of the sub-fund and shall repay the unitholders proportionally to the number of Units held. The net liquidation proceeds, which shall not be distributed, shall be deposited with the *Caisse de Consignations of Luxembourg.*

The Management Company may decide to merge two or several sub-funds of the Fund or to contribute one or several sub-funds to another Luxembourg or foreign UCITS in case of changes in the economic, political or monetary situation or when the net asset of a sub-fund falls below 25,000,000. - EURO (twenty-five millions EURO) and such merger/contribution will be realized in accordance with Chapter 8 of the 2010 Law. The Management Company will decide on the effective date of the merger of the Fund with another UCITS pursuant to article 66 (4) of the 2010 Law. Notice of any mergers shall be sent to unitholders. Holders of Units in the sub-funds in question may, for a period established by the Board of Directors – which may be no less than one month and shall be indicated in the notice to unitholders – request that their Units be redeemed free of charge.

Any sub-fund of the Fund that qualifies as a Feeder sub-fund shall be liquidated:

1) if its Master UCITS is liquidated, unless the CSSF approves:
   a) The investment of at least 85% of the assets of the Feeder sub-fund in units of another Master UCITS; or
   b) Its conversion into a sub-fund which is not a Feeder sub-fund.

2) if its Master UCITS is divided into two or more UCITS or merged with another UCITS, unless the CSSF approves:
   a) That the Feeder sub-fund continues to be a feeder of the Master UCITS or of another UCITS resulting from the merger or division of the Master UCITS;
   b) The investment of at least 85% of the assets of the Feeder sub-fund in units of another Master UCITS; or
   c) Its conversion into a sub-fund which is not a Feeder sub-fund.

Without prejudice to specific provisions regarding compulsory liquidation, the liquidation of a sub-fund of the Fund being a Master sub-fund shall take place no sooner than three (3) months after the Master sub-fund has informed all of its unitholders and the CSSF of the binding decision to liquidate.

Where a sub-fund of the Fund has been established as a Master sub-fund, no merger or division shall become effective, unless the Master sub-fund has provided all of its unitholders and the competent authorities of the home Member State of the European Union (the "Member State") with the

information required by law. Unless the CSSF or the competent authorities of the Member State of the Feeder UCITS, as the case may be, have granted the Feeder-UCITS approval to continue to be a Feeder-UCITS of the Master sub-fund resulting from the merger or division of such master sub-fund, the Master sub-fund shall enable the Feeder UCITS to repurchase or redeem all units in the Master sub-fund before the merger or division becomes effective.

25) INVESTMENT POLICY

Transferable securities and money market instruments admitted to the official listing on a stock exchange in a non-Member State of the European Union or dealt in an another market of a non-Member State of the European Union which is regulated, operates regularly, recognized and open to the public: namely a stock exchange or another Regulated Market in any country of America, Europe, Africa, Asia and Oceania.

1. Use of financial derivatives instruments

Commitments arising from financial derivatives must not exceed the amount of the Net Asset Value of the sub-fund concerned at any time.

Investors' attention is drawn to the fact that a sub-fund may use financial derivatives up to an amount equivalent to 100% of its net assets. As a result, the overall risk relating to investments in the sub-fund may amount to 200% of its net assets. Given the possible use of borrowings amounting to 10% of net assets, the overall risk may therefore amount to 210% of a sub-fund's net assets.

The aim of using these financial derivatives is to supplement or obtain exposure, in accordance with the investment policy concerned. Specifically, financial derivatives like options, index futures, and forward contracts, etc. are used from time to time for the purpose of hedging market or currency risk. The same instruments can be used to create exposure to the underlying asset, as part of the investment policy.

The use of financial derivatives can be advantageous. The Management Company acting for the Fund will always use them according to the principle of prudence, for the effective management of the sub-fund, and for hedging and potentially policy purposes. In the last case, the investment policy of the sub-fund concerned will be adjusted.

The counterparties to the transactions will be financial institutions that are highly ranked for this type of transactions and are subject to prudential oversight; they will be selected in accordance with their reputation, their rating by credit rating agencies and any other information from independent sources that enables the credit risk for these financial institutions to be assessed.

a) Warning regarding the risks associated with financial derivatives

However, financial derivatives may include risks that are different, and in some cases higher than the risks relating to conventional investments. These risks include:

- market risk, which applies to all types of investment, given that the use of derivative products requires not only an understanding of the basic instruments but also of the actual derivative products, without however, offering the possibility of being able to observe the performance of the derivative products under all possible market conditions;

- credit risk, if another stakeholder in a financial derivative does not comply with the provisions of the contract. The credit risk for financial derivatives that are traded on a stock exchange is generally lower than the risk relating to financial derivatives traded over-the-counter, as the clearing house acting in the capacity of issuer or counterparty for each financial derivative traded on a stock exchange guarantees its performance. To reduce the overall risk of loss, this guarantee is supported by a daily payment system, i.e. by the coverage requirements maintained by the clearing house. The clearing house offers no comparable guarantees for financial derivatives traded over-the-counter, and the Management Company must take the solvency of each counterparty to a financial derivative traded over-the-counter into account when assessing the potential credit risk;

- liquidity risk, as some financial derivatives are hard to purchase or sell. If transactions in a financial derivative are particularly significant, or if the corresponding market is illiquid (as is the case for many financial derivatives traded over-the-counter), transactions may not be performed, or a position may not be liquidated at a favourable price;

- the risk of determining the price or valuing financial derivatives, as well as

- the risk arising from the imperfect correlation between financial derivatives and their underlying assets, interest-rate and indices. Many financial derivatives are complex, and are often valued on a subjective basis. Inadequate valuations may lead to the payment of higher margin calls to the counterparties, or to a loss of value for the Fund. Financial derivatives are not always directly or concurrently related to the value of the assets, interest rates or indices from which they are derived. This is why the use of financial derivatives does not always represent an efficient way of achieving the company's investment objective, and may even at times have the opposite effect; counterparty risk. This counterparty risk cannot exceed 10% of the Net Asset Value of each sub-fund where the counterparty is a credit institution, or 5% of the Net Asset Value in other cases, as described in the section entitled “Investment Restrictions” below.

b) Special limits relating to credit derivatives

The Fund may carry out transactions on credit derivatives:

- under an ISDA master agreement with first class counterparties specialised in that transaction, evaluated by the Management Company’s internal Counterparty Risk Committee and approved by the Board of Directors,

- where underlying assets comply with the objectives and investment policy of the sub-fund,

- which may be liquidated at any time at their valuation value,

- whose valuation must be reliable and periodically verifiable,

- for hedging purposes or not.

If the credit derivatives are concluded for another purpose than hedging, the following requirements must be fulfilled:

- credit derivatives must be used in the exclusive interest of the Investors by assuming an interesting return balanced against the risks of the Fund and in accordance with the investment objectives,

- investment restrictions in the Prospectus hereafter shall be applied to the issuer of a Credit Default Swap (CDS) and to the risk of the final debtor of the credit derivative (underlying), except if the credit derivative is based on an index,

- the sub-funds must ensure an appropriate and permanent covering of the commitments relating to the CDS in order to be able at any time to meet the redemption requests from Investors.

- Claimed strategies relating to credit derivatives are notably the following (which may, as appropriate, be combined):

- to invest quickly the newly subscribed amounts in an UCI in the credit market via the sale of credit derivatives,

- in case of positive anticipation in the evolution of spreads, to take a credit exposure (global or targeted) thanks to the sale of credit derivatives,

- in case of negative anticipation in the evolution of spreads, to protect or take positions (globally or targeted) by the purchase of credit derivatives.

c) Special limits relating to equity swaps and stock index swaps

The Fund may conclude equity swaps and stock index swaps, in accordance with the investment restrictions in the Prospectus:

- under an ISDA master agreement with first class counterparties specialised in that transaction, evaluated by the Management Company's internal Counterparty Risk Committee and approved by the Board of Directors,

- where the underlying assets comply with the objectives and investment policy of the sub-fund,

- which may be liquidated at any time at their valuation value,

- whose valuation must be reliable and periodically verifiable,

- for hedging purposes or not.

d) Conclusion of "Contracts for Difference" ("CFD")

Each sub-fund may enter into "contracts for difference" ("CFD"). A CFD is an agreement between two parties for the exchange, at the end of the contract, of the difference between the open price and the closed price of the contract, multiplied by the number of Units of the underlying assets specified in the contract. These differences in the settlements are therefore made by payment in cash more than by physical delivery of underlying assets.

When these CFD transactions are carried out for a different purpose than the one of risk hedging, the risk exposure relating to these transactions, together with the global risk relating to other derivative instruments shall not, at any time, exceed the Net Asset Value of the concerned sub-fund.

Particularly, the CFD on transferable securities, on financial index or on swaps shall be used strictly in accordance with the investment policy followed by each sub-fund. Each sub-fund shall ensure an adequate and permanent coverage of its commitments related to CFDs in order to face the redemption requests of unitholders.

e) Intervention on currency markets

Each sub-fund may enter into derivative transactions on currencies (such as forwards, options, futures and swaps) for hedging purposes or intended to take exchange risks within its investment policy without, however, diverting from its investment objectives.

Moreover, for all sub-funds that follow a Benchmark, the Fund may also purchase, respectively sell, forward contracts on currencies within an efficient management of its portfolio in order to maintain the same exposure on currencies as the one of the Benchmark of each sub-fund. These forward contracts on currencies must be within the limits of the Benchmark of the sub-fund in such a way that an exposure in a currency other than the Reference Currency of the sub-fund may not, in principle, be higher than the portion of this currency being part of the Benchmark. The use of these forward contracts on currencies shall be made in the best interest of unitholders.

In addition, all sub-funds that follow a Benchmark, the Fund may also purchase, or sell, forward contracts on currencies in order to protect it against the risk of exchange rate fluctuations with the view to acquire future investments. The hedging purpose of these transactions presupposes the existence of a direct relationship between them and the futures commitments to be covered while taking into account the Benchmark of the sub-funds; consequently, the transactions made in one currency may in principle not exceed in volume the valuation of the aggregate future commitments in that currency nor exceed the presumed period during which such future commitments will be held.

f) Special limits relating to total return swaps or other financial derivative instruments with the same characteristics

A sub-fund may enter into a total return swap, or other financial derivative instruments with the same characteristics, for hedging or investment purposes and in compliance with the investment objective and policy of the concerned sub-fund as per set out in the Prospectus.

The underlying exposures of the financial derivative instruments shall be taken into account to calculate the investment limits laid down in article 52 of the UCITS Directive.

Total return swaps involve the exchange of the right to receive the total return, coupons plus capital gains or losses, of a specified reference asset, index or basket of assets against the right to make fixed or floating payments.

Interest rate swaps involve the exchange by a sub-fund with another party of their respective commitments to pay or receive interest, such as an exchange of fixed rate payments for floating rate payments. Currency swaps may involve the exchange of rights to make or receive payments in specified currencies. Where a sub-fund enters into interest rate swaps or total return swaps on a net basis, the two payment streams are netted out, with each sub-fund receiving or paying, as the case may be, only the net amount of the two payments. Interest rate swaps or total return swaps entered into on a net basis do not involve the physical delivery of investments, other underlying assets or principal. Accordingly, it is intended that the risk of loss with respect to interest rate swaps is limited to the net amount of interest payments that the sub-fund is contractually obligated to make (or in the case of total return swaps, the net amount of the difference between the total rate of return of a reference investment, index or basket of investments and the fixed or floating payments). If the other party to an interest rate swap or total return swap defaults, in normal circumstances the sub-fund's risk of loss consists of the net amount of interest or total return payments that the sub-fund is contractually entitled to receive. In contrast, currency swaps usually involve the delivery of the entire principal value of one designated currency in exchange for the other designated currency. Therefore, the entire principal value of a currency swap is subject to the risk that the other party to the swap will default on its contractual delivery obligations.

The sub-fund entering into a total return swap, or other financial derivative instruments with the same characteristics, may be subject to the risk of counterparty default or insolvency. Such event could affect the assets of the sub-fund and the risk profile of the sub-fund may be increased.

Unless otherwise provided for a specific sub-fund, the counterparty of a total return swap, or other financial derivative instruments with the same characteristics, has no discretion about the composition or management of the UCITS' target investments or the underlying of the financial derivative instruments.

2. Efficient portfolio management techniques ("EMT")

The Management Company may resort to (i) security lending transactions, (ii) total return swaps ("TRS") or to (iii) repurchase transactions/reverse repurchase transactions on behalf of the Fund, under the conditions and within the limits provided by law, the regulations, administrative practice and subject to CSSF Circular 08/356 regarding the rules applicable to UCIs in cases where they use certain techniques and instruments relating to transferable securities and money-market instruments, the CSSF Circular 11/512 and the CSSF Circular 14/592 regarding the ESMA Guidelines for listed funds (ETF) and other issues relating to UCITS (ESMA 2014/937) (as they may be amended or replaced from time to time) and the Regulation (EU) 2015/2365 Of European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012, as amended from time to time (the "SFT Regulation") for the purpose of the efficient management of the portfolio and with a view to increasing the Fund's profits, generate additional revenues or reducing expenses and risks and in compliance with the investment objectives and policies of the relevant sub-funds.

If specified in the relevant sub-fund's investment policy, a sub-fund will participate in (i) repurchase transactions / reverse repurchase transactions and / or (ii) securities lending transactions, on a continuous basis and irrespective of specific market conditions that will occur, in order to generate additional revenue.

Entering into TRS, securities lending, repurchase transactions/reverse repurchase transactions may increase the risk profile of the sub-funds.

At the date of the Prospectus, none of the sub-fund enters in reverse repurchase transactions.

None of the sub-funds will use (i) buy-sell back transactions or sell-buy back transactions nor (ii) margin lending transactions.

The maximum and expected portions of the sub-funds' assets that can be subject to i) repurchase transactions / reverse repurchase transactions and (ii) securities lending transactions are disclosed in the sub-funds' respective investment policy.

The described limits allow such transactions activities to be managed efficiently, aiming as far as possible to reach the best results in terms of additional revenues opportunities for the sub-funds, in the best interest of the sub-funds' respective Investors.

The actual portion of the total net assets of a relevant sub-fund engaged into such transactions will vary over time depending, *inter alia*, on market conditions and the demand of the counterparties.

- **Sale with right of repurchase transactions / Reverse repurchase and Repurchase agreement transactions**

A repurchase agreement is a transaction governed by an agreement by which a counterparty transfers securities or guaranteed rights relating to title to securities, and the agreement contains a commitment to repurchase them, or failing that, to repurchase securities with the same characteristics, at a fixed price and at a time fixed by the lender or to be fixed later.

Rights to securities may be the subject of such transaction only if they are guaranteed by a recognized exchange which holds the rights to the securities, and if the agreement does not allow one of the counterparties to transfer or pledge a particular security at the same time to more than one other counterparty; for the counterparty that sells the securities, the transaction is a repurchase agreement, and for the other party that buys it, the transaction is a reverse repurchase agreement.

Each sub-fund may, acting as buyer, agree to purchase securities with a repurchase option (consisting of the purchase of securities with a clause reserving for the seller the right to repurchase the securities sold from the sub-fund at a price and time agreed between the two parties at the time when the contract is entered into) or, acting as seller, agree to sell securities with a repurchase option (consisting of the sale of securities with a clause reserving for the sub-fund the right to repurchase the securities from the purchaser at a price and at a time agreed between the two parties at the time when the contract is entered into); each sub-fund may also enter into reverse repurchase agreement transactions (which consist of a forward transaction at the maturity of which the seller - counterparty - has the obligation to repurchase the asset sold and the sub-fund the obligation to return the asset received under the transaction) and into repurchase agreement transactions (which consist of a forward transaction at the maturity of which the sub-fund has the obligation to repurchase the asset sold and the buyer - the counterparty - the obligation to return the asset received under the transaction).

The involvement of each sub-fund in such transactions is however subject to the regulations set forth in CSSF Circular 08/356, CSSF Circular 14/592 and ESMA Guidelines 2014/937 concerning the rules applicable to UCIs when they use certain techniques and instruments relating to transferable securities and money market instruments, as amended from time to time and the SFT Regulation.

Consequently, each sub-fund must comply with the following rules:

It may enter into these transactions only if the counterparties to these transactions (the "Repo Counterparties") are subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by Community law. Details of the Repo Counterparties (if any) will be disclosed in the Fund's annual report.

During the duration of a purchase with a repurchase option agreement or of a reverse repurchase agreement, it may not sell or pledge/give as security the securities which are the subject of the contract, before the counterparty has exercised its option or until the deadline for the repurchase has expired, unless it has other means of coverage.

It must ensure that it is able, at all times, to meet its redemption obligations towards its unitholders.

Securities that are the subject of purchase with a repurchase option transaction or of reverse repurchase agreements are limited to:

(i) short term bank certificates or money market instruments such as defined in Article 2(1)(o) of Directive 2009/65/EC, and instruments as referred to in Article 3 of Commission Directive 2007/16/EC of 19 March 2007 implementing Council Directive 85/611/EEC on the coordination of laws, regulations and administrative provisions relating to certain UCITS as regards the clarification of certain definitions as defined in Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017 on money market funds (the "Money Market Regulation");

(ii) bonds issued or guaranteed by a Member State of the OECD or by their local public authorities or by supranational institutions and undertakings with EU, regional or world-wide scope;

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

(iv) bonds issued by non-governmental issuers offering an adequate liquidity;

(v) shares quoted or negotiated on a Regulated Market of a European Union Member State or on a stock exchange of a Member State of the OECD, on the condition that these shares are included in a main index.

The securities purchased with a repurchase option or through a reverse repurchase agreement transaction must be in accordance with the Sub-Fund Particulars and must, together with the other securities that it holds in its portfolio, globally comply with its investment restrictions.

- **Securities lending transactions**

A securities lending transaction is a transaction whereby a counterparty transfers securities subject to a commitment that the party borrowing the securities will return the equivalent at a later date or at the request of the transferring party.

Each sub-fund in order to achieve a positive return in absolute terms may enter into securities lending transactions provided that they comply with the regulations set forth in CSSF's Circular 08/356, CSSF's Circular 14/592 and ESMA Guidelines 2014/937 concerning the rules applicable to UCIs when they use certain techniques and instruments relating to transferable securities and money market instruments, as amended from time to time and the SFT Regulation.

Each sub-fund may lend the securities included in its portfolio to a borrower either directly or through a standardized lending system organized by a recognized clearing institution or through a lending system organized by a financial institution subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by Community law and must be evaluated by the Management Company's internal Counterparty Risk Committee and approved by the Board of Directors. In all cases, the counterparty to the securities lending agreement (i.e. the borrower) must be subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by Community law and comply with article 3 of the SFT Regulation. In case the aforementioned financial institution acts on its own account, it is to be considered as counterparty in the securities lending agreement.

Each sub-fund must 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 jeopardize the management of the sub-fund's assets in accordance with its investment policy.

The Management Company of the Fund does not act as securities lending agent.

The Management Company has designated FIDEURAM BANK (LUXEMBOURG) S.A. as securities lending agent for the sub-funds that engage in securities lending transactions (the "Securities Lending Agent") under a securities lending authorization agreement.

The Securities Lending Agent may have securities lending agency agreement in place with sub-agents. Details of such sub-agents will be disclosed in the Management Company's annual report. The Securities Lending Agent is a related party to the Management Company, which could potentially lead to a conflict of interest.

Securities that are subject to securities lending or borrowing are: Equities and Bonds.

3) Sharing return generated by EMT and total return swap or similar instruments

All revenues arising from securities lending activities, net of any direct or indirect operating costs and fees paid to the Securities Lending Agent, shall be returned to the sub-fund and will form part of the Net Asset Value of the sub-fund.

Such remuneration paid to the Securities Lending Agent / sub-agents, as detailed in the Fund's annual report, should not exceed 25% of the gross revenues received on annual basis from the securities lending activities.

All revenues arising from repo/reverse repo shall be returned to the relevant sub-fund and will form part of the Net Asset Value of the sub-fund.

The Fund's annual report will contain additional information on income from efficient portfolio-management techniques and TRS or similar instruments for the sub-funds' entire reporting period, together with details of the sub-funds' direct (e.g. transaction fees for securities, etc.) and indirect (e.g. general costs incurred for legal advice) operational costs and fees (e.g. fees included in the TRS for the underlying management), insofar as they are associated with the management of the corresponding Fund/sub-fund.

The Fund's annual report will provide details on the identity of companies associated with the Management Company or the Depositary Bank of the Fund, provided they receive direct and indirect operational costs and fees.

All income arising from the use of techniques and instruments for efficient portfolio management and TRS or similar instruments, less direct and indirect operational costs, and fees profit to the Fund in order to be reinvested in line with the Fund's investment policy and consequently will positively impact on the performance of the sub-fund.

The counterparties to the agreements on the use of techniques and instruments for efficient portfolio management and TRS or similar instruments will be eligible counterparties as defined above and will be selected according to the Management Company's principles for executing orders for financial instruments (the "best execution policy") and will be disclosed in the Fund's annual report.

The costs and fees to be paid to the respective counterparty or other third party will be negotiated according to market practice.

In principle, and unless otherwise indicated in the Prospectus, the counterparties are not affiliated companies of the Management Company or companies belonging to the promoter's group.

Entering into TRS, securities lending, repurchase/reverse repurchase transactions may increase the risk profile of the sub-funds.

4. Management of collateral for OTC financial derivatives transactions and EMT

As security for any EMT and OTC financial derivatives transactions, the relevant sub-fund will obtain collateral that must at all times meet with the following criteria:

(a) Liquidity: Collateral must be sufficiently liquid in order that it can be sold quickly at a robust price that is close to its pre-sale valuation.

(b) Valuation: Collateral must be capable of being valued on at least a daily basis and must be marked to market daily and may be subject to daily variation margin requirements.

(c) Issuer credit quality: The Fund will ordinarily only accept very high quality collateral.

(d) Correlation – the collateral will be issued by an entity that is independent from the counterparty and is expected not to display a high correlation with the performance of the counterparty.

(e) Collateral diversification (asset concentration) – collateral should be sufficiently diversified in terms of country, markets and issuers. The criterion of sufficient diversification with respect to issuer concentration is considered to be respected if the sub-fund receives from a counterparty of efficient portfolio management and over-the-counter financial derivative transactions a basket of collateral with a maximum exposure to a given issuer of 20% of the sub-fund's net asset value. When a sub-fund is exposed to different counterparties, the different baskets of collateral should be aggregated to calculate the 20% limit of exposure to a single issuer. By way of derogation from this sub-paragraph, a sub-fund may be fully collateralised in different transferable securities and money market instruments issued or guaranteed by a Member State, one or more of its local authorities, a third country, or a public international body to which one or more Member States belong. Such a sub-fund should receive securities from at least six different issues, but securities from any single issue should not account for more than 30% of the sub-fund's net asset value.

(f) Safekeeping: As a principle, assets subject to SFTs become the property of the counterparty of the Fund and the assets of equivalent type will be returned to the Fund at the maturity of the transaction. As a consequence, during the life of the transaction, the assets will not be held by the Depositary Bank. Any collateral posted in favour of the Fund or any of its sub-funds under a title transfer arrangement should be held by the Depositary Bank. Such collateral may be held by one collateral agent or, in case of TRSs, by the Depositary Bank's correspondents or sub-custodians provided that the Depositary Bank has delegated the custody of the collateral to such collateral agent, correspondent or sub-custodian and the Depositary Bank remains liable subject to the provisions of the 2010 Law, if the collateral is lost by the collateral agent or the sub-custodian. Collateral posted in favour of the Fund or any of its sub-funds under a security interest arrangement (e.g., a pledge) can be held by the Depositary Bank or a third party custodian which is subject to prudential supervision, and which is unrelated to the provider of the collateral.

(g) Enforceable: Collateral must be immediately available to the Fund without recourse to the counterparty, in the event of a default by that entity.

(h) Non-Cash collateral
- cannot be sold, pledged or re-invested;
- must be issued by an entity independent of the counterparty; and
- must be diversified to avoid concentration risk in one issue, sector or country.

(i) Cash Collateral can only be:
- placed on deposit with entities prescribed in Article 41(f) of the 2010 Law;
- invested in high-quality government bonds;
  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;
- invested in short-term money market funds as defined in Money Market Regulation.

Re-invested cash collateral will expose the sub-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.

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

Each sub-fund must make sure that it is able to claim its rights on the guarantee in case of the occurrence of an event requiring the execution thereof. Therefore, the guarantee must be available at all times, either directly or through the intermediary of a first class financial institution or a wholly-owned subsidiary of this institution, in such a manner that the sub-fund is able to appropriate or realize the assets given as guarantee, without delay, if the counterparty does not comply with its obligation to return the securities.

During the duration of the agreement, the guarantee cannot be sold or given as a security or pledged.

When entering into securities lending transactions, each sub-fund must receive, during the lifetime of the lending agreement, the following type of collateral covering at least the market value of the lent securities:

- Government bonds with maturity up to 1 year: Haircut between 0 and 2%

- Government bonds with maturity of more than 1 year: Minimum haircut 2%

- Corporate bonds: Minimum haircut 6%

- Equity in the same currency as the security lent: Minimum haircut 10%

- Cash: 0%

When entering into repurchase or reverse repurchase transactions, each sub-fund will obtain the following collateral covering at least the market value of the financial instrument object of the transaction:

- Cash: 0%

- Government Bonds: 0%

The absence of haircut is mainly due to the very short term of the transactions.

When entering into OTC financial derivatives transactions each sub-fund will obtain the following collateral covering at least the market value of the financial instrument object of the OTC transaction:

- Cash: 0%

- Government bonds with maturity up to 1 year: Haircut between 0 and 2%

- Government bonds with maturity of more than 1 year: Minimum haircut 2%

The Fund must proceed on a daily basis to the valuation of the guarantee received.

In addition, the Fund has implemented a haircut policy in respect of each class of bonds received as collateral in respect of each relevant sub-fund. Such policy takes account of the characteristics of the relevant asset class, including the credit standing of the issuer of the collateral, the price volatility of the collateral and the results of any stress tests which may be performed in accordance with the stress testing policy.

The Annual reports will also mention the following information:
a) if the Collateral received from an issuer has exceeded 20% of the NAV of a sub-fund, and/or;
b) if a sub-fund has been fully collateralised in securities issued or guaranteed by a Member State."

Details regarding the counterparty or counterparties to these effective portfolio management techniques (where applicable) will be provided in the Fund's annual and half-yearly reports.

Eligible counterparties for OTC financial derivatives transactions and efficient portfolio management techniques (EMT) will have a public rating of at least A- from Standard & Poor's or equivalent rating from Moody's and Fitch and will be financial counterparties in accordance with article 3 of the SFT Regulation. In the event that a previously authorised counterparty is downgraded to below the minimum level required to be eligible (A-), it may nevertheless remain approved if the downgrade does not fall below the suspension threshold identified by the following two circumstances:
a) the majority of the three ratings agencies give the broker a rating of BBB- or lower;
b) one of the three major ratings agencies downgrades the broker to BB+ or lower.

The legal form is however not a decisive criterion for the selection of the counterparty.

The eligible counterparties will be established in EU member countries, in countries member of the Organisation for Economic Cooperation and Development ("OECD"), Jersey, Hong Kong or Singapore.

26) INVESTMENT RESTRICTIONS

The Fund has been granted a European passport. This means that the investment restrictions and policy are governed by Section I of the 2010 Law that transposes Directive 2009/65/EC, as amended, into Luxembourg Law.

Each sub-fund in the Fund, or where a UCITS includes more than one sub-fund, such sub-fund or UCITS sub-fund shall be considered as a separate UCITS for the purposes of this Section. The Management Company shall have the power to determine the investment policy for the Fund and for each sub-fund, based on the risk diversification principle, together with the Reference Currency for each sub-fund, subject to compliance with the following investment restrictions:

The following criteria and restrictions must be observed by the Fund for each sub-fund:

1) The investments of the Fund consist exclusively of:

a) transferable securities and money-market instruments that are listed or traded on a Regulated Market;

b) transferable securities and money-market instruments that are traded on another market in a Member State (within the meaning of Paragraph 13 of Article I of the 2010 Law), which is regulated, operates on a regular basis, and is recognised and open to the public;

c) transferable securities and money-market instruments admitted to the official listing on a stock exchange in an American, Eastern or Western European, Asian, African, or South Pacific State, or traded on another market in an American, Eastern or Western European, Asian, African, or South Pacific State, which is regulated, operates on a regular basis, and is recognised and open to the public;

d) newly issued transferable securities and money-market instruments, on condition that:

- the issuance conditions include an undertaking that a request has been made for admission to the official listing on a securities exchange or to another Regulated Market located in an American, Eastern or Western European, Asian, African or South Pacific State, which operates on a regular basis, and is recognised and open to the public;
- that admission is obtained at the latest within a period of one year following the issue;

e) units or shares in UCITS approved in accordance with Directive 2009/65/EC, as amended and/or other UCIs within the meaning of Paragraph 2 a) and b) of Article 1 of Directive 2009/65/EC, as amended, regardless of whether these UCITS or other UCIs are established in a Member State, on condition that:

- these other UCIs are approved in accordance with legislation that provides for these bodies being subject to oversight that the Luxembourg Financial Sector Supervisory Commission ("CSSF") considers to be equivalent to that provided by European Community legislation, and there are sufficient guarantees of cooperation between the authorities;
- the level of protection guaranteed to unitholders in these other UCIs is equivalent to the level provided for unitholders in a UCITS, and specifically, that the rules relating to the segregation of assets, to borrowings, loans, and the short-selling of transferable securities and money-market instruments are equivalent to the requirements of Directive 2009/65/EC, as amended.
- the activities of these other UCIs are the subject of half-yearly and annual reports that enable their assets and liabilities, and income, and the transactions during the period under consideration to be assessed;
- the overall proportion of their assets that the UCITS or other UCIs that are being considered for purchase may invest in the units of other UCITS or UCIs does not exceed 10%, in accordance with their management regulations or their incorporation documents;

f) deposits with a credit institution repayable on request, or that can be withdrawn and have a maturity of less than or equal to twelve (12) months, on condition that the credit institution has its registered office in a Member State, or, if the credit institution's registered office is in a third-party country, that the institution is governed by prudential rules that the CSSF considers as equivalent to those provided for by European Community legislation;

g) financial derivatives, including similar instruments giving rise to settlement in cash and traded on a Regulated Market of the kind referred to under Points a), b) and c) above, or financial derivatives traded over-the-counter, on condition that:

- the underlying asset consists of instruments referred to under Points a), b), c), d), e), f), g), and h) above, of financial indices, interest rates, exchange rates or currencies in which the Fund may invest in accordance with its investment objectives, as defined in the Management Regulations or in this Prospectus;
- the counterparties to the over-the-counter transactions in financial derivatives are institutions subject to prudential oversight that belong to the categories approved by the CSSF; and
- the over-the-counter financial instruments are subject to a reliable and verifiable valuation process on a daily basis, and may be sold, liquidated or closed via a symmetrical transaction at their fair value at any time, at the Management Company's initiative.

h) money-market instruments other than those traded on a Regulated Market, and referred to in Article 1 of the 2010 Law, as long as the issue or issuer of these instruments is actually subject to regulations aimed at protecting Investors and savings, and that these instruments are:

- issued or guaranteed by a central, regional or local authority, by the Central Bank of a Member State, by the European Central Bank, by the European Union or the European Investment Bank, by a third-party State, or in the case of a federal State, by one of the members of the federation, or by an international public body of which one or several Member States are members; or
- issued by a company where the securities are traded on the Regulated Markets referred to under Points a), b) and c) above; or
- issued or guaranteed by an institution that is subject to prudential oversight in accordance with the criteria defined by European Community Law, or by an institution that is subject to and complies with prudential rules that the CSSF considers as at least as stringent as those provided for by European Community legislation; or
- issued by other entities that fall under the categories approved by the CSSF, as long as investments in these instruments are subject to investor protection rules that are equivalent to those provided for in the first, second or third indents, and the issuer is a company where the capital and reserves amount to at least ten million Euros (EUR 10,000,000), and which presents and publishes its annual financial statements in accordance with the Fourth Directive 78/660/EEC, i.e. either an entity within a group of companies including one or several listed companies that is dedicated to the financing of the group, or an entity that is dedicated to the financing of securitisation vehicles and benefits from a bank financing facility.

2) However, the Fund may invest no more than 10% of the net assets of each sub-fund in transferable securities and money market instruments other than those referred to in Paragraph 1).

3) The Fund may not invest in immovable property.

4) The Fund may acquire neither precious metals nor certificates representing them for any sub-fund.

5) Each sub-fund of the Fund may hold ancillary liquid assets. Liquid assets used to back-up derivatives exposure are not considered as ancillary liquid assets. Each sub-fund will not invest more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. Under exceptionally unfavourable market conditions and on a temporary basis, this limit may be breached, if justified in the interest of the Investors.

6) a) Each sub-fund cannot invest over 10% of its assets in transferable securities or money-market instruments issued by the same issuer. Each sub-fund shall also refrain from investing over 20% of its assets in deposits invested with the same issuer. The counterparty risk for each sub-fund in a transaction involving over-the-counter financial derivatives cannot exceed 10% of its assets where the counterparty is one of the credit institutions referred to in Paragraph 1) f), or 5% of its assets in other cases.

b) The total value of the transferable securities and money-market instruments held by each sub-fund with issuers in which it invests over 5% of its assets cannot exceed 40% of the value of its assets. This limit does not apply to deposits with financial institutions that are the subject of prudential oversight, and to over-the-counter financial derivatives transactions with these institutions.

Notwithstanding the individual limits set out in Paragraph 1, each sub-fund cannot combine several of the following factors where this would lead to it investing over 20% of its assets in the same entity:

- investments in transferable securities or money-market instruments issued by said entity;
- deposits with said entity, or
- risks arising from over-the-counter transactions in financial derivatives with said entity that exceed 20% of its assets.

c) The limit provided for in the first sentence of Paragraph 1 shall be increased to a maximum of 35% if the transferable securities or money-market instruments are issued a guaranteed by a Member State, by its regional public authorities, by a third-party State, or by international public bodies of which one or several Member States are members.

d) The limit provided for in the first sentence of Paragraph 1 is increased to a maximum of 25% covered bonds as defined under article 3, point 1 of Directive (EU) 2019/2162 of the European Parliament and of the Council of 27 November 2019 on the issue of covered bonds and covered bond public supervision and amending Directives 2009/65/EC and 2014/59/EU, and, for certain bonds when they are issued before 8 July 2022 by a credit institution that has its registered office in a Member State and is also subject to special oversight by the public authorities aimed at protecting the bondholders. Specifically, the amounts arising from the issue of these bonds issued before 8 July 2022 must be invested in assets that are able to cover the receivables arising from the bonds, and that would be used in priority to redeem the principal and pay the accrued interest in the event that the issuer defaults, throughout the term of the bonds, in accordance with the legislation.

Where a sub-fund invests over 5% of its assets in bonds mentioned in the first sub-paragraph that are issued by a single issuer, the total value of these investments cannot exceed 80% of the value of the sub-fund's assets.

e) The transferable securities and the money-market instruments referred to in Paragraphs 3 and 4 are not taken into account for the application of the 40% limit mentioned in Paragraph 2.

The limits provided for in Paragraphs 1, 2, 3, and 4 cannot be combined; as a result, investments in transferable securities or money-market instruments issued by the same issuer, in deposits or in financial derivatives entered into with this entity in accordance with Paragraphs 1, 2, 3, and 4 cannot exceed 35% of the sub-fund's assets in total.

Companies that are grouped for the purpose of consolidating their financial statements, within the meaning of Directive 2013/34/EU, as amended, or in accordance with recognised international accounting rules, are considered as a single entity where calculating the limits provided for in this Section is concerned.

Each sub-fund can invest a total of up to 20% of its assets in transferable securities or money-market instruments issued by the same group.

ACCORDING TO ARTICLE 44 OF THE 2010 LAW, THE SUB-FUNDS OF THE FUND ARE AUTHORIZED TO INVEST NO MORE THAN 20% OF THEIR ASSETS IN SHARES AND/OR BONDS ISSUED BY THE SAME ISSUER, WHEN THE INVESTMENT POLICY OF THESE SUB-FUNDS SHALL REPLICATE THE COMPOSITION OF A CERTAIN STOCK OR BOND INDEX THAT IS RECOGNIZED BY THE CSSF, ON THE FOLLOWING BASIS:

- THE COMPOSITION OF THE INDEX IS SUFFICIENTLY DIVERSIFIED,

- THE INDEX IS A REPRESENTATIVE STANDARD OF THE MARKET WHICH IT REFERS TO,

- IT IS SUBJECT TO AN APPROPRIATE PUBLICATION.

THIS LIMIT OF 20% MAY BE RAISED TO 35% FOR ONE ISSUER IN CASE OF EXCEPTIONAL CONDITIONS ON REGULATED MARKETS WHERE CERTAIN TRANSFERABLE SECURITIES OR CERTAIN MONEY MARKET INSTRUMENTS ARE HIGHLY DOMINANT.

THE INDICES TO WHICH THE RELEVANT SUB-FUND WILL TAKE EXPOSURE COMPLY WITH ARTICLE 44 OF THE 2010 LAW AND THE ARTICLE 9 OF GRAND DUCAL REGULATION DATED 8 FEBRUARY 2008. SUCH INDICES MAY HAVE DIFFERENT REBALANCING FREQUENCIES, WITH THE MOST PREVALENT REBALANCING FREQUENCY BEING MONTHLY. THE FREQUENCY OF THE REBALANCING DOES NOT AFFECT THE COSTS LINKED TO GAINING EXPOSURE TO THE INDICES. THE LIST OF INDICES TO WHICH THE SUB-FUND MAY TAKE EXPOSURE FROM TIME TO TIME IS AVAILABLE ON THE MANAGEMENT COMPANY'S WEBSITE: https://www.fideuramassetmanagement.ie/en/

MOREOVER, IN ACCORDANCE WITH THE RISK DIVERSIFICATION PRINCIPLE, EACH SUB-FUND IS AUTHORISED TO INVEST UP TO 100% OF ITS ASSETS IN VARIOUS TRANSFERABLE SECURITIES AND MONEY-MARKET INSTRUMENTS ISSUED OR GUARANTEED BY A MEMBER STATE, THAT STATE'S REGIONAL PUBLIC AUTHORITIES, A THIRD-PARTY COUNTRY, AN OECD MEMBER STATE, SINGAPORE, BRAZIL OR ANY OTHER MEMBER OF THE G20, OR BY INTERNATIONAL BODIES OF A PUBLIC NATURE OF WHICH ONE OR SEVERAL EUROPEAN UNION MEMBER STATES ARE MEMBERS, ON CONDITION THAT THESE SECURITIES AND MONEY-MARKET INSTRUMENTS BELONG TO AT LEAST SIX DIFFERENT ISSUES, AND THAT THE SECURITIES BELONGING TO ONE ISSUE DO NOT EXCEED 30% OF THE TOTAL AMOUNT.

7) a) Subject to the exceptions provided for by a sub-fund's investment policy, a sub-fund cannot invest over 10% of its net assets in units or shares of the UCITS and/or other UCIs referred to in Paragraph 1)e.) above.

b) Where a sub-fund is authorised to invest over 10% of its net assets in units or shares of UCITS and/or other UCIs, the sub-fund will also be required to comply with the following investment restrictions:

- investments in units of UCIs other than UCITS cannot exceed 30% of its overall net assets;
- the sub-fund may not invest over 20% of its net assets in the units of the same UCITS or other UCI. To the extent that a UCITS or other UCI consists of several sub-funds, and on condition that the principle of segregating the liabilities of the various sub-funds towards a third party is guaranteed, each sub-fund shall be considered as a separate issuer for the purposes of applying this 20% investment limit.

c) Where the Fund invests in the units of other UCITS and/or other UCIs that are managed by the Management Company, either directly or indirectly, or by any other company to which the Management Company is related as part of the pooling of management or control processes, or via a material direct or indirect interest, the Management Company may not invoice subscription or redemption rights relating to the Fund's investment in the units of other UCITS and/or other UCIs. In the event that a significant portion of their assets is invested in other UCITS or other UCIs, the maximum amount of the management fees that may be invoiced both to the respective sub-funds and to these other UCITS and/or other UCIs cannot exceed 5% of the assets of the sub-fund concerned.

8) A Fund sub-fund, (defined as an "Investor sub-fund" for the purposes of this paragraph) may subscribe to, purchase and/or hold securities to be issued or issued by one or several other Fund sub-funds (each of which is a "Target sub-fund"), without the Fund being subject to the requirements set out in the Law of 10 August 1915 regarding commercial companies, as amended, where the subscription, purchase and/or holding of its own shares by a company is concerned, as long as, however:

(i) The Target sub-fund does not then invest in the Investor sub-fund that has invested in this Target sub-fund in turn; and

(ii) the overall proportion of their assets that the Target sub-funds that are being considered for purchase may invest in the units or shares of other UCITS or UCIs, including other Target sub-funds in the same UCI, does not exceed 10%, in accordance with their investment policy; and

(iii) any voting rights that may be attached to the shares concerned are suspended throughout the period when they are held by the Investor sub-fund, and without jeopardising their appropriate treatment in the accounting process and the periodic reports; and
(iv) their value is not taken into account under any circumstances for the calculation of the Fund's net assets for the purpose of checking the minimum net asset threshold imposed by the 2010 Law, throughout the period when these securities are held by the Investor sub-fund.

9) a) The Management Company acting for all the mutual investment funds that it manages and that fall within the scope of application of Part I of the 2010 Law and of Directive 2009/65/EC respectively cannot acquire shares with voting rights that enable them to exercise significant influence over an issuer's management.

b) In addition, a sub-fund cannot acquire more than:

(i) 10% of the non-voting shares in a single issuer;
(ii) 10% of the debt securities in a single issuer;
(iii) 25% of the units in the same UCITS or other UCI within the meaning of Paragraph 2 of Article 2 of the 2010 Law;
(iv) 10% of the money-market instruments issued by a single issuer.

The limits provided for in the second, third and fourth indents may not be complied with at the time of the purchase if, at that time, the gross amount of the bonds or money-market instruments, or the net amount of the securities issued cannot be calculated.

c) Paragraphs a) and b) do not apply where the following are concerned:

(i) transferable securities and money-market instruments issued or guaranteed by a Member State or its regional public authorities;

(ii) transferable securities and money-market instruments issued or guaranteed by a State that is not part of the European Union;

(iii) transferable securities and money-market instruments issued by international bodies of a public nature of which one or several European Union Member States are members;

(iv) shares held by the Fund in a company based in a State outside the European Union that primarily invests its assets in the securities of issuers originating from that State, where, pursuant to the latter's legislation, such an investment represents the sole opportunity for the Fund to invest in the securities of issuers from this State. However, this exemption shall only apply on condition that the company based in the State outside the European Union complies with the limits determined by Articles 43, 46 and 48 in Paragraphs 1 and 2 of the 2010 Law in its investment policy. In the event that the limits provided for under Articles 43 and 46 are exceeded, Article 49 of the aforementioned Law shall apply mutatis mutandis.

10) a) The Management Company acting on behalf of the Fund cannot borrow, but can, however, purchase currencies via currency back-to-back loans.

b) Notwithstanding Point 1, each sub-fund may borrow up to 10% of its assets, as long as the borrowings are on a temporary basis.

11) a) The Management Company acting for the Fund cannot grant any credit or act as a guarantor on behalf of third parties.

b)Paragraph a) does not prevent the Fund from purchasing transferable securities, money-market instruments or other financial instruments referred to in Points e), g) and h) of Paragraph 1) that are not fully paid-up.

12) The Management Company acting for the Fund cannot enter into short sales of transferable securities, money-market instruments or other financial instruments mentioned in Article 41 of the 2010 Law and in Points e), g) and h) of Paragraph 1.

The sub-funds must not necessarily comply with the limits provided for by this Article when exercising

the subscription rights relating to the transferable securities or money-market instruments that form part of their assets.

In the event that the percentages mentioned in Sections 2, 3 and 4 are exceeded as a result of the exercise of rights attached to securities in the portfolio or otherwise than via the purchase of securities, the priority aim for each sub-fund shall be to adjust the situation via its sale transactions while taking the interests of the unitholders into account.

To the extent that an issuer is a legal entity with multiple sub-funds, or where the assets of a sub-fund are exclusively governed by the rights of Investors relating to said sub-fund and to the rights of its creditors, whose receivable was incurred at the time when the sub-fund was set up, in operation, or liquidated, each sub-fund must be considered as a distinct issuer for the purpose of applying the risk diversification rules expressed in Sections 2, 3 and 4.

13) In accordance with the laws and applicable regulations, and especially CSSF Regulation No. 10-4 regarding the transposal of European Commission Directive 2010/43/EU regarding the execution measures for Directive 2009/65/EC in terms of organisational requirements, conflicts of interest, the conduct of business, risk management and the contents of the agreement between the Depositary Bank and the Management Company, CSSF Circular 11/512, and the ESMA recommendations, the Management Company shall employ or shall ensure that the Investment Manager that it has appointed use a risk management method that enables them to manage and assess the risk relating to positions and their contributions to the overall risk at all times.

The overall risk relating to the derivatives of each sub-fund shall be calculated using the commitment approach, unless indicated otherwise in the sub-fund's investment policy.

The "commitment approach" and the "Value-at-Risk" methodology are methods of calculation of global exposure approach as detailed in applicable laws and regulations including but not limited to CSSF Circular 11/512 as amended from time to time.

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

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

Absolute Value-at-Risk (Absolute VaR): the sub-fund estimates the level which the loss on its Net Asset Value over a 1-month time frame (meaning 20 trading days) may exceed with a 1% probability in normal market conditions. This estimated level should not be higher than 20%.

Relative Value-at-Risk (Relative VaR): the ratio of the sub-fund's Absolute VaR over the Absolute VaR of a chosen benchmark (typically an appropriate market index or combination of indices) should not exceed 200%.

Commitment: the sub-fund calculates all derivatives exposures as if they were direct investments in the underlying positions. This allows the sub-fund to include the effects of any hedging or offsetting positions as well as some positions taken for efficient portfolio management where applicable. The exposure calculated using this approach should not exceed 100% of total assets.

If an investor makes the request, the Management Company must also provide additional information regarding the quantitative limits that apply to the risk management process for each sub-fund, the methods selected to comply with these limits, and recent changes in the risk and return of the main instrument categories.

14) Specific rules for Master / Feeder structures:

- a Feeder sub-fund is a sub-fund of the Fund, which has been approved to invest, by way of

derogation from article 2, paragraph (2), first indent of the 2010 Law, at least 85% of its assets in units of another UCITS or sub-fund thereof (hereafter referred to as the "**Master UCITS**").

- A Feeder sub-fund may hold up to 15% of its assets in one or more of the following:
    a. ancillary liquid;
    b. financial derivative instruments, which may be used only for hedging purposes, in accordance with article 42, paragraphs (2) and (3) of the 2010 Law;
    c. movable and immovable property which is essential for the direct pursuit of its business.
- For the purposes of compliance with article 42, paragraph (3) of the 2010 Law, the Feeder sub-fund shall calculate its global exposure related to financial derivative instruments by combining its own direct exposure with:
    a. either the Master UCITS's actual exposure to financial derivative instruments in proportion to the Feeder sub-funds' investment into the Master UCITS;
    b. or the Master UCITS's potential maximum global exposure to financial derivative instruments provided for in the Master UCITS management regulations or instruments of incorporation in proportion to the Feeder sub-funds' investment into the Master UCITS;
- a Master UCITS is a UCITS, or a sub-fund thereof, which:
    a. has, among its shareholders, at least one Feeder UCITS;
    b. is not itself a Feeder UCITS; and
    c. does not hold units of a Feeder UCITS.
- if a Master UCITS has at least two Feeder UCITS as shareholders, article 2, paragraph (2), first indent and article 3, second indent of the 2010 Law shall not apply.

The restriction pursuant to which, when the Fund invests in the units of other UCITS and/or other UCIs that are managed, directly or by delegation, by the same investment manager or by any other company with which the investment manager is linked by common management or control, or by a substantial direct or indirect holding, no subscription and redemption fees may be charged on the target fund level to the Fund on its investment in the units of such other UCITS and/or UCIs, does not apply to a Feeder UCITS.

Should a sub-fund qualify as a Feeder UCITS, a description of all remuneration and reimbursement of costs payable by the Feeder UCITS by virtue of its investments in shares/units of the Master UCITS, as well as the aggregate charges of both the Feeder UCITS and the Master UCITS, shall be disclosed under "Charges and expenses borne by the Fund". The Fund shall disclose in its annual report a statement on the aggregate charges of both the Feeder UCITS and the Master UCITS.

Each sub-fund may, subscribe, acquire and/or hold securities to be issued or issued by one or more other sub-fund of the Fund under the condition, that:

- the target sub-fund does not, in turn, invest in the sub-fund invested in the target sub-fund; and
- no more than 10% of the assets of the target sub-fund whose acquisition is contemplated may be invested, pursuant to its constitutive documents, in units of other UCIs; and
- voting rights, if any, attaching to the relevant securities are suspended for as long as they are held by the sub-fund concerned and without prejudice to the appropriate processing in the accounts and the periodic reports; and
- in any event, for as long as these securities are held by the sub-fund, their value will not be taken into consideration for the calculation of the net assets of the sub-fund for the purposes of verifying the minimum threshold of the net assets imposed by the 2010 Law; and
- there is no duplication of management/subscription or repurchase fees between those at the level of the sub-fund and the target sub-fund.

With respect to investments of a sub-fund in other UCITS and/or other UCIs, the maximum level of management fees that may be charged both to each sub-fund of the Fund and to the other UCITS and/or other UCIs in which it intends to invest, may not exceed 5% of the net assets of each sub-fund.

In order to assess the performance of certain sub-funds, a benchmark index is used. The benchmark index is calculated by widely recognized providers and represents the structure and performance of specific areas of the financial markets, which are coherent with the investment policy of the sub-fund assessed.

APPENDIX I

The various sub-fund's investment policies featured in Appendix I form an integral part of the Prospectus.

As at the date of this Prospectus, the following sub-funds were available within the Fund:

Investment policy #	SUB-FUND	CATEGORY
I	Willerequity Switzerland	Equity
II	Willer Flexible Financial Bond	Fixed-income

WILLERFUNDS – PRIVATE SUITE SUB-FUNDS

Investment policy #	SUB-FUND	CATEGORY
III	Willerfunds – Private Suite – Fidelity Flexible Short Duration	Fixed-income
IV	Willerfunds – Private Suite – Schroder Global Climate Change until 30 January 2026, renamed Willerfunds - Private Suite - Schroder Global Leaders as from 31 January 2026	Equity
V	Willerfunds – Private Suite – BNY Mellon Global Real Return	Flexible
VI	Willerfunds – Private Suite – Millennials Equity	Equity
VII	Willerfunds – Private Suite – BlackRock Balanced ESG	Flexible
VIII	Willerfunds – Private Suite – Pictet Health Innovation Trends	Equity
IX	Willerfunds – Private Suite – Lombard Odier Natural Capital	Equity
X	Willerfunds – Private Suite – Janus Henderson Strategic Bond	Fixed-income
XI	Willerfunds – Private Suite – JPM Europe Equity	Equity
XII	Willerfunds – Private Suite – Vontobel Equity Global Impact	Equity
XIII	Willerfunds – Private Suite – Wellington Equity Global Research	Equity

XIV	Willerfunds – Private Suite – Eurizon Multi-Asset Circular Economy	Flexible
XV	Willerfunds – Private Suite – Fidelity Global Equity Income	Equity
XVI	Willerfunds – Private Suite – FAMI Euro Short Term	Fixed-income
XVII	Willerfunds – Private Suite – Asteria – Man Flexible Allocation	Flexible
XVIII	Willerfunds – Private Suite – Franklin Emerging Corporate Bond	Fixed-income
IXX	Willerfunds – Private Suite – T. Rowe Price Equity US Research	Equity
XX	Willerfunds – Private Suite – Invesco Euro Corporate Bond	Fixed-income
XXI	Willerfunds – Private Suite – PIMCO European Income Bond	Fixed-income
XXII	Willerfunds – Private Suite – JPM Global Aggregate Bond	Fixed-income
XXIII	Willerfunds – Private Suite – M&G European Strategic Value	Equity

I. WILLERFUNDS - WILLEREQUITY SWITZERLAND

Investment policy

The objective of the Willerequity Switzerland sub-fund is to gain significant exposure to the shares and other participation rights of companies that have their registered office or exercise most of their business activities in Switzerland, or that hold most of their holdings in companies with registered offices in that country via their remit as holding companies. Accordingly, the Management Company is authorised to invest in these securities either directly or via financial derivatives, or in units and/or shares of UCIs that grant exposure to this type of assets or to indices that consist of this type of assets. Financial derivatives may be used for hedging and/or investment purposes.

In any event, investments in other UCIs in transferable securities and other UCIs will be limited to 10% of the Net Asset Value.

The sub-fund may also hold shares and participation rights in companies based in other countries, or straight and convertible bonds and bonds with warrants on an ancillary basis.

The sub-fund may be fully invested in term deposits and money-market instruments with a maturity of less than 12 months, issued by top-tier entities, including OECD Member States and entities of those States where the Management Company believes that market circumstances require it, in order to protect the interests of the Unitholders.

The sub-fund may hold ancillary liquid assets. Liquid assets used to back-up financial derivative instruments exposure are not considered as ancillary liquid assets. The sub-fund will not hold more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. In exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of its net assets, if justified in the interest of the Investors.

The sub-fund does not fall within the scope of the Money Market Regulation.

The Benchmark of the sub-fund consists of the index "MSCI Switzerland 10/40 Net Return Index".

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is significant. The relative risk and positioning to the Benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the Benchmark, however there is discretion to invest in other securities not included in the Benchmark.

Securities lending:

- Maximum portion of assets that can be subject to securities lending: 50%.
- Expected portion of assets that will be subject to securities lending: 20%.

Profile of the typical Investor	This sub-fund is intended for aggressive Investors. Their priority is to achieve long-term capital appreciation by building a diversified portfolio in an optimal manner.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "equity securities", "bonds securities", "Options, Futures and Swaps", "Interest Rates", "Credit Default Swaps (CDS) transactions", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	CHF
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.

Subscription	Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch.
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question.
Redemption	Each Business Day will also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid in the Reference Currency of the sub-fund or Unit Class concerned.
Minimum subsequent holding	Class P: CHF 1,000 Class I: CHF equivalent of EUR 2.000.000
Unit Classes	Class P and Class I The Management Company may decide to issue Unit Classes for which the Reference Currency may be the USD, the EUR or the CHF. Units in the Classes denominated in a currency other than the Reference Currency shall be hedged against the sub-fund's Reference Currency. The expenses relating to this hedging process shall be borne by the Unit Class concerned. The minimum subscription amount and the minimum holding amount shall be: For P Class Units: - EUR 1.000 - USD 1.000 - CHF 1.000 For I Class Units: - EUR 2.000.000 (or equivalent in CHF and USD)
Distribution Policy	Capitalisation
Target Investors	All categories of Investors
Management fee	For Class P: 1.55% For Class I: 1.30%
Performance fee	The Management Company currently receives a remuneration amount in the form of a Performance fee, which is described in more detail in this Prospectus.

Subscription commission	Maximum of 2,00%
Placement fee	N/A
Redemption commission	N/A
Conversion commission	N/A
Global exposure determination	Commitment approach

II. WILLERFUNDS - WILLER FLEXIBLE FINANCIAL BOND

Investment policy

The sub-fund aims to offer an income deriving from the investment in a diversified portfolio of fixed income securities issued by corporations, non-government and government issuers domiciled in developed or in emerging markets countries and denominated in any currency, excluding the emerging markets currencies.

The sub-fund will invest, not exclusively but with a special focus, in subordinated fixed income securities issued by financial institutions, including senior non-preferred securities, hybrid securities, contingent convertible tier 1, upper and lower tier 2, trust preferred securities ("TruPS"), preference shares and other subordinated debt, including junior subordinated debt.

The sub-fund's investments in contingent convertible bonds ("CoCos") (as defined by European Securities and Markets Authority) will not exceed 30% of the total Net Asset Value of the sub-fund.

The sub-fund will not invest in ordinary equity securities; however, it may invest in ordinary equity securities if such ordinary equity securities are acquired by way of conversion from another security held by the sub-fund (e.g. a CoCos tier 1 or tier 2 automatically converted into equity securities of the issuer). In this event, the Management Company will analyse the situation in the best interest of the sub-fund in order to take actions.

The sub-fund may invest up to 60% of its net asset value in non-investment grade securities. The sub-fund will not invest in distressed securities or in defaulted securities.

Securities will be deemed non-investment grade if, at the time of purchase, they are classified below "BBB-", or equivalent, and above or equal to "CCC", or equivalent, based on rating agencies or equivalent as defined by the internal valuation model implemented by the Management Company.

Some "CCC" rated securities may be considered as distressed securities. If a security eligible for the sub-fund is rated "CCC", the Management Company will perform an analysis in order to determine if such security is a distressed security, if so, the sub-fund will not invest in such security.

In case of downgrade of an existing investment or other events leading to qualify a security of the sub-fund as distressed or default, the Management Company will analyse the situation in the best interest of the sub-fund in order to take actions. Actions may include without limitation selling the security at low value. In any event the Management Company shall ensure that distressed and / or default securities held by the sub-fund shall not exceed 10% of its net asset value.

The sub-fund may also invest up to 20% of its net assets in fixed income instruments (both investment grade and non-investment grade) issued by corporations, non-government or government issuers domiciled in emerging markets.

The sub-fund may invest without limitation in instruments denominated in currencies other than the Reference Currency (Euro) with the exclusion of the emerging markets currencies. The currency exposure of the sub-fund will normally be hedged back into Euro.

The sub-fund may invest in units / shares of UCITS and / or UCIs, including UCITS compliant exchange traded funds ("ETF") in order to pursue its investment objective. Such investment may not exceed 10% of the total Net Asset Value of the sub-fund.

The sub-fund may use financial derivative instruments for the purpose of investment and risk hedging. The sub-fund may invest in derivatives instruments which may include, without limitation, spot and forward contracts (including non-deliverable forward), listed derivatives, swaps (including non-deliverable interest rate swaps, credit default swaps, unfunded total return swaps (where the underlying assets could be, without being limited to, fixed income, foreign exchange, fixed income futures, index futures and options on financial derivative instruments), options, index options.

The sub-fund is actively managed. The sub-fund uses the arithmetical weighted average of the following indices for the purposes of risk and performance measurement:

- 20% ICE BofA Contingent Capital Index, Total Return, EUR Hedged
- 80% ICE BofA Euro Subordinated Financial Index, Total Return, in EUR

The weights of the indices are rebalanced on a monthly basis.

The sub-fund is not bound by the components or weighting of the Benchmark when selecting investments. The sub-fund's portfolio may deviate significantly from the Benchmark.

Total Return Swap:
- Maximum portion of assets that can be subject to TRS: 30%
- Expected portion of assets that will be subject to TRS: 10%

Securities lending:
- Maximum portion of assets that can be subject to securities lending: 70%
- Expected portion of assets that will be subject to securities lending: 40%

Profile of the typical Investor	The sub-fund is suitable for Investors who search medium-term investments. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk factors" section of the Prospectus in terms of risks applicable to investing in the sub-fund and inter alia: Risked relating to investments in bonds; non-investment grade bonds (high yield securities); hybrid securities; CoCos; distressed securities; default securities; investment in the units of UCIs; currency risk; emerging markets risk; securities lending risk. Investors should consider these extra risks when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Launch Date of the sub-fund	October 1, 2020
Initial Subscription Period of the sub-fund/ Initial Subscription Day	For Unit Classes P and S: From 1st October 2020 until 15th December 2020 only, at initial price of 10 EUR. After such period, no more subscriptions of Unit Classes P and S are allowed. For Unit Classes P1, S1 and I: From 4th December 2020 until 15th December 2020, at initial price of 10 EUR.
First Calculation Day	16th December 2020
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day on the basis of the prices on the Valuation Day
Subscription	Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch.

Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of Unit Classes P and S into Classes of Units of other sub-funds are not allowed. Conversions of Unit Classes P1, S1 and I into Classes of Units of other sub-funds are allowed.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Friday that is a Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Minimum subsequent holding	Class P: EUR 1,000 Class S: EUR 1,000 Class P1: EUR 1,000 Class S1: EUR 1,000 Class I: EUR 2,000,000
Unit Classes	Classes P and S: Available for subscription only from October 1st, 2020 to December 15th, 2020. Classes P1, S1 and I: Available for subscription from December 4th, 2020. The minimum subscription amount and the minimum holding amount shall be: Class P: EUR 1,000 Class S: EUR 1,000 Class P1: EUR 1,000 Class S1: EUR 1,000 Class I: EUR 2,000,000
Distribution Policy	Class P: Capitalisation Class P1: Capitalisation Class S: Distribution Class S1: Distribution Class I: Capitalisation
Target Investors	All categories of Investors
Management fee	For P and S Unit Classes: - 0.60% (from December 16th 2020 to December 15th, 2023) - 1.20% (from December 16th, 2023) For P1 and S1 Unit Classes: - 1.20% For I Unit Class: - 0.65%

Performance fee	No Performance fee is charged for this sub-fund.
Subscription commission	For P and S Unit Classes: N/A; For P1, S1 and I Unit Classes: maximum of 1.50%.
Placement fee	For P and S Unit Classes: A placement fee applied at the end of the Initial Subscription Period equals to 1.80% of the initial Net Asset Value multiplied by the number of resulting Units being issued; it is levied on the sub-fund's assets collected as formation expenses and is amortised over the next three (3) years. For P1, S1 and I Unit Classes: N/A.
Conversion commission	For P and S Unit Classes:N/A For P1, S1 and I Unit Classes: N/A
Global exposure determination	Commitment approach

III. WILLERFUNDS – PRIVATE SUITE – FIDELITY FLEXIBLE SHORT DURATION

Investment policy

The sub-fund, expressed in Euro, aims to deliver an attractive level of income by investing in a flexible diversified portfolio consisting of fixed income securities issued by corporations, other non-government issuers, governments and government related issuers located in both developed and emerging markets and denominated in global currencies.

The sub-fund seeks to maintain an average duration of investments that does not exceed three (3) years.

The sub-fund may invest up to 50% of its net asset value in non-investment grade instruments. The sub-fund may invest in unrated debt securities, in which case the Investment Manager will determine a rating. The sub-fund will not invest in distressed securities or in default securities.

Securities will be deemed non-investment grade if, at the time of purchase, they are classified below "BBB-" or equivalent and above or equal to "CCC" or equivalent based on rating agencies or equivalent defined on the basis of the internal valuation model implemented by the Investment Manager. Some "CCC" rated securities may be considered as distressed securities. If a security eligible for the sub-fund is rated "CCC", the Investment Manager will perform an analysis in order to determine if such security is a distressed security, if so the Investment Manager will ensure that the investment limit in such security will be respected.

In case of downgrade of an existing investment or other events leading to qualify a security of the sub-fund as distressed or default, the Investment Manager will analyse the situation in the best interest of the Fund in order to take actions. Actions may include without limitation selling the security at low value. In any event the Management Company shall ensure that distressed and / or default securities held by the sub-fund shall not exceed 10% of its net asset value.

The sub-fund will aim to maintain a portfolio minimum average rating of "BBB-" or equivalent, (where the portfolio average rating is the market weighted sum of the individual security ratings, which does not include cash), based on the rating agencies or equivalent rating defined on the basis of the internal valuation model implemented by the Investment Manager.

Although there are no particular geographic investment limits, the sub-fund may also invest up to 40% of its net assets in fixed income instruments (both investment grade and non-investment grade) issued by corporations, other non-government issuers, governments and government related issuers located in emerging markets.

The sub-fund will not have any restrictions in selecting securities in terms of industry or geographical allocation. The sub-fund may invest up to 10% of its net assets in debt securities issued by Mainland China issuers through Bond Connect program.

The sub-fund may invest without limitation in instruments denominated in currencies other than the Reference Currency. The sub-fund may use strategies to hedge developed and emerging market currency risks, in relation to currencies different from the Euro. In aggregate, and accounting for active currency positions, the non-Euro currency exposure will not exceed 10% of the sub-fund's net assets.

The sub-fund exposure to fixed-income securities achieved by investments through units/shares of UCITS and/or other UCIs including UCITS compliant exchange traded funds ("ETF") will not exceed 20% of the sub-fund's net assets.

The sub-fund is actively managed. The sub-fund is not managed in reference to a Benchmark.

The sub-fund may invest no more than 10% of its net asset value (cumulatively) in ABS and MBS and no more than 10% of its net asset value in CoCos.

The sub-fund may also buy money-market instruments, money-market funds and hold cash, up to 10% of its net assets.

The sub-fund may use financial derivative instruments for the purpose of investment and risk hedging. The sub-fund may invest in derivative instruments which may include, without limitation, futures, spot and forward contracts (including non-deliverable forward), swaps (including non-deliverable interest rate swaps), credit default swaps, options, index options.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with similar universe.

The sub-fund has been categorised as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the asset selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Securities lending:

- Maximum portion of assets that can be subject to securities lending: 70%
- Expected portion of assets that will be subject to securities lending: 40%

Profile of the typical Investor	The sub-fund is suitable for Investors who search medium term investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Bonds securities", "Emerging Markets", "Options, Futures and Swaps, "Interest Rates", "Credit Default Swaps (CDS) transactions", "Credit Risk", "Asset-Backed-Securities – Mortgage-Backed-Securities", "Non-investment grade securities", "Contingent Convertible Bonds", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Investment Manager	FIL Pensions Management Beech Gate Millfield Lane Lower Kingswood Tadworth, Surrey KT20 6RP UNITED KINGDOM
Sub-Investment Managers	FIL Investments International Beech Gate Millfield Lane Lower Kingswood Tadworth, Surrey KT20 6RP UNITED KINGDOM Fidelity Investments Canada ULC 483 Bay Street, Suite 300, Toronto ON M5G 2N7, Canada

Launch Date of the sub-fund	31 January 2022
Initial Subscription Period	For Unit Classes G and GS: From 31 January 2022 until 9 February 2022, at initial price of 10 EUR. For Unit Class I: From 28 March 2022 until 6 April 2022, at initial price of 10 EUR. For Unit Classes D and DS: N/A
First Calculation Day	For Unit Classes G and GS: 10 February 2022 For Unit Class I: 7 April 2022
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G, GS and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D and DS Unit Classes: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G and GS Unit Classes are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D and DS Unit Classes are permitted only into Diamond Unit Classes of other sub-funds with a payment of a switch fee. G and GS Unit Classes cannot be voluntarily converted into Diamond Unit Classes. Conversions of G and GS Class Units into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.

Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class GS Class D Class DS Class I
Distribution policy	Class G: Capitalisation Class GS: Distribution Class D: Capitalisation Class DS: Distribution Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class GS: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500 Class GS: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Class G: Up to 0.20% For Class GS: Up to 0.20% For Class D: Up to 0.80% For Class DS: Up to 0.80% For Class I: Up to 0.40%
Subscription commission	For Classes G, GS, D and DS: N/A For Class I: max 1.80%
Placement fee	For G and GS Unit Classes: 1.80% amortized in three (3) years. Upon purchase of G and GS Unit Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After three (3) years, G and GS Unit Classes are automatically exchanged, value for value, into D and DS Unit Classes of the same sub-fund.

	For I Unit Class: N/A For D and DS Unit Classes: N/A
Redemption commission	For G and GS Unit Classes: If you sell G and GS Unit Classes before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For I Unit Class: N/A For D and DS Unit Classes: N/A
Conversion commission	For G and GS Unit Classes: N/A For D and DS Unit Classes: max 0.40% For I Unit Class: N/A
Global exposure determination	Commitment approach
Performance fee	N/A

IV. WILLERFUNDS – PRIVATE SUITE – SCHRODER GLOBAL CLIMATE CHANGE UNTIL 30 JANUARY 2026, RENAMED WILLERFUNDS - PRIVATE SUITE - SCHRODER GLOBAL LEADERS AS FROM 31 JANUARY 2026

Investment policy

The sub-fund, expressed in Euro, aims to achieve long-term capital growth by investing primarily in equity securities issued by companies that are currently aligned to the Paris Climate Goals or have ambitious global targets to meet them.

The sub-fund will seek to achieve its investment objective by investing in a diversified portfolio consisting primarily of equity and equity related securities listed on a stock exchange or dealt in any Regulated Market worldwide, including in depositary receipts (such as American depository receipts ("ADRs"), European depository receipts ("EDRs") and global depository receipts ("GDRs"). ADR, GDR and EDR and related underlying will at any time comply with the eligibility criteria stated in the 2010 Law, as amended from time to time.

The sub-fund will not have any restrictions in selecting securities in terms of geography, industry or sectors.

Although there are no particular geographic investment limits, the sub-fund may invest no more than 50% of its net asset value in instruments issued by entities located in emerging markets and such investments could be significantly lower depending on investment opportunities. The sub-fund may invest up to 15% of its net assets in China A-Shares via the Shanghai-Hong Kong Stock Connect program.

This sub-fund pursues a strategy that aims to be positioned as a Paris-aligned global equity portfolio by investing in companies that have ambitious targets to decarbonize, consistent with achieving a 1.5 degree scenario under the Paris Agreement on climate change or better.

The sub-fund may invest without limitation in securities denominated in currencies other than the Reference Currency. The currency exposure of the sub-fund is flexibly managed.

The sub-fund exposure to the equity and equity related securities is achieved through direct investments. Any indirect exposure via units/shares of UCITS and/or other UCIs, including UCITS compliant exchange traded funds ("ETF") will not exceed 10% of the sub-fund's net assets.

The sub-fund may also buy money-market instruments and hold cash up to 10% of its net assets.

The sub-fund may use financial derivative instruments for the purpose of risk hedging. The sub-fund may invest in derivative instruments which may include, without limitation, spot and forward contracts, options, index options, swaps and credit default swaps.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with similar universe.

The sub-fund is actively managed. The sub-fund is not managed in reference to a Benchmark.

The Investment Manager will measure the sub-fund's SFDR article 8 commitments strategy using Schroders proprietary tool sustainability tool. This tool, SustainEx, quantifies the positive contributions and negative impacts companies have on society. Viewing those costs and benefits through a hard economic lens provides an objective measure of companies' credit or deficit with society, which will become more important as they crystallise into financial costs or benefits.

The sub-fund has been categorised as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288. Securities lending: • Maximum portion of assets that can be subject to securities lending: 50% • Expected portion of assets that will be subject to securities lending: 20%	
Profile of the typical Investor	The sub-fund is suitable for Investors who search long term investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Equity securities", "Emerging Markets", "Options, Futures and Swaps, "Interest Rates", "Credit Default Swaps (CDS) transactions", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Investment Manager	Schroder Investment Management (Europe) S.A. 5, Hohenhof L-1736 Senningerberg Grand Duchy of Luxembourg
Sub-Investment Manager	Schroder Investment Management Limited 1, London Wall Place London EC2Y 5AU United Kingdom
Launch Date of the sub-fund	31 January 2022
Initial Subscription Period	For Unit Classes G and I: 31 January 2022 until 9 February 2022, at initial price of 10 EUR. For Unit Classes D and DS: N/A
First Calculation Day	10 February 2022
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch.

	For D and DS Unit Classes: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G Unit Class is permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D and DS Unit Classes is permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G Unit Class cannot be voluntarily converted into Diamond Unit Class. Conversions of G Class Units into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class D Class DS Class I
Distribution policy	Class G: Capitalisation Class D: Capitalisation Class DS: Distribution Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's D and/or DS Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500
Target Investors	All categories of Investors

Management fee	Class G: Up to 1.25% Classes D and DS: Up to 1.85% Class I: Up to 0.90%
Performance fee	N/A
Subscription commission	For Classes G, D and DS: N/A For Class I: max 2.00%
Placement fee	For G Unit Class: 1.80% amortized in 3 years Upon purchase of G Unit Class (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G Unit Class is automatically exchanged, value for value, into D Unit Class of the same sub-fund. For D and DS Unit Classes: N/A For I Unit Class: N/A
Redemption commission	For G Unit Class: If you sell G Unit Class before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D and DS Unit Classes: N/A For I Unit Class: N/A
Conversion commission	For G Unit Class: N/A For D and DS Unit Classes: max 0.40% For I Unit Class: N/A
Global exposure determination	Committment Approach

V. WILLERFUNDS – PRIVATE SUITE – BNY MELLON GLOBAL REAL RETURN

Investment policy

The sub-fund, expressed in Euro, invests in a diversified portfolio consisting of: equity, equity-related securities, debt and debt-related securities (including inflation linked bonds), derivatives, UCITS compliant exchange traded funds ("ETF") or exchange traded commodities ("ETC"), deposits, cash, money market instruments and cash equivalents.

The sub-fund may invest up to 100% of its net asset value in fixed income instruments, which include bonds, fixed-interest and floating rate securities, debt securities and other similar instruments issued by corporations, other non-government issuers, governments and government related issuers. This may include, but is not limited to, money market instruments, amortizing debt, hybrids, convertible securities, guaranteed investment certificates and deferred interests.

With the exception of exchange traded commodities (ETCs), exchange traded funds (ETFs) or structured notes, the sub-fund may invest up to 80% of its total assets in equity securities listed on a stock exchange or dealt in any Regulated Market worldwide, including preferred securities, closed-ended REITs and other closed-ended listed funds and depositary receipts (such as American depository receipts ("ADRs"), European depository receipts ("EDRs") and global depository receipts ("GDRs") which may embed financial derivative investments. ADR, GDR and EDR and related underlyings will at any time comply with the eligibility criteria stated in the 2010 Law, as amended from time to time.

The sub-fund will not invest directly in real estate but may be exposed to property, renewable energy and infrastructure through investments in a combination of eligible UCITS and other UCIs (including eligible open-ended exchange traded funds), equity and equity-related securities (such as closed ended REITS and other closed ended listed funds) and fixed income securities (such as exchange traded notes (including exchange traded commodities and exchange traded certificates)). The sub-fund's exposure to REITs will not exceed 10%.

The sub-fund will not invest directly in commodities. The sub-fund may invest indirectly in commodities, through futures, forwards and swaps, as well as via ETCs, ETFs and structured notes, provided that they are UCITS compliant. The sub-fund will limit its exposure to gold to 30% of its total assets.

Although there are no particular geographic investment limits, the sub-fund may invest no more than 20% of its net asset value in government bonds, corporate bonds (investment grade and non-investment grade debt securities) and equity and equity related securities issued by entities located in emerging markets.

The sub-fund may invest up to 10% of its net assets in debt securities issued by Mainland China issuers traded in the China interbank bond market ("CIBM") through Bond Connect program.

The sub-fund may invest up to 30% of its net assets in non-investment grade debt securities (including non-investment grade debt securities issued by emerging market issuers), but it will generally be substantially lower than 30%.

In most market conditions, the average rating for sovereign bonds is not expected to fall below "BB" or equivalent and for corporate bonds not below "B" or equivalent based on rating agencies.

The sub-fund may invest in unrated debt securities, in which case the Investment Manager will determine a rating based on its internal rating policy. With the exception of ETCs and structured notes, unrated debt securities will not represent more than 10% of the sub-fund's net assets.

The sub-fund will not invest in distressed securities nor in default securities.

Securities will be deemed non-investment grade if, at the time of purchase, they are classified below "BBB-" or equivalent and above or equal to "CCC" or equivalent based on rating agencies or equivalent such rating shall be based on the lowest available rating from widely recognized rating agencies or an equivalent measure produced by the Investment Manager based on proprietary models.

In case of downgrade of an existing investment or other events leading to qualify a security of the sub-fund as distressed or default, the Management Company through its pricing committee, will analyze the situation in the best interest of the Fund in order to take actions. Actions may include without limitation selling the security at low value. In any event, the Management Company shall ensure that such downgraded distressed and / or default securities held by the sub-fund shall not exceed 10% of its net assets.

The sub-fund may invest up to 10% (cumulatively) in asset backed securities ("ABS"), mortgage backed securities ("MBS"), collateralized loan obligations ("CLOs"), collateralized debt obligations ("CDOs") and in commercial mortgage backed securities ("CMBS").

The sub-fund may invest no more than 10% of its net asset value in contingent convertible securities ("CoCos").

The sub-fund may invest without limitation in securities denominated in currencies other than the Reference Currency. The sub-fund may use strategies to hedge developed and emerging market currency risks, in relation to currencies different from the Euro. In aggregate, and accounting for active currency positions, the non-Euro currency exposure, including emerging markets, will not exceed 25% (on a look through basis) of the sub-fund's net assets.

The sub-fund exposure to the above-mentioned asset classes achieved through investments in units/shares of UCITS and/or other UCIs, including UCITS compliant ETF or ETC, will not exceed 25% of the sub-fund's net assets.

As the exposure to the above-mentioned asset classes may be achieved through financial derivative instruments, in exceptional market conditions and on a temporary basis, the sub-fund may hold cash and cash equivalents up to 100%.

The sub-fund is actively managed. The sub-fund is not managed in reference to a Benchmark.

The sub-fund may use financial derivative instruments for investment and risk hedging purposes. The sub-fund may invest in derivative instruments which may include, but are not limited to, exchange traded and over-the-counter options, futures (including equity and bond futures), spot and forward contracts, swaps (included but not limited to credit default swaps, interest rates swaps, unfunded total return swaps which underlying assets could be equities, currencies, ETF, and indices on all the aforementioned asset classes), swaptions and contract for difference.

All the above limits take into consideration the net exposure given that the sub-fund has long and short positions over a variety of time periods.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with similar universe.

The sub-fund has been categorised as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Total Return Swap:

- Maximum portion of assets that can be subject to TRS: 100%
- Expected portion of assets that will be subject to TRS: 30%

Securities lending:

- Maximum portion of assets that can be subject to securities lending: 50%
- Expected portion of assets that will be subject to securities lending: 20%

Profile of the typical Investor	The sub-fund is suitable for Investors who search long term investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Equity securities", "Bond securities, "Emerging Markets", "Options, Futures and Swaps, "Interest Rates", "Credit Default Swaps (CDS) transactions", "Credit Risk", "Asset-Backed-Securities – Mortgage-Backed-Securities", "Non-investment grade securities", "Contingent Convertible Bonds", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Investments in CDOS, CLOs", "Investments in Real Estate Investment Trust", "Investments in Exchange Trade Commodities", "Total return swap and/or excess return swap", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Investment Manager	Newton Investment Management Limited The Bank of New York Mellon Centre 160, Queen Victoria Street London, EC4V 4LA United Kingdom
Launch Date of the sub-fund	31 January 2022
Initial Subscription Period	For Unit Classes G, GS and I: 31 January 2022 until 9 February 2022, at initial price of 10 EUR. For Unit Classes D and DS: N/A
First Calculation Day	10 February 2022
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G, GS and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D and DS Unit Classes: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question.

	Conversions of G and GS Unit Classes is permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D and DS Unit Classes is permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G and GS Unit Classes cannot be voluntarily converted into Diamond Unit Classes. Conversions of G and GS Units Classes into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class GS Class D Class DS Class I
Distribution policy	Class G: Capitalisation Class GS: Distribution Class D: Capitalisation Class DS: Distribution Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class GS: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's D and/or DS Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500 Class GS: EUR 2,500
Target Investors	All categories of Investors

Management fee	Class G: Up to 1.10% Class GS: Up to 1.10% Class D: Up to 1.70% Class DS: Up to 1.70% Class I: Up to 0.85%
Performance fee	N/A
Subscription commission	For Classes G, GS, D and DS: N/A For Class I: max 2.00%
Placement fee	For G and GS Unit Classes: 1.80% amortized in 3 years Upon purchase of G and GS Unit Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G and GS Unit Classes are automatically exchanged, value for value, into D and DS Unit Classes of the same sub-fund. For D and DS Unit Classes: N/A For I Unit Class: N/A
Redemption commission	For G and GS Unit Classes: If you sell G and GS Unit Classes before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D and DS Unit Classes: N/A For I Unit Class: N/A
Conversion commission	For G and GS Unit Classes: N.A. For D and DS Unit Classes: max 0.40% For I Unit Class: N/A
Global exposure determination	Absolute VaR
Expected level of leverage	The sub-fund will regularly monitor its leverage and the average level of leverage is expected to be approximately 180%. The sub-fund's leverage may increase to higher levels, for example, at times when the Investment Manager deems it most appropriate to use financial derivative instruments to alter the sub-fund's interest rate sensitivity. The leverage figure is calculated as the sum of the notionals of the derivatives used as required by the regulations. The notional value of the investments varies significantly from their market value which is why the leverage limits may be high. These leverage limits do not take into account any netting and hedging arrangements that the sub-fund may have in place at any time even though these netting and hedging arrangements are used for risk reduction purposes. The methodology used to calculate the leverage is the sum of the absolute value of the notionals.

VI. WILLERFUNDS – PRIVATE SUITE – MILLENNIALS EQUITY

Investment policy

The sub-fund, expressed in EURO, aims to achieve long-term capital growth by investing primarily in equity transferable securities issued by entities without any geographical limitations, including emerging markets (up to 10% of the net asset value), which comply with Environmental, Social and Governance ("ESG") criteria.

The equity securities will be mainly issued by companies whose business model is better positioned to benefit from the increasing role of the Millennial Generation in the economy and in the society in general, at a worldwide level.

The Millennial Generation comprises people born between 1980 and 1999. This generation is also known as Y Generation or Internet Generation. The main sectors where the Millennials theme has impact are inter alia social & entertainment; financials; clothing & apparel; housing & households; travel & mobility; education & employment; food, restaurant & consumer staples; health & fitness.

The sub-fund may invest without limitation in securities denominated in currencies other than the Reference Currency. The currency exposure of the sub-fund is flexibly managed.

The sub-fund follows an investment approach that aims to systematically incorporate ESG and sustainability factors into investment decision-making in order to better manage risks and to generate sustainable, long-term returns.

Securities subject to the ESG analysis within the investment universe are analysed on the basis of binding ESG criteria.

The sub-fund follows an investment strategy that establishes the security selection starting from a negative screening, and adopting a best in class approach stock picking where each security is ranked by the Management Company's external provider from 1 (low ESG score) to 5 (high ESG score). The sub-fund will favour companies that score higher among their industry peers to be compliant with its "best-in-class" approach.

In addition to the exclusion applied to be compliant with the Management Company Sustainable and Responsible Investment Policy, the security selection process will consider the "ESG" principles using a screening process that includes securities identified with a sustainability assessment that integrates an ESG dynamic and Impact analysis considering past, current, and forecasted social/environmental targets and results. In addition, good governance practices of the identified securities are assessed through a specific scoring methodology.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and also for investment purposes.

The sub-fund can invest a portion of assets in unfunded total return swaps ("TRS") on indices and single stocks. Such indices may have as underlying asset (without being limited to) equity, exchange traded funds ("ETF"), forward foreign exchange, equity futures, index futures and options on financial derivative instruments.

The sub-fund may invest up to 10% in aggregate of its net asset value in Chinese companies listed offshore (mainly in United States and Hong Kong) and in China A-shares (up to 5% of its net asset value) via the Shanghai-Hong Kong Stock Connect program (the "Stock Connect"). China A-Shares are shares of Mainland China based companies traded on Shanghai Stock exchange, denominated in Renminbi ("RMB"), and which may be purchased through the Stock Connect.

The sub-fund may hold money-market instruments, money-market funds and hold cash, up to 20% of its net assets.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with similar universe.

The benchmark of the sub-fund consists of the index "MSCI World Growth 4% issuer capped Net Total Return in EUR".

The benchmark is not designed to ensure the promotion of, among other characteristics, environmental or social characteristics, or a combination of those characteristics.

For more details on the benchmark's methodology, please refer to www.msci.com.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is significant.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the benchmark, however there is a discretion to invest in other securities not included in the benchmark.

The sub-fund has been categorised as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Total Return Swap:

- Maximum portion of assets that can be subject to TRS: 10%
- Expected portion of assets that will be subject to TRS: 5%

Securities lending:

- Maximum portion of assets that can be subject to securities lending: 50%
- Expected portion of assets that will be subject to securities lending: 20%

Profile of the typical investor	The sub-fund is suitable for Investors who search long-term investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with Article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Equity securities", "Emerging Markets", "Options, Futures and Swaps", "Interest Rates", "Credit Default Swaps (CDS) transactions", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Total return swap and/or excess return swap", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	EUR
Launch Date of the sub-fund	28 March 2022
Initial Subscription Period	For Units Class G: 28 March 2022 until 6 April 2022, at initial price of 10 EUR. For Unit Classes D: N/A
First Calculation Day	7 April 2022
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.

Subscription	For G Unit Class: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch. For D Unit Class: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversion of G Unit Class is permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversion of D Unit Class is permitted only into Diamond Unit Classes of other sub-funds with a payment of a switch fee. G Unit Class cannot be voluntarily converted into Diamond Unit Classes. Conversions of G Unit Class into Diamond Unit Classes will take place only automatically after a 3 year holding period.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class D
Distribution policy	Class G: Capitalisation Class D: Capitalisation
Minimum investment	Class G: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes.
Minimum additional payment	Class G: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Class G: Up to 1.40% For Class D: Up to 2.00%

Performance fee	N/A
Subscription commission	N/A
Placement fee	For G Units Class: 1.80% amortized in 3 years. Upon purchase of G Unit Class (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G Unit Class is automatically exchanged, value for value, into D Unit Class of the same sub-fund. For D Unit Class: N/A
Redemption commission	For G Unit Class: If you sell G Unit Class before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D Unit Class: N/A
Conversion commission	For G Unit Class: N/A For D Unit Class: max 0.40%
Global exposure determination	Commitment approach.

VII. WILLERFUNDS – PRIVATE SUITE – BLACKROCK BALANCED ESG

Investment policy

The sub-fund, aims to provide a positive total return, measured in Euro, defined as a mix of capital growth and income.

The sub-fund adopts a flexible asset allocation policy and will invest in a diversified portfolio of assets. The asset allocation policy is consistent with the principles of environmental, social and governance 'ESG' focussed investing. The investments may include: equities, fixed-interest and floating rate securities, non-investment grade securities, units / shares of UCITS and / or UCIs, as well as currencies and cash.

The sub-fund will invest in securities issued by corporations, governments and government related issuers, other non-government issuers, located in both developed and emerging markets, and denominated in global currencies. Such issuers will be systematically screened and considered suitable according to the Investment Manager's assessment and ESG criteria analysis and policy, as detailed in the Appendix to the Prospectus.

The sub-fund may invest up to 65% of its net asset value in equity securities, in depositary receipts (such as American depository receipts ("ADRs"), European depository receipts ("EDRs") and global depository receipts ("GDRs"). ADR, GDR and EDR and related underlyings will at any time comply with the eligibility criteria stated in the 2010 Law and the Grand Ducal regulation dated 8 February 2008, as amended from time to time.

The sub-fund will not have any restrictions in selecting securities in terms of geographical allocation.

The sub-fund may invest up to 100% of its net asset value in fixed-interest and floating rate securities.

Although there are no particular geographic investment limits, the sub-fund may invest no more than 30% of its net asset value in government bonds, corporate bonds (investment grade and non-investment grade debt securities) and equity securities issued by entities located in emerging markets.

The sub-fund may invest up to 10% of its net assets in China A-Shares via the Shanghai-Hong Kong Stock Connect program and 10% of its net assets in debt securities issued by Mainland China issuers through Bond Connect program.

The sub-fund should invest approximately 10%-15% of its net assets in non-investment grade debt securities (including non-investment grade debt securities issued by emerging market issuers) with the possibility for the Investment Manager to invest up to 20% of the sub-fund's net assets in those securities.

The sub-fund will not invest in distressed securities nor in default securities.

Securities will be deemed non-investment grade if, at the time of purchase, they are classified below "BBB-" or equivalent and above or equal to "CCC" or equivalent based on rating agencies or equivalent such rating shall be based on the lowest available rating from widely recognised rating agencies or an equivalent measure produced by the Investment Manager based on proprietary models.

Some "CCC" rated securities may be considered as distressed securities. If a security eligible for the sub-fund is rated "CCC", the Investment Manager will perform an analysis in order to determine if such security is a distressed security, if so, the sub-fund will not invest in such security.

In case of downgrade of an existing investment or other events leading to qualify a security of the sub-fund as distressed or default, the Management Company through its pricing committee, will analyse the situation in the best interest of the Fund in order to take actions. Actions may include without limitation selling the security at low value. In any event the Management Company shall ensure that distressed and / or default securities held by the sub-fund shall not exceed 10% of its net assets.

The sub-fund may invest up to 20% (cumulatively) in asset backed securities ("ABS"), mortgage backed securities ("MBS"), collateralized loan obligations ("CLOs"), collateralised debt obligations ("CDOs") and in commercial mortgage backed securities ("CMBS"). The sub-fund may invest no more than 10% of its net asset value in contingent convertible securities ("CoCos").

The sub-fund may invest up to 5% of its net assets in closed-ended real estate investment trusts ("REITS") or Listed Closed-Ended Funds.

The sub-fund may invest in initial public offerings ("IPOs") up to 10% of its net assets. In this case, there is a risk that the price of the newly floated share may see greater volatility as a result of factors such as the absence of an existing public market, non-seasonal transactions, the limited number of securities that can be traded and the lack of information about the issuer.

The sub-fund's exposure to the above-mentioned asset classes may be achieved through direct investments and / or, up to the 49% of the sub-fund's net assets, through investments in units / shares of UCITS and / or UCIs, including exchange traded funds ("ETF"). At least 51% of such indirect investments shall be in units / shares of UCITS / UCI that promote, among other, environmental or social characteristics, and fall within the scope of article 8 of the SFDR.

The sub-fund's exposure to commodities may also not exceed 10% of the sub-fund's net assets and will be achieved through investments in exchange-traded commodities ("ETCs"), which are compliant with the provisions of the Grand Ducal Regulation of February 8, 2008, as amended from time to time.

The sub-fund may also buy money-market instruments (including time deposit, certificates of deposit, money-market funds) up to 10% of its net assets, and may hold cash up to 20% of its net assets.

The sub-fund is actively managed. The sub-fund is not managed in reference to a Benchmark.

The sub-fund may use financial derivative instruments for the purpose of investment and risk hedging. The sub-fund may invest in derivative instruments which may include, but are not limited to, exchange traded and over-the-counter options, futures (including equity and bond futures), spot and forward contracts, listed derivatives, swaps (included but not limited to credit default swaps, interest rates swaps, unfunded total return swaps which underlying assets could be equities, currencies, ETF, and indices on all the aforementioned asset classes), options, swaptions and contract for difference.

The sub-fund may invest without limitation in instruments denominated in currencies other than the Reference Currency. The sub-fund may use strategies to hedge developed market currency risks, in relation to currencies different from the EURO. In aggregate, and accounting for active currency positions, the non-EURO currency exposure will not exceed 70% (on a look through basis) of the sub-fund's net assets.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with similar universe.

The sub-fund has been categorised as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Total Return Swap:

- Maximum portion of assets that can be subject to TRS: 30%
- Expected portion of assets that will be subject to TRS: 10%

Securities lending:

- Maximum portion of assets that can be subject to securities lending: 50%
- Expected portion of assets that will be subject to securities lending: 20%

Profile of the typical investor	The sub-fund is suitable for Investors who search long-term investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.

Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Equity securities", "Emerging Markets", "Options, Futures and Swaps, "Interest Rates", "Credit Default Swaps (CDS) transactions", "Credit Risk", "Asset-Backed-Securities – Mortgage-Backed-Securities", "Non-investment grade securities", "Contingent Convertible Bonds", "Distressed securities", "Default securities", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Investments in CDOS, CLOs", "Investments in Real Estate Investment Trust", "Investments in Exchange Trade Commodities", "Total return swap and/or excess return swap", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	EUR
Investment Manager	BlackRock Investment Management (UK) Limited 12 Throgmorton Avenue London, EC2N 2DL United Kingdom
Sub-Investment Manager	Until 1 February 2026: BlackRock Investment Management, LLC 1 University Square Drive Princeton, 08540 New Jersey, USA As from 2 February 2026: BlackRock Investment Management, LLC 1 University Square Drive Princeton, 08540, New Jersey UNITED STATES OF AMERICA BlackRock Financial Management Inc. 251 Little Falls Drive Wilmington, DE 19808 UNITED STATES OF AMERICA
Launch Date of the sub-fund	28 March 2022
Initial Subscription Period	For Unit Classes G, GS and I: 28 March 2022 until 6 April 2022, at initial price of 10 EUR. For Unit Classes D and DS: N/A
First Calculation Day	7 April 2022
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G, GS and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund

	account held with STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch. For D and DS Unit Classes: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G and GS Unit Classes are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D and DS Unit Classes are permitted only into Diamond Unit Classes of other sub-funds with a payment of a switch fee. G and GS Unit Classes cannot be voluntarily converted into Diamond Unit Classes. Conversions of G and GS Class Units into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class GS Class D Class DS Class I
Distribution policy	Class G: Capitalisation Class GS: Distribution Class D: Capitalisation Class DS: Distribution Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class GS: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000

Minimum additional payment	Class G: EUR 2,500 Class GS: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Class G: Up to 1.10% For Class GS: Up to 1.10% For Class D: Up to 1.70% For Class DS: Up to 1.70% For Class I: Up to 0.85%
Performance fee	N/A
Subscription commission	For Classes G, GS, D and DS: N/A For Class I: max 2.00%
Placement fee	For G and GS Units Classes: 1.80% amortized in 3 years Upon purchase of G and GS Unit Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G and GS Unit Classes are automatically exchanged, value for value, into D and DS Unit Classes of the same sub-fund. For D and DS Unit Classes: N/A For I Unit Class: N/A
Redemption commission	For G and GS Unit Classes: If you sell G and GS Unit Class before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D and DS Unit Classes: N/A For I Unit Class: N/A
Conversion commission	For G and GS Unit Classes: N/A For D and DS Unit Classes: max 0.40% For I Unit Class: N/A
Global exposure determination	Absolute VaR approach.
Expected level of leverage	The sub-fund will regularly monitor its leverage and the average level of leverage is expected to be approximately 100%. The sub-fund's leverage may increase to higher levels, for example, at times when the Investment Manager deems it most appropriate to use financial derivative instruments to alter the sub-fund's interest rate sensitivity. The leverage figure is calculated as the sum of the notionals of the derivatives used as required by the regulations. The notional value of the investments varies significantly from their market value which is why the leverage limits may be high. These leverage limits do not take into account any netting and hedging arrangements that the sub-fund may have in place at any time even though these netting and hedging arrangements are used for risk reduction purposes. The methodology used to calculate the leverage is the sum of the absolute value of the notionals.

VIII. WILLERFUNDS – PRIVATE SUITE – PICTET HEALTH INNOVATION TRENDS

The sub-fund, expressed in Euro, aims to achieve long-term capital growth by investing primarily in equity securities issued by bio-pharmaceutical companies throughout the world (including emerging countries). However, in light of the particularly innovative nature of the pharmaceutical industry in North America and Western Europe, the vast majority of investments in equity securities issued by bio-pharmaceutical companies will be made in these regions. The sub-fund may also invest in equities or equity related securities issued by companies that are active in sectors related to health.

The sub-fund will seek to achieve its investment objective by investing in a diversified portfolio consisting primarily of equity securities listed on a stock exchange or dealt in any Regulated Market worldwide, including in depositary receipts (such as American depository receipts ("ADRs"), European depository receipts ("EDRs") and global depository receipts ("GDRs"). ADR, GDR and EDR and related underlyings will at any time comply with the eligibility criteria stated in the 2010 Law, as amended from time to time.

The sub-fund will not have any restrictions in selecting securities in terms of geography, industry or sectors.

This sub-fund pursues a thematic strategy that aims to deliver a financial return alongside achieving a positive environmental and/or social impact by investing mainly in companies supporting the health of people and in those supporting the health of people with high innovation capacity.

Although there are no particular geographic investment limits, the sub-fund may invest no more than 50% of its net asset value in instruments issued by entities located in emerging markets. The sub-fund may invest up to 35% of its net assets in China A-Shares via the Shanghai-Hong Kong Stock Connect program.

The sub-fund may invest without limitation in securities denominated in currencies other than the Reference Currency. The currency exposure of the sub-fund is flexibly managed.

The sub-fund exposure to the equity securities achieved through investments in units/shares of UCITS and/or other UCIs, including UCITS compliant exchange traded funds ("ETF") will not exceed 20% of the sub-fund's net assets.

The sub-fund may also buy money-market instruments and hold cash up to 20% of its net assets.

The sub-fund is actively managed. The sub-fund is not managed in reference to a Benchmark.

The sub-fund may use financial derivative instruments for investment and risk hedging purposes. The sub-fund may invest in derivative instruments which may include, but are not limited to, exchange traded and over-the-counter options, futures (including equity and bond futures), spot and forward contracts, swaps (included but not limited to credit default swaps, interest rates swaps, unfunded total return swaps which underlying assets could be equities, currencies, ETF, and indices on equities), swaptions and contract for difference.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with similar universe.

The sub-fund has been categorised as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Total Return Swap:

- Maximum portion of assets that can be subject to TRS: 20%
- Expected portion of assets that will be subject to TRS: 0%

Securities lending: • Maximum portion of assets that can be subject to securities lending: 50% • Expected portion of assets that will be subject to securities lending: 20%	
Profile of the typical Investor	The sub-fund is suitable for Investors who search long term investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Equity securities", "Emerging Markets", "Options, Futures and Swaps, "Credit Default Swaps (CDS) transactions", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Total return swap and/or excess return swap", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Investment Manager	Pictet Asset Management S.A. 60, Route des Acacias 1211 Geneva 73, Switzerland
Launch Date of the sub-fund	16 May 2022
Initial Subscription Period	For Unit Classes G and I: 16 May 2022 until 25 May 2022, at initial price of 10 EUR. For Unit Classes D: N/A
First Calculation Day	26 May 2022
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D Unit Class: N/A

Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G Unit Class is permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D Unit Class is permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G Unit Class cannot be voluntarily converted into Diamond Unit Class. Conversions of G Units Class into Diamond Unit Class will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class D Class I
Distribution policy	Class G: Capitalisation Class D: Capitalisation Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500
Management fee	Class G: Up to 1.40% Class D: Up to 2.00% Class I: Up to 1.00%
Performance fee	N/A
Subscription commission	For Classes G and D: N/A For Class I: max 2.00%
Placement fee	For G Unit Class: 1.80% amortized in 3 years

	Upon purchase of G Unit Class (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G Unit Class is automatically exchanged, value for value, into D Unit Class of the same sub-fund. For D Unit Class: N/A For I Unit Class: N/A
Redemption commission	For G Unit Class: If you sell G Unit Class before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D Unit Class: N/A For I Unit Class: N/A
Conversion commission	For G Unit Class: N/A For D Unit Class: max 0.40% For I Unit Class: N/A
Global exposure determination	Commitment
Target Investors	All categories of Investors

IX. WILLERFUNDS – PRIVATE SUITE – LOMBARD ODIER NATURAL CAPITAL

The sub-fund, expressed in Euro, aims to achieve long-term capital growth by investing primarily in equity securities listed on a stock exchange or dealt in any Regulated Market, issued by issuers located worldwide (including emerging markets) whose growth will benefit from regulations, innovations, services or products favoring the transition to a more circular economy and to an economy that values natural capital.

The sub-fund's investments are measured on the exposure to the business activities with a contribution towards positive environmental outcomes along the transition to Circular Bio-Economy, Resource Efficiency, Outcome-oriented economy and Zero Waste, aiming to achieve a sustainable investment objective being a positive environmental impact.

The sub-fund will bindingly invest in high quality companies with sustainable financial models, business practices and business models showing resilience and the ability to evolve and benefit from long term structural trends using Investment Manager proprietary ESG and sustainability profiling tools and methodologies set out below. The investment approach is based on a high conviction stock picking process.

The sub-fund may invest in depositary receipts (such as American depositary receipts ("ADRs"), European depositary receipts ("EDRs") and global depositary receipts ("GDRs"). ADR, GDR and EDR and related underlying will at any time comply with the eligibility criteria stated in the 2010 Law, as amended from time to time.

The Investment Manager will use its discretion with regards to the selection of markets, sectors, size of companies and currencies (including emerging market currencies), and will employ a high conviction strategy which means it will generally concentrate the sub-fund's assets into a smaller group of investments.

Although there are no particular geographic investment limits, the sub-fund may invest no more than 50% of its net asset value in instruments issued by entities located in emerging markets. The sub-fund may invest up to 20% of its net assets in China A-Shares via the Shanghai-Hong Kong Stock Connect program.

The sub-fund may invest without limitation in securities denominated in currencies other than the Reference Currency. The currency exposure of the sub-fund is flexibly managed.

The sub-fund's exposure to securities may be achieved through direct or indirect investments. Any exposure via units/shares of UCITS and/or other UCIs, including UCITS compliant exchange traded funds ("ETF") will not exceed 10% of the sub-fund's net assets.

The sub-fund may also invest in money-market instruments, money-market funds, and hold cash up to 20% of its net assets.

The sub-fund may use financial derivative instruments for risk hedging purposes. The sub-fund may invest in derivative instruments which may include, but are not limited to, exchange traded and over-the-counter options, futures (including equity and bond futures), spot and forward contracts, swaps (included but not limited to credit default swaps, interest rates swaps, unfunded total return swaps (which underlying assets could be equities, currencies, ETF, and indices on all the aforementioned asset classes)), swaptions and contract for difference.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with similar universe.

The Benchmark of the sub-fund consists of the index "MSCI World SMID Cap" Net Total Return, in USD converted in EUR.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is significant.

The relative risk and positioning to the Benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the Benchmark, however there is discretion to invest in other securities not included in the Benchmark.

The sub-fund has been categorised as a Sustainable Objective sub-fund, as it has sustainable investments as its objective in accordance with article 9 of the SFDR. More information relating to the sustainable investment objective of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Profile of the typical Investor	The sub-fund is suitable for Investors who search long term investments. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Equity securities", "Emerging Markets", "Options, Futures and Swaps, "Interest Rates", "Credit Default Swaps (CDS) transactions", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Total return swap and/or excess return swap", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Investment Manager	Lombard Odier Asset Management (Europe) Limited Queensberry House 3 Old Burlington Street London W1S 3AB United Kingdom
Launch Date of the sub-fund	16 May 2022
Initial Subscription Period	For Unit Classes G and I: 16 May 2022 until 25 May 2022, at initial price of 10 EUR. For Unit Classes D: N/A
First Calculation Day	26 May 2022
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D Unit Class: N/A

Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G Unit Class is permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D Unit Class is permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G Unit Class cannot be voluntarily converted into Diamond Unit Class. Conversions of G Units Class into Diamond Unit Class will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class D Class I
Distribution policy	Class G: Capitalisation Class D: Capitalisation Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500
Target Investors	All categories of Investors
Management fee	Class G: Up to 1.25% Class D: Up to 1.85% Class I: Up to 0.90%
Performance fee	N/A
Subscription commission	For Classes G and D: N/A For Class I: max 2.00%
Placement fee	For G Unit Class: 1.80% amortized in 3 years

	Upon purchase of G Unit Class (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G Unit Class is automatically exchanged, value for value, into D Unit Class of the same sub-fund. For D Unit Class: N/A For I Unit Class: N/A
Redemption commission	For G Unit Class: If you sell G Unit Class before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D Unit Class: N/A For I Unit Class: N/A
Conversion commission	For G Unit Class: N/A For D Unit Class: max 0.40% For I Unit Class: N/A
Global exposure determination	Commitment

X. WILLERFUNDS – PRIVATE SUITE – JANUS HENDERSON STRATEGIC BOND

The sub-fund aims to provide a return, from a combination of income and capital growth, over the long term. To achieve this objective the sub-fund will invest in a diversified portfolio consisting of: global fixed and floating rate securities, asset backed securities and mortgage backed securities, convertible bonds, perpetual bonds, structured notes, exchange traded derivatives, OTC swaps (such as interest rate swaps, credit default swaps, credit default swaps on indices and total return swaps), forward foreign exchange contracts and preferred stocks.

Using careful macroeconomic research and credit analysis, the Investment Manager actively varies the allocation to different types of fixed income instruments to suit the prevailing economic environment.

The sub-fund may invest up to 100% of its net asset value in fixed income instruments, which include bonds, fixed-interest and floating rate securities, debt securities and other similar instruments issued by corporations, other non-government issuers, governments and government related issuers.

The sub-fund may invest up to 10% of its total assets in equity securities listed on a stock exchange or dealt in any Regulated Market worldwide, including preferred shares, closed-ended REITs and depositary receipts (such as American depository receipts ("ADRs"), European depository receipts ("EDRs") and global depository receipts ("GDRs"). ADR, GDR and EDR and related underlyings will at any time comply with the eligibility criteria stated in the UCI Law, as amended from time to time.

Although there are no particular geographic investment limits, the sub-fund may invest no more than 5% of its net asset value in government bonds, corporate bonds (investment grade and non-investment grade debt securities) and equity instruments issued by entities located in emerging markets.

The sub-fund may invest up to 100% of its net assets in non-investment grade debt securities. The sub-fund may invest in unrated debt securities, in which case the Investment Manager will determine a rating. Unrated debt securities will not represent more than 10% of the sub-fund's net assets.

The sub-fund will not invest in distressed securities nor in default securities.

Securities will be deemed non-investment grade if, at the time of purchase, they are classified below "BBB-" or equivalent and above or equal to "CCC" or equivalent based on rating agencies or equivalent such rating shall be based on the lowest available rating from widely recognized rating agencies or an equivalent measure produced by the Investment Manager based on proprietary models.

Some "CCC" rated securities may be considered as distressed securities. If a security eligible for the sub-fund is rated "CCC", the Investment Manager will perform an analysis in order to determine if such security is a distressed security, if so, the sub-fund will not invest in such security.

In case of downgrade of an existing investment or other events leading to qualify a security of the sub-fund as distressed or default, the Management Company through its pricing committee, will analyze the situation in the best interest of the Fund in order to take actions. Actions may include without limitation selling the security at low value. In any event, the Management Company shall ensure that distressed and / or default securities held by the sub-fund shall not exceed 10% of its net assets.

The sub-fund may invest up to 20% (cumulatively) in asset backed securities ("ABS"), mortgage backed securities ("MBS"), collateralized loan obligations ("CLOs"), collateralized debt obligations ("CDOs") and in commercial mortgage backed securities ("CMBS").

The sub-fund may invest no more than 20% of its net asset value in contingent convertible securities ("CoCos").

The sub-fund may invest without limitation in securities denominated in currencies other than the Reference Currency. The sub-fund may use strategies to hedge currency risks, in relation to currencies different from the Reference Currency. In aggregate, and accounting for active currency positions, the non-EURO currency exposure, including emerging markets, will not exceed 20% (on a look through basis) of the sub-fund's net assets.

The sub-fund exposure to the above-mentioned asset classes achieved through investments in units/shares of UCITS and/or other UCIs, including UCITS compliant ETF or ETC, will not exceed 20% of the sub-fund's net assets.

As the exposure to the above-mentioned asset classes may be achieved through financial derivative instruments, in exceptional market conditions and on a temporary basis, the sub-fund may hold cash and cash equivalent up to 100%.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with similar universe.

The sub-fund is actively managed. The sub-fund is not managed in reference to a Benchmark.

The sub-fund may use financial derivative instruments for the purpose of investment and risk hedging. The sub-fund may invest in derivative instruments which may include, but are not limited to, exchange traded and over-the-counter options, futures (including equity and bond futures), spot and forward contracts, swaps (included but not limited to credit default swaps, unfunded total return swaps which underlying assets consist of a range of securities or indices), currencies, ETF, and indices on all the aforementioned asset classes), swaptions and contract for difference.

All the above limits take into consideration the net exposure given that the sub-fund has long and short positions over a variety of time periods. However, the combination of long and short positions never results in uncovered short positions.

The sub-fund has been categorized as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Total Return Swap:

- Maximum portion of assets that can be subject to TRS: 20%
- Expected portion of assets that will be subject to TRS: 0%

Securities lending:

- Maximum portion of assets that can be subject to securities lending: 70%
- Expected portion of assets that will be subject to securities lending: 40%

Profile of the typical Investor	The sub-fund is suitable for Investors who search long term investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Bond securities", "Emerging Markets", "Options, Futures and Swaps, "Interest Rates", "Credit Default Swaps (CDS) transactions", "Credit Risk", "Asset-Backed-Securities – Mortgage-Backed-Securities", "Non-investment grade securities", "Contingent Convertible Bonds", "Distressed securities", "Default securities", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Investments in CDOS, CLOs", "Total return swap and/or excess return swap", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.

Reference Currency	Euro
Investment Manager	Henderson Global Investors Limited 201 Bishopsgate London EC2M 3AE United Kingdom
Launch Date of the sub-fund	28 March 2022
Initial Subscription Period	For Unit Classes G, GS and I: 28 March 2022 until 6 April 2022, at initial price of 10 EUR. For Unit Classes D and DS: N/A
First Calculation Day	7 April 2022
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G, GS and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D and DS Unit Classes: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G and GS Unit Classes are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D and DS Unit Classes are permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G and GS Unit Classes cannot be voluntarily converted into Diamond Unit Classes. Conversions of G and GS Unit Classes into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.

Initial Price	10 Euro
Unit Classes	Class G Class GS Class D Class DS Class I
Distribution policy	Class G: Capitalisation Class GS: Distribution Class D: Capitalisation Class DS: Distribution Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class GS: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500 Class GS: EUR 2,500
Target Investors	All categories of Investors
Management fee	Class G: Up to 0.70% Class GS: Up to 0.70% Class D: Up to 1.30% Class DS: Up to 1.30% Class I: Up to 0.70%
Performance fee	N/A
Subscription commission	For Classes G, GS, D and DS: N/A For Class I: max 2.00%
Placement fee	For G and GS Unit Classes: 1.80% amortized in 3 years Upon purchase of G and GS Unit Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G and GS Unit Classes are automatically exchanged, value for value, into D and DS Unit Classes of the same sub-fund. For D and DS Unit Classes: N/A For I Unit Class: N/A
Redemption commission	For G and GS Unit Classes: If you sell G and GS Unit Classes before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a

	redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D and DS Unit Classes: N/A For I Unit Class: N/A
Conversion commission	For G and GS Unit Classes: N/A For D and DS Unit Classes: max 0.40% For I Unit Class: N/A
Global exposure determination	Absolute VaR approach
Expected level of leverage	The sub-fund will regularly monitor its leverage and the average level of leverage is expected to be approximately 150%. The sub-fund's leverage may increase to higher levels, for example, at times when the Investment Manager deems it most appropriate to use financial derivative instruments to alter the sub-fund's interest rate sensitivity. The leverage figure is calculated as the sum of the notionals of the derivatives used as required by the regulations. The notional value of the investments varies significantly from their market value which is why the leverage limits may be high. These leverage limits do not take into account any netting and hedging arrangements that the sub-fund may have in place at any time even though these netting and hedging arrangements are used for risk reduction purposes. The methodology used to calculate the leverage is the sum of the absolute value of the notionals.

XI. WILLERFUNDS – PRIVATE SUITE – JPM EUROPE EQUITY

Investment policy

The sub-fund, expressed in Euro, aims to achieve long-term capital growth by investing primarily in European sustainable companies or European companies that demonstrate improving sustainable characteristics. Sustainable companies are those that the Investment Manager believes to have effective governance and superior management of environmental and social issues (sustainable characteristics).

The sub-fund will seek to achieve its investment objective by investing in a diversified portfolio consisting primarily of equity and equity related securities of European issuers listed on a stock exchange or dealt in any Regulated Market worldwide, including in depositary receipts (such as American depository receipts ("ADRs"), European depository receipts ("EDRs") and global depository receipts ("GDRs"). ADR, GDR and EDR and related underlying will at any time comply with the eligibility criteria stated in the 2010 Law, as amended from time to time.

The Investment Manager will take a bottom-up fundamental approach to stock selection, looking for sustainable leaders in each sector and preferring attractively valued, well-managed companies for which the outlook is improving.

The sub-fund will not have any restrictions in selecting securities in terms of geography, industry or sectors.

The sub-fund will not invest in instruments issued by entities located in emerging markets.

The sub-fund may invest without limitation in securities denominated in currencies other than the Reference Currency. The currency exposure of the sub-fund is flexibly managed.

The sub-fund exposure to the equity and equity related securities is achieved through direct investments. Any indirect exposure via units/shares of UCITS and/or other UCIs, including UCITS compliant exchange traded funds ("ETF") will not exceed 30% of the sub-fund's net assets.

The sub-fund may also invest in money-market instruments up to 10% of its net assets.

The sub-fund may hold ancillary liquid assets. Liquid assets used to back-up financial derivative instruments exposure are not considered as ancillary liquid assets. The sub-fund will not invest more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. In exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of its net assets, if justified in the interest of the Investors.

The sub-fund may use financial derivative instruments for the purpose of risk hedging. The sub-fund may invest in derivative instruments which may include, without limitation, spot and forward contracts, options, index options, swaps and credit default swaps.

The aim is to engage in securities lending on a continuous basis.

Securities lending:

- Maximum portion of assets that can be subject to securities lending: 50%
- Expected portion of assets that will be subject to securities lending: 20%

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETFs) with a similar investment universe to that of the sub-fund's.

The Benchmark of the sub-fund consists of the index "MSCI Europe Index" Net Total Return in EUR.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is material.

The relative risk and positioning to the Benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the Benchmark, however there is discretion to invest in other securities not included in the Benchmark.

The sub-fund has been categorised as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Profile of the typical Investor	The sub-fund is suitable for Investors who search long term investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Equity securities", "Options, Futures and Swaps, "Credit Default Swaps (CDS) transactions", "Credit Risk", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Investment Manager	J.P. Morgan Asset Management (UK) Limited 25 Bank Street, Canary Wharf, London, E14 5JP, United Kingdom
Launch Date of the sub-fund	13 February 2023
Initial Subscription Period	For Unit Classes G and I: 13 February 2023 until 22 February 2023 For Unit Class D: N/A
First Calculation Day	23 February 2023
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D Unit Class: N/A

Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G Unit Class are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D Unit Class are permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G Unit Class cannot be voluntarily converted into Diamond Unit Classes. Conversions of G Unit Class into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class D Class I
Distribution policy	Class G: Capitalisation Class D: Capitalisation Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Class G: Up to 1.25% For Class D: Up to 1.85% For Class I: Up to 0.85%
Performance fee	N/A
Subscription commission	For Classes Gold and Diamond: N.A. For Class I: max 2.00%
Placement fee	For G Unit Class: 1.80% amortized in 3 years Upon purchase of G Unit Class (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at

	NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G Unit Class are automatically exchanged, value for value, into D Unit Class of the same sub-fund. For D Unit Class: N/A For Class I: N/A
Redemption commission	For G Unit Class: If you sell G Unit Class before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D Unit Class: N/A For Class I: N/A
Conversion commission	For G Unit Class: N.A. For D Unit Class: max 0.40% For Class I: N.A.
Global exposure determination	Commitment approach

XII. WILLERFUNDS – PRIVATE SUITE – VONTOBEL EQUITY GLOBAL IMPACT

Investment policy

The sub-fund has a sustainable investment objective which consists of investing in companies whose economic activities contribute to environ-mental and/or social objectives and seeks to provide long-term capital growth in EUR.

The sub-fund will seek to achieve its investment objective by investing in a diversified portfolio consisting primarily of equity and equity related securities listed on a stock exchange or dealt in any Regulated Market worldwide, including in depositary receipts (such as American depository receipts ("ADRs"), European depository receipts ("EDRs") and global depository receipts ("GDRs"). ADR, GDR and EDR and related underlying will at any time comply with the eligibility criteria stated in the 2010 Law, as amended from time to time.

The Investment Manager will select securities issued by companies worldwide whose economic activities contribute to an environmental objective and/or a social objective in the Investment Manager's opinion ('impact'). The sub-fund focuses on eight core impact pillars ('Impact Pillars'): clean water, clean energy, solutions for sustainable cities, innovative industries & technology, good health & well-being, sustainable food & agriculture, responsible production & consumption and equal opportunities. The targeted companies provide products and services along the whole value chain, which have the potential to tackle today's pressing problems such as population growth, urbanization and rising inequalities.

The sub-fund will not have any restrictions in selecting securities in terms of geography, industry or sectors.

Although there are no particular geographic investment limits, the sub-fund may invest no more than 30% of its net assets in instruments issued by entities located in emerging markets and such investments could be significantly lower depending on investment opportunities. The sub-fund may invest up to 30% of its net assets in China A-Shares via the Shanghai-Hong Kong Stock Connect program and Shenzhen-Hong Kong Stock Connect in China A-Shares.

The sub-fund regularly reports its positive impact by disclosing the contribution of the holdings to the various impact pillars and corresponding UN Sustainable Development Goals (SDGs). In addition, distinct quantitative impact indicators are disclosed.

The sub-fund may invest without limitation in securities denominated in currencies other than the Reference Currency. The currency exposure of the sub-fund is flexibly managed.

The sub-fund exposure to the equity and equity related securities is achieved through direct investments. Any indirect exposure via units/shares of UCITS and/or other UCIs, including UCITS compliant exchange traded funds ("ETF") will not exceed 10% of the sub-fund's net assets. Any UCITS/UCIs that the sub-fund invests in will also need to have been categorised under article 9 SFDR.

The sub-fund may also invest in money-market instruments up to 40% of its net assets.

The sub-fund may hold ancillary liquid assets. Liquid assets used to back-up financial derivative instruments exposure are not considered as ancillary liquid assets. The sub-fund will not invest more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. In exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of its net assets, if justified in the interest of the Investors.

The sub-fund may use financial derivative instruments to gain exposure to underlying equity securities in the investable universe of the sub-fund and for the purpose of risk hedging. The sub-fund may invest in derivative instruments which may include, without limitation, spot and forward contracts, options, index options, swaps (including unfunded total return swaps, whose underlying could be, without being limited to indexes, equity, exchange traded funds ("ETF"), forward foreign exchange, equity futures, index futures and options on financial derivative instruments) and credit default swaps.

The aim is to use total return swaps on a temporary basis based on market conditions.

Total Return Swap (TRS):

- Maximum portion of assets that can be subject to TRS: 5%
- Expected portion of assets that will be subject to TRS: 3%

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with similar universe.

The Benchmark of the sub-fund consists of the index "MSCI All Countries World" Net Total Return, in USD converted in EUR.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is significant.

The relative risk and positioning to the Benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the Benchmark, however there is discretion to invest in other securities not included in the Benchmark.

The sub-fund has been categorised as a Sustainable Objective sub-fund, as it has sustainable investments as its objective in accordance with article 9 of the SFDR. More information relating to the sustainable investment objective of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Profile of the typical Investor	The sub-fund is suitable for Investors who search long term investments, with an investment strategy categorised as a Sustainable Objective sub-fund, as it has sustainable investments as its objective in accordance with article 9 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Equity securities", "Emerging Markets", "Stock Connect and China" "Options, Futures and Swaps, "Credit Default Swaps (CDS) transactions", "Credit Risk", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Total return swap and/or excess return swap", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Investment Manager	Vontobel Asset Management AG 43, Gotthardstrasse 8002 Zürich Switzerland.
Launch Date of the sub-fund	10 October 2022
Initial Subscription Period	For Unit Classes G and I: 10 October 2022 until 19 October 2022, at initial price of 10 EUR. For Unit Classes D: N/A
First Calculation Day	20 October 2022
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.

Subscription	For G and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D Unit Class: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G Unit Class are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D Unit Class are permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G Unit Class cannot be voluntarily converted into Diamond Unit Classes. Conversions of G Unit Class into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class D Class I
Distribution policy	Class G: Capitalisation Class D: Capitalisation Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000

Minimum additional payment	Class G: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Class G: Up to 1.25% For Class D: Up to 1.85% For Class I: Up to 0.85%
Performance fee	N/A
Subscription commission	For Classes Gold and Diamond: N.A. For Class I: max 2.00%
Placement fee	For G Unit Class: 1.80% amortized in 3 years Upon purchase of G Unit Class (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G Unit Class are automatically exchanged, value for value, into D Unit Class of the same sub-fund. For D Unit Class: N/A For I Unit Class: N/A
Redemption commission	For G Unit Class: If you sell G Unit Class before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D Unit Class: N/A For I Unit Class: N/A
Conversion commission	For G Unit Class: N.A. For D Unit Class: max 0.40% For I Unit Class: N.A.
Global exposure determination	Commitment approach

XIII. WILLERFUNDS – PRIVATE SUITE – WELLINGTON EQUITY GLOBAL RESEARCH

Investment policy

The sub-fund, expressed in Euro, aims to achieve long-term total returns in excess of the MSCI World Index (the "Index"), by primarily investing in equity securities issued by companies worldwide, with a maximum of 50% of the weighted average carbon intensity of the Index.[1]

The sub-fund will seek to achieve its investment objective by investing in a diversified portfolio consisting primarily of equity and equity related securities listed on a stock exchange or dealt in any Regulated Market worldwide, including common stock and depositary receipts (such as American depository receipts ("ADRs"), European depository receipts ("EDRs") and global depository receipts ("GDRs"). ADR, GDR and EDR and related underlying will at any time comply with the eligibility criteria stated in the 2010 Law, as amended from time to time.

The Investment Manager will select securities from within their global equity opportunity set using bottom-up stock selection based on fundamental research of individual companies. The sub-fund will not have any restrictions in selecting securities in terms of geography, industry or sectors.

Although there are no particular geographic investment limits, the sub-fund may invest no more than 20% of its net asset value in instruments issued by entities located in emerging markets (including up to 10% of its net assets in China A-Shares via the Shanghai-Hong Kong Stock Connect program) and such investments could be significantly lower depending on investment opportunities.

The sub-fund may invest without limitation in securities denominated in currencies other than the Reference Currency. The currency exposure of the sub-fund is flexibly managed.

The sub-fund exposure to the equity and equity related securities is achieved through direct investments. Any indirect exposure via units/shares of UCITS and/or other UCIs, including UCITS compliant exchange traded funds ("ETF") will not exceed 10% of the sub-fund's net assets.

The sub-fund may also buy money-market instruments up to 10% of its net assets.

The sub-fund may hold ancillary liquid assets. Liquid assets used to back-up financial derivative instruments exposure are not considered as ancillary liquid assets. The sub-fund will not invest more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. In exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of its net assets, if justified in the interest of the Investors.

The sub-fund may use financial derivative instruments for the purpose of risk hedging. The sub-fund may invest in derivative instruments which may include, without limitation, spot and forward contracts, options, index options, swaps and credit default swaps.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with similar universe.

The sub-fund is actively managed. The Benchmark that the sub-fund seeks to outperformance and compare performance against is the "MSCI World Index", Net Total Return in USD, converted in EUR. The degree of freedom allowed within the management of the sub-fund is significant.

The relative risk and positioning to the Benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the Benchmark, however there is discretion to invest in other securities not included in the Benchmark.

1 As from 27 February 2026, this sentence should be read as follow: "*The sub-fund, expressed in Euro, aims to achieve long-term total returns in excess of the MSCI World Index (the "Index"), by primarily investing in equity securities issued by companies worldwide*."

The sub-fund has been categorised as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Securities lending:

The aim is to engage in securities lending on a continuous basis subject to market conditions.

- Maximum portion of assets that can be subject to securities lending: 50%
- Expected portion of assets that will be subject to securities lending: 20%

Profile of the typical Investor	The sub-fund is suitable for Investors who search long term investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with Article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Equity securities", "Emerging Markets", "Stock Connect and China", "Options, Futures and Swaps", "Interest Rates", "Credit Default Swaps (CDS) transactions", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Investment Manager	Wellington Management International Ltd Cardinal Place, 80 Victoria Street London SW1E 5JL United Kingdom
Sub-Investment Manager	Wellington Management Company LLP 280, Congress Street Boston, MA 02210 USA
Launch Date of the sub-fund	5 June 2023
Initial Subscription Period	For Unit Classes G and I: 5 June 2023 until 14 June 2023 For Unit Class D: N/A
First Calculation Day	15 June 2023
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.

Subscription	For G and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D Unit Class: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G Unit Class are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D Unit Class are permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G Unit Class cannot be voluntarily converted into Diamond Unit Classes. Conversions of G Unit Class into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class D Class I
Distribution policy	Class G: Capitalisation Class D: Capitalisation Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000

Minimum additional payment	Class G: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Class G: Up to 1.25% For Class D: Up to 1.85% For Class I: Up to 0.85%
Performance fee	N/A
Subscription commission	For Classes Gold and Diamond: N.A. For Class I: max 2.00%
Placement fee	For G Unit Class: 1.80% amortized in 3 years Upon purchase of G Unit Class (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G Unit Class are automatically exchanged, value for value, into D Unit Class of the same sub-fund. For D Unit Class: N/A For Class I: N/A
Redemption commission	For G Unit Class: If you sell G Unit Class before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D Unit Class: N/A For Class I: N/A
Conversion commission	For G Unit Class: N.A. For D Unit Class: max 0.40% For Class I: N.A.
Global exposure determination	Commitment approach

XIV. WILLERFUNDS – PRIVATE SUITE – EURIZON MULTI-ASSET CIRCULAR ECONOMY

Investment policy

The sub-fund, measured in Euro, aims at providing a positive total return, defined as a mix of capital growth and income. The sub-fund has a sustainable investment objective and will invest up to 70% of its net assets in equities of companies that participate in the transition to a circular economy through processes such as product recycling, waste reduction, product life extension and renewable resources. The sub-fund may also invest its net assets in green bonds i.e. corporates, governments and agency bonds, issued to finance, for example, projects that respect the climate and the environment, such as renewable energy, energy efficiency, pollution prevention, clean transport, water management, circular economy, biodiversity protection and green building.

The sub-fund adopts a flexible asset allocation policy and will invest in a diversified portfolio of assets. The asset allocation policy is consistent with the principles of sustainability focused investing. The investments may include: equities, fixed-interest and floating rate securities, non-investment grade securities, units / shares of UCITS and / or UCIs, as well as currencies and cash.

The sub-fund will invest in securities issued by corporations, governments and government related issuers, other non-government issuers, located in both developed and emerging markets, and denominated in global currencies. Such issuers will be systematically screened and considered suitable according to the Investment Manager's assessment and ESG criteria analysis and policy, as detailed in the Appendix to the Prospectus.

The sub-fund will mainly invest in equities of companies that participate in the transition to a circular economy through processes such as product recycling, waste reduction, product life extension and renewable resources.

Specifically, the sub-fund normally invests at least 30% of total net assets in debt and debt-related instruments, including money market instruments that are issued to finance climate- and environment-friendly projects.

The sub-fund will not have any restrictions in selecting securities in terms of geographical allocation.

Although there are no particular geographic investment limits, the sub-fund may invest no more than 50% of its net asset value in government bonds, corporate bonds (investment grade and non-investment grade debt securities) and equity securities issued by entities located in emerging markets.

The sub-fund may invest its net assets in Chinese debt securities issued by Mainland China issuers through Bond Connect program, up to 20% of its net assets.

The sub-fund may invest up to 25% of its net assets in non-investment grade debt securities (including non-investment grade debt securities issued by emerging market issuers).

The sub-fund will not invest in distressed securities nor in default securities.

Debt securities will typically have an average credit quality of at least BBB- or equivalent as measured by credit rating agencies or as defined on the basis of the internal valuation model implemented by the Investment Manager.

Securities will be deemed non-investment grade if, at the time of purchase, they are classified below "BBB-" or equivalent and above or equal to "CCC" or equivalent based on rating agencies or equivalent such rating shall be based on the lowest available rating from widely recognised rating agencies or an equivalent measure produced by the Investment Manager based on proprietary models.

Some "CCC" rated securities may be considered as distressed securities. If a security eligible for the sub-fund is rated "CCC", the Investment Manager will perform an analysis in order to determine if such security is a distressed security, if so, the sub-fund will not invest in such security.

In case of downgrade of an existing investment or other events leading to qualify a security of the sub-fund as distressed or default, the Management Company through its pricing committee, will analyse the situation in the best interest of the sub-fund in order to take actions. Actions may include without limitation selling

the security at low value. In any event the Management Company shall ensure that distressed and / or default securities held by the sub-fund shall not exceed 10% of its net assets.

The sub-fund may invest up to 20% (cumulatively) in asset backed securities ("ABS"), mortgage backed securities ("MBS"), collateralized loan obligations ("CLOs"), collateralised debt obligations ("CDOs") and in commercial mortgage backed securities ("CMBS"). The sub-fund may invest no more than 10% of its net asset value in contingent convertible securities ("CoCos").

The sub-fund's exposure to the above-mentioned asset classes may be achieved through direct investments and / or, up to the 30% of the sub-fund's net assets, through investments in units / shares of UCITS and / or UCIs, including exchange traded funds ("ETF"). Any UCITS/UCI that the sub-fund invests in will also need to have been categorized under article 9 SFDR.

The sub-fund may also buy money-market instruments (including time deposit, certificates of deposit, money-market funds) up to 10% of its net assets.

The sub-fund may hold ancillary liquid assets. Liquid assets used to back-up financial derivative instruments exposure are not considered as ancillary liquid assets. The sub-fund will not invest more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. In exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of its net assets, if justified in the interest of the Investors.

The sub-fund is actively managed. The sub-fund is not managed in reference to a Benchmark.

The sub-fund may use financial derivative instruments for the purpose of investment and risk hedging. The sub-fund may invest in derivative instruments which may include, but are not limited to, exchange traded and over-the-counter options, futures (including equity and bond futures), spot and forward contracts, listed derivatives, swaps (included but not limited to credit default swaps, interest rates swaps, unfunded total return swaps which underlying assets could be equities, currencies, ETF, and indices on all the aforementioned asset classes), options, swaptions and contract for difference.

The aim is to use total return swaps on a temporary basis based on discretionary decisions to adapt case by case to specific market conditions.

The sub-fund may invest without limitation in instruments denominated in currencies other than the Reference Currency. The sub-fund may use strategies to hedge developed market currency risks, in relation to currencies different from the EURO. In aggregate, and accounting for active currency positions, the non-EURO currency exposure will not exceed 80% (on a look through basis) of the sub-fund's net assets.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with a similar investment universe.

The sub-fund has been categorised as a Sustainable Objective sub-fund, as it has sustainable investments as its objective in accordance with article 9 of the SFDR. More information relating to the sustainable investment objective of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Total Return Swap (TRS):
- Maximum portion of assets that can be subject to TRS: 20%
- Expected portion of assets that will be subject to TRS: 5%

Profile of the typical Investor	The sub-fund is suitable for Investors who search long term investments, with an investment strategy categorised as a Sustainable Objective sub-fund, as it has sustainable investments as its objective in accordance with article 9 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.

Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Equity securities", "Bond securities", "Emerging Markets", "Options, Futures and Swaps, "Interest Rates", "Credit Default Swaps (CDS) transactions", "Credit Risk", "Asset-Backed-Securities – Mortgage-Backed-Securities", "Non-investment grade securities", "Contingent Convertible Bonds", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Investments in CDOs, CLOs", "Total return swap and/or excess return swap", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Investment Manager	Eurizon Capital SGR S.p.A. 22, via Melchiorre Gioia 20124 Milan Italy
Launch Date of the sub-fund	10 October 2022
Initial Subscription Period	For Unit Classes G, GS and I: 10 October 2022 until 19 October 2022, at initial price of 10 EUR. For Unit Classes D and DS: N/A
First Calculation Day	20 October 2022
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G, GS and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D and DS Unit Classes: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G and GS Unit Classes are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D and DS Unit Classes are permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G and GS Unit Classes cannot be voluntarily converted into Diamond Unit Classes. Conversions of G and GS Unit Classes into Diamond Unit Classes will take place only automatically after a 3 year holding

	period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class GS Class D Class DS Class I
Distribution policy	Class G: Capitalisation Class GS: Distribution Class D: Capitalisation Class DS: Distribution Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class GS: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500 Class GS: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Class G and GS: Up to 1.10% For Class D and DS: Up to 1.70% For Class I: Up to 0.80%
Performance fee	N/A
Subscription commission	For Classes Gold and Diamond: N.A. For Class I: max 2.00%
Placement fee	For G and GS Unit Class: 1.80% amortized in 3 years Upon purchase of G and GS Unit Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and

	is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G and GS Unit Classes are automatically exchanged, value for value, into D and DS Unit Classes of the same sub-fund. For D and DS Unit Class: N/A For Class I: N/A
Redemption commission	For G and GS Unit Class: If you sell G Unit Class before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D and DS Unit Class: N/A For Class I: N/A
Conversion commission	For G and GS Unit Class: N.A. For D and DS Unit Class: max 0.40% For Class I: N.A.
Global exposure determination	Commitment approach

XV. WILLERFUNDS – PRIVATE SUITE – FIDELITY GLOBAL EQUITY INCOME

The sub-fund, expressed in EURO, aims to achieve capital growth over the long term and provide income.

In actively managing the sub-fund, the Investment Manager considers growth and valuation metrics, company financials, return on capital, cash flows and other measures, as well as company management, industry, economic conditions, and other factors. The Investment Manager will target investments which it believes offer attractive dividend yields in addition to price appreciation.

The sub-fund shall aim to achieve its objective by investing at least 70% of its net assets, in income producing equities and equity related instruments such as American depository receipts ("ADRs), European depository receipts ("EDRs") and global depository receipts ("GDRs"), of companies from anywhere in the world, including emerging markets. ADR, GDR and EDR and related underlyings will at any time comply with the eligibility criteria stated in the 2010 Law, as amended from time to time.

Although there are no particular geographic investment limits, the sub-fund may invest no more than 30% of its net assets in equity securities and equity related instruments issued by entities located in emerging markets.

The sub-fund may invest up to 10% of its net assets in China A-Shares via the Shanghai-Hong Kong Stock Connect program.

The sub-fund may invest without limitation in securities denominated in currencies other than the Reference Currency. The currency exposure of the sub-fund is flexibly managed.

The benchmark of the Sub-fund consists of the index "MSCI ACWI Index" Net Total Return in EUR which is used for portfolio construction, risk and performance measurement.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is significant. The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a material part of the investments of the sub-fund will be components of the benchmark, however there is discretion to invest in other securities not included in the benchmark.

The sub-fund's exposure to the above-mentioned asset classes may be achieved through direct investments and / or through indirect investments in units / shares of UCITS and / or UCIs, including exchange traded funds ("ETFs"). Total investments in units / shares of UCITS and / or UCIs shall not exceed 10% of the sub-fund's net assets.

The Sub-fund may engage in transactions in financial derivative instruments which may include but are not limited to exchange traded and over-the-counter options, forwards, non-deliverable forwards, futures, swaps or credit default swaps principally for investment and/or for hedging as well as for efficient portfolio management purposes.

The sub-fund may hold ancillary liquid assets. Liquid assets used to back-up financial derivative instruments exposure are not considered as ancillary liquid assets. The sub-fund will not invest more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. In exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of its net assets, if justified in the interest of the investors.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the Sub-fund's assets in UCITS (including ETF) with similar universe.

The sub-fund has been categorised as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

The aim is to engage in securities lending on a continuous basis subject to market conditions.

Securities lending:
- Maximum portion of assets that can be subject to securities lending: 50%
- Expected portion of assets that will be subject to securities lending: 20%

Total Return Swap:
Maximum portion of assets that can be subject to TRS: 50%.
Expected portion of assets that will be subject to TRS: 10%.

Profile of the typical Investor	The sub-fund is suitable for investors who look for long term investments and have a preference for sustainable ESG strategies. The investor must be able to accept a certain volatility and the possibility of losing a part of the invested amount. This product is for investors who meet the conditions for accessing the product in question (see prospectus) with any level of knowledge and experience. Investors should understand the product risks and only invest if they can bear potentially substantial losses.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the Sub-fund and inter alia "Options, Futures and Swaps, "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Total return swap and/or excess return swap", "ESG risks", "Operational Risk". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Investment Manager	FIL Pensions Management Beech Gate Millfield Lane Lower Kingswood Tadworth, Surrey KT20 6RP UNITED KINGDOM
Sub-Investment Manager	FIL Investments International Beech Gate Millfield Lane Lower Kingswood Tadworth, Surrey KT20 6RP UNITED KINGDOM

Launch Date of the sub-fund	27 February 2026
Initial Subscription Period	N/A
First Calculation Day	2 March 2026
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G, GS and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D and DS Unit Class: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G and GS Unit Classes are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D and DS Unit Classes are permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G and GS Unit Classes cannot be voluntarily converted into Diamond Unit Classes. Conversions of G and GS Unit Class into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class GS Class D Class DS Class I

Distribution policy	Class G: Capitalisation Class GS: Distribution Class D: Capitalisation Class DS: Distribution Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class GS: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Classes G and GS: 1.20% For Classes D and DS: 1.80% For Class I: 0.80%
Performance fee	N/A
Subscription commission	For Classes Gold and Diamond: N.A. For Class I: max 2.00%
Placement fee	For G and GS Unit Classes: 1.80% amortized in 3 years Upon purchase of G and GS Unit Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G and GS Unit Classes are automatically exchanged, value for value, into D and DS Unit Classes of the same sub-fund. For D and DS Unit Classes: N/A For Class I: N/A
Redemption commission	For G and GS Unit Classes: If you sell G and GS Unit Classes before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D and DS Unit Classes: N/A For I Unit Class: N/A
Conversion commission	For G and GS Unit Classes: N.A. For D and DS Unit Classes: max 0.40% For Class I: N.A.

Global exposure determination	Commitment approach

XVI. WILLERFUNDS – PRIVATE SUITE – FAMI EURO SHORT TERM

Investment policy

The Sub-fund aims to provide a positive return relative to the benchmark, with the possibility of capital growth.

To achieve this objective the Sub-fund will invest at least 80% of its net assets in Euro-denominated securities issued by corporations, other non-government issuers, governments and government related issuers mainly issued by European entities. The investments may include: bullet bonds, callable bonds, floating rate notes (FRNs), additional tier 1 bonds (AT1s), corporate perpetuals, single name CDS, ITRX indices, government bond futures (Europe/UK/US), interest rate swaps, forex (FX), exchange traded funds (ETFs) and total return swaps.

The Sub-fund seeks to maintain an effective duration of three (3) years or less, although under certain market conditions such as in periods of significant volatility in interest rates and spreads, the Sub-fund's duration may be longer than three years.

Returns are predominately driven by yield curve positioning, asset allocation, sector allocation and security selection. With the corporate bond allocation, issuer selection will include both a bottom-up and a top-down approach, leveraging off the Management Company's credit and general markets expertise, whilst ensuring adequate diversity due to the asymmetric nature of returns.

The Management Company has flexibility to invest in out-of-index strategies as a means of adding performance but adherence to the investment objective remains imperative. The Sub-fund is managed according to the Management Company's active philosophy and approach to fixed income investing.

The Sub-fund has the freedom to invest outside its principal geographical areas.

Although there are no particular geographic investment limits, the Sub-fund may invest no more than 10% of its net assets in each of the following assets: government bonds and corporate bonds instruments issued by entities located in emerging markets.

The Sub-fund may invest up to 10% of its net assets in non-investment grade debt securities.

In addition, the Sub-fund may invest in unrated debt securities, in which case the Management Company will determine a rating. Unrated debt securities will not represent more than 10% of the Sub-fund's net assets.

The Sub-fund will not invest in distressed securities nor in defaulted securities.

Debt securities will typically have an average credit quality of investment grade or equivalent as measured by credit rating agencies or as defined on the basis of the internal valuation model implemented by the Management Company. This is a typical average rating and not a target or limit, the average rating can be lower or higher.

Securities will be deemed non-investment grade if, at the time of purchase, they are classified below "BBB-" or equivalent and above or equal to "CCC" or equivalent based on rating agencies or any equivalent rating which shall be based on the lowest available rating from a widely recognized rating agency or an equivalent measure produced by the Management Company based on proprietary models.

Some "CCC" rated securities may be considered as distressed securities. If a security eligible for the Sub-fund is rated "CCC", the Management Company will perform an analysis in order to determine if such security is a distressed security, if so, the Sub-fund will not invest in such security.

In case of downgrade of an existing investment or other events leading to qualify a security of the Sub-fund as distressed or default, the Management Company through its pricing committee, will analyse the situation in the best interest of the Sub-fund in order to take actions. Actions may include, without limitation, selling the security at low value. In any event, the Management Company shall ensure that distressed and / or defaulted securities held by the Sub-fund shall not exceed 10% of its net assets.

The Sub-fund may invest in hybrid bonds (including perpetual bonds), which rating can vary from investment grade to high yield. Exposure to such debt instruments will not exceed 5% of the Sub-fund's net assets.

The Sub-fund may invest no more than 5% of its net assets in contingent convertible securities ("CoCos").

The Sub-fund may invest in instruments denominated in currencies other than the reference currency (EUR) up to 20% of its net assets. The currency exposure of the Sub-fund is flexibly managed.

The Sub-fund exposure to the above-mentioned asset classes achieved through investments in units/shares of UCITS and/or other UCIs, including UCITS compliant ETFs or ETCs, will not exceed 20% of the Sub-fund's net assets.

The Sub-fund may hold ancillary liquid assets. Liquid assets used to back-up financial derivative instruments exposure are not considered as ancillary liquid assets. The Sub-fund will not invest more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. In exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of its net assets, if justified in the interest of the investors.

At inception of the Sub-fund and for a period of maximum 6 months, the above-described investment policy can be pursued by investing part or all of the Sub-fund's assets in UCITS (including ETFs) with a similar investment universe to the Sub-fund's.

The benchmarks of the Sub-fund consist of an equal weighting of 50% each of the two indices "ICE BofA 1-3 Year Euro Government Index" and "ICE BofA 1-3 Year Euro Corporate Index".

The Sub-fund is actively managed and the degree of freedom allowed within the management of the Sub-fund can be significant (as from 27 February 2026, it can be limited). The Management Company may use its full discretion to invest in companies or sectors not included in the benchmarks in order to take advantage of specific investment opportunities.

The benchmarks are used for portfolio construction, risk and performance measurement.

The relative risk and positioning to the benchmarks are monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the Sub-fund will be components of the benchmarks, however there is discretion to invest in other securities not included in the benchmarks.

The Sub-fund may use financial derivative instruments for the purpose of investment and risk hedging.

The Sub-fund may invest in derivative instruments which may include, but are not limited to, exchange traded and over-the-counter options, futures (including bond and interest rate futures), spot and forward contracts, swaps (included but not limited to interest rate swaps, credit default swaps, unfunded total return swaps which underlying assets consist of a range of securities or indices, currencies, ETF, and indices on all the aforementioned asset classes), swaptions and contract for difference.

The aim is to use total return swaps on a temporary basis as long as it is necessary to optimize portfolio structure in the interest of the unitholders.

Total Return Swap (including CFD):
- Maximum portion of assets that can be subject to TRS: 50%
- Expected portion of assets that will be subject to TRS: 0-10%

The aim is to engage in securities lending on a continuous basis.

Securities lending:
- Maximum portion of assets that can be subject to securities lending: 70%
- Expected portion of assets that will be subject to securities lending: 40%

The Sub-fund has been categorized as an ESG Promotion Strategy Sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the Sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR. More information relating to the environmental and social characteristics of the Sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation EU) 2022/1288.	
Profile of the typical Investor	The sub-fund is suitable for Investors who search medium term investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	*Investors should refer to the "Risk" section of this Prospectus in terms* of risks applicable to investing in the Sub-fund and inter alia "Bond securities", "Emerging Markets", "Options, Futures and Swaps, "Interest Rates", "Credit Default Swaps (CDS) transactions", "Credit Risk", "Non-investment grade securities", "Contingent Convertible Bonds", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Total return swap and/or excess return swap", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the Sub-fund.
Reference Currency	Euro
Launch Date of the sub-fund	10 October 2022
Initial Subscription Period	For Unit Classes G, GS and I: 10 October 2022 until 19 October 2022, at initial price of 10 EUR. For Unit Classes D and DS: N/A
First Calculation Day	20 October 2022
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G, GS and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D and DS Unit Classes: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question.

	Conversions of G and GS Unit Classes are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D and DS Unit Classes are permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G and GS Unit Classes cannot be voluntarily converted into Diamond Unit Classes. Conversions of G and GS Unit Classes into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class GS Class D Class DS Class I
Distribution policy	Class G: Capitalisation Class GS: Distribution Class D: Capitalisation Class DS: Distribution Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class GS: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500 Class GS: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Class G and GS: Up to 0.20% For Class D and DS: Up to 0.80% For Class I: Up to 0.35%
Performance fee	N/A

Subscription commission	For Classes Gold and Diamond: N.A. For Class I: max 2.00%
Placement fee	For G and GS Unit Class: 1.80% amortized in 3 years Upon purchase of G and GS Unit Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G and GS Unit Classes are automatically exchanged, value for value, into D and DS Unit Classes of the same sub-fund. For D and DS Unit Class: N/A For Class I: N/A
Redemption commission	For G and GS Unit Class: If you sell G Unit Class before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D and DS Unit Class: N/A For Class I: N/A
Conversion commission	For G and GS Unit Class: N.A. For D and DS Unit Class: max 0.40% For Class I: N.A.
Global exposure determination	Commitment approach

XVII. WILLERFUNDS – PRIVATE SUITE – ASTERIA – MAN FLEXIBLE ALLOCATION

Investment policy

The Sub-fund, expressed in Euro, aims to provide a positive return, measured in Euro, defined as a mix of income and capital growth, by providing dynamic exposure to a diversified range of asset classes. The Sub-fund will seek to achieve its investment objective by investing directly and/or indirectly, through investment in Investment Funds (as defined below), in a global flexible diversified portfolio consisting primarily of equities, fixed-interest and floating rate securities, noninvestment grade securities, commodities (only indirectly), currencies and cash.

The allocation across asset classes remains dynamic over time, with the strategic asset allocation ("SAA") serving as a baseline allocation. The SAA can be dynamically and tactically adjusted such that the allocation to equity, fixed income and alternatives is adjusted up or down based on a variety of models including inflation (level and direction of), valuation, growth and sentiment, in line with an internal proprietary framework. The Sub-fund's exposure to the above-mentioned asset classes is expected to be predominantly achieved through investments in units / shares of UCITS and / or UCIs, including UCITS compliant exchange traded funds (together "Investment Funds").

The Sub-fund may invest up to 100% of the Sub-fund's net assets in Investment Funds, but no more than 20% of its net asset value in units / shares of a single Investment Fund. The target allocation of investments in units / shares of Investment Funds is expected to mirror a 40/60 portfolio split between investments in Investment Funds following an equity and fixed income strategy. While the Sub-Fund mainly intends to operate as a fund of funds, the Sub-fund may also invest directly in the abovementioned asset classes subject to certain specified limits, as detailed below.

The Sub-fund may directly invest in securities issued by corporations, other nongovernment issuers, governments and government related issuers located in both developed and emerging markets and denominated in global currencies in line with the limits specified below:

The Sub-fund may directly invest up to 45% of its net asset value in equities instruments, in depositary receipts (such as American depositary receipts ("ADRs"), European depositary receipts ("EDRs") and global depositary receipts ("GDRs"). ADRs, GDRs and EDRs and their related underlying securities will at any time comply with the eligibility criteria stated in the UCI Law, as amended from time to time.

The Sub-fund will not have any restrictions in selecting securities in terms of industry or geographical allocation. Although there are no particular geographic investment limits, the Sub-fund may directly invest no more than 30% of its net asset value in government bonds, corporate bonds (investment grade and non-investment grade) and equity instruments issued by entities located in emerging markets. The Sub-fund may directly invest up to 100% of its net asset value in eligible fixed interest and floating rate securities.

The Sub-fund may directly invest up to 20% of its net assets in eligible non-investment grade debt securities (including non-investment grade debt securities issued by emerging market issuers). The Sub-fund may directly invest up to 10% of its net assets in China A-Shares via the Shanghai Hong Kong Stock Connect program and debt securities issued by Mainland China issuers through Bond Connect program.

The Sub-fund will not directly invest in distressed securities nor in default securities. Securities will be deemed non-investment grade if, at the time of purchase, they are classified below "BBB-" or equivalent and above or equal to "CCC" or equivalent based on rating agencies or equivalent defined on the basis of the internal valuation model implemented by the Investment Manager. Some "CCC" rated securities may be considered as distressed securities. If a security eligible for the Sub-fund is rated "CCC", the Investment Manager will perform an analysis in order to determine if such security is a distressed security, if so, the Sub-fund will not invest in such security. In case of a downgrade of an existing investment or other events leading to a security of the Sub-fund qualifying as distressed or default, the Investment Manager will analyse the situation in the best interest of the Fund in order to take the appropriate action. Such actions may include, without limitation, selling the security at low value. In any event, the Management Company shall ensure that distressed and / or default securities held by the Sub-fund shall not exceed 10% of its net asset value.

The Sub-fund may directly invest up to 20% of its net asset value (cumulatively) in asset backed securities ("ABS") and mortgage-backed securities ("MBS"), of which no more than 10% will be invested in quoted

non-agency MBS. The Sub-fund may directly invest no more than 10% of its net asset value in contingent convertible securities ("CoCos"). The Sub-fund will not invest directly in commodities.

The Sub-fund may directly invest in money-market instruments up to 20% of its net assets. The direct holding of ancillary liquid assets (cash and deposits at sight (such as cash held in current accounts)) is limited to 20% of the net assets of the Sub-Fund. Under exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of the Sub-Fund's net assets, if justified in the interest of the investors.

The Sub-fund is actively managed. The Sub-fund is not managed by reference to a benchmark.

The Sub-fund may directly use financial derivative instruments for the purpose of investment and risk hedging. Financial derivative instruments may include, without limitation, exchange traded and over-the-counter options, futures, spot and forward contracts, listed derivatives, swaps, credit default swaps, options, index options.

The Sub-fund may directly invest up to 5% of its net asset value in eligible certificates pursuing investment policies in accordance with this Sub-fund's Investment Policy and intended as secured debt obligations issued by special purpose vehicle (SPV) entities affiliated to one or more investment banks, and falling within the categorisation of transferable securities as contemplated by the UCITS Regulations 2016/438 (including, but not limited to, being exchange listed with an observable market price), and will typically have no fixed maturity date.

The Sub-fund may purchase Financing Assets (as detailed below) and transfer the full economic interest in such assets to first class financial institutions ("Broker") acting as swap counterparty pursuant to swap agreements (the "Financing Swap"). "Financing Assets" will include UCITS-eligible regulated investment funds (including money market funds and ETFs) domiciled in the EEA, Jersey, Guernsey, the Isle of Man, or the United States. Such investment funds will be UCITS funds or alternative investment funds which are equivalent to UCITS which will deliver exposure to equities. They may also include equity securities, including, but not limited to, preferred stocks, warrants on equities (which gives the holder the right to buy the underlying equity at a specified price and time and will not embed leverage) and depositary receipts for such securities (American depositary receipts (ADR) traded in the United States markets and global depositary receipts (GDR) traded in other world markets), issued by companies worldwide. The Financing Assets will have no more than 30% exposure to emerging markets.

The Sub-fund may directly invest, without limitation, in instruments denominated in currencies other than the reference currency (EUR).

The Sub-fund may use strategies to hedge developed market currency risks, in relation to currencies different from the EURO. In aggregate, and accounting for active currency positions as described in the previous paragraph, the non-EURO currency exposure will not exceed 50% of the Sub-fund's net assets.

For the avoidance of doubt, the specified limits for direct investment do not apply to exposure achieved indirectly through Investment Funds.

Total return swaps ("TRS"):

- Maximum portion of assets that can be subject to TRS: 100%
- Expected portion of assets that may be subject to TRS: 50%

The Sub-fund will not directly enter into securities lending transactions nor in repurchase or reverse repurchase agreements.

Profile of the typical Investor	The Sub-fund is suitable for investors who search long term investments. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the Sub-fund and inter alia, "Equity securities", "Noninvestment grade securities", "Credit Risk", "Emerging Markets", "Options, Futures and Swaps", "Interest Rates", "Exchange Rates", "Credit Default Swaps (CDS) transactions",

	"Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Asset-Backed-Securities – Mortgage-Backed-Securities", "Contingent Convertible Bonds", and "Total return swap and/or excess return swap". Investors should consider this extra risk when evaluating the potential benefits of investing in the Sub-fund.
Reference Currency	Euro
Investment Manager	Man Asset Management (Ireland) Limited 70 Sir John Rogerson's Quay, Dublin, D02 R296 Ireland
Sub-Investment Managers	Man Solutions Limited Riverbank House, 2 Swan Lane London, EC4R 3AD United Kingdom and Asteria Investment Managers SA Rue de Lausanne 15 1201 Geneva, Switzerland
Launch Date of the sub-fund	13 February 2023
Initial Subscription Period	For Unit Classes G, GS and I: 13 February 2023 to 22 February 2023 For Unit Classes D and DS: N/A
First Calculation Day	23 February 2023
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G, GS and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D and DS Unit Classes: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question.

	Conversions of G and GS Unit Classes are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D and DS Unit Classes are permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G and GS Unit Classes cannot be voluntarily converted into Diamond Unit Classes. Conversions of G and GS Unit Classes into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class GS Class D Class DS Class I
Distribution policy	Class G: Capitalisation Class GS: Distribution Class D: Capitalisation Class DS: Distribution Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class GS: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500 Class GS: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Class G and GS: Up to 0.90% For Class D and DS: Up to 1.50% For Class I: Up to 0.50%
Performance fee	N/A

Subscription commission	For Classes Gold and Diamond: N.A. For Class I: max 2.00%
Placement fee	For G and GS Unit Classes: 1.80% amortized in 3 years Upon purchase of G and GS Unit Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the Sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G and GS Unit Classes are automatically exchanged, value for value, into D and DS Unit Classes of the same Sub-fund. For D and DS Unit Classes: N/A For Class I: N/A
Redemption commission	For G and GS Unit Classes: If you sell G and GS Unit Classes before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the Sub-fund in order to avoid any negative effects the redemption may create for the other investors. For D and DS Unit Class: N/A For Class I: N/A
Conversion commission	For G and GS Unit Class: N.A. For D and DS Unit Class: max 0.40% For Class I: N.A.
Global exposure determination	Commitment approach

XVIII. WILLERFUNDS – PRIVATE SUITE – FRANKLIN EMERGING CORPORATE BOND

Investment policy

The sub-fund aims at achieving income yield and increase the value of its investments over the medium term. To achieve this objective the sub-fund will invest mainly in a diversified portfolio consisting of: debt securities of any maturity or rating (which may include predominantly below investment grade and/or unrated securities) issued by governments, government-related entities and corporations located in, or doing significant business in, developing or emerging markets and denominated in any currency. The sub-fund may also invest in fixed and floating rate securities, asset and mortgage backed securities, convertible bonds, perpetual bonds, structured notes, exchange traded derivatives, OTC swaps (such as interest rate swaps, credit default swaps, credit default swaps on indices and total return swaps), forward foreign exchange contracts and preferred stocks.

The sub-fund may invest up to 20% of its net assets in Mainland China through the Bond Connect Program or directly (also referred to as CIBM direct).

The sub-fund may invest up to 75% of its net assets in non-investment grade debt securities. The sub-fund may invest in unrated debt securities, in which case the Investment Manager will determine a rating. Unrated debt securities will not represent more than 10% of the sub-fund's net assets.

The sub-fund will not invest in distressed securities nor in default securities.

Securities will be deemed non-investment grade if, at the time of purchase, they are classified below "BBB-" or equivalent and above or equal to "CCC" or equivalent based on rating agencies or equivalent such rating shall be based on the lowest available rating from widely recognized rating agencies or an equivalent measure produced by the Investment Manager based on proprietary models.

Some "CCC" rated securities may be considered as distressed securities. If a security eligible for the sub-fund is rated "CCC", the Investment Manager will perform an analysis in order to determine if such security is a distressed security, if so, the sub-fund will not invest in such security.

In case of downgrade of an existing investment or other events leading to qualify a security of the sub-fund as distressed or default, the Management Company through its pricing committee, will analyze the situation in the best interest of the sub-fund in order to take actions. Actions may include without limitation selling the security at low value. In any event, the Management Company shall ensure that distressed and / or default securities held by the sub-fund shall not exceed 10% of its net assets.

The sub-fund may invest in perpetual bonds, which rating can vary from investment grade to high yield. Exposure to such debt instruments will not exceed 20% of the sub-fund's net assets.

Debt securities will typically have an average credit quality of at least BB or equivalent as measured by credit rating agencies or as defined on the basis of the internal valuation model implemented by the Investment Manager.

The sub-fund may invest up to 20% (cumulatively) in asset backed securities ("ABS"), mortgage backed securities ("MBS"), collateralized loan obligations ("CLOs"), collateralized debt obligations ("CDOs") and in commercial mortgage backed securities ("CMBS").

The sub-fund may invest no more than 20% of its net asset value in contingent convertible securities ("CoCos").

The sub-fund may invest without limitation in instruments denominated in currencies other than the Reference Currency (EUR). The currency exposure of the sub-fund is flexibly managed.

The sub-fund exposure to the above-mentioned asset classes achieved through investments in units/shares of UCITS and/or other UCIs, including UCITS compliant ETF or ETC, will not exceed 20% of the sub-fund's net assets.

The sub-fund may hold ancillary liquid assets. Liquid assets used to back-up financial derivative instruments exposure are not considered as ancillary liquid assets. The sub-fund will not invest more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. In exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of its net assets, if justified in the interest of the Investors.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with similar universe.

The sub-fund is actively managed. The Benchmark of the sub-fund used for performance comparison purposes consists of:

- For classes G, GS, D, DS and I: "JPM CEMBI Broad Diversified", in USD and converted in EUR

- For classes GH, GSH, DH, DSH and IH: "JPM CEMBI Broad Diversified", Hedged in EUR.

The degree of freedom allowed within the management of the sub-fund is significant.

The relative risk and positioning to the Benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the Benchmark, however there is discretion to invest in other securities not included in the Benchmark.

The sub-fund may use financial derivative instruments for the purpose of investment and risk hedging. The sub-fund may invest in derivative instruments which may include, but are not limited to, exchange traded and over-the-counter options, futures (including bond futures), spot and forward contracts, swaps (included but not limited to credit default swaps, unfunded total return swaps which underlying assets consist of a range of securities or indices), currencies, ETF, and indices on all the aforementioned asset classes), swaptions and contract for difference.

The aim is to use total return swaps on a temporary basis in circumstances when liquidity is highly challenged, or occasions when bid/offer spreads are highly unattractive.

Total Return Swap:
- Maximum portion of assets that can be subject to TRS: 10%
- Expected portion of assets that will be subject to TRS: 0%

The aim is to engage in securities lending on a continuous basis subject to market conditions.
Securities lending:
- Maximum portion of assets that can be subject to securities lending: 70%
- Expected portion of assets that will be subject to securities lending: 40%

All the above limits take into consideration the net exposure given that the sub-fund has long and short positions over a variety of time periods. However, the combination of long and short positions never results in uncovered short positions.

The sub-fund has been categorized as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Profile of the typical Investor	The sub-fund is suitable for Investors who search medium term investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with Article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.

Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Bond securities", "Emerging Markets", "Bond Connect and China", "Options, Futures and Swaps, "Interest Rates", "Credit Default Swaps (CDS) transactions", "Credit Risk", "Asset-Backed-Securities – Mortgage-Backed-Securities", "Non-investment grade securities", "Contingent Convertible Bonds", "Distressed securities", "Default securities", "Securities lending Risks", "Liquidity Risk", Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Investments in CDOS, CLOs", "Total return swap and/or excess return swap", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Investment Manager	Franklin Templeton International Services S.à r. l. 8A, rue Albert Borschette L-1246, Luxembourg Grand Duchy of Luxembourg
Sub-Investment Manager	Franklin Templeton Investment Management Limited Cannon Place, 78 Cannon Street EC4N 6HL London United Kingdom Franklin Templeton Investments (ME) Limited Unit 2, Level 2, Gate Building Dubai International Financial Centre United Arab Emirates
Launch Date of the sub-fund	3 April 2023
Initial Subscription Period	For Unit Classes G, GH, GS, GSH, I and IH: 3 April 2023 to 12 April 2023 For Unit Classes D, DS, DH and DSH: N/A
First Calculation Day	13 April 2023
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G, GS, GH, GSH and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D, DS, DH and DSH Unit Classes: N/A

Conversion	Conversions of G, GS, GH and GSH Unit Classes are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D, DS, DH and DSH Unit Classes are permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G, GS, GH and GSH Unit Classes cannot be voluntarily converted into Diamond Unit Classes. Conversions of G, GS, GH and GSH Unit Classes into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I and IH Unit Classes is permitted only into I and IH Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class GS Class GH Class GSH Class D Class DS Class DH Class DSH Class I Class IH
Distribution policy	Class G: Capitalisation Class GS: Distribution Class GH: Capitalisation Class GSH: Distribution Class D: Capitalisation Class DS: Distribution Class DH: Capitalisation Class DSH: Distribution Class I: Capitalisation Class IH: Capitalisation
Minimum investment	Class G: EUR 5,000 Class GH: EUR 5,000 Class GS: EUR 5,000 Class GSH: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class DH: available only via automatic conversion of GH Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes.

	Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's D and/or DS Unit Classes. Class DSH: available only via automatic conversion of GSH Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000 Class IH: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500 Class GS: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Class G, GS, GH and GSH: Up to 0.80% For Class D, DS, DH and DSH: Up to 1.40% For Class I and IH: Up to 0.70%
Performance fee	N/A
Subscription commission	For Classes Gold and Diamond: N.A. For Class I: max 2.00% For Class IH: max 2.00%
Placement fee	For G, GS, GH and GSH Unit Classes: 1.80% amortized in 3 years Upon purchase of G, GS, GH and GSH Unit Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G, GS, GH and GSH Unit Classes are automatically exchanged, value for value, into D and DS Unit Classes of the same sub-fund. For D, DS, DH and DSH Unit Classes: N/A For Classed I and IH: N/A
Redemption commission	For G, GS, GH and GSH Unit Classes: If you sell G, GS, GH and GSH Unit Classes before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D, DS, DH and DSH Unit Classes: N/A For Classes I and IH: N/A
Conversion commission	For G, GS, GH and GSH Unit Classes: N.A. For D, DS, DH and DSH Unit Classes: max 0.40% For Classes I and IH: N.A.
Global exposure determination	Commitment approach

XIX. WILLERFUNDS – PRIVATE SUITE – T. ROWE PRICE EQUITY US RESEARCH

Investment policy

The sub-fund aims to provide long-term capital growth by primarily investing in equity securities issued by US companies.

The strategy attempts to create a portfolio with similar characteristics to the "S&P 500" Net Total Return, in USD converted in EUR (the "Index") with the potential to provide excess returns relative to the Index.

The Investment Manager uses a disciplined portfolio construction process whereby it weights each sector and industry approximately the same as the Index. Within each sector and industry, the weighting of individual fund holdings can vary significantly from their weighting within the Index.

The sub-fund attempts to outperform the Index by overweighting those stocks that are viewed favourably relative to their weighting in the Index, and underweighting or avoiding those stocks that are viewed negatively.

The sub-fund is managed within the targeted sector and individual security limits relative to the Index. This Index will be used for initial portfolio construction and for performance comparison. The Benchmark, however, is a broad market index and, as such, not aligned with the environmental and social characteristics of the sub-fund. The sub-fund is managed within the targeted country, industry, sector and individual security limits relative to the Index, before applying the T. Rowe Price Responsible Exclusion List. After the T. Rowe Price Exclusion List is applied, the sub-fund may deviate from these targeted limits. Although the Investment Manager has freedom to invest in securities that do not form part of the Benchmark and not own all Benchmark securities, its ability to deviate from it is somewhat limited. As a consequence of its investment strategy, the sub-fund's performance may, at times, be relatively closely aligned with that of the Benchmark.

The Investment Manager seeks to take advantage of its fundamental research by assigning equity analysts to select stocks for the sub-fund within industries where they have focused expertise.

The equity analysts are responsible for selecting stocks and determining the stocks' weights within their industry-specific portfolios, subject to the oversight and discretion of the portfolio managers who work closely with the analysts. The analysts and portfolio managers rely on fundamental research, which considers various factors such as the quality of a company's management team and its business franchise, earnings growth potential of a company and its market sector, and valuation.

The sub-fund will seek to achieve its investment objective by investing in a diversified portfolio consisting primarily of equity and equity related securities listed on a stock exchange or dealt in any Regulated Market worldwide, including in depositary receipts (such as American depository receipts ("ADRs"), European depository receipts ("EDRs") and global depository receipts ("GDRs")). ADR, GDR and EDR and related underlying will at any time comply with the eligibility criteria stated in the 2010 Law, as amended from time to time.

The Investment Manager will select securities from within their industry using bottom-up stock selection based on fundamental research of individual companies. The sub-fund will not have any restrictions in selecting securities in terms of industry or sectors save for the restrictions specified in the T. Rowe Price Responsible Exclusion List.

The sub-fund may invest up to 10% its net assets in non-US domiciled companies of developed countries via ADR/GDR.

The sub-fund will not invest its net assets in instruments issued by entities located in emerging markets.

The sub-fund may invest without limitation in securities denominated in currencies other than the Reference Currency. The currency exposure of the sub-fund is flexibly managed.

The sub-fund may also invest up to 10% of its net assets in money-market instruments.

The sub-fund may hold ancillary liquid assets. Liquid assets used to back-up financial derivative instruments exposure are not considered as ancillary liquid assets. The sub-fund will not hold more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. In exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of its net assets, if justified in the interest of the Investors.

The sub-fund may use financial derivative instruments for the purpose of risk hedging and cash equitisation, including but not limited to futures, FX spots, and forwards.

The aim is to engage in securities lending on a continuous basis subject to market conditions.
Securities lending:
- Maximum portion of assets that can be subject to securities lending: 50%
- Expected portion of assets that will be subject to securities lending: 20%

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with similar universe.

The sub-fund is actively managed. The Benchmark of the sub-fund consists of the index "S&P 500" Net Total Return, in USD converted in EUR.

The degree of freedom allowed within the management of the sub-fund is significant.

The relative risk and positioning to the Benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the Benchmark, however there is discretion to invest in other securities not included in the Benchmark.

The sub-fund has been categorised as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with the Investment Manager's Good Governance Policy, and pursuant to article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Profile of the typical Investor	The sub-fund is suitable for Investors who search long term investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Equity securities", "Options, Futures and Swaps, "Credit Default Swaps (CDS) transactions", "Credit Risk", "Securities lending Risks", "Liquidity Risk, "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "ESG risks". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro

Investment Manager	T. Rowe Price International Ltd Warwick Court 5, Paternoster Square London, EC4M 7DX United Kingdom
Sub-Investment Manager	T. Rowe Price Associates, Inc. 100 East Pratt Street Baltimore, MD 21202 United States
Launch Date of the sub-fund	5 June 2023
Initial Subscription Period	For Unit Classes G and I: 5 June 2023 to 14 June 2023 For Unit Class D: N/A
First Calculation Day	15 June 2023
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D Unit Class: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G Unit Class are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D Unit Class are permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G Unit Class cannot be voluntarily converted into Diamond Unit Classes. Conversions of G Unit Class into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.

Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Calculation Day in question. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class D Class I
Distribution policy	Class G: Capitalisation Class D: Capitalisation Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Class G: Up to 1.25% For Class D: Up to 1.85% For Class I: Up to 0.85%
Performance fee	N/A
Subscription commission	For Classes Gold and Diamond: N.A. For Class I: max 2.00%
Placement fee	For G Unit Class: 1.80% amortized in 3 years Upon purchase of G Unit Class (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G Unit Class are automatically exchanged, value for value, into D Unit Class of the same sub-fund. For D Unit Class: N/A For Class I: N/A

Redemption commission	For G Unit Class: If you sell G Unit Class before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D Unit Class: N/A For Class I: N/A
Conversion commission	For G Unit Class: N.A. For D Unit Class: max 0.40% For Class I: N.A.
Global exposure determination	Commitment approach

XX. WILLERFUNDS – PRIVATE SUITE – INVESCO EURO CORPORATE BOND

Investment policy

The sub-fund, expressed in EUR, aims to achieve a combination of income and capital growth over the medium term. The sub-fund seeks to achieve its objective by investing at least 70% of its net assets in debt securities denominated in Euro issued by corporate issuers.

Up to 30% of the net assets of the sub-fund may be invested in aggregate money market instruments and debt securities issued by companies or other entities not meeting the above requirements (non-corporate entities issuing government bonds and quasi government bonds).

The sub-fund may invest up to 100% of its net assets in fixed income instruments (both investment grade and non-investment grade) issued by corporations, non-government or government issuers domiciled in Emerging Markets. Up to 30% of net assets of the sub-fund may be invested in non-investment grade debt securities.

The sub-fund may invest up to 20% of its net assets in contingent convertible bonds ("CoCos").

The sub-fund may invest up to 15% of its net assets in unrated securities.

The sub-fund may invest up to 10% of its net assets in securities which are either in default or deemed to be at high risk of default as determined by the Investment Manager ("distressed securities").

Debt securities will typically have an average credit quality of BBB or equivalent as measured by credit rating agencies or as defined on the basis of the internal valuation model implemented by the Investment Manager. This is a typical average rating and not a target or limit, the average rating can be lower or higher.

Securities will be deemed non-investment grade if, at the time of purchase, they are classified below "BBB-" or equivalent and above or equal to "CCC" or equivalent based on rating agencies or any equivalent rating which shall be based on the lowest available rating from a widely recognized rating agency or an equivalent measure produced by the Investment Manager based on proprietary models.

Some "CCC" rated securities may be considered as distressed securities. If a security eligible for the sub-fund is rated "CCC", the Investment Manager will perform an analysis in order to determine if such security is a distressed security, if so, the Investment Manager will ensure that the investment limit in such security will be respected.

In case of downgrade of an existing investment or other events leading to qualify a security of the sub-fund as distressed or default, the Management Company through its pricing committee, will analyse the situation in the best interest of the sub-fund in order to take actions. Actions may include, without limitation, selling the security at low value. In any event, the Management Company shall ensure that distressed and / or defaulted securities held by the sub-fund shall not exceed 10% of its net assets.

The sub-fund may invest in units / shares of UCITS and / or UCIs, including UCITS compliant exchange traded funds ("ETF") in order to pursue its investment objective. Such investment may not exceed 10% of the total Net Asset Value of the sub-fund.

The sub-fund may hold ancillary liquid assets. Liquid assets used to back-up financial derivative instruments exposure are not considered as ancillary liquid assets. The sub-fund will not invest more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. In exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of its net assets, if justified in the interest of the Investors.

The sub-fund may invest up to 100% of its net assets in money market instruments and credit institution term deposits for cash management purposes.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's net assets in UCITS (including ETFs) with a similar investment universe to the sub-fund's.

The sub-fund is actively managed.

The sub-fund uses a composite index for performance and risk measurement, which consists of the arithmetical weighted average of following indices:

- 85% ICE BofA Euro Corporate Index (Total Return) and
- 15% ICE BofA Euro High Yield Index (Total Return)

The weights of the indices are rebalanced on a monthly basis.

The sub-fund is not bound by the components or weighting of the Benchmark when selecting investments. The sub-fund's portfolio may deviate significantly from the Benchmark.

The sub-fund may use financial derivative instruments for the purpose of efficient portfolio management, hedging purposes and for investment purposes.

The sub-fund may invest in financial derivative instruments which may include, but are not limited to, exchange traded and over-the-counter options, futures, spot and forwards contracts, swaps (including but not limited to credit-default swaps, inflation swaps, swaptions, and total return swaps whose underlying assets could be bonds and rates).

The sub-fund's use of financial derivative instruments may include derivatives on credit, rates and currencies and may be used to achieve both long and short positions, which overall will not result in the sub-fund being directionally short or short any asset class.

Non-Euro denominated investments are intended to be hedged back into Euro at the discretion of the Investment Manager.

The aim is to use total return swaps from time to time on a temporary basis and as long as it is necessary to optimize portfolio structure in the interest of the unitholders.

Total Return Swap:
- Maximum portion of assets that can be subject to TRS: 30%
- Expected portion of assets that will be subject to TRS: 0%

The aim is to engage in securities lending on a continuous basis.

Securities lending:
- Maximum portion of assets that can be subject to securities lending: 70%
- Expected portion of assets that will be subject to securities lending: 40%

The sub-fund has been categorized as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Profile of the typical Investor	The sub-fund is suitable for Investors who search medium investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Bond securities", "Emerging Markets", "Options, Futures and Swaps, "Interest Rates", "Credit Default Swaps (CDS) transactions", "Credit Risk", "Non-investment grade securities", "Contingent Convertible

	Bonds", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Investments in CDOs, CLOs", "Total return swap and/or excess return swap", "ESG risks" and "distressed securities investments". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Investment Manager	Invesco Asset Management Limited Perpetual Park, Perpetual Park Drive Henley-on-Thames, Oxfordshire RG9 1HH United Kingdom
Launch Date of the sub-fund	13 November 2023
Initial Subscription Period	For Unit Classes G, GS and I: 13 November to 26 November 2023 For Unit Classes D and DS: N/A
First Calculation Day	27 November 2023
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G, GS and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Valuation Day. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D and DS Unit Classes: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Valuation Day. Conversions of G and GS Unit Classes are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D and DS Unit Classes are permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G and GS Unit Classes cannot be voluntarily converted into Diamond Unit Classes. Conversions of G and GS Unit Classes into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Valuation Day.

	The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class GS Class D Class DS Class I
Distribution policy	Class G: Capitalisation Class GS: Distribution Class D: Capitalisation Class DS: Distribution Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class GS: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's D and/or DS Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500 Class GS: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Classes G and GS: 0.40% For Classes D and DS: 1.00% For Class I: 0.40%
Performance fee	N/A
Subscription commission	For Classes G, GS, D and DS: N/A For Class I: max 2.00%
Placement fee	For G and GS Unit Classes: 1.80% amortized in 3 years Upon purchase of G and GS Unit Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G and GS Unit Classes are automatically exchanged, value for value, into D and DS Unit Classes of the same sub-fund. For D and DS Unit Classes: N/A For Class I: N/A

Redemption commission	For G and GS Unit Classes: If you sell G and GS Unit Classes before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D and DS Unit Classes: N/A For Class I: N/A
Conversion commission	For G and GS Unit Classes: N/A For D and DS Unit Classes: max 0.40%For Class I: N/A.
Global exposure determination	Commitment approach

XXI. WILLERFUNDS – PRIVATE SUITE – PIMCO EUROPEAN INCOME BOND

Investment policy

The Sub-fund PIMCO EUROPEAN INCOME BOND, expressed in EURO, aims to maximise current income, consistent with prudent investment management with long-term capital appreciation being a secondary objective.

The Sub-fund shall aim to achieve its investment objective by investing in a diversified portfolio consisting primarily of fixed income securities. The pool of securities eligible for investment by the Sub-fund includes government bonds, bonds issued by supranational organizations and government-related entities, corporate bonds, emerging market government and corporate debt (including issues denominated in local currency), non-investment grade debt securities (as defined below), asset backed securities ("ABS"), mortgage-backed securities ("MBS"), contingent convertible securities ("CoCos"), money market instruments and cash.

The Sub-fund may invest up to 10% of its net assets (combined) in asset backed securities ("ABS"), mortgage backed securities ("MBS"), collateralized loan obligations ("CLOs"), collateralized debt obligations ("CDOs") and in commercial mortgage backed securities ("CMBS") traded in Regulated Markets.

The Sub-fund may invest up to 30% of its net assets in UCITS eligible Agency MBS, where agency MBS refers to MBS issued by government-sponsored enterprises, such as the Ginnie Mae, Fannie Mae or Freddie Mac.

The Sub-fund's exposure to the above-mentioned asset classes may be achieved through direct investments and / or through indirect investments in units / shares of UCITS and / or UCIs, including exchange traded funds ("ETFs"). Total investments in units / shares of UCITS and / or UCIs shall not exceed 10% of the Sub-fund's net assets.

The Sub-fund may engage in transactions in financial derivative instruments which may include but are not limited to exchange traded and over-the-counter options, futures, swaps (including interest rate swaps and swaps on fixed income indices) or credit default swaps principally for investment and/or for hedging as well as for efficient portfolio management purposes.

The Sub-fund invests at least 60% of its assets in a diversified portfolio of EUR-denominated bonds and other Fixed Income Instruments of varying maturities. The Sub-fund will seek to maintain a high level of dividend income by investing in a broad array of fixed-income sectors which in the Investment Manager's view typically generate elevated levels of income.

The average portfolio duration of the Sub-fund will normally vary from 0 to 8 years based on the Investment Manager's forecast for interest rates.

The Sub-fund may invest up to 50% of its net assets in non-investment grade debt securities. For the avoidance of doubt, non-investment grade debt securities issued by entities based in Emerging Markets shall be counted towards the 50% limit. Securities will be deemed non-investment grade if, at the time of the purchase, they are rated below "BBB-" (or equivalent). Such rating shall be based on that of widely recognized rating agencies, namely Moody's, S&P and Fitch, or an equivalent measure produced by the Investment Manager based on proprietary models.

Some "CCC" rated securities may be considered as distressed securities. If a security eligible for the Sub-fund is rated "CCC", the Investment Manager will perform an analysis in order to determine if such security is a distressed security.

In case of downgrade of an existing investment or other events leading to qualify a security of the Sub-fund as distressed or default, the Investment Manager will analyse the situation in the best interest of the Fund in order to take actions. Actions may include without limitation selling the security at low value. In any event the Management Company shall ensure that the investment restrictions concerning exposure in distressed and / or default securities shall be complied with in such situation.

The portfolio will typically have an average credit quality of investment grade or equivalent as measured by credit rating agencies or as defined on the basis of the internal valuation model implemented by the Investment Manager. This is a typical average rating and not a target or limit, the average rating can be lower or higher.

Assets not invested in EUR-denominated bonds and Fixed Income Instruments may be invested in other Fixed Income Instruments which may not necessarily be denominated in EUR or economically tied to the Eurozone.

The Sub-fund's exposure to securities issued by entities based in emerging markets shall not exceed 25% of its net assets.

The Sub-fund may invest up to 10% of its net assets in China A-Shares via the Shanghai-Hong Kong Stock Connect program and/or debt securities issued by Mainland China issuers through Bond Connect program.

The Sub-fund may use strategies to hedge currency risk in relation to the reference currency. In aggregate, unhedged exposures to currencies other than the reference currency shall not exceed 30% of the Sub-fund's net assets.

The Sub-fund may invest no more than 25% of its net assets in fixed income instruments that are convertible into equity securities including up to 20% of its net assets in contingent convertible securities ("CoCos"). No more than 10% of the Sub-fund's total assets may be invested in equity securities. The Sub-fund is subject to an aggregate limit of one third of its total assets (33%) on combined investments in (i) securities that are convertible into equity securities, (ii) equity securities, (iii) certificates of deposit, and (iv) bankers' acceptances issued by OECD banks. The Sub-fund may use convertibles or equity securities in order to seek exposure to companies whose debt securities may not be readily available or have been identified as good investment opportunities through detailed analysis.

The aim is to engage in securities lending on a continuous basis subject to market conditions.

Securities lending:

- Maximum portion of assets that can be subject to securities lending: 70%

- Expected portion of assets that will be subject to securities lending: 40%

Total Return Swap:

Maximum portion of assets that can be subject to TRS: 10%

Expected portion of assets that will be subject to TRS: 5%

The Sub-fund may hold ancillary liquid assets. Liquid assets used to back-up financial derivative instruments exposure are not considered as ancillary liquid assets. The Sub-fund will not invest more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. In exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of its net assets, if justified in the interest of the investors.

The Sub-fund is actively managed. The Sub-fund is not managed in reference to a benchmark.

At inception of the Sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the Sub-fund's assets in UCITS (including ETF) with similar universe.

The Sub-fund has been categorised as an ESG Promotion Strategy Sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the Sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the Sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

Profile of the typical Investor	The sub-fund is suitable for Investors who search medium investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.

Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the Sub-fund and inter alia "Equity securities", "Emerging Markets", "Stock Connect and China Risk", "Options, Futures and Swaps, "Interest Rates", "Credit Default Swaps (CDS) transactions", "Credit Risk", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Total return swap and/or excess return swap", "ESG risks", "Operational Risk", "ESG Risk", "Liquidity Risk", "Asset-Backed-Securities – Mortgage-Backed-Securities", and "Contingent Convertible Bonds", Investors should consider this extra risk when evaluating the potential benefits of investing in the Sub-fund.
Reference Currency	Euro
Investment Manager	PIMCO Europe GmbH Seidlstrasse 24 – 24a Munich, 80335 Germany
Sub Investment Manager	PIMCO Europe Ltd 11 Baker Street London, W1U 3AH United Kingdom
Launch Date of the sub-fund	28 March 2025
Initial Subscription Period	For Unit Classes G, GS and I: N/A For Unit Classes D and DS: N/A
First Calculation Day	31 March 2025
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G, GS and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Valuation Day. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D and DS Unit Classes: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Valuation Day.

	Conversions of G and GS Unit Classes are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D and DS Unit Classes are permitted only into Diamond Unit Classes of other sub-funds, with a payment of a switch fee. G and GS Unit Classes cannot be voluntarily converted into Diamond Unit Classes. Conversions of G and GS Unit Classes into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Valuation Day. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class GS Class D Class DS Class I
Distribution policy	Class G: Capitalisation Class GS: Distribution Class D: Capitalisation Class DS: Distribution Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class GS: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's D and/or DS Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500 Class GS: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Classes G and GS: 0.60% For Classes D and DS: 1.20% For Class I: 0.45%
Performance fee	N/A
Subscription commission	For Classes G, GS, D and DS: N/A For Class I: max 2.00%
Placement fee	For G and GS Unit Classes: 1.80% amortized in 3 years Upon purchase of G and GS Unit Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at

	NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G and GS Unit Classes are automatically exchanged, value for value, into D and DS Unit Classes of the same sub-fund. For D and DS Unit Classes: N/A For Class I: N/A
Redemption commission	For G and GS Unit Classes: If you sell G and GS Unit Classes before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For D and DS Unit Classes: N/A For Class I: N/A
Conversion commission	For G and GS Unit Classes: N/A For D and DS Unit Classes: max 0.40% For Class I: N/A.
Global exposure determination	Absolute VaR approach The Sub-fund will regularly monitor its leverage and the level of leverage is expected to range from 0% to 400%. The Sub-fund's leverage may increase to higher levels, for example, at times when the Investment Manager deems it most appropriate to use financial derivative instruments to alter the Sub-fund's interest rate, currency, or credit exposure. The leverage figure is calculated as the sum of the notionals of the derivatives used as required by the regulations. The notional value of the investments varies significantly from their market value which is why the leverage limits may be high. These leverage limits do not take into account any netting and hedging arrangements that the Sub-fund may have in place at any time even though these netting and hedging arrangements are used for risk reduction purposes. The methodology used to calculate the leverage is the sum of the absolute value of the notionals.

XXII. WILLERFUNDS – PRIVATE SUITE – JPM GLOBAL AGGREGATE BOND

Investment policy

The Sub-fund, expressed in EURO, aims to achieve a return in excess of global bond markets by investing primarily in global investment grade debt securities, using financial derivative instruments where appropriate.

The Sub-fund shall aim to achieve its investment objective using globally integrated research driven investment process that focuses on analysing fundamental, quantitative and technical factors across countries, sectors and issuers, combining top down asset allocation and bottom-up security selection and targeting diversified sources of portfolio return – including sector rotation, security selection, currencies and yield curve positioning.

The Sub- Fund invests across all sectors of global investment grade debt which includes government, government related, corporate, emerging markets and securitised debt and may also invest in high yield and currency exposure is typically hedged back to the reference currency of the fund (EURO).

The Sub-fund is actively managed. The benchmark of the Sub-fund consists of the index "Bloomberg Global Aggregate Index", Total Return Hedged in EUR which is used for portfolio construction, risk and performance measurement. The degree of freedom allowed within the management of the sub-fund is significant.

At least 67% of the net assets of the Sub-fund are invested, either directly or through derivatives, in investment grade debt securities (including MBS/ABS) from global issuers, including emerging markets. The Sub-fund is expected to invest between 5% and 30% of its net assets in mortgage-backed securities ("MBS") and/or asset-backed securities ("ABS"). MBS which may be agency (issued by quasi US government agencies) and non-agency (issued by private institutions) refers to debt securities that are backed by mortgages, including residential and commercial mortgages, and ABS refers to those that are backed by other types of assets such as credit card debt, car loans, consumer loans and equipment leases. The Sub-fund will not invest directly or indirectly more than 20% of its combined net assets in MBS (excluding agency MBS) and/or ABS.

The Sub-fund will aim to maintain a portfolio minimum average rating of "BBB-" or equivalent, (where the portfolio average rating is the market weighted sum of the individual security ratings, which does not include cash), based on the rating agencies or equivalent rating defined on the basis of the internal valuation model implemented by the Investment Manager. This is a typical average rating not a target or limit, the average rating can be lower or higher.

The Sub-fund may invest in unrated debt securities, in which case the Investment Manager will determine a rating: unrated debt securities will not represent more than 20% of the Sub-fund's net assets

The Sub-fund may invest up to 5% of its net assets in securities which are either in default or deemed to be at high risk of default as determined by the Investment Manager ("distressed securities").

The Sub-fund may invest in below investment grade and unrated securities and may invest in covered bonds to a limited extent. Securities will be deemed non-investment grade if, at the time of the purchase, they are rated below "BBB-" (or equivalent). Such rating shall be based on that of widely recognized rating agencies, namely Moody's, S&P and Fitch, or an equivalent measure produced by the Investment Manager based on proprietary models.

Some "CCC" rated securities may be considered as distressed securities. If a security eligible for the Sub-fund is rated "CCC", the Investment Manager will perform an analysis in order to determine if such security is a distressed security.

In case of downgrade of an existing investment or other events leading to qualify a security of the Sub-fund as distressed or default, the Investment Manager will analyse the situation in the best interest of the Sub-fund in order to take actions. Actions may include without limitation selling the security at low value. In any event, the Management Company shall ensure that distressed and / or defaulted securities held by the Sub-fund shall not exceed 5% of its net assets.

The Sub-fund's exposure to securities issued by entities based in emerging markets shall not exceed 40% of its net assets.

The Sub-fund may invest up to 25% of its net assets in onshore debt securities issued within the PRC through China-Hong Kong Bond Connect program. The Sub-fund's exposure to the above-mentioned asset classes may be achieved through direct investments and / or through indirect investments in units / shares of UCITS and / or UCIs, including exchange traded funds ("ETFs"). Total investments in units / shares of UCITS and / or UCIs shall not exceed 40% of the Sub-fund's net assets. The Sub-fund may engage in transactions in financial derivative instruments which may include but are not limited to exchange traded and over-the-counter options, futures, swaps (including interest rate swaps and swaps on fixed income indices) or credit default swaps principally for investment and/or for hedging as well as for efficient portfolio management purposes. The Sub-fund may hold ancillary liquid assets. Liquid assets used to back-up financial derivative instruments exposure are not considered as ancillary liquid assets. The Sub-fund will not invest more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. In exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of its net assets, if justified in the interest of the investors. At inception of the Sub-fund and for a period of maximum 6 months, the above-described investment policy can be pursued by investing part or all of the Sub-fund's assets in UCITS (including ETFs) with a similar investment universe to the Sub-fund's. The Sub-fund has been categorised as an ESG Promotion Strategy Sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the Sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR. More information relating to the environmental and social characteristics of the Sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288. The aim is to engage in securities lending on a temporary basis subject to market conditions. Securities lending: - Maximum portion of assets that can be subject to securities lending: 70% - Expected portion of assets that will be subject to securities lending: 40% The aim is to use total return swaps from time to time on a temporary basis and as long as it is necessary to optimize portfolio structure in the interest of the unitholders. Total Return Swap: Maximum portion of assets that can be subject to TRS: 50% Expected portion of assets that will be subject to TRS: 0%	
Profile of the typical Investor	The Sub-fund is suitable for investors who look for medium term investments and have a preference for sustainable ESG strategies. The investor must be able to accept a certain volatility and the possibility of losing a part of the invested amount. This product is for investors who meet the conditions for accessing the product in question (see prospectus) with any level of knowledge and experience. Investors should understand the product risks and only invest if they can bear potentially substantial losses.
Risk factors	investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the Sub-fund and inter alia "Emerging Markets", "Stock Connect and China Risk", "Options, Futures and Swaps, "Interest Rates", "Credit Default Swaps (CDS) transactions", "Credit Risk", "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other

	UCITS and/or UCIs", "Total return swap and/or excess return swap", "ESG risks", "Operational Risk", "ESG Risk", "Liquidity Risk", "Asset-Backed-Securities – Mortgage-Backed-Securities", "distressed securities investments" and "Contingent Convertible Bonds", Investors should consider this extra risk when evaluating the potential benefits of investing in the Sub-fund.
Reference Currency	Euro
Investment Manager	JPMorgan Asset Management (UK) Limited 25 Bank Street, Canary Wharf, London, E14 5JP, United Kingdom
Sub Investment Managers	J.P. Morgan Investment Management Inc.; 383 Madison Ave, New York, NY 10179 USA JPMorgan Asset Management (Asia Pacific) Limited, 19/F Chater House, 8 Connaught Road Central, Hong Kong
Launch Date of the sub-fund	5 May 2025
Initial Subscription Period	From 5 May 2025 to 11 June 2025
First Calculation Day	12 June 2025
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G, GS and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Valuation Day. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch. For D and DS Unit Classes: N/A
Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G and GS Unit Classes are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D and DS Unit Classes are permitted only into Diamond Unit Classes of other sub-funds with a payment of a switch fee. G and GS Unit Classes cannot be voluntarily converted into Diamond Unit Classes. Conversions of G and GS Class Units into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of

	other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Valuation Day. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class GS Class D Class DS Class I
Distribution policy	Class G: Capitalisation Class GS: Distribution Class D: Capitalisation Class DS: Distribution Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class GS: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's D and/or DS Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500 Class GS: EUR 2,500
Target Investors	All categories of Investors
Management fee	Class G, GS: 0.50% Class D, DS: 1.10% Class I: 0.40%
Performance fee	N/A
Subscription commission	For Classes G, GS, D and DS: N/A For Class I: max 2.00%
Placement fee	For G and GS Unit Classes: 1.80% amortized in 3 years Upon purchase of G and GS Unit Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After 3 years, G and GS Unit Classes are automatically exchanged, value for value, into D and DS Unit Classes of the same sub-fund. For D and DS Unit Classes: N/A For Class I: N/A

Redemption commission	For G and GS Unit Classes: If you sell G and GS Unit Classes before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the Sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For I Unit Class: N/A For D and DS Unit Classes: N/A
Conversion commission	For G and GS Unit Classes: N/A For D and DS Unit Classes: max 0.40% For Class I: N/A
Global exposure determination	Relative VaR approach The Sub-fund will regularly monitor its leverage and the level of leverage is expected to range from 0% to 400%. The Sub-fund's leverage may increase to higher levels, for example, at times when the Investment Manager deems it most appropriate to use financial derivative instruments to alter the Sub-fund's interest rate, currency, or credit exposure. The leverage figure is calculated as the sum of the notionals of the derivatives used as required by the regulations. The notional value of the investments varies significantly from their market value which is why the leverage limits may be high. These leverage limits do not take into account any netting and hedging arrangements that the Sub-fund may have in place at any time even though these netting and hedging arrangements are used for risk reduction purposes. The methodology used to calculate the leverage is the sum of the absolute value of the notionals.

XXIII. WILLERFUNDS – PRIVATE SUITE – M&G EUROPEAN STRATEGIC VALUE

Investment policy

The sub-fund, expressed in EURO, aims to provide a combination of capital growth and income to deliver a return that is higher than that of the European stock market.

The sub-fund employs a bottom-up stock picking approach to identify shares of European companies that the Investment Manager believes are undervalued. The Investment Manager seeks to identify companies that are mispriced, while trying to avoid firms that are cheap for a reason and whose share prices are unlikely to improve over time.

The sub-fund's approach combines strict value-focused screening with rigorous qualitative analysis to ensure the sub-fund has a consistent and disciplined value bias, without compromising on the robustness of the companies in the portfolio. The main drivers of returns are expected to be the value style and overall stock selection rather than any individual sector or stock.

The sub-fund shall aim to achieve its objective by investing at least 80% of its net assets in the equity securities and equity related instruments, including closed-ended real estate investment trusts ("REITs") and depositary receipts such as American depository receipts ("ADRs"), European depository receipts ("EDRs") and global depository receipts ("GDRs"), of companies across any sector and market capitalisation that are domiciled in, or conducting the major part of their economic activity in Europe. ADR, GDR and EDR and related underlyings will at any time comply with the eligibility criteria stated in the 2010 Law, as amended from time to time.

The sub-fund may invest no more than 10% of its net asset value in instruments issued by entities located in emerging markets.

The sub-fund may invest without limitation in securities denominated in currencies other than the Reference Currency. The currency exposure of the sub-fund is flexibly managed.

The benchmark of the sub-fund consists of the index "MSCI Europe Net Return Index" Net Total Return in EUR which is used for portfolio construction, risk and performance measurement.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is significant. The relative risk and positioning to the Benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a material part of the investments of the sub-fund will be components of the Benchmark, however there is discretion to invest in other securities not included in the Benchmark.

The sub-fund's exposure to the above-mentioned asset classes may be achieved through direct investments and / or through indirect investments in units / shares of UCITS and / or UCIs, including exchange traded funds ("ETFs"). Total investments in units / shares of UCITS and / or UCIs shall not exceed 20% of the sub-fund's net assets.

The sub-fund may engage in transactions in financial derivative instruments which may include but are not limited to equity index futures, equity forwards, and currency forwards principally for hedging as well as for efficient portfolio management purposes.

The sub-fund may receive certain assets as a consequence of corporate actions such as mergers and acquisitions and restructures that are not consistent with its investment policy. The sub-fund will generally dispose of such assets to the extent possible but may continue to hold up to 10% of its Net Asset Value in such assets where the Investment Manager considers this to be in the best interest of investors.

The sub-fund may hold ancillary liquid assets. Liquid assets used to back-up financial derivative instruments exposure are not considered as ancillary liquid assets. The sub-fund will not invest more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. In exceptionally unfavourable market conditions and on a temporary basis, this limit may be increased up to 100% of its net assets, if justified in the interest of the investors.

The sub-fund may invest up to 20% of its net assets in money market instruments and credit institution term deposits for cash management purposes.

At inception of the sub-fund and for a period of maximum six (6) months, the above described investment policy can be pursued by investing part or all of the sub-fund's assets in UCITS (including ETF) with similar universe.

The aim is to engage in securities lending on a continuous basis subject to market conditions.
Securities lending:

- Maximum portion of assets that can be subject to securities lending: 50%
- Expected portion of assets that will be subject to securities lending: 20%

The sub-fund will not enter into total return swaps agreements.

Profile of the typical Investor	The sub-fund is suitable for investors who look for long term investments. The investor must be able to accept a certain volatility and the possibility of losing a part of the invested amount. This product is for investors who meet the conditions for accessing the product in question (see prospectus) with any level of knowledge and experience. Investors should understand the product risks and only invest if they can bear potentially substantial losses.
Risk factors	Investors should refer to the "Risk" section of this Prospectus in terms of risks applicable to investing in the sub-fund and inter alia "Options, Futures and Swaps, "Securities lending Risks", "Liquidity Risk", "Counterparty Risks", "Legal Risks", "Investment in other UCITS and/or UCIs", "Operational Risk". Investors should consider this extra risk when evaluating the potential benefits of investing in the sub-fund.
Reference Currency	Euro
Investment Manager	M&G Investment Management Limited 10 Fenchurch Avenue London, EC3M 5AG United Kingdom
Launch Date of the sub-fund	27 February 2026
Initial Subscription Period	From 27 February 2026 to 20 March 2026, at initial price of 10 EUR
First Calculation Day	23 March 2026
Net Asset Value Calculation Frequency and Valuation Day	The Net Asset Value is calculated by the Administrator on each Calculation Day, on the basis of the prices on the Valuation Day.
Subscription	For G, GS and I Unit Classes: Each Business Day shall also be a Subscription Day. Subscription requests must reach STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch before 2.00 pm (Luxembourg time) on the Valuation Day. The subscription price must be paid in exchange for a payment or transfer in the Reference Currency of the sub-fund or Unit Class concerned. The amount will be credited to the Willerfunds sub-fund account held with STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. For D and DS Unit Classes: N/A

Conversion	Conversion requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Business Day prior to the Valuation Day in question. Conversions of G and GS Unit Classes are permitted only into Gold Unit Classes of other sub-funds without any switch fee. Conversions of D and DS Unit Classes are permitted only into Diamond Unit Classes of other sub-funds with a payment of a switch fee. G and GS Unit Classes cannot be voluntarily converted into Diamond Unit Classes. Conversions of G and GS Class Units into Diamond Unit Classes will take place only automatically after a 3 year holding period. Conversions of I Unit Class is permitted only into I Unit Classes of other sub-funds without any switch fee.
Redemption	Each Business Day shall also be a Redemption Day. Redemption requests must reach STATE STREET BANK INTERNATIONAL GmbH - Luxembourg Branch before 2.00 pm (Luxembourg time) on the Valuation Day. The redemption price will be paid by cheque or transfer in the Reference Currency of the sub-fund or Unit Class concerned.
Initial Price	10 Euro
Unit Classes	Class G Class GS Class D Class DS Class I
Distribution policy	Class G: Capitalisation Class GS: Distribution Class D: Capitalisation Class DS: Distribution Class I: Capitalisation
Minimum investment	Class G: EUR 5,000 Class GS: EUR 5,000 Class D: available only via automatic conversion of G Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's Diamond Unit Classes. Class DS: available only via automatic conversion of GS Unit Classes after 3 years, via a merger between Sub-funds of the Fund and/or sub-funds of funds managed by the Management Company or via conversion of another sub-fund's D and/or DS Unit Classes. Class I: EUR 2,000,000
Minimum additional payment	Class G: EUR 2,500 Class GS: EUR 2,500
Target Investors	All categories of Investors
Management fee	For Classes G and GS: 1.15% For Classes D and DS: 1.75% For Class I: 0.75%
Performance fee	N/A

Subscription commission	For Classes G, GS, D and DS: N/A For Class I: max 2.00%
Placement fee	For G and GS Unit Classes: 1.80% amortized in three (3) years. Upon purchase of G and GS Unit Classes (whether initial or subsequent purchase), the full amount of the investment is invested in the Units at NAV. An amount corresponding to the placement fee is set aside (levied on the sub-fund's assets) at the time of purchase, and is then paid out over a 3-year period via daily deductions that use straight-line amortisation. After three (3) years, G and GS Unit Classes are automatically exchanged, value for value, into D and DS Unit Classes of the same sub-fund. For I Unit Class: N/A For D and DS Unit Classes: N/A
Redemption commission	For G and GS Unit Classes: If you sell G and GS Unit Classes before the end of the 3-year period, you will be charged, as a redemption fee, the total of all remaining daily deductions of the placement fee. Amounts collected as a redemption fee are credited to the sub-fund in order to avoid any negative effects the redemption may create for the other Investors. For I Unit Class: N/A For D and DS Unit Classes: N/A
Conversion commission	For G and GS Unit Classes: N/A For D and DS Unit Classes: max 0.40% For I Unit Class: N/A.
Global exposure determination	Commitment approach

APPENDIX II - PRE-CONTRACTUAL DISCLOSURES

Information relating to the environmental and social characteristics or sustainable investment objectives of the sub-funds is provided in the following Appendix in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

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

Product name:

Willerfunds - Private Suite - Fidelity Flexible Short Duration

Legal entity identifier

549300R5OMGKK4EOXB74

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Investment Manager's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or

social characteristics promoted by the Sub-fund.

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

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

• the absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Investment Manager excludes investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;

• the ESG rating of the portfolio.

To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

Not applicable

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

Not applicable

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

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

Not applicable

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

Not applicable

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

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

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

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

[x] Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Investment Manager can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs, will be available in the Fund's annual report.

[ ] No

What investment strategy does this financial product follow?

The Investment Manager's approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

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

Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

SRI exclusion criteria:

Issuers directly operating in the following sectors are not permitted:

• in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);

• in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating. To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 50% of the portfolio (box #1Aligned with E/S characteristics).

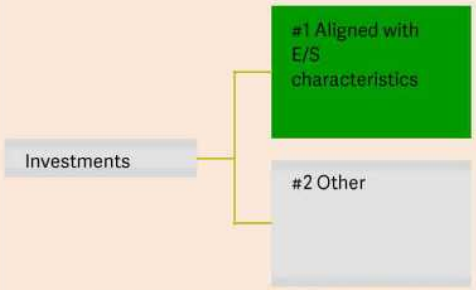
The remaining proportion (50% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

☐ Yes

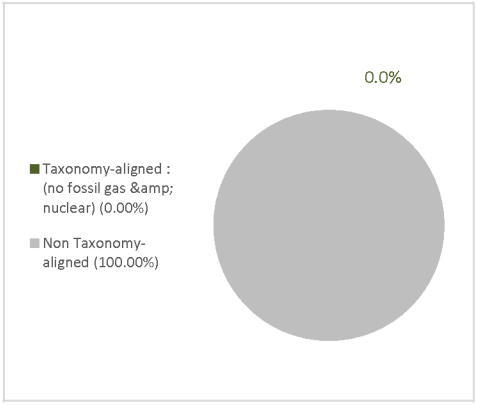
☐ In fossil gas ☐ In nuclear energy

☒ No

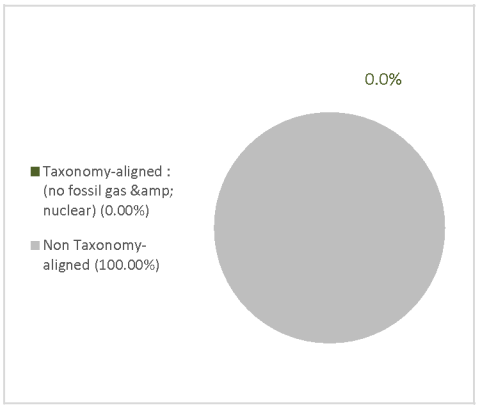
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 87.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.

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

Not applicable

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

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf

Please also refer to the Management Company's policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of

a product is delegated to third-party fund houses.Further details on the sustainability indicators approach (as may be updated from time to time) adopted are set out at:

https://fidelityinternational.com/sustainable-investing-framework

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

Product name:

Until 30th of January 2026: Willerfunds - Private Suite – Schroder Global Climate Change –
As from 31st of January 2026: Willerfunds - Private Suite - Schroder Global Leaders

Legal entity identifier

549300FNA6X08O2IXD20

Environmental and/or social characteristics

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

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

Does this financial product have a sustainable investment objective?

☐ Yes	☒ No
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☐ 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 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Investment Manager's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

  The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

  • the absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy ; and

  • the ESG rating of the portfolio.

  To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

  Not applicable

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

  Not applicable

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

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

Not applicable

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

Not applicable

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

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

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



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

[x] Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Investment Manager can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs, will be available in the Fund's annual report.

[ ] No



What investment strategy does this financial product follow?

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

The Investment Manager's approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

In order to assess good governance practices, the Investment Manager utilises a Schroders' proprietary tool to help it develop a complete understanding of a company through a stakeholder lens. Wherever the Investment Manager deems possible, in the context of an incomplete and developing data landscape, the Investment Manager sets levels or principles for what would be deemed to cause significant harm by applying appropriate values in relation to the principal adverse impacts applicable to sustainable products

The Fund's investment and asset selection process has been reviewed and approved by the investment manager's Product Development Committee that includes representatives from the Legal, Compliance, Product and Sustainable Investment functions. Ongoing compliance with the agreed sustainability characteristics is monitored by the Portfolio Compliance Team. There are no external controls on that due diligence.

The Investment Manager's investment process is driven by proprietary bottom-up fundamental stock selection. Expertise from both the Investment team and the Sustainability team provide a diversity of idea generation and high degree of scrutiny of ideas around the expected trajectory of long term growth, ESG and sustainability characteristics.

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

Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

SRI exclusion criteria:

Issuers directly operating in the following sectors are not permitted:

1. In issuers operating in the following sector: production and/or marketing of ordinary weapons, with the exception of issuers belonging to European Union and/or NATO countries or that have less than 5% of their revenue attributable to such activities (consistent with the provisions of the "Rules Governing transactions with subjects active in the armaments sector" issued by Intesa Sanpaolo Group).

2. In issuers operating in the following sector: production, maintenance, sale and storage of weapons of mass destruction (WMD) i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW). Any issuers involved in the production, maintenance, sale and storage of dual-use components are also excluded. Specifically, it is strictly prohibited investing in companies that, directly or indirectly, through subsidiaries or affiliates, engage in the construction, production, development, assembly, repair, preservation, use, utilization, storage, holding, promotion, sale, distribution, import, export, transfer or transportation of antipersonnel mines, cluster munitions and submunitions;

3. In issuers deriving at least 25% of their revenues from extraction activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions.

4. In issuers deriving at least 10% of their revenues from unconventional oil & gas mining activities

5. In issuers (a) with an ESG rating equal to CCC MSCI rating (or equivalent rating assessed through the ESG rating tool/info provider used by the Investment Manager) or (b) with a severe and serious dispute equal to RED according to MSCI (or the equivalent assessment developed through the ESG rating tool used by the Investment Manager) or (c) that fail the MSCI UNGC screening.

Additionally the Sub-Fund follows the exclusion criteria referred to in Article 12(1)(a) to (g) of Commission Delegated Regulation (EU) 2020/1818.as detailed below:

- companies involved in any activities related to controversial weapons;
- companies involved in the cultivation and production of tobacco;
- companies that are assessed to be in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;
- companies that derive 1 % or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;
- companies that derive 10 % or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;
- companies that derive 50 % or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels;
- companies that derive 50 % or more of their revenues rom electricity generation with a GHG intensity of more than 100 g CO2 e/kWh.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating. To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



Asset allocation describes the share of investments in specific assets.

What is the asset allocation planned for this financial product?

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 80% of the portfolio (box #1Aligned with E/S characteristics).

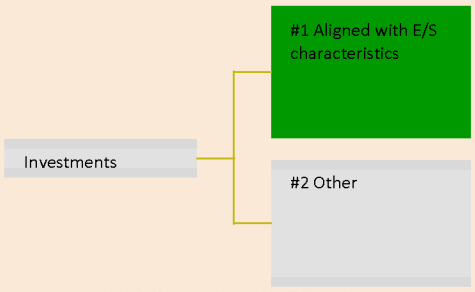
The remaining proportion (20% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

Yes

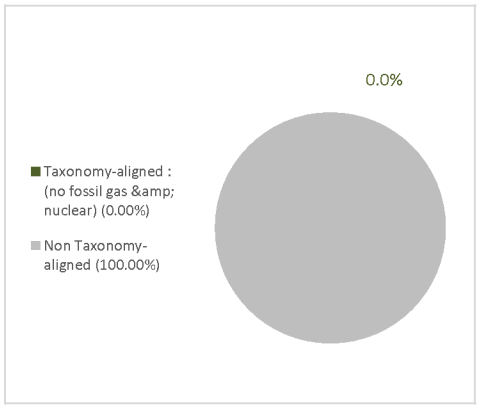
☐ In fossil gas ☐ In nuclear energy

☒ No

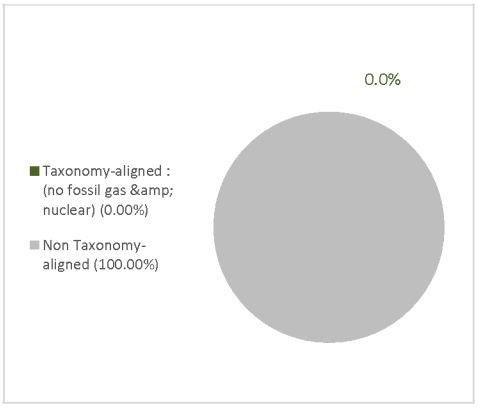
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 100.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.

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

%

Not applicable

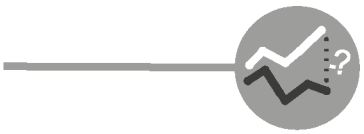
are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.



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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable



Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

https://www.fideuramassetmanagement.ie/en/sustainability/sustainability/Please also refer to the Management Company's policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses.Further details on the sustainability indicators approach (as may be updated from time to time) adopted are set out at:

https://www.schroders.com/en-lu/lu/individual/what-we-do/sustainable-investing/our-sustainable-investment-policies-disclosures-voting-reports/

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

Product name:

Willerfunds - Private Suite - BNY Mellon Global Real Return

Legal entity identifier

549300BZ2JMSZN333523

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Investment Manager's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or

social characteristics promoted by the Sub-fund.

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

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

• the absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Investment Manager excludes investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;

• the ESG rating of the portfolio.

To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

Not applicable

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

Not applicable

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

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

Not applicable

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

Not applicable

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

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

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

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

[x] Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Investment Manager can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs, will be available in the Fund's annual report.

[ ] No

What investment strategy does this financial product follow?

The Investment Manager's approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

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

Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

SRI exclusion criteria:

Issuers directly operating in the following sectors are not permitted:

• in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);

• in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating. To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 50% of the portfolio (box #1Aligned with E/S characteristics).

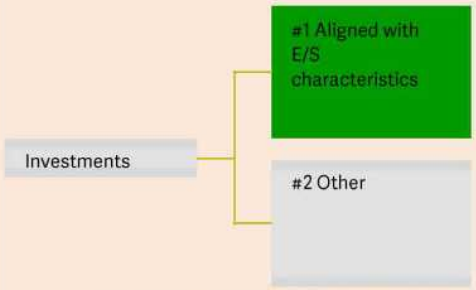
The remaining proportion (50% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

☐ Yes

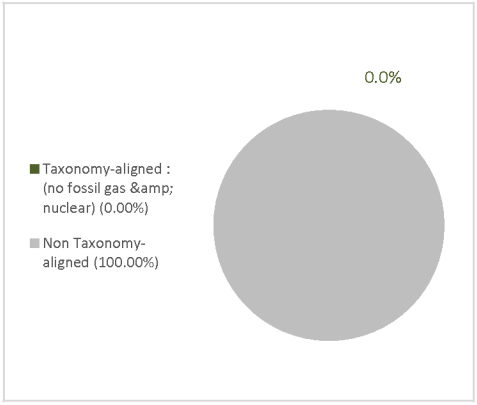
☐ In fossil gas ☐ In nuclear energy

☒ No

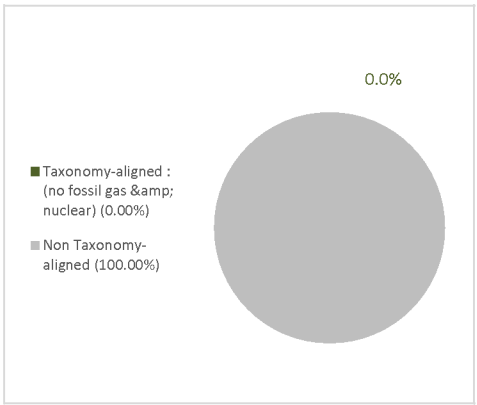
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 59.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.

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

Not applicable

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

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf

Please also refer to the Management Company's policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of

a product is delegated to third-party fund houses.Further details on the sustainability indicators approach (as may be updated from time to time) adopted are set out at:

https://www.bnymellon.com/content/dam/bnymellon/documents/pdf/csr/environment-sustainability-policy-statement.pdf.coredownload.pdf

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

Product name:

Willerfunds - Private Suite - Millennials Equity

Legal entity identifier

549300Z0O0NI730S5G19

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ Yes	☒ No
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Management Company's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste); environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

In addition the Sub-fund partly invests in sustainable investments pursuant to article 2(17) SFDR which means companies and issuers involved in activities that contribute to an

environmental and social objective as outlined in UN Sustainable Development Goals (hereinafter also ”SDGs”) while not significantly harming any other environmental or social objectives.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the sub-fund.

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

  The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

  • the binding restrictions in the investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Management Company restricts investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;

  • the weighted average ESG score of the portfolio.

  To undertake this ESG criteria analysis, the Management Company will use data provided by external ESG research providers’ proprietary models (e.g. MSCI).

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

  The Sub-fund has a commitment to invest a minimum part of the portfolio in sustainable investments combining environmental and social objectives. It aims to create positive environmental and social impact by investing in companies that are involved in economic activities that are considered environmentally or socially sustainable by virtue of their contribution to one or more of the 17 environmental or social-themed SDGs (https://sdgs.un.org/goals).

  It must be clarified that the Sub-fund does not commit to make investments in taxonomy-aligned environmentally sustainable investments according to article 6 of the Taxonomy Regulation (EU) 2020/852 (the “EU Taxonomy”). Consequently there is not a specific commitment to pursue one or more environmental objectives of article 9 of the EU Taxonomy. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation.

  The criteria assumed for measuring the positive contribution of each investment to each sustainable objective is based on the components defined by "MSCI ESG Research" within its methodological framework "SDG Alignment Methodology” which is based on the two following main indicators:

  • "Product Alignment", i.e. the indicator of the degree of "net alignment" of an issuer's products and services to the targets associated with each SDG; this indicator aims to (i) estimate the revenue of companies issuing products and services that respond to one or more relevant SDGs, and (ii) identify products and services that have potentially negative impacts with respect to the achievement of the SDGs;

  • "Operational Alignment", i.e. the indicator of the degree of alignment of the production processes of the issuing companies with respect to specific SDGs. This metric takes into account the internal policies, objectives and practices implemented by the issuers.

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

  The sustainable investment methodology based on SDGs is built around the concept of SDGs alignment as much as misalignment. Each investee companies is evaluated in

relation to both metrics therefore any misalignment to at least one of the 17 SDGs is considered a breach of the Do Not Significantly Harm ("DNSH") threshold and it excludes the possibility to consider the issuer as a sustainable investment. Additional third party data provides further tools and KPIs to assess if and how any investee company pass the DNSH test.

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

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

The significant harm to any environmental or social sustainable investment objective (represented by one or more of the 17 SDGs) is avoided by the monitoring of any adverse impact caused by each sustainable investment on sustainability factors.

All of the mandatory adverse impact indicators of Table 1 of Annex I of Commission Delegated Regulation (EU) 2022/1288 (the "SFDR RTS") are taken into account and any relevant ones in Tables 2 and 3 of the SFDR RTS by checking the PAI data through a periodic monitoring report where the values of the indicators at product level can be consulted and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process.

However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Additional information on PAI is available in the section dedicated to sustainability in the Management Company's website (http://www.fideuramireland.ie/en/sustainability/sustainability/), which includes the "Sustainable And Responsible Investment Policy" as well as other PAI information.

→ *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 Management Company's Sustainable and Responsible Investment Policy specifies that corporate approach to sustainable and responsible investments is inspired by the principles contained in documents such as UN Global Compact principles (UNGC), UN Guiding Principles on Business and Human Rights (UNGPs), Organization for Economic Cooperation and Development (OECD) Guidelines for multinational enterprises, International Labor Organization Conventions. This approach follows the methodology for the definition of "sustainable investments" with specific reference to the Do Not Significantly Harm Principle.

The Management Company monitors the entire portfolio on the basis of a series of environmental, social and governance indicators (via third party data), including the violations of the UNGC and OECD Guidelines for Multinational Enterprises. Issuers characterized by a severe and serious dispute equal to "Red" (also referring to selected global norms and conventions, including the United Nations Global Compact Principles, the International Labour Organization's conventions, and the United Nations Guiding Principles on Business and Human Rights) are excluded from the investment perimeter.

In addition, as described in the Sustainable and Responsible Investment Policy, the Management Company monitors two social PAI selected to limit exposures to violations of the UNGC principles/OECD guidelines.

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

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

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

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

[x] Yes, the Management Company specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Management Company can check the PAI data through a periodic monitoring report where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs will be available in the Fund's annual report.

[ ] No

What investment strategy does this financial product follow?

The Management Company's approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

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

Below are detailed the binding elements followed by the Management Company for each strategy adopted for promoting environmental and social characteristics.

The Sub-Fund partially makes sustainable investments, as defined by article 2(17) SFDR in accordance with the Management Company's methodology for selecting sustainable investments.

SRI exclusion criteria:

Issuers directly operating in the following sectors are subject to binding investment restrictions:

• in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e. nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);

• in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.

ESG screening and monitoring:

Issuers characterized by the following are restricted from the investment perimeter:

• an ESG rating equal to "CCC", classified according to the proprietary rating methodology of the external provider MSCI, which contemplates a range of values going from "AAA", for the best rated issuers, to "CCC" for the riskiest issuers;

• a severe and serious dispute equal to "Red", classified according to the proprietary methodology of the external provider MSCI, that indicates an ongoing very severe ESG controversy (a controversy having a social and/or environmental impact) implicating a company directly through its actions, products or operations (e.g. loss of life, destruction of eco-system, economic shakedown affecting multiple jurisdictions).

The ESG screening and monitoring is performed using data based on MSCI methodology.

For this product, which has a benchmark (as set out in the Sub-fund's investment policy), the binding investment restrictions allow a maximum permissible exposure equal to the issuer's weight on the benchmark.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of issuers in terms of their sustainable performance through an ESG score and in order that the final average ESG portfolio scoring is higher than that one related to the Sub-fund's benchmark. To undertake this ESG score analysis, the Management Company will use data provided by external ESG research providers' proprietary models (e.g. MSCI).

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Management Company and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 80% of the portfolio (box

Asset allocation describes the share of investments in specific assets.

#1Aligned with E/S characteristics).

The remaining proportion (20% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics or in the classification of sustainable investment) should be limited to:

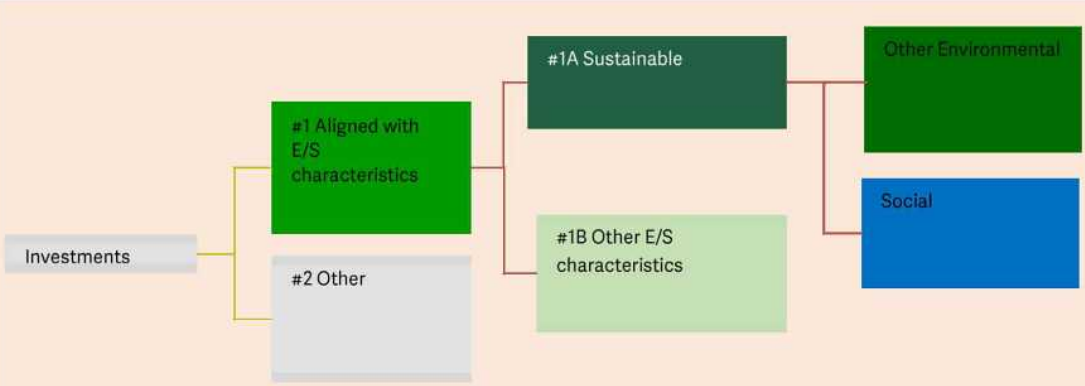
• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

The Sub-fund will have a minimum proportion of 30% of sustainable investments (box #1A Sustainable).

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to climate change mitigation and/or climate change adaptation.

However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

☐ Yes

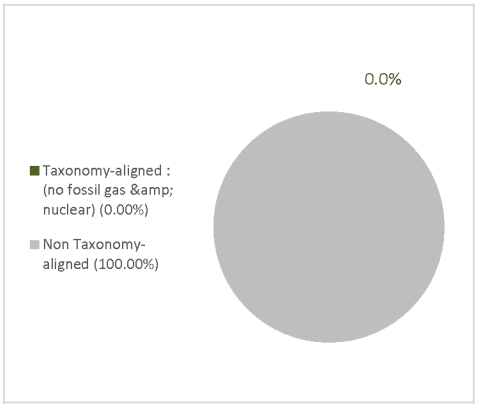
☐ In fossil gas ☐ In nuclear energy

☒ No

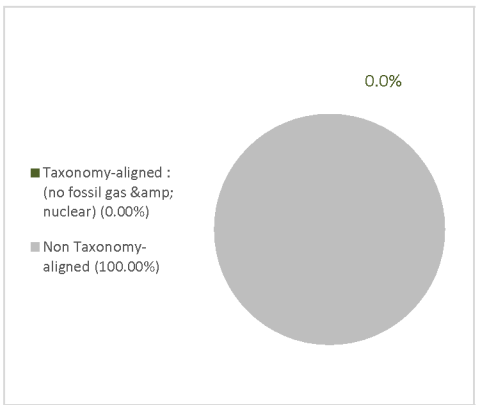
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 100.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.

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

20

The Sub-fund commits to invest at least 20% of the portfolio in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

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

What is the minimum share of socially sustainable investments?

The Sub-fund commits to invest at least 25% of the portfolio in sustainable investment with a social objective.

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf

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

Product name:

Willerfunds - Private Suite - Blackrock Balanced ESG

Legal entity identifier

549300LHXET85GOJIL67

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ Yes	☒ No
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Investment Manager's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

  The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

  • the absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy ; and

  • the ESG rating of the portfolio.

  To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

  Not applicable

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

  Not applicable

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

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

Not applicable

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

Not applicable

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

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

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



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

x Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Investment Manager can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs, will be available in the Fund's annual report.

No



What investment strategy does this financial product follow?

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

The Investment Manager's approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.BlackRock assesses good governance practices of the investee companies by combining proprietary insights and shareholder engagement by the Investment Manager, with data from external ESG research providers. BlackRock uses data from external ESG research providers to initially identify issuers which may not have satisfactory governance practices in relation to key performance indicators (KPIs) related to sound management structure, employee relations, remuneration of staff and tax compliance. Where issuers are identified as potentially having issues with regards to good governance, the issuers are reviewed to ensure that, where the Investment Manager agrees with this external assessment, the Investment Manager is satisfied that the issuer has either taken remediation actions or will take remedial actions within a reasonable time frame based on the Investment Manager's direct engagement with the issuer. The Investment Manager may also decide to reduce exposure to such issuers.

BlackRock is monitoring compliance of the Portfolio on an ongoing daily basis by the using Aladdin.

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?

Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

SRI exclusion criteria:

Issuers directly operating in the following sectors are not permitted:

1. In issuers operating in the following sector: production and/or marketing of ordinary weapons, with the exception of issuers belonging to European Union and/or NATO countries or that have less than 5% of their revenue attributable to such activities (consistent with the provisions of the "Rules Governing transactions with subjects active in the armaments sector" issued by Intesa Sanpaolo Group).

2. In issuers operating in the following sector: production, maintenance, sale and storage of weapons of mass destruction (WMD) i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW). Any issuers involved in the production, maintenance, sale and storage of dual-use components are also excluded. Specifically, it is strictly prohibited investing in companies that, directly or indirectly, through subsidiaries or affiliates, engage in the construction, production, development, assembly, repair, preservation, use, utilization, storage, holding, promotion, sale, distribution, import, export, transfer or transportation of antipersonnel mines, cluster munitions and submunitions;

3. In issuers deriving at least 25% of their revenues from extraction activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions.

4. In issuers deriving at least 10% of their revenues from unconventional oil & gas mining activities

5. In issuers (a) with an ESG rating equal to CCC MSCI rating (or equivalent rating assessed through the ESG rating tool/info provider used by the Investment Manager) or (b) with a severe and serious dispute equal to RED according to MSCI (or the equivalent assessment developed through the ESG rating tool used by the Investment Manager) or (c) that fail the MSCI UNGC screening.

Additionally the Sub-Fund follows the exclusion criteria referred to in Article 12(1)(a) to (g) of Commission Delegated Regulation (EU) 2020/1818.as detailed below:

- companies involved in any activities related to controversial weapons;
- companies involved in the cultivation and production of tobacco;
- companies that are assessed to be in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;
- companies that derive 1% or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;
- companies that derive 10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;
- companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels;
- companies that derive 50% or more of their revenues rom electricity generation with a GHG intensity of more than 100 g CO2 e/kWh.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating. To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 80% of the portfolio (box #1Aligned with E/S characteristics).

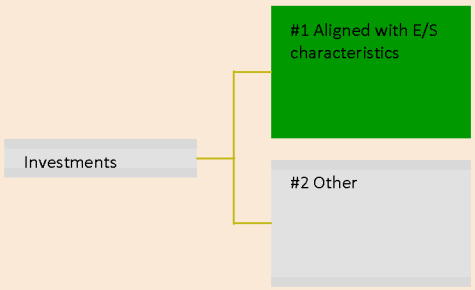
The remaining proportion (20% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

Yes

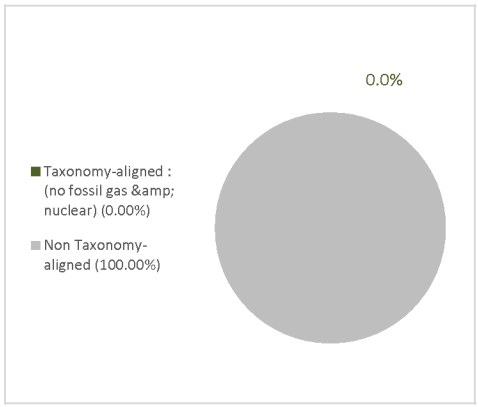
☐ In fossil gas ☐ In nuclear energy

☒ No

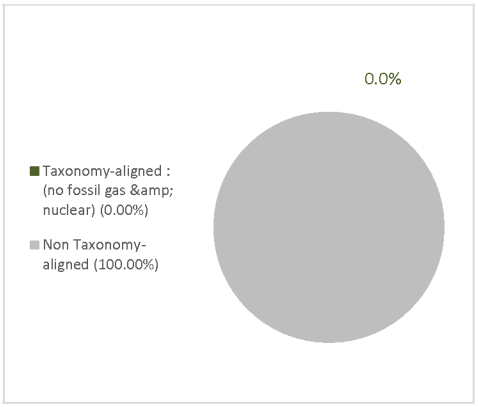
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 65.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.

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

Not applicable

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

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

https://www.fideuramassetmanagement.ie/en/sustainability/sustainability/Please also refer to the Management Company's policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses.Further details on the sustainability indicators approach (as may be updated from time to time) adopted are set out at:

https://www.blackrock.com/corporate/insights/our-approach-to-sustainability

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

Product name:

Willerfunds - Private Suite - Pictet Health Innovation Trends

Legal entity identifier

549300RVTIDCHWJOJ391 -

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ Yes	☒ No
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Investment Manager's ESG methodology are the following:

• Environmental: climate change mitigation and adaptation (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

  The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

  • the absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy ; and

  • the ESG rating of the portfolio.

  To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

  Not applicable

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

  Not applicable

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

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

Not applicable

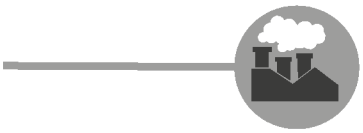
→ *How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable

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

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

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



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

[x] Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Investment Manager can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs, will be available in the Fund's annual report.

☐ No



What investment strategy does this financial product follow?

The Investment Manager's approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

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

Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

SRI exclusion criteria:

Issuers directly operating in the following sectors are not permitted:

1. In issuers operating in the following sector: production and/or marketing of ordinary weapons, with the exception of issuers belonging to European Union and/or NATO countries or that have less than 5% of their revenue attributable to such activities (consistent with the provisions of the "Rules Governing transactions with subjects active in the armaments sector" issued by Intesa Sanpaolo Group).

2. In issuers operating in the following sector: production, maintenance, sale and storage of weapons of mass destruction (WMD) i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW). Any issuers involved in the production, maintenance, sale and storage of dual-use components are also excluded. Specifically, it is strictly prohibited investing in companies that, directly or indirectly, through subsidiaries or affiliates, engage in the construction, production, development, assembly, repair, preservation, use, utilization, storage, holding, promotion, sale, distribution, import, export, transfer or transportation of antipersonnel mines, cluster munitions and submunitions;

3. In issuers deriving at least 25% of their revenues from extraction activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions.

4. In issuers deriving at least 10% of their revenues from unconventional oil & gas mining activities

5. In issuers (a) with an ESG rating equal to CCC MSCI rating (or equivalent rating assessed through the ESG rating tool/info provider used by the Investment Manager) or (b) with a severe and serious dispute equal to RED according to MSCI (or the equivalent assessment developed through the ESG rating tool used by the Investment Manager) or (c) that fail the MSCI UNGC screening (or equivalent assessment developed through the ESG rating tool used by the Investment Manager).

.

Additionally the Sub-Fund follows the exclusion criteria referred to in Article 12(1), points (a), (b) and (c) of Commission Delegated Regulation (EU) 2020/1818, as detailed below:

- companies involved in any activities related to controversial weapons;
- companies involved in the cultivation and production of tobacco;
- companies that are assessed to be in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating. To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 80% of the portfolio (box #1Aligned with E/S characteristics).

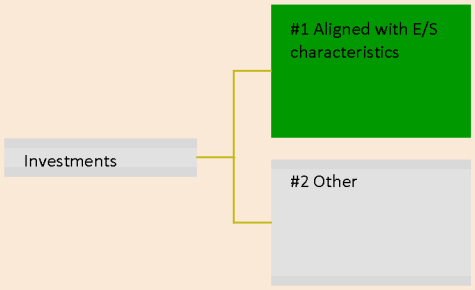
The remaining proportion (20% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

Yes

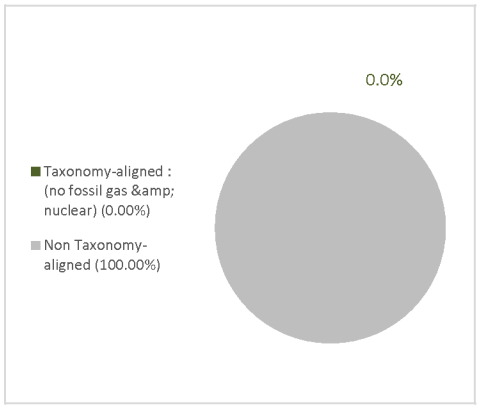
☐ In fossil gas ☐ In nuclear energy

☒ No

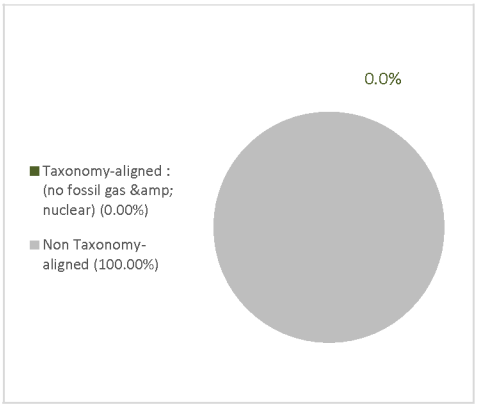
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 100.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.

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

Not applicable

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

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

https://www.fideuramassetmanagement.ie/en/sustainability/sustainability/Please also refer to the Management Company's policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses.Further details on the sustainability indicators approach (as may be updated from time to time) adopted are set out at:

https://am.pictet/-/media/pam/pam-common-gallery/pictet-asset-management/responsible-investment-policy.pdf

Pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name:

Willerfunds - Private Suite - Lombard Odier Natural Capital

Legal entity identifier

54930087IT0UJM6RN654

Sustainable investment objective

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

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

Does this financial product have a sustainable investment objective?

- [x] **Yes**
- [ ] **No**

- [x] It will make a minimum of **sustainable investments with an environmental objective**: 70%
  - [ ] in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - [x] in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- [ ] It will make a minimum of **sustainable investments with a social objective** %

- [ ] It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of _% of sustainable investments
  - [ ] with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - [ ] with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - [ ] with a social objective
- [ ] It promotes E/S characteristics, but **will not make any sustainable investments**



What is the sustainable investment objective of this financial product?

Sustainability indicators measure how the sustainable objectives of this financial product are attained

The Sub-fund invests in companies whose growth will benefit from regulations, innovations, services or products favoring the transition to a more circular economy and to an economy that values natural capital. The Sub-fund seeks to invest in high quality companies with sustainable financial models, business practices and business models showing resilience and the ability to evolve and benefit from long term structural trends using inter alia the profiling tools and methodologies set out below.

The Sub-fund's investment philosophy is rooted in the Investment Manager's worldview describing a necessary transition from a Wasteful, Idle, Lopsided and Dirty (WILD) economic model to one that is Circular, Lean, Inclusive and Clean (CLIC®). The Investment Manager believes this transition will require a transformation across the global economic systems related to energy, land & oceans and materials, enabled by carbon markets, which the Investment Manager refers to as the '3+1 framework'.

The Sub-fund focuses in particular on the following transformations:

• Transformation of land & ocean systems: transitions across our reliance on land & oceans, including the transformation of agriculture, food and land use (AFOLU) systems through more sustainable food production and sustainable forestry, the expansion of the bioeconomy, and the improvement of water systems, aiming to restore land and ecosystems back to nature.

• Materials - transitions across our material systems, including moves towards improved resource productivity, adoption of less harmful production processes, reduced reliance on resource extraction, and reductions and improvement management of waste.

The Sub-fund is expected to contribute to the following environmental objectives established by article 9 of the Taxonomy Regulation:

• The sustainable use and protection of water and marine resources

• The transition to a circular economy

• Pollution prevention and control

• The protection and restoration of biodiversity and ecosystems

The Sub-fund is also expected to indirectly contribute to Climate change mitigation.

In order to acheive the objectives and contributions described above, the Investment Manager aims to:

• invest the Sub-fund's assets primarily in investments making a meaningful contribution to the specific objectives outlined above as determined by reference to the Investment Manager's proprietary classification framework in which activities and companies may be classified as either 'green', 'grey' or 'red' (the "LOIM Classification Framework").

• invest at least 70% of the Sub-fund's assets in sustainable investments described as 'green' according to the LOIM Classification Framework.

The Investment Manager uses a pass/fail approach to define whether a given investment, defined at the company level, is considered as a "sustainable investment" or not.

The Investment Manager classifies companies into three categories, referred to as Green Star, Grey Star and Red Star companies, with only Green Star companies considered sustainable.

To "pass" as a Green Star company, a company must:

1. Have at least 25% revenue exposure to environmentally-sustainable "green" activities, understood to include:

a. Activities that in and of themselves contribute to one of the six environmental objectives recognised by the EU Taxonomy; or

b. Transitioning activities for which there are no technologically and economically feasible low-carbon alternatives, but that support the transition to a climate-neutral economy in a manner that is consistent with Paris-aligned (well below 2C) objectives; or

c. Enabling activities: activities that enable other activities to make a substantial contribution to one or more of the objectives; and

where the specific activities included and technical criteria applicable to these are defined by:

a. The activities and technical criteria already or expected to be included in the EU Taxonomy; or

b. The Investment Manager, where it believes specific activities are either already low-impact within high-impact industries in a relative or absolute sense, contribute to the transition including through commitments to credible transition strategies, or are enabling other activities to meet key thresholds; and

where a company's exposure to relevant activities can be established using either:

a. The company's own disclosures related to the EU Taxonomy; or

b. The Investment Manager's documented assessment of the company and its activities; and

2. Have at most 5% revenue exposure to "red" activities that are:

a. Classified by the Investment Manager as inherently harmful in nature, including activities related to the mining of thermal coal, the generation of power using coal, the extraction or refining of oil and gas, along with selected other activities; or

3. If not meeting the criteria above, to be dedicating more than 50% of its capital expenditure to the "green" activities defined above and to have specific targets around the accelerated phaseout or mitigation of any applicable "red" activities; or

4. If not meeting the criteria above, to be subject to a documented, facts-based assessment by the Investment Manager – undertaken ex ante for any investments made from January 1, 2023 – outlining the specific reasons the company's activities are considered well-aligned to desirable environmental transitions and are deemed appropriate to a given theme or environmental objective; and

5. In all cases, and as a minimum safeguard, not have exposure to level 4 and level 5 UN Global Compact controversies using the Sustainalytics rating scale, subject only to overrides correcting for factual or data errors.

While the above criteria constitute the minimum criteria applicable to a Green Star company, the Investment Manager may apply additional criteria to its assessment of companies involved in specific activities to act as additional safeguards, particularly in its assessment of Do No Significant Harm criteria. While such additional criteria cannot be used to "pass" companies if they do not meet the criteria above, they may lead companies to "fail" as a sustainable investment even if they meet the criteria above.

Grey Star and Red Star companies: Only companies classified as Green Star companies are considered by the Investment Manager to be sustainable investments. For all other companies, the Investment Manager applies additional criteria to distinguish between Grey Star and Red Star companies. Red Star companies are those companies with material exposure to the "red" activities referenced above, where such companies lack a credible phaseout strategy for those activities or include companies with exposure to high level controversies or other harmful aspects.

There can be no guarantee that the above aims will be achieved.

It should be noted that whilst the Investment Manager may make certain comparisons with one or more benchmarks for certain elements of its investment process as described above, the Investment Manager has not designated a formal benchmark for the purpose of attaining the sustainable investment objective of the Sub-fund.

- ***What Sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?***

  The Investment Manager will focus on the following primary indicator to measure attainment of the specific commitments outlined above:

  • the % of the sub-fund's assets invested in 'green', investments accordiing to the LOIM Classification Framework.

  • the absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy.

  Given the specific focus of this sub-fund, the Investment Manager will also prioritise consideration of the portfolio's performance on the following indicators, which are also considered as part of the Investment Manager's do no sigificant harm considerations outlined in the LOIM Classification Framework.

  • Water withdrawal (m3 / MEUR revenues)

  • Operational assets in biosensitive areas (#)

  • Forest management quality score (Investment Manager's scoring system)

  • Controversies related to water use, land use or biodiversity (# level 1-5)

  • Controversies related to non-GHG emissions, effluents and waste (# level 1-5)

- ***How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?***

  The analysis of possible significant harm to environmental or social sustainable investment objectives forms an inherent part of the analysis undertaken under the LOIM Classification Framework.

This LOIM Classification Framework takes explicit account of any material environmental or social dimensions, an investee company's performance with respect to these indicators, on a current or forward-looking basis.

The Investment Manager identifies 'Sustainable investments' as companies classified as 'green' under the LOIM Classification Framework which have specifically been assessed to not cause significant harm or to be subject to credible mitigating factors.

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

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

Indicators for adverse impact on sustainability factors are considered as part of the Investment Manager's activity-by-activity assessment of possible significant harm under the LOIM Classification Framework.

The specific Principal Adverse Indicators considered as part of this assessment are described further below.

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

The Investment Manager considers exposure to UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights controversies under to the LOIM Classification Framework. In the absence of credible mitigating factors, companies exposed to high level controversies, will not be considered as 'green'.



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

[x] Through its LOIM Classification Framework, the Investment Manager considers PAIs as shown in the table attached at the end of the document.

[ ] No



What investment strategy does this financial product follow?

In pursuing a sustainable investment objective being a positive environmental impact, the Investment Manager aims to select companies which generate material revenues and/or earnings from business activities that have a positive contribution towards one or more of the following areas of natural capital investment opportunities: Circular Bio-Economy, Resource Efficiency, Outcome-oriented Economy and Zero Waste.

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

What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

Exclusions

The followinig exclusions are applied:

- the absence of investments in securities and the binding restrictions in the investments in securities that are on the exclusion list as result of the application of the exclusion policy :

1. In issuers operating in the following sector: production and/or marketing of ordinary weapons, with the exception of issuers belonging to European Union and/or NATO countries or that have less than 5% of their revenue attributable to such activities (consistent with the provisions of the "Rules Governing transactions with subjects active in the armaments sector" issued by Intesa Sanpaolo Group).

2. In issuers operating in the following sector: production, maintenance, sale and storage of weapons of mass destruction (WMD) i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW). Any issuers involved in the production, maintenance, sale and storage of dual-use components are also excluded. Specifically, it is strictly prohibited investing in companies that, directly or indirectly, through subsidiaries or affiliates, engage in the construction, production, development, assembly, repair, preservation, use, utilization, storage, holding, promotion, sale, distribution, import, export, transfer or transportation of antipersonnel mines, cluster munitions and submunitions;

3. In issuers deriving at least 25% of their revenues from extraction activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions.

4. In issuers deriving at least 10% of their revenues from unconventional oil & gas mining activities

5. In issuers (a) with an ESG rating equal to CCC MSCI rating (or equivalent rating assessed through the ESG rating tool/info provider used by the Investment Manager) or (b) with a severe and serious dispute equal to RED according to MSCI (or the equivalent assessment developed through the ESG rating tool used by the Investment Manager) or (c) that fail the MSCI UNGC screening.

Additionally the Sub-Fund follows the exclusion criteria referred to in Article 12(1)(a) to (g) of Commission Delegated Regulation (EU) 2020/1818.as detailed below:

- companies involved in any activities related to controversial weapons;
- companies involved in the cultivation and production of tobacco;
- companies that are assessed to be in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;
- companies that derive 1% or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;
- companies that derive 10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;
- companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels;
- companies that derive 50% or more of their revenues rom electricity generation with a GHG intensity of more than 100 g CO2 e/kWh.

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

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

The criteria for good governance and minimum social safeguards include an analysis of exposure to high level social and governance controversies and the company's performance on social and governance scores under the Investment Manager's proprietary ESG scoring framework, if highly material to the company's sector. Good governance is also considered as part of the LOIM Classification Framework, including consideration of social and employee matters PAIs (e.g. violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises and lack of processes and compliance mechanisms to monitor compliance with UN Global).

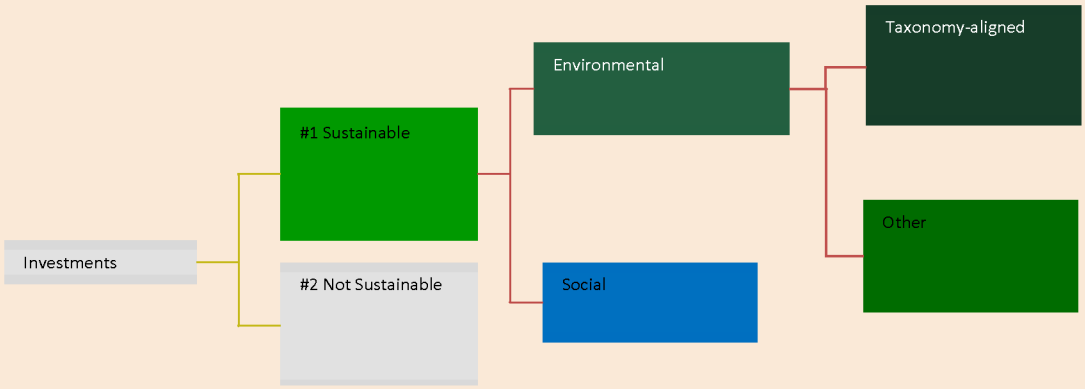
What is the asset allocation and the minimum share of sustainable investments?

The Investment Manager aims to invest at least 70% of the sub-fund's assets in #1A Sustainable

The minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 80% of the portfolio.

Asset allocation describes the share of investments in specific assets.

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



#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable investments.

How does the use of derivatives attain the sustainable investment objective?

The sub-fund does not use derivatives to attain the sustainable investment objective.

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

0%. The Investment Manager does not set a specific target regarding the extent to which sustainable investments with an environmental objective will be aligned with the EU Taxonomy.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

Yes

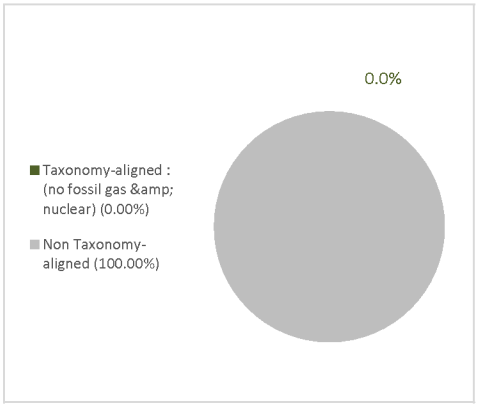
In fossil gas In nuclear energy

X No

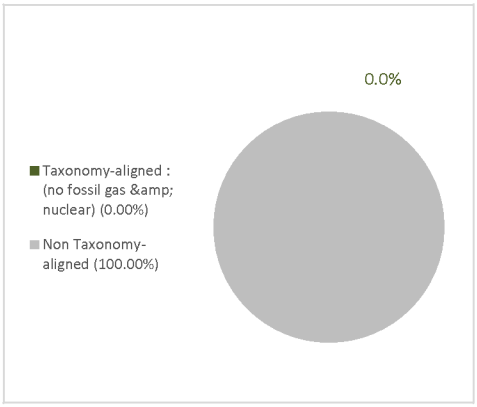
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 100.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable

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

70

There is no commitment to have any share of the Sub-Fund's sustainable investments aligned with the EU Taxonomy

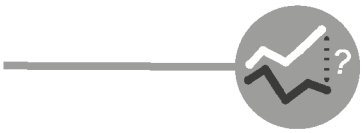
are environmentally sustainable investments that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

What is the minimum share of sustainable investments with a social objective?

0%. The Sub-fund focuses on sustainable investments with an environmental and not a social objective.

What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

Investments classified as "#2 Other" will be cash and cash equivalents. Cash may be kept for liquidity purposes or pending investment or where suitable sustainable investments are not available.



Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

No reference benchmark has been designated for the purpose of attaining the sustainable investment objective.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

  Not applicable

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

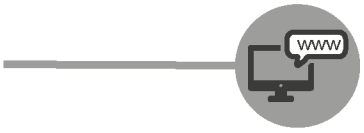
  Not applicable

- ***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:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

https://www.fideuramassetmanagement.ie/en/sustainability/sustainability/ Please also refer to Management Company's Policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses.Further details on the sustainability indicators approach, as may be updated from time to time, adopted are set out at:

https://am.lombardodier.com/files/live/sites/am/files/Documents/AssetManagement/RegulatoryDisclosures/2019/LOIM%20SRI%20Policy%202019.pdf

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

Product name:

Willerfunds - Private Suite - Janus Henderson Strategic Bond

Legal entity identifier

549300FYQ988GBSMQO03

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Investment Manager's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or

social characteristics promoted by the Sub-fund.

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

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

• the absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Investment Manager excludes investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;

• the ESG rating of the portfolio.

To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

Not applicable

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

Not applicable

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

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

Not applicable

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

Not applicable

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

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

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

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

[x] Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Investment Manager can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs, will be available in the Fund's annual report.

[ ] No

What investment strategy does this financial product follow?

The Investment Manager's approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

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

Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

SRI exclusion criteria:

Issuers directly operating in the following sectors are not permitted:

• in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);

• in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating. To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 50% of the portfolio (box #1Aligned with E/S characteristics).

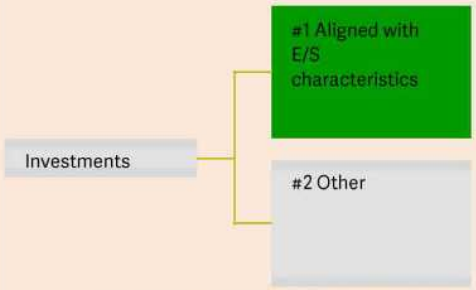
The remaining proportion (50% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

Yes

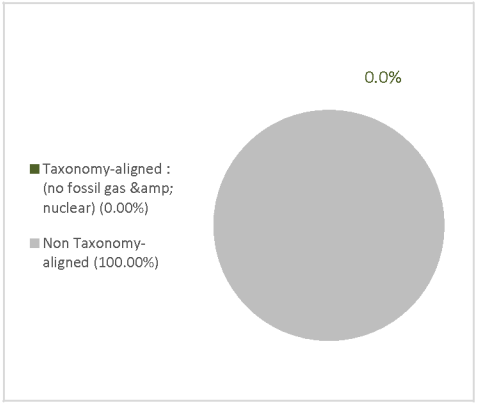
☐ In fossil gas ☐ In nuclear energy

☒ No

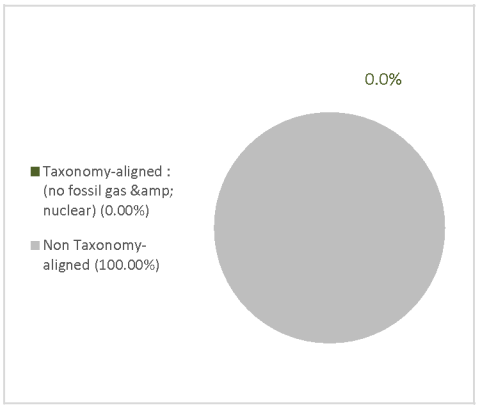
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 49.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.

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

Not applicable

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

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf

Please also refer to the Management Company's policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of

a product is delegated to third-party fund houses.Further details on the sustainability indicators approach (as may be updated from time to time) adopted are set out at:

https://cdn.janushenderson.com/webdocs/JHI_ESG_Investment_Policy_June_2022.pdf

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

Product name:

Willerfunds - Private Suite - JPM Europe Equity

Legal entity identifier

549300K6B6B1OH7UTN62

Environmental and/or social characteristics

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

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

Does this financial product have a sustainable investment objective?

☐ Yes	☒ No
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☐ 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 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Investment Manager's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

• the absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy. To fulfil the above purpose the Investment Manager shall not invest:

1. In compliance with Italian Law No. 220 of December 9th, 2021, in companies that, directly or indirectly, through subsidiaries or affiliates, engage in the construction, production, development, assembly, repair, preservation, use, utilization, storage, holding, promotion, sale, distribution, import, export, transfer or transportation of antipersonnel mines, cluster munitions and submunitions.
2.

• the binding restrictions in the investments in securities that are on the exclusion list as result of the application of the exclusion policy :

1. In issuers operating in the following sector: production and/or marketing of ordinary weapons, with the exception of issuers belonging to European Union and/or NATO countries or that have less than 5% of their revenue attributable to such activities (consistent with the provisions of the "Rules Governing transactions with subjects active in the armaments sector" issued by Intesa Sanpaolo Group).
2. In issuers operating in the following sector: production, maintenance, sale and storage of weapons of mass destruction (WMD) i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW). Any issuers involved in the production, maintenance, sale and storage of dual-use components are also excluded.
3. In issuers deriving at least 25% of their revenues from extraction activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions.
4. In issuers deriving at least 10% of their revenues from unconventional oil & gas mining activities
5. In issuers (a) with an ESG rating equal to CCC MSCI rating (or equivalent rating assessed through the ESG rating tool/info provider used by the Investment Manager) or (b) with a severe and serious dispute equal to RED according to MSCI (or the equivalent assessment developed through the ESG rating tool used by the Investment Manager) or (c) that fail the MSCI UNGC screening.

• the ESG rating of the portfolio.

To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

Not applicable

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

Not applicable

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

Not applicable

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

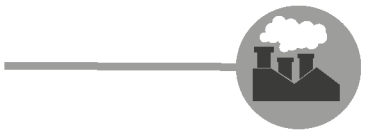
→ *How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable

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

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

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



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

[x] Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Investment Manager can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs, will be available in the Fund's annual report.

[ ] No



What investment strategy does this financial product follow?

The Sub-Funds strategy can be considered in respect of its general investment approach and ESG approach as follows:

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

Investment approach

- Uses a bottom-up stock selection process.

- Uses the full breadth of the eligible equity investment universe through a combination of fundamental research insights and quantitative analysis.

ESG approach

- Excludes certain sectors, companies or practices based on specific values or norms based criteria.

- At least 51% of assets to be invested in companies with positive environmental and/ or social characteristics.

- At least 10% of assets to be invested in Sustainable Investments.

- All companies follow good governance practices.

All investments (excluding cash and derivatives) are screened to exclude known violators of good governance practices. In addition, for those investments included in the 51% of assets promoting environmental and/or social characteristics or qualifying Sustainable Investments, additional considerations apply. For these investments, the Sub-Fund incorporates a peer group comparison and screens out companies that do not score in the top 80% relative to peers based on good governance indicators.

- ***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?***

  Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

  SRI exclusion criteria:

  Issuers directly operating in the following sectors are not permitted:
  1. In compliance with Italian Law No. 220 of December 9th, 2021, in companies that, directly or indirectly, through subsidiaries or affiliates, engage in the construction, production, development, assembly, repair, preservation, use, utilization, storage, holding, promotion, sale, distribution, import, export, transfer or transportation of antipersonnel mines, cluster munitions and submunitions.
  Issuers directly operating in the following sectors are subject to binding investment restrictions:
  1. In issuers operating in the following sector: production and/or marketing of ordinary weapons, with the exception of issuers belonging to European Union and/or NATO countries or that have less than 5% of their revenue attributable to such activities (consistent with the provisions of the “Rules Governing transactions with subjects active in the armaments sector” issued by Intesa Sanpaolo Group).
  2. In issuers operating in the following sector: production, maintenance, sale and storage of weapons of mass destruction (WMD) i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW). Any issuers involved in the production, maintenance, sale and storage of dual-use components are also excluded.
  3. In issuers deriving at least 25% of their revenues from extraction activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions.
  4. In issuers deriving at least 10% of their revenues from unconventional oil & gas mining activities
  5. In issuers (a) with an ESG rating equal to CCC MSCI rating (or equivalent rating assessed through the ESG rating tool/info provider used by the Investment Manager) or (b) with a severe and serious dispute equal to RED according to MSCI (or the equivalent assessment developed through the ESG rating tool used by the Investment Manager) or (c) that fail the MSCI UNGC screening. Integration of ESG factors:

  The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating. To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager’s proprietary models and data provided by external ESG research providers.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

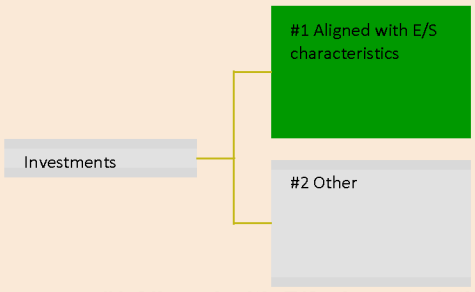
Asset allocation describes the share of investments in specific assets.

The Sub-Fund plans to allocate at least 51% of its assets to companies with positive environmental and / or social characteristics and a minimum of 10% of assets to Sustainable Investments. The Sub-Fund does not commit to investing any proportion of assets specifically in companies exhibiting positive environmental characteristics or specifically in positive social characteristics or both nor is there any commitment to any specific individual or combination of environmental or social objectives in respect of the Sustainable Investments. Therefore, there are no specific minimum allocations to environmental or social objectives referred to in the diagram below.

Ancillary Liquid Assets, Deposits with Credit Institutions, money market instruments / funds (for managing cash subscriptions and redemptions as well as current and exceptional payments) and derivatives for EPM are not included in the % of assets set out in the table below. These holdings fluctuate depending on investment flows and are ancillary to the investment policy with minimal or no impact on investment operations.

The allocations referred to above are all through direct exposure to the underlying investee companies by purchasing equities in such companies. The Sub-Fund does not use derivatives (indirect exposure) to attain the positive environmental and / or social characteristics or Sustainable Investments.The Sub-Fund may hold short positions, through derivatives, on securities that could qualify as Sustainable Investments or within the 51% of long positions promoting positive environmental and/or social characteristics. It may also hold short positions on securities that could be excluded in respect of the Sub-Fund's values and norms based screening. However, the Sub-Fund will not take short positions on securities excluded through controversial weapons screening.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

☐ Yes

In fossil gas

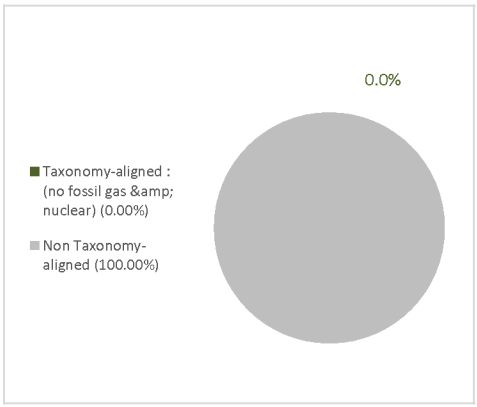
In nuclear energy

X No

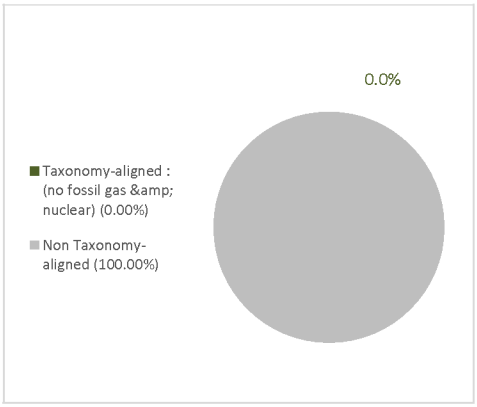
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 100.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable

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

%

Not applicable

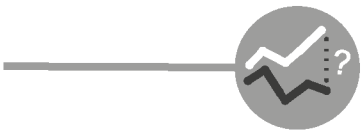
are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.



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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable



Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

https://www.fideuramassetmanagement.ie/en/sustainability/sustainability/Please also refer to Management Company's Policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses.

Further details on the sustainability indicators approach, as may be updated from time to time, adopted are set out at:

https://am.jpmorgan.com/it/it/asset-management/adv/investment-themes/sustainable-investing

Pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name:

Willerfunds - Private Suite - Vontobel Equity Global Impact

Legal entity identifier

549300ZTNGXQ48HUXS18

Sustainable investment objective

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

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

Does this financial product have a sustainable investment objective?

- [x] **Yes**
- [ ] **No**

- [x] It will make a minimum of **sustainable investments with an environmental objective**: 20%
  - [x] in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - [x] in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- [x] It will make a minimum of **sustainable investments with a social objective** 20%

- [ ] It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of _% of sustainable investments
  - [ ] with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - [ ] with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - [ ] with a social objective
- [ ] It promotes E/S characteristics, but **will not make any sustainable investments**

What is the sustainable investment objective of this financial product?

Sustainability indicators measure how the sustainable objectives of this financial product are attained

This Sub-fund has a sustainable investment objective. The Sub-fund is expected to invest at least 80% of its NAV in companies that qualify as sustainable investments . The Sub-fund is expected to invest at least 20% of its NAV in sustainable investments with an environmental objective and at least 20% of its NAV in sustainable investment with social objective.

The Investment Manager commits to investing a minimum of 5% of the Sub-fund's NAV in sustainable investments with environmental objective Taxonomy-aligned investments.

The Sub-fund sustainable investment objective consists in investing in issuers that contribute to pre-defined so called "Impact Pillars" through their products and services, based pre-determined revenue thresholds and on the Investment Manager's assessment using a proprietary impact score. The Impact Pillars are: clean water, clean energy, sustainable cities, innovative industries & technology, good health & well-being, sustainable food & agriculture, responsible consumption and equal opportunities. The targeted companies provide products and services along the whole value chain, which are designed to tackle today's pressing environmental and social problems i.e., environmental pollution, climate change, technological advances, population growth, urbanization and rising inequalities.

The Investment Manager aims to partially invest in companies that contribute, amongst other, to the following EU Taxonomy aligned objectives: climate change adaptation and transition to a circular economy.

No reference benchmark has been designated for the purpose of attaining the sustainable investment objective.

What Sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?

The Investment Manager's sustainability investment process consists of detailed, systematic qualitative and quantitative analysis of a potential investee. The Investment Manager uses the following sustainability indicators to measure the attainment of the Sub-fund's sustainable investment objective:

• Percentage of company's revenue derived from economic activities that contribute to at least one of the Impact Pillars.

• Percentage of investments in sustainable investments, by Impact Pillars.

• Investee companies Impact Strategy Score (as defined below).

• Percentage of investments in issuers with an ESG score below the minimum threshold set for this Sub-fund.

• Percentage of investments in issuers involved in activities excluded by the Sub-fund.

• Percentage of investments in issuers that are in violation with certain international norms and standards promoted by the Sub-fund or that are exposed to severe controversies (without positive outlook).

• the absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

In order to ensure that the sustainable investments that Sub-fund intends to make do not cause significant harm to any environmental or social investment objective, the Sub-fund implements a screening and exclusion approach as further described below, takes into account all the mandatory indicators for adverse impacts and ensures that the Sub-fund's investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights as further outlined below.

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

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

The Investment Manager takes into account all the mandatory adverse impacts indicators of Table 1 of Annex 1 of Commission Delegated Regulation (EU) 2022/1288 (the "SFDR RTS") and any relevant additional indicators in Tables 2 and 3 of the SFDR RTS by applying the following process:

• The Investment Manager identifies investments that are exposed to principal adverse impacts on sustainability factors against pre-determined thresholds based on in-house research; data sources include ESG data providers, news alerts, and the issuers themselves. Where no reliable third-party data is available, the Managament Company may make reasonable estimates or assumptions.

• Where the Investment Manager identifies an investment as critical in one of the considered principal adverse impacts areas by exceeding the pre-set threshold(s), and where no signs of improvement have been observed, an action must be taken within a reasonable period of time. Action mechanisms include: exclusion, engagement, tilting.

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

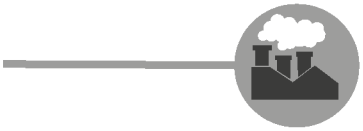
The Sub-fund has a controversy monitoring process in place, that among others takes into account the alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. This process is based on third party data and may be complemented by the Investment Manager own ESG research capabilities.

The Sub-fund excludes issuers that are:

(i) in violation with the norms and standards (defined under the investment strategy section) promoted by the Sub-fund,

(ii) involved in severe controversies.

Unless, in either case, the Investment Manager has not identified a positive outlook (i.e., through proactive response by the issuer, proportionate rectification measures already announced or taken, or through active ownership activities with reasonable promise of successful outcomes).



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

[x] Yes, the Investment Manager considers the adverse impacts on sustainability factors by applying the following process:

The Investment Manager identifies investments that are exposed to principal adverse impacts on sustainability factors against pre-determined thresholds, based on in-house research; data sources include ESG data providers, news alerts, and the issuers themselves. Where no reliable third-party data is available, the Investment Manager may make reasonable estimates or assumptions.

Where the Investment Manager identifies an investment as critical in one of the considered principal adverse impacts areas by exceeding the pre-set threshold(s), and where no signs of improvement have been observed, an action must be taken within a reasonable period of time. Action mechanisms include: exclusion, engagement, use of voting rights, tilting.

Information on how principal adverse impacts on sustainability factors were considered will be made available in the periodic reporting of the Sub-fund.

[ ] No



What investment strategy does this financial product follow?

The Sub-fund invests in issuers that contribute to the Impact Pillars through their products and services. The Impact Pillars are mapped to the UN Sustainable Development Goals ("SDGs"). In order to qualify for investment:

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

• the investee companies must have a positive contribution to at least one of the Impact Pillars where the company must derive at least 20% of its revenues from economic activities that contribute to at least one of the Impact Pillars;

• the investee companies must have a positive impact strategy score ("Impact Strategy Score"). The Investment Manager systematically assess the investee companies impact strategies, based on a qualitative scoring of six criteria (score from -3 to +3), reflecting the benefits linked to an investee company's strategy, also relative to peers or similar industries. These six scores aggregate to an overall Impact Strategy Score for each company.

Additionally, the Sub-fund applies the following approaches:

1. Screening approach:

The Sub-fund invests in issuers that the Investment Manager considers as demonstrating a superior ESG score. Investee companies will be screened based on a minimum ESG score, which is provided by a third-party data provider.

2. Exclusion approach:

The Sub-fund applies certain exclusion criteria with regards to products and activities related to: unconventional / controversial weapons, nuclear weapons, coal (extraction and power plants), unconventional oil and gas, nuclear energy, tobacco, adult entertainment, alcohol, gambling, animal testing, fur, palm oil. Such involvement is measured by the revenues an issuer derives from such activities. The Investment Manager considers that a company is involved in such activities when it derives a non-marginal part of its revenues from these activities. Exceptions may apply, if the company has a clear strategy to exit from these activities (e.g., through investments in other energy sources, strategy to decrease CO2 intensity).

3. Severe controversies monitoring:

The Sub-fund promotes the adherence with certain international norms and standards, i.e., UN Global Compact, OECD guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, ILO guidelines, UN conventions, by excluding issuers that are:

(i) in violation with these norms and standards,

(ii) that are involved in severe controversies.

Unless, in either case, the Investment Manager has not identified a positive outlook (i.e., through proactive response by the issuer, proportionate rectification measures already announced or taken, or through active ownership activities with reasonable promise of successful outcomes).

The securities will be analyzed based on the binding elements prior to investment and monitored on a continuous basis. Each asset in the portfolio has their sustainability performance periodically revaluated using the above-described sustainability framework. If a company does not comply with the criteria described below, the Investment Manager divests from such a company within a time period to be determined by the Investment Manager without exceeding in principle three months after such breach was detected, considering prevailing market conditions and taking due account of the best interests of the shareholders. The Investment Manager may decide to further postpone the rectification of such a breach or decide to carry out the divestment in several instalments over a longer period of time in exceptional cases, provided this is considered to be in the best interests of the shareholders.The Sub-fund is expected to invest at least 80% of its NAV in companies that qualify as sustainable investments (#1 Sustainable).

The Sub-fund is expected to invest at least 20% of its NAV in sustainable investments with an environmental objective (Environmental), and at least 20% of its NAV in sustainable investment with social objective (Social).

The Sub-fund is allowed to invest up to 20% of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Not Sustainable).

The ESG analysis coverage, based on the above-mentioned indicators (where relevant), will be guaranteed for at least 100% of the Sub-fund's securities. The use of data may be subject to methodological limits.

- ***What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?***

  • The Sub-fund makes sustainable investments, as defined by article 2(17) SFDR in accordance with the Investment Manager's methodology for selecting sustainable investments.

  • Through the implementation of the process described above, the Sub-fund excludes at least 20% of the investment universe (global listed equity markets).

  • The Sub-fund excludes issuers that derive a non-marginal part of their revenues from products/activities to those listed in the exclusion list.

  • The Sub-fund excludes issuers in violation of UN Global Compact Principles, UN Conventions, OECD Guidelines for Multinational Enterprises unless a positive outlook is identified.

• The Sub-fund excludes issuers that are exposed to severe controversies unless a positive outlook is identified.

• The Sub-fund invests in issuers that have a positive Impact Strategy Score.

• The Sub-fund invests in issuers that derive at least 20% of their revenue from economic activities that contribute to at least one of the Impact Pillars.

• SRI exclusion criteria, issuers directly operating in the following sectors are not permitted:

1. In issuers operating in the following sector: production and/or marketing of ordinary weapons, with the exception of issuers belonging to European Union and/or NATO countries or that have less than 5% of their revenue attributable to such activities (consistent with the provisions of the "Rules Governing transactions with subjects active in the armaments sector" issued by Intesa Sanpaolo Group).

2. In issuers operating in the following sector: production, maintenance, sale and storage of weapons of mass destruction (WMD) i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW). Any issuers involved in the production, maintenance, sale and storage of dual-use components are also excluded. Specifically, it is strictly prohibited investing in companies that, directly or indirectly, through subsidiaries or affiliates, engage in the construction, production, development, assembly, repair, preservation, use, utilization, storage, holding, promotion, sale, distribution, import, export, transfer or transportation of antipersonnel mines, cluster munitions and submunitions;

3. In issuers deriving at least 25% of their revenues from extraction activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions.

4. In issuers deriving at least 10% of their revenues from unconventional oil & gas mining activities

5. In issuers (a) with an ESG rating equal to CCC MSCI rating (or equivalent rating assessed through the ESG rating tool/info provider used by the Investment Manager) or (b) with a severe and serious dispute equal to RED according to MSCI (or the equivalent assessment developed through the ESG rating tool used by the Investment Manager) or (c) that fail the MSCI UNGC screening.

Additionally the Sub-Fund follows the exclusion criteria referred to in Article 12(1)(a) to (g) of Commission Delegated Regulation (EU) 2020/1818.as detailed below:

- companies involved in any activities related to controversial weapons;
- companies involved in the cultivation and production of tobacco;
- companies that are assessed to be in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;
- companies that derive 1% or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;
- companies that derive 10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;
- companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels;
- companies that derive 50% or more of their revenues from electricity generation with a GHG intensity of more than 100 g CO2 e/kWh.

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

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

The Investment Manager will assess investee companies' good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance, by applying a severe controversies monitoring process.

The Sub-fund excludes issuers that are:

(i) in violation with the norms and standards promoted by the Sub-fund, or

(ii) that are involved in severe controversies, including those related to governance matters.

Unless, in either case, the Investment Manager has not identified a positive outlook (i.e., through proactive response by the issuer, proportionate rectification measures already announced or taken, or through active ownership activities with reasonable promise of successful outcomes).

Active ownership activities: The Sub-fund further intends to ensure good governance of the investee companies via active ownership. The Investment Manager puts best effort in engaging with regards to ESG policies and to promote sustainability awareness.



Asset allocation describes the share of investments in specific assets.

What is the asset allocation and the minimum share of sustainable investments?

The Sub-fund is expected to invest at least 80% of its NAV in companies that qualify as sustainable investments (#1 Sustainable). The Sub-fund is expected to invest at least 20% of its NAV in sustainable investments with an environmental objective (Environmental), and at least 20% of its NAV in sustainable investment with social objective (Social).

Under "#1 Sustainable", the Sub-Fund will partially invest in sustainable investments with an environmental objective aligned with the EU Taxonomy. The Sub-Fund intends to partially invest in sustainable investments with an environmental objective as defined by the EU Taxonomy. These objectives are: "climate change mitigation", "climate change adaptation", "transition to a circulareconomy". It is expected that at least 5% of the Sub-Fund's investments will be considered as aligned with the EU Taxonomy. This percentage reflects the contribution to the objectives "climate change mitigation" and "climate change adaptation". At the

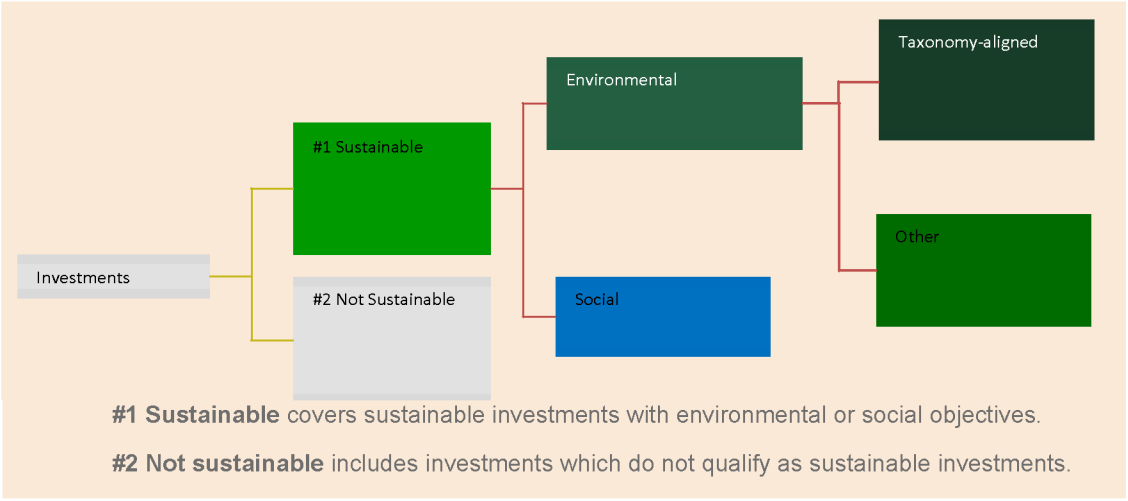
date of the Sales Prospectus, the EU Taxonomy technical screening criteria are available only for the objectives "climate change mitigation" and "climate change adaptation". As the Sub-Fund will solely invest in investee companies, none of the investments will consist of sovereign exposures. The Taxonomy alignment of the investment is calculated by turnover. In order to calculate and monitor the EU Taxonomy alignment of the Sub-Fund, the Investment Manager will use data reported by the investee companies themselves. Where investee companies do not report such data, the Investment Manager will use equivalent information obtained directly from investee companies and/or from third party data providers. The compliance with the criteria for environmentally sustainable economic activities will not be subject to an assurance provided by one or more auditors or a review by one or more third parties.

The Sub-fund is allowed to invest up to 20% of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Not Sustainable).

Under "#2 Other", the Sub-Fund may hold ancillary liquidity and use financial derivative instruments for the purpose of hedging. While these instruments are not expected to detrimentally affect the attainment of the Sub-Fund's sustainable investment objective, no minimum environmental or social safeguards are applied.

The ESG analysis coverage, based on the above-mentioned indicators (where relevant), will be guaranteed for at least 100% of the Sub-fund's securities. The use of data may be subject to methodological limits.

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



#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable investments.

How does the use of derivatives attain the sustainable investment objective?

Not applicable, derivatives are not used for the purpose of attaining the sustainable investment objective of the Sub-fund.

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

It is expected that at least 5% of the Sub-fund's investments will be considered as Taxonomy-aligned (contributing to amongst other the following EU Taxonomy aligned objective: climate change adaptation and transition to a circular economy) and hence will comply with the technical screening criteria specific to the economic activity at hand. As the Sub-fund will solely invest in investee companies, none of the investments will consist of sovereign exposures.

The Taxonomy alignment of the investment is calculated by turnover.

The information of the Taxonomy alignment will be provided by a third-party data provider, which might be augmented by information gathered by the Investment Manager through their proprietary research analysis.

At this moment, compliance with the EU Taxonomy will not be subject to a review by auditors nor by third parties.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

Yes

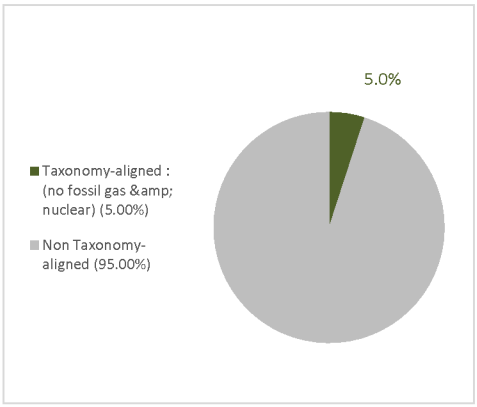
☐ In fossil gas ☐ In nuclear energy

☒ No

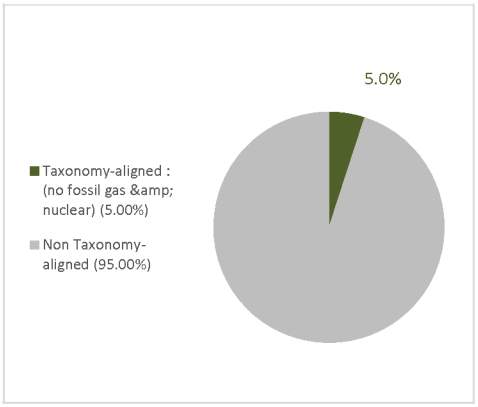
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 100.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The Sub-fund will invest at least 1% in enabling activities but does not seek particular exposure to transitional activities.

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

The Sub-fund will partially invest in environmentally sustainable investments, as defined by the EU Taxonomy. However, the Sub-fund also invests in sustainable investments that are not aligned with the criteria set out by the EU Taxonomy but the Investment Manager is not currently in a position to specify the exact proportion of the Sub-fund underlying sustainable investments which take into account the EU criteria for environmentally sustainable economic activities.

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

What is the minimum share of sustainable investments with a social objective?

The Sub-fund's minimum share of socially sustainable investments will be at least 20% of the Sub-fund's assets

What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

The Sub-fund may hold ancillary liquidity and use financial derivative instruments for the purpose of hedging. While these instruments are not expected to detrimentally affect the attainment of the Sub-fund's sustainable investment objective, no minimum environmental or social safeguards are applied.

Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

No reference benchmark has been designated for the purpose of attaining the sustainable investment objective.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

  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:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

https://www.fideuramassetmanagement.ie/en/sustainability/sustainability/

Please also refer to Management Company's Policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses.Further details on the sustainability indicators approach, as may be updated from time to time, adopted are set out at:

https://www.vontobel.com/en/about-vontobel/responsibility/

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

Product name:

Willerfunds - Private Suite - Wellington Equity Global Research

Legal entity identifier

549300IMY6RY8DYEZE32

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Investment Manager's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or

social characteristics promoted by the Sub-fund.

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

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

• the binding restrictions in the investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Investment Manager excludes investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;

• the ESG rating of the portfolio.

To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

Not applicable

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

Not applicable

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

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

Not applicable

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

Not applicable

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

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

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

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

[x] Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Investment Manager can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs, will be available in the Fund's annual report.

[ ] No

What investment strategy does this financial product follow?

The Investment Manager's approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

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

Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

SRI exclusion criteria:

Issuers directly operating in the following sectors are subject to binding investment restrictions:

• in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);

• in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating. To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 50% of the portfolio (box #1Aligned with E/S characteristics).

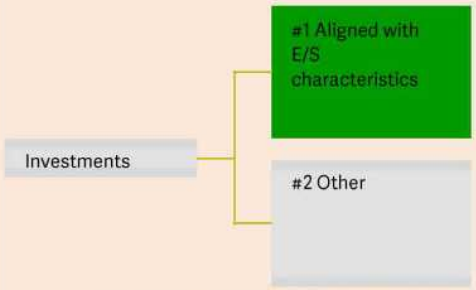
The remaining proportion (50% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

☐ Yes

In fossil gas

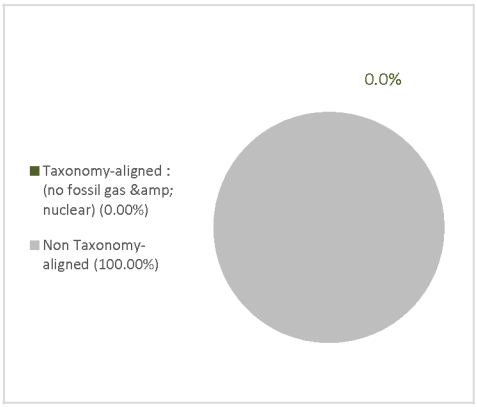
In nuclear energy

X No

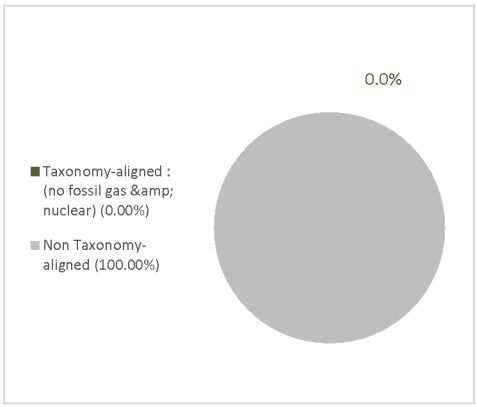
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 100.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable

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

Not applicable

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

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf

Please also refer to Management Company's Policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses.

Further details on the sustainability indicators approach, as may be updated from time to time, adopted are set out at:

https://www.wellington.com/en/sustainable-investing/sustainable-finance-disclosure-regulation-sfdr

Pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name:

Willerfunds - Private Suite - Eurizon Multi-Asset Circular Economy

Legal entity identifier

549300DBR0GV365XZG89

Sustainable investment objective

Does this financial product have a sustainable investment objective?

- [x] **Yes**
- [ ] **No**

- [x] It will make a minimum of **sustainable investments with an environmental objective**: 70%
  - [ ] in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - [x] in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- [ ] It will make a minimum of **sustainable investments with a social objective** %

- [ ] It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of _% of sustainable investments
  - [ ] with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - [ ] with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - [ ] with a social objective
- [ ] It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

What is the sustainable investment objective of this financial product?

Sustainability indicators measure how the sustainable objectives of this financial product are attained

The Sub-fund has a sustainable investment objective and will invest its net assets in equities of companies that participate in the transition to a circular economy through processes such as product recycling, waste reduction, product life extension and renewable resources.

The Sub-fund may also invest its net assets in green bonds i.e. corporates, governments and agency bonds, issued to finance, for example, projects that respect the climate and the environment, such as renewable energy, energy efficiency, pollution prevention, clean transport, water management, circular economy, biodiversity protection and green building.

In order to reach its sustainable objective the Investment Manager adopts the firmwide sustainable investment framework built around the United Nations Social Development Goals (UN SDGs). This framework helps the Investment Manager to assess the extent companies' products and services address at least one of the selected environmental challenges, as defined by the UN Sustainable Development Goals (UN SDGs) without conflicting with any of the 17 SDGs.

The Sub-fund is actively managed. The Sub-fund is not managed in reference to a benchmark.

What Sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?

The sustainability indicators used to measure the achievement of the Sub-fund's sustainable investment objective are the following:

• the absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy.

• the weight of issuers operating in sectors deemed not "socially responsible", identified through the data of infoproviders specialized on ESG and SRI issues;

• the weight of issuers with a high exposure to ESG risks (so-called "critical issuers"), identified through data from specialized information providers on ESG issues;

• the weighted average weight of the issuers who appear to have, with reference to their products and services and production processes: (i) a net positive alignment with at least 1 of the no. 17 SDGs promoted by the United Nations and (ii) no net misalignment with any of the n. 17 SDGsthe % of investments in UCITS/UCI categorized under article 9 SFDR;

• the weighted average ESG score of the portfolio compared with the investment universe.

As regards Active Ownership - Engagement, please refer to the Stewardship Report published on the website:

https://www.eurizoncapital.com/en/sustainability/stewardship-and-esg-engagement-policy.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

The sustainable investment framework based on UN SDGs is built around the concept of SDGs alignment as much as misalignment. Each investee company is evaluated in relation to both metrics therefore any misalignment to at least one of the 17 SDGs is considered a breach of the Do Not Significantly Harm (DNSH) criteria and it excludes the opportunity to invest in the issuer. Additional third party data provides further tools and KPIs to assess if and how any investee company pass the Do Not Significantly Harm ("DNSH") test.

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

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

The significant harm to any environmental or social sustainable investment objective (represented by one or more of each SDGs) is avoided by the monitoring of any adverse impact caused by each sustainable investment on sustainability factors. Impacts on PAI are managed directly throught the application of the exclusion policy (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and the active engagement by FAMI on investee companies.

The Investment Manager can check the PAIs data concerning the Sub-fund through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process.

The Investment Manager considers the following indicators: PAI 3 - GHG intensity of investee companies; PAI 4 Exposure to companies active in fossil fuel sector; PAI 5 - Share of non-renewable energy consumption and production; PAI 7 – Activites negatively affecting biodiversity-sensitive areas; PAI 13 - Board gender diversity; PAI 14 - Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons).

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 methodology for selecting sustainable investments based on the Sustainable Development Goals promoted by the United Nations (UN SDGs) adopted by the SGR takes into consideration the main indicators of adverse impact through quantitative and qualitative metrics, such as the exposure of the issuer to any disputes. In this context, for example, the issuer's involvement in disputes over Human Rights, Workers' Rights and the conduct of its business is assessed.



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

[x] Yes, the Investment Manager considers the following indicators: PAI 3 - GHG intensity of investee companies; PAI 4 Exposure to companies active in fossil fuel sector; PAI 5 - Share of non-renewable energy consumption and production; PAI 7 – Activites negatively affecting biodiversity-sensitive areas; (for investments in soverigns and supranationals) PAI 13 - Board gender diversity; PAI 14 - Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons).

In the best interest of its financial products, the SGR undertakes (i) to continue to develop its own policies on sustainability and (ii) to activate specific engagement actions towards investee issuers that show significant deviations from specific environmental indicators , social and governance or that show significant negative effects on several indicators, with the aim of orienting them towards improving their sustainability practices by evaluating, only as a last resort, the disposal of investments.Information on PAI, will be available in the annual Sub-fund report in the specific section of the template “Periodic 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”.

[ ] No



What investment strategy does this financial product follow?

In actively managing the Sub-fund, the Investment Manager follows a disciplined two-step ESG selection process:

• negative screening: exclusion of companies that are involved in the production of cluster bombs and landmines or, limited to investments in equity, derive 25% or more of their revenues from thermal coal mining or the production of electricity from thermal coal, or do not include independent members in the corporate government institutions. The issuers are identified among those included in the "MSCI ESG Ratings - World";

• positive screening for equity investments: selection of companies that are leaders in the transition to a circular economy and, in particular, that meet following inclusion criteria: “circular transition” (such as companies that have a high percentage of waste recycling, recycle products or share products as a service), “facilitators” (such as companies that produce renewable resources or contribute to green mobility) and “suppliers” (companies that provide products and services that support circular production models).

The contribution of each investment to the investment objectives are monitored by the Investment Manager on a continuous basis. Investments which does not contribute to the investment objective are subject to potential exclusion.

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

What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

1. The Sub-fund is an impact sub-fund classified under SFDR Art. 9 therefore the first binding element is the mandatory requirement to invest only in sustainable investments unless for liquidity and hedging purpose;

2. Any UCITS/UCI that the Sub-fund invests in will also need to have been categorized under article 9 SFDR;

3. The weighted average ESG score must be higher than the one of itsinvestment universe.

4. The Sub-fund must also be compliant with the following binding elements:

a. the absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy. To fulfil the above purpose the Investment Manager shall not invest:

- In issuers operating in the following sector: production and/or marketing of ordinary weapons, with the exception of issuers belonging to European Union and/or NATO countries or that have less than 5% of their revenue attributable to such activities (consistent with the provisions of the "Rules Governing transactions with subjects active in the armaments sector" issued by Intesa Sanpaolo Group).
- In issuers operating in the following sector: production, maintenance, sale and storage of weapons of mass destruction (WMD) i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW). Any issuers involved in the production, maintenance, sale and storage of dual-use components are also excluded. Specifically, it is strictly prohibited investing in companies that, directly or indirectly, through subsidiaries or affiliates, engage in the construction, production, development, assembly, repair, preservation, use, utilization, storage, holding, promotion, sale, distribution, import, export, transfer or transportation of antipersonnel mines, cluster munitions and submunitions;
- In issuers deriving at least 25% of their revenues from extraction activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions.
- In issuers deriving at least 10% of their revenues from unconventional oil & gas mining activities.
- In issuers (a) with an ESG rating equal to CCC MSCI rating (or equivalent rating assessed through the ESG rating tool/info provider used by the Investment Manager) or (b) with a severe and serious dispute equal to RED according to MSCI (or the equivalent assessment developed through the ESG rating tool used by the Investment Manager) or (c) that fail the MSCI UNGC screening.

b. Sustainability Integration - measured by the weighted average weight of the issuers who appear to have, with reference to their products and services and production processes: (i) a net positive alignment with at least 1 of the no. 17 SDGs promoted by the United Nations and (ii) no net misalignment with any of the n. 17 SDGs.

c. Active Ownership - as regards the binding element of Active Ownership - Engagement, please refer to the Stewardship Report published on the website: Stewardship and ESG Engagement Policy - Eurizon (eurizoncapital.com). The binding elements are monitored on ongoing basis by the risk manager and by the portfolio manager.

Additionally the Sub-Fund follows the exclusion criteria referred to in Article 12(1)(a) to (g) of Commission Delegated Regulation (EU) 2020/1818.as detailed below:

- companies involved in any activities related to controversial weapons;
- companies involved in the cultivation and production of tobacco;
- companies that are assessed to be in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;
- companies that derive 1 % or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;
- companies that derive 10 % or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;
- companies that derive 50 % or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels;
- companies that derive 50 % or more of their revenues rom electricity generation with a GHG intensity of more than 100 g CO2 e/kWh.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists of the assurance that the governance of the issuers (or investee companies) is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholders' interests also by means of a remuneration policy.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria and through extensive screening based on third party data provider based on specific relevant factors, among them employee practices, ownership and management structures, tax and accounting compliance and open or past controversies.



What is the asset allocation and the minimum share of sustainable investments?

Asset allocation describes the share of investments in specific assets.

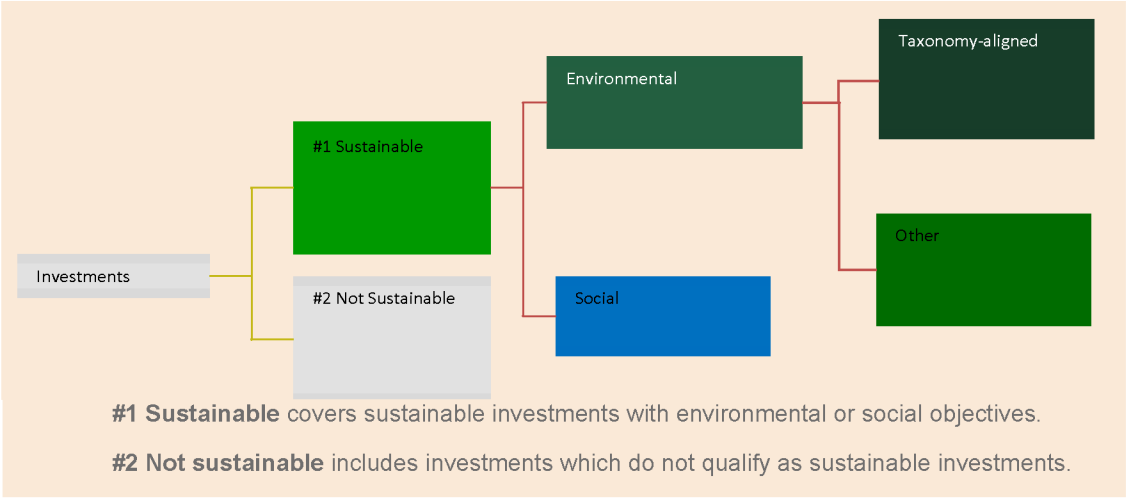
The Sub-fund has a sustainable investment objective and will pursue a minimum share of sustainable investment of 80%.

The minimum share of sustainable investment with an environmental objective is 80%. There is no minimum commitment to sustainable investment with a social objective.

Sustainable investments with an environmental objective will be made in economic activities that are not considered sustainable in accordance with the EU taxonomy.

It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation, but such investments are not in themselves decisive for the pursuit of the Fund's environmental objectives.

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



#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable investments.

How does the use of derivatives attain the sustainable investment objective?

Derivatives are only used for hedging purposes if and when market conditions encourage a prudent approach to protect clients' investment and a more efficient portfolio management.

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

The Sub-fund cannot yet commit to a minimum share of sustainable Investment with an environmental objective aligned with the EU Taxonomy.

It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

Yes

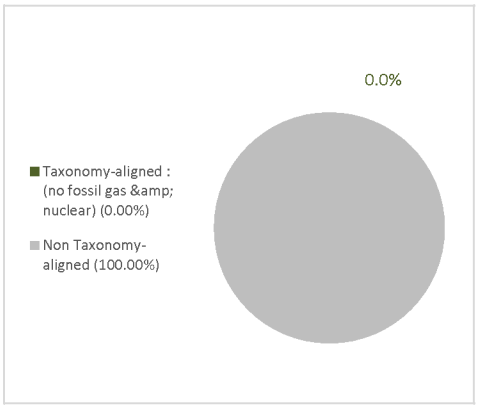
☐ In fossil gas ☐ In nuclear energy

☒ No

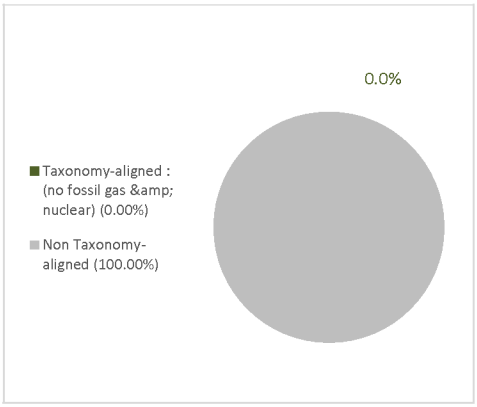
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 87.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Currently there is no commitment to a minimum share of investments in transitional and enabling activities although the Sub-fund may have significant exposure to some of these activities.

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

70%

The Sub-fund commits to invest at least 70% of the portfolio in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

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

What is the minimum share of sustainable investments with a social objective?

The Sub-fund does not committ to make sustainable investments with a social objective

What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

The Sub-Fund has a sustainable investment objective and will make a minimum of sustainable investments with an environmental objective of 70%. The remaining part of the Fund's assets may be invested in liquidity management instruments as well as in financial derivative instruments used both for risk hedging purposes and for efficient portfolio management, in line with the investment policy. It is therefore specified that no environmental or social safeguard clause has been taken into consideration with regard to these investments.

Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

No reference benchmark has been designated to meet the sustainable investment objective.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

  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:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

https://www.fideuramassetmanagement.ie/en/sustainability/sustainability/Please also refer to the Management Company's policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses.Further details on the sustainability indicators approach (as may be updated from time to time) adopted are set out at:

https://www.eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ENG/PoliticaSostenibilita_eng.pdf

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

Product name:

Willerfunds - Private Suite - Fidelity Global Equity Income

Legal entity identifier

636700ZBVB2RQKYEP447

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Management Company's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

The indicators used to measure the attainment of each of the environmental or social characteristics promoted by the Sub-fund are:

• The absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy.

The Investment Manager excludes investment in sectors which it deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;

• the ESG rating of the portfolio.

To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

Not applicable

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

Not applicable

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

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

Not applicable

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

Not applicable

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

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

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

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

[x] Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Investment Manager can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs, will be available in the Fund's annual report.

[ ] No

What investment strategy does this financial product follow?

The Investment Manager aims to achieve an ESG score of its portfolio greater than that of its benchmark by investing in securities of issuers with, on average, better ESG characteristics than those in the benchmark. In respect of direct investments, the fund is subject to:

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

1. Removal of securities that are on the exclusion list as result of the application of the exclusion policy.

2. a principle-based screening policy which includes:

(i) norms-based screening of issuers which the Investment Manager considers have failed to conduct their business in accordance with international norms, including as set out in the UNGC; and

(ii) negative screening of certain sectors, issuers or practices based on specific ESG criteria where revenue thresholds may be applied. The above exclusions and screens may be updated from time to time.

The Investment Manager also has discretion to implement additional exclusions.

- ***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?***

  Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

  SRI exclusion criteria:

  Issuers directly operating in the following sectors are not permitted:

  1. In compliance with Italian Law No. 220 of December 9th, 2021, in companies that, directly or indirectly, through subsidiaries or affiliates, engage in the construction, production, development, assembly, repair, preservation, use, utilization, storage, holding, promotion, sale, distribution, import, export, transfer or transportation of antipersonnel mines, cluster munitions and submunitions.

  Issuers directly operating in the following sectors are subject to binding investment restrictions:

  1. In issuers operating in the following sector: production and/or marketing of ordinary weapons, with the exception of issuers belonging to European Union and/or NATO countries or that have less than 5% of their revenue attributable to such activities (consistent with the provisions of the "Rules Governing transactions with subjects active in the armaments sector" issued by Intesa Sanpaolo Group).

2. In issuers operating in the following sector: production, maintenance, sale and storage of weapons of mass destruction (WMD) i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW). Any issuers involved in the production, maintenance, sale and storage of dual-use components are also excluded.

3. In issuers deriving at least 25% of their revenues from extraction activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions.

4. In issuers deriving at least 10% of their revenues from unconventional oil & gas mining activities

5. In issuers (a) with an ESG rating equal to CCC MSCI rating (or equivalent rating assessed through the ESG rating tool/info provider used by the Investment Manager) or (b) with a severe and serious dispute equal to RED according to MSCI (or the equivalent assessment developed through the ESG rating tool used by the Investment Manager) or (c) that fail the MSCI UNGC screening.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating. To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 70% of the portfolio (box #1Aligned with E/S characteristics).

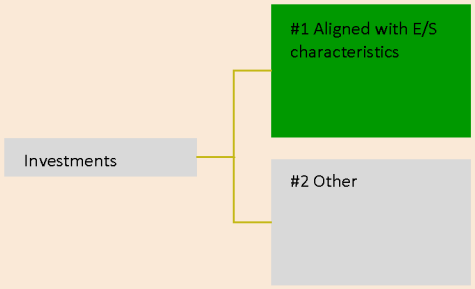
The remaining proportion (30% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

Yes

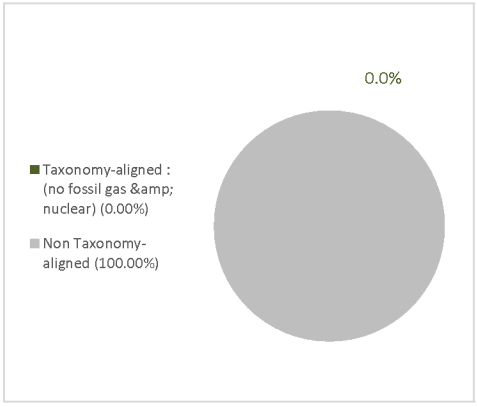
☐ In fossil gas ☐ In nuclear energy

☒ No

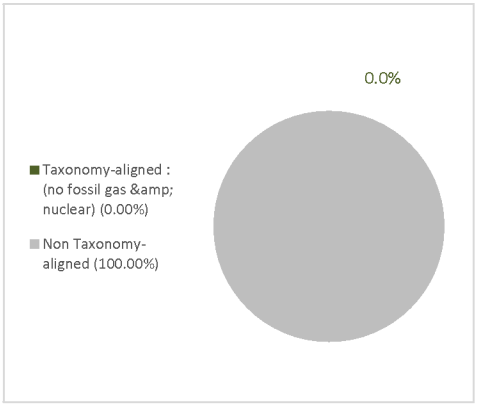
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 100 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.

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

Not applicable

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

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf

Please also refer to the Management Company's policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses.Further details on the sustainability indicators approach (as may be updated from time to time) adopted are set out at:

https://fidelityinternational.com/sustainable-investing-framework

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

Product name:

Willerfunds - Private Suite - FAMI Euro Short Term

Legal entity identifier

549300EO4D1SLP1BMD81

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Management Company's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste); environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

In addition the Sub-fund partly invests in sustainable investments pursuant to article 2(17) SFDR which means companies and issuers involved in activities that contribute to an

environmental and social objective as outlined in UN Sustainable Development Goals (hereinafter also ”SDGs”) while not significantly harming any other environmental or social objectives.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the sub-fund.

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

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

• the binding restrictions in the investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Management Company restricts investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;

• the weighted average ESG score of the portfolio.

To undertake this ESG criteria analysis, the Management Company will use data provided by external ESG research providers’ proprietary models (e.g. MSCI).

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

The Sub-fund has a commitment to invest a minimum part of the portfolio in sustainable investments combining environmental and social objectives. It aims to create positive environmental and social impact by investing in companies that are involved in economic activities that are considered environmentally or socially sustainable by virtue of their contribution to one or more of the 17 environmental or social-themed SDGs (https://sdgs.un.org/goals).

It must be clarified that the Sub-fund does not commit to make investments in taxonomy-aligned environmentally sustainable investments according to article 6 of the Taxonomy Regulation (EU) 2020/852 (the “EU Taxonomy”). Consequently there is not a specific commitment to pursue one or more environmental objectives of article 9 of the EU Taxonomy. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation.

The criteria assumed for measuring the positive contribution of each investment to each sustainable objective is based on the components defined by "MSCI ESG Research" within its methodological framework "SDG Alignment Methodology” which is based on the two following main indicators:

• "Product Alignment", i.e. the indicator of the degree of "net alignment" of an issuer's products and services to the targets associated with each SDG; this indicator aims to (i) estimate the revenue of companies issuing products and services that respond to one or more relevant SDGs, and (ii) identify products and services that have potentially negative impacts with respect to the achievement of the SDGs;

• "Operational Alignment", i.e. the indicator of the degree of alignment of the production processes of the issuing companies with respect to specific SDGs. This metric takes into account the internal policies, objectives and practices implemented by the issuers.

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

The sustainable investment methodology based on SDGs is built around the concept of SDGs alignment as much as misalignment. Each investee companies is evaluated in

relation to both metrics therefore any misalignment to at least one of the 17 SDGs is considered a breach of the Do Not Significantly Harm ("DNSH") threshold and it excludes the possibility to consider the issuer as a sustainable investment. Additional third party data provides further tools and KPIs to assess if and how any investee company pass the DNSH test.

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

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

The significant harm to any environmental or social sustainable investment objective (represented by one or more of the 17 SDGs) is avoided by the monitoring of any adverse impact caused by each sustainable investment on sustainability factors.

All of the mandatory adverse impact indicators of Table 1 of Annex I of Commission Delegated Regulation (EU) 2022/1288 (the "SFDR RTS") are taken into account and any relevant ones in Tables 2 and 3 of the SFDR RTS by checking the PAI data through a periodic monitoring report where the values of the indicators at product level can be consulted and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process.

However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Additional information on PAI is available in the section dedicated to sustainability in the Management Company's website (http://www.fideuramireland.ie/en/sustainability/sustainability/), which includes the "Sustainable And Responsible Investment Policy" as well as other PAI information.

→ *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 Management Company's Sustainable and Responsible Investment Policy specifies that corporate approach to sustainable and responsible investments is inspired by the principles contained in documents such as UN Global Compact principles (UNGC), UN Guiding Principles on Business and Human Rights (UNGPs), Organization for Economic Cooperation and Development (OECD) Guidelines for multinational enterprises, International Labor Organization Conventions. This approach follows the methodology for the definition of "sustainable investments" with specific reference to the Do Not Significantly Harm Principle.

The Management Company monitors the entire portfolio on the basis of a series of environmental, social and governance indicators (via third party data), including the violations of the UNGC and OECD Guidelines for Multinational Enterprises. Issuers characterized by a severe and serious dispute equal to "Red" (also referring to selected global norms and conventions, including the United Nations Global Compact Principles, the International Labour Organization's conventions, and the United Nations Guiding Principles on Business and Human Rights) are excluded from the investment perimeter.

In addition, as described in the Sustainable and Responsible Investment Policy, the Management Company monitors two social PAI selected to limit exposures to violations of the UNGC principles/OECD guidelines.

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

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

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

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

[x] Yes, the Management Company specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Management Company can check the PAI data through a periodic monitoring report where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs will be available in the Fund's annual report.

[ ] No

What investment strategy does this financial product follow?

The Management Company's approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

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

Below are detailed the binding elements followed by the Management Company for each strategy adopted for promoting environmental and social characteristics.

The Sub-Fund partially makes sustainable investments, as defined by article 2(17) SFDR in accordance with the Management Company's methodology for selecting sustainable investments.

SRI exclusion criteria:

Issuers directly operating in the following sectors are subject to binding investment restrictions:

• in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e. nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);

• in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.

ESG screening and monitoring:

Issuers characterized by the following are restricted from the investment perimeter:

• an ESG rating equal to "CCC", classified according to the proprietary rating methodology of the external provider MSCI, which contemplates a range of values going from "AAA", for the best rated issuers, to "CCC" for the riskiest issuers;

• a severe and serious dispute equal to "Red", classified according to the proprietary methodology of the external provider MSCI, that indicates an ongoing very severe ESG controversy (a controversy having a social and/or environmental impact) implicating a company directly through its actions, products or operations (e.g. loss of life, destruction of eco-system, economic shakedown affecting multiple jurisdictions).

The ESG screening and monitoring is performed using data based on MSCI methodology.

For this product, which has a benchmark (as set out in the Sub-fund's investment policy), the binding investment restrictions allow a maximum permissible exposure equal to the issuer's weight on the benchmark.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of issuers in terms of their sustainable performance through an ESG score and in order that the final average ESG portfolio scoring is higher than that one related to the Sub-fund's benchmark. To undertake this ESG score analysis, the Management Company will use data provided by external ESG research providers' proprietary models (e.g. MSCI).

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Management Company and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 80% of the portfolio (box

Asset allocation describes the share of investments in specific assets.

#1Aligned with E/S characteristics).

The remaining proportion (20% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics or in the classification of sustainable investment) should be limited to:

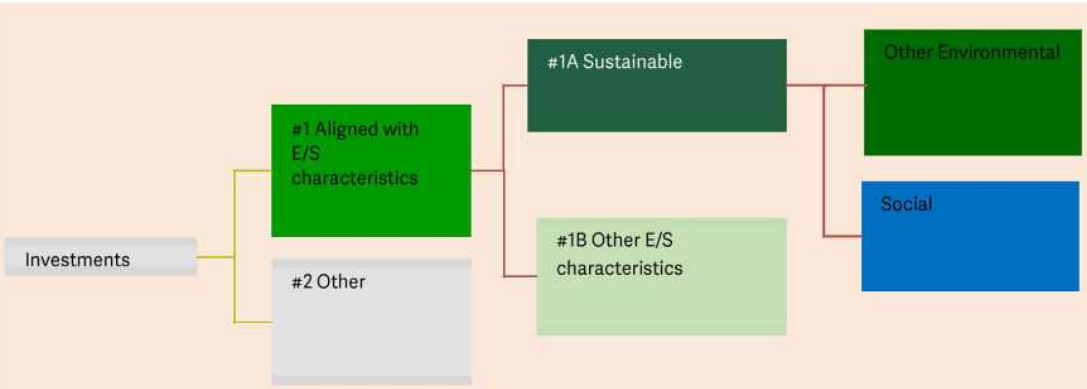
• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

The Sub-fund will have a minimum proportion of 10% of sustainable investments (box #1A Sustainable).

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to climate change mitigation and/or climate change adaptation.

However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

☐ Yes

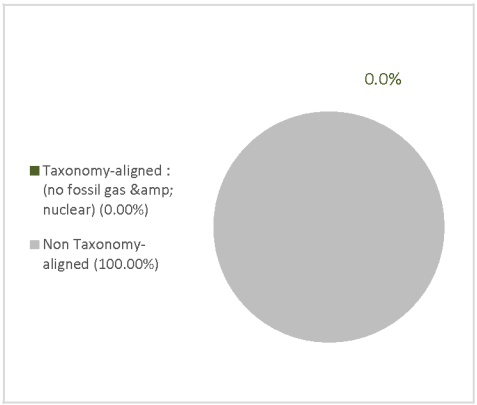
☐ In fossil gas ☐ In nuclear energy

☒ No

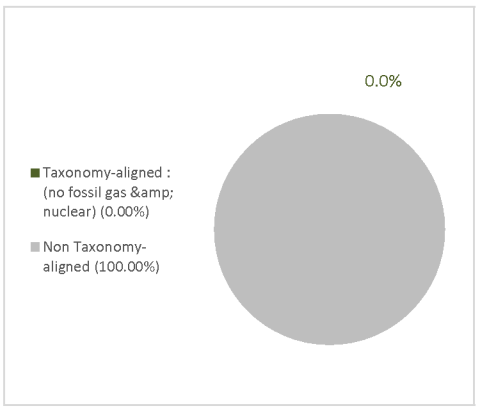
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 51.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.

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

5

The Sub-fund commits to invest at least 5% of the portfolio in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

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

What is the minimum share of socially sustainable investments?

The Sub-fund commits to invest at least 10% of the portfolio in sustainable investment with a social objective.

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf

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

Product name:

Willerfunds - Private Suite - Franklin Emerging Corporate Bond

Legal entity identifier

549300T48JFXAVCEGR79

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

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

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ Yes	☒ 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 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Investment Manager's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or

social characteristics promoted by the Sub-fund.

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

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

• the binding restrictions in the investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Investment Manager excludes investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;

• the ESG rating of the portfolio.

To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

Not applicable

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

Not applicable

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

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

Not applicable

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

Not applicable

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

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

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

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

[x] Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Investment Manager can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs, will be available in the Fund's annual report.

[ ] No

What investment strategy does this financial product follow?

The Investment Manager's approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

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

Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

SRI exclusion criteria:

Issuers directly operating in the following sectors are subject to binding investment restrictions:

• in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);

• in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating. To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 50% of the portfolio (box #1Aligned with E/S characteristics).

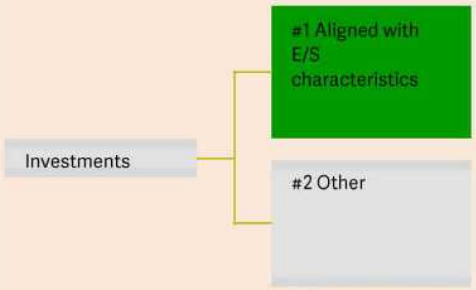
The remaining proportion (50% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

Yes

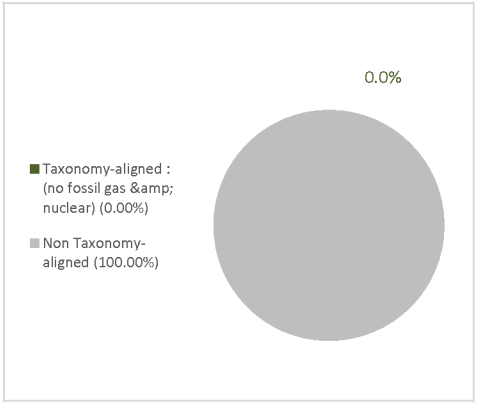
☐ In fossil gas ☐ In nuclear energy

☒ No

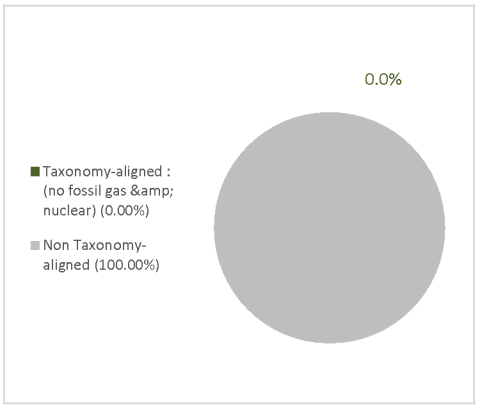
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 100.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable

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

Not applicable

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

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf

Please also refer to Management Company's Policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses.

Further details on the sustainability indicators approach, as may be updated from time to time, adopted are set out at:

https://www.franklintempleton.it/chi-siamo/investimento-sostenibile

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

Product name:

Willerfunds - Private Suite - T. Rowe Price Equity US Research

Legal entity identifier

549300ZWRL6BWTE2TO93

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Investment Manager's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or

social characteristics promoted by the Sub-fund.

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

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

• the binding restrictions in the investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Investment Manager excludes investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;

• the ESG rating of the portfolio.

To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

Not applicable

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

Not applicable

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

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

Not applicable

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

Not applicable

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

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

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

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

[x] Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Investment Manager can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs, will be available in the Fund's annual report.

[ ] No

What investment strategy does this financial product follow?

The Investment Manager's approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

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

Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

SRI exclusion criteria:

Issuers directly operating in the following sectors are subject to binding investment restrictions:

• in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);

• in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating. To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 50% of the portfolio (box #1Aligned with E/S characteristics).

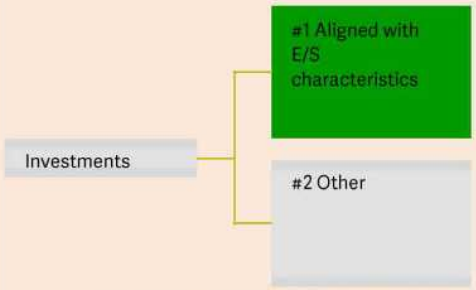
The remaining proportion (50% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

☐ Yes

In fossil gas

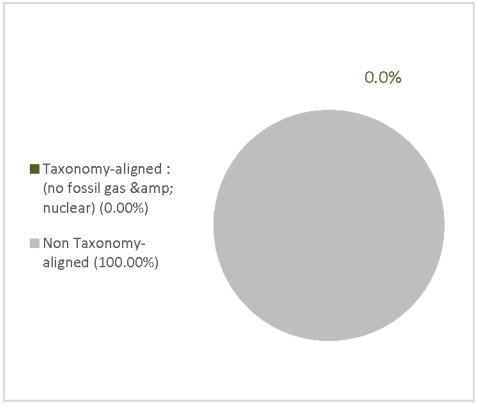
In nuclear energy

X No

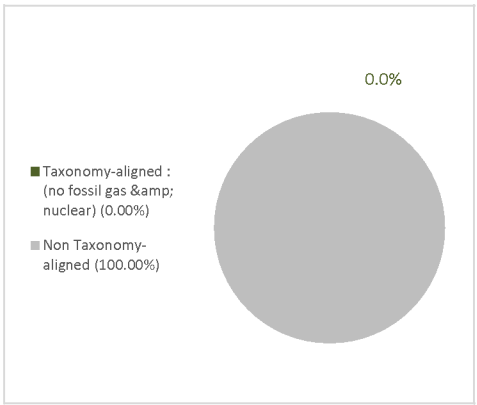
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 100.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable

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

Not applicable

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

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf

Please also refer to the Management Company's policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of

a product is delegated to third-party fund houses.Further details on the sustainability indicators approach (as may be updated from time to time) adopted are set out at:

https://www.troweprice.com/corporate/en/what-we-do/investing-approach/esg-investment-policy.html

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

Product name:

Willerfunds - Private Suite - Invesco Euro Corporate Bond

Legal entity identifier

6367000MQ3NGD9FV7519

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Investment Manager's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or

social characteristics promoted by the Sub-fund.

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

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

• the binding restrictions in the investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Investment Manager excludes investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;

• the ESG rating of the portfolio.

To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

Not applicable

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

Not applicable

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

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

Not applicable

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

Not applicable

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

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

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

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

[x] Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Investment Manager can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs, will be available in the Fund's annual report.

[ ] No

What investment strategy does this financial product follow?

The Investment Manager's approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

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

Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

SRI exclusion criteria:

Issuers directly operating in the following sectors are subject to binding investment restrictions:

• in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);

• in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating. To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 50% of the portfolio (box #1Aligned with E/S characteristics).

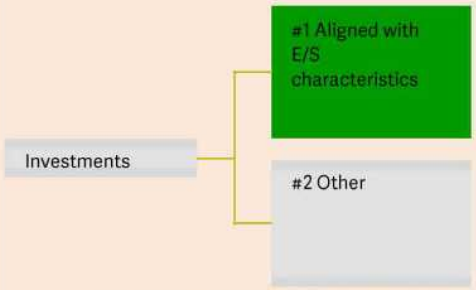
The remaining proportion (50% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

☐ Yes

In fossil gas

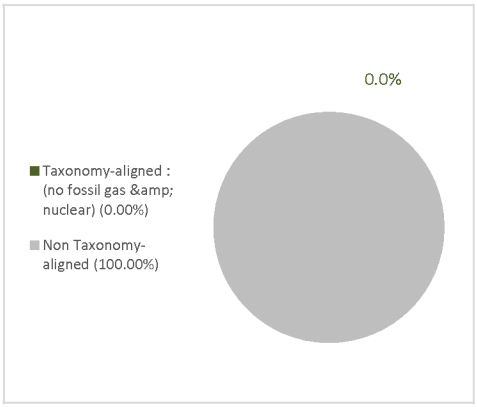
In nuclear energy

X No

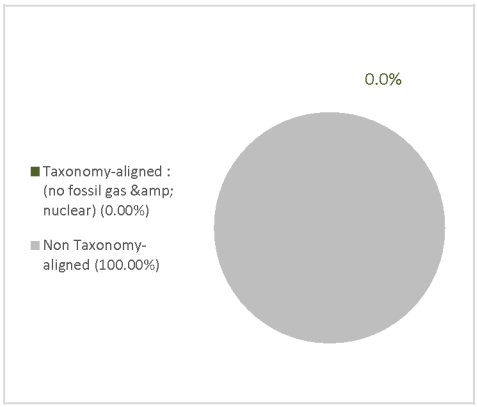
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 100.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable

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

Not applicable

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

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf

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

Product name:

Willerfunds - Willerfunds - Private Suite - PIMCO European Income Bond

Legal entity identifier

636700HMUACRGY4WDK73

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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



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

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

The main environmental and social characteristics promoted by the Sub-fund through the Investment Manager's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

• the absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Investment Manager excludes investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;

• the ESG rating of the portfolio.

To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

Not applicable

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

Not applicable

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

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

Not applicable

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

Not applicable

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

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

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

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

[x] Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators for corporate issuers: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government and supranational issuers: GHG intensity and Investee Countries subject to social violations.

The Investment Manager shall give effect to the PAI indicators listed above through the application of exclusion criteria applied to the issuer.

The PAI indicators for corporate issuers listed above will be integrated in the investment process directly or indirectly through the application of the SRI exclusion criteria which are binding elements of the investment strategy.

The PAI indicators for government and supranational issuers listed above will be integrated in the investment process through the applicaton of additional exclusion criteria, namely the exclusion of issues:

- GHG Intensity: countries with the highest GHG intensity;
- Investee countries subject to social violations: countries included in the UN Security Council List.

Further information on PAIs, will be available in the Fund's annual report.

[ ] No

What investment strategy does this financial product follow?

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

The Investment Manager's approach includes the adoption of strategies in line with the Principles for Responsible Investing (the "PRI principles"). These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

The Sub-fund's investment policy is set out in the Sub-fund Appendix.

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?

Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

SRI exclusion criteria:

Issuers directly operating in the following sectors are not permitted:

• in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);

• in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for

carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of issuers in terms of their sustainable performance through an ESG score and in order that average ESG portfolio scoring is above the score determined as a weighted average of the scores for the AUM of each asset class that make up the financial product.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

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

The assessment of the good governance practices is a central pillar of the investment process adoped by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 50% of the portfolio (box #1Aligned with E/S characteristics).

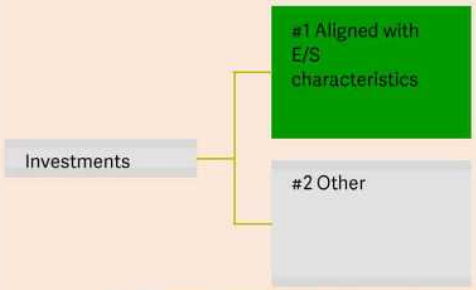
The remaining proportion (50% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

Yes

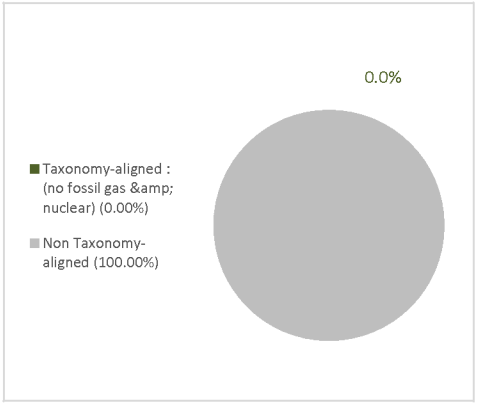
☐ In fossil gas ☐ In nuclear energy

☒ No

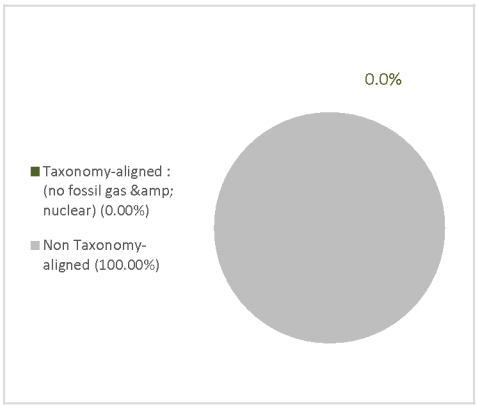
[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas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

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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 96.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.

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

%

Not applicable

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

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.



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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable



Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf

Please also refer to the Management Company's policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses. Further details on the sustainability indicators approach (as may be updated from time to time) adopted are set out at: https://www.pimco.com/eu/en/documents/7cda75e6-525b-4297-90b5-4634f2bc6db6

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

Product name:

Willerfunds - Private Suite - JPM Global Aggragate Bond

Legal entity identifier

6367003F1QOL0H1FSU87

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective**: _%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective** _%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

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

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

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

The main environmental and social characteristics promoted by the Sub-fund through the Investment Manager's ESG methodology are the following:

• Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy);

• Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or

social characteristics promoted by the Sub-fund.

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

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

• the absence of investments in securities that are on the exclusion list as result of the application of the exclusion policy. To fulfil the above purpose the Investment Manager shall not invest:

1. In compliance with Italian Law No. 220 of December 9th, 2021, in companies that, directly or indirectly, through subsidiaries or affiliates, engage in the construction, production, development, assembly, repair, preservation, use, utilization, storage, holding, promotion, sale, distribution, import, export, transfer or transportation of antipersonnel mines, cluster munitions and submunitions.

• the binding restrictions in the investments in securities that are on the exclusion list as result of the application of the exclusion policy :

1. In issuers operating in the following sector: production and/or marketing of ordinary weapons, with the exception of issuers belonging to European Union and/or NATO countries or that have less than 5% of their revenue attributable to such activities (consistent with the provisions of the "Rules Governing transactions with subjects active in the armaments sector" issued by Intesa Sanpaolo Group).

2. In issuers operating in the following sector: production, maintenance, sale and storage of weapons of mass destruction (WMD) i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW). Any issuers involved in the production, maintenance, sale and storage of dual-use components are also excluded.

3. In issuers deriving at least 25% of their revenues from extraction activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions.

4. In issuers deriving at least 10% of their revenues from unconventional oil & gas mining activities

5. In issuers (a) with an ESG rating equal to CCC MSCI rating (or equivalent rating assessed through the ESG rating tool/info provider used by the Investment Manager) or (b) with a severe and serious dispute equal to RED according to MSCI (or the equivalent assessment developed through the ESG rating tool used by the Investment Manager) or (c) that fail the MSCI UNGC screening.

• the ESG rating of the portfolio.

To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

Not applicable

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

Not applicable

Principal adverse impacts are the most significant negative impacts of investment decisions on

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

Not applicable

sustainability factors relating to environmental, social and employee matters, respect for human rights, anti - corruption and anti - bribery matters.

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

Not applicable

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

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

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



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

x Yes, the Investment Manager specifically considers the following principal adverse impact ("PAI") indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund's Investment Manager can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs, will be available in the Fund's annual report.

☐ No



What investment strategy does this financial product follow?

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

The Sub-Funds strategy can be considered in respect of its general investment approach and ESG approach as follows:

Investment approach

- Uses a globally integrated research driven investment process that focuses on analysing fundamental, quantitative and technical factors across countries, sectors and issuers.

- Combines top down asset allocation and bottom-up security selection targeting diversified sources of portfolio return – including sector rotation, security selection, currencies and yield curve positioning.

- Invests across all sectors of global investment grade debt which includes government, government related, corporate, emergingmarkets and securitised debt.

- May also invest in high yield and currency exposure is typically hedged back to the currency weights of the benchmark.

ESG approach

- Excludes certain sectors, companies or practices based on specific values or norms-based criteria.

- At least 51% of assets to be invested in issuers promoting environmental and/or social characteristics.

- All issuers / companies follow good governance practices, which is based on portfolio screening to exclude known violators of good governance practices.

In addition, for those investments included in the 51% of assets promoting environmental and/or social characteristics, additional considerations apply. For these investments, the Sub-Fund incorporates a peer group comparison and screens out issuers that do not score in the top 80% relative to the Sub-Fund's Benchmark based on good governance indicators to ensure the overall ESG score of the portfolio is higher than the ESG score of the Sub-Fund's Benchmark.

- ***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?***

  Below are detailed the binding elements followed by the Investment Manager for each strategy adopted for promoting environmental and social characteristics:

  SRI exclusion criteria:

  Issuers directly operating in the following sectors are not permitted:

  1. In compliance with Italian Law No. 220 of December 9th, 2021, in companies that, directly or indirectly, through subsidiaries or affiliates, engage in the construction, production, development, assembly, repair, preservation, use, utilization, storage, holding, promotion, sale, distribution, import, export, transfer or transportation of antipersonnel mines, cluster munitions and submunitions.

  Issuers directly operating in the following sectors are subject to binding investment restrictions:

  1. In issuers operating in the following sector: production and/or marketing of ordinary weapons, with the exception of issuers belonging to European Union and/or NATO countries or that have less than 5% of their revenue attributable to such activities (consistent with the provisions of the "Rules Governing transactions with subjects active in the armaments sector" issued by Intesa Sanpaolo Group).

  2. In issuers operating in the following sector: production, maintenance, sale and storage of weapons of mass destruction (WMD) i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW). Any issuers involved in the production, maintenance, sale and storage of dual-use components are also excluded.

  3. In issuers deriving at least 25% of their revenues from extraction activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions.

  4. In issuers deriving at least 10% of their revenues from unconventional oil & gas mining activities

  5. In issuers (a) with an ESG rating equal to CCC MSCI rating (or equivalent rating assessed through the ESG rating tool/info provider used by the Investment Manager) or (b) with a severe and serious dispute equal to RED according to MSCI (or the equivalent assessment developed through the ESG rating tool used by the Investment Manager) or (c) that fail the MSCI UNGC screening.

  Integration of ESG factors:

  The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating. To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.SRI exclusion criteria:Issuers directly operating in the following sectors are not permitted:• in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e., nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);• in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.Integration of ESG factors:The integration of ESG factors is promoted through the selection of the most virtuous issuers in terms of sustainable performance through an ESG rating.To undertake the ESG rating analysis, sustainable characteristics of the underlying investments are defined by reference to a combination of data generated internally by the Investment Manager's proprietary models and data provided by external ESG research providers.

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

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

The assessment of the good governance practices is a central pillar of the investment process adopted by the Investment Manager and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refers to the answer to the question "What investment strategy does this financial product follow?".



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 51% of the portfolio (box #1Aligned with E/S characteristics).

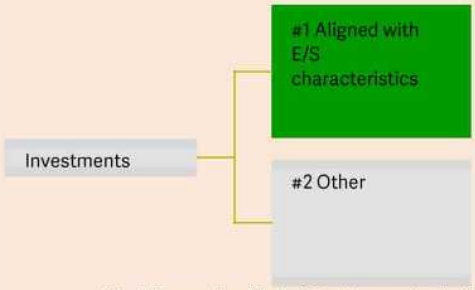
The remaining proportion (49% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

• cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;

• derivatives which may be held forinvestment purposes, efficient portfolio management and hedging but not for promoting environmental and social characteristic;

• securities for which relevant data is not available.

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



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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

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

Not applicable, derivatives are not used to promote environmental or social characteristics.

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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?[1]

Yes

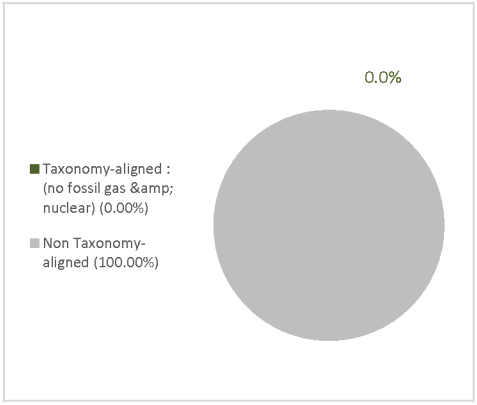
☐ In fossil gas ☐ In nuclear energy

☒ No

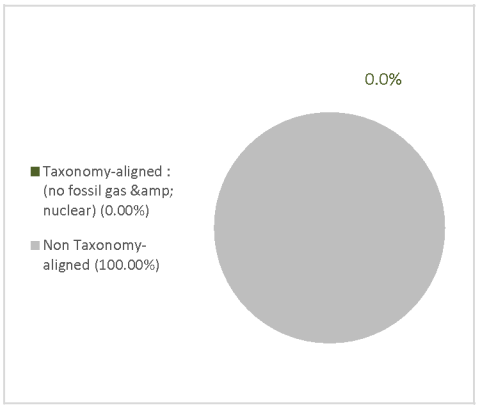
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The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy-alignment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

1. Taxonomy alignment of investments **including sovereign bonds***



2. Taxonomy alignment of investments **excluding sovereign bonds***



This graph represents 54.00 % of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

Not applicable

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

%

Not applicable

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

What is the minimum share of socially sustainable investments?

Not applicable

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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

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

  Not applicable

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

  Not applicable

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

  Not applicable

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

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

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Please also refer to Management Company's Policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses.

Further details on the sustainability indicators approach, as may be updated from time to time, adopted are set out at:

https://am.jpmorgan.com/us/en/asset-management/institutional/investment-strategies/sustainable-investing/