

## HEPTAGON FUND ICAV

(An open-ended Irish collective asset-management vehicle with registered number C67289 and established as an umbrella fund with segregated liability between sub-funds pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011 (as amended))

### SUPPLEMENT

#### QBLUE GLOBAL SUSTAINABLE LEADERS FUND

dated 16 June 2023

This Supplement contains information relating specifically to the **Qblue Global Sustainable Leaders Fund** (the “Fund”) a Fund of Heptagon Fund ICAV (the “ICAV”), an open-ended umbrella fund type with segregated liability between sub-funds, authorised by the Central Bank as a UCITS pursuant to the UCITS Regulations.

**This Supplement forms part of and should be read in the context of and in conjunction with the Prospectus for ICAV dated 1 December 2022 (the “Prospectus”) which is available from the Administrator at 30 Herbert Street, Dublin 2, Ireland.** Words and expressions defined in the Prospectus shall, unless the context otherwise requires, have the same meaning when used in this Supplement.

The Directors of the ICAV whose names appear under the heading “Management and Administration” in the Prospectus accept responsibility for the information contained in this Supplement and the Prospectus. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case) the information contained in this Supplement and in the Prospectus is in accordance with the facts and does not omit anything likely to affect the importance of such information.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.** Investors should read and consider the section entitled “Risk Factors” before investing in the Fund.

**Shareholders should note that for distributing Share Classes, dividends may be payable out of the capital of the Fund. As a result, capital will be eroded and distributions will be achieved by foregoing the potential for future capital growth and this cycle may continue until all capital is depleted.**

#### 1. Interpretation

In this Supplement, the following words and phrases have the meanings set forth below, except where the context otherwise requires:

**“Business Day”**

means any day (except Saturday or Sunday) on which banks in Dublin and Copenhagen are generally open for business or such other day or days as may be determined by the Directors and notified to Shareholders.

**“Dealing Day”**

means every Business Day or such other day or days as may be determined by the Directors and notified to Shareholders in advance, provided there shall be at least one Dealing Day per fortnight.

“Dealing Deadline”

means 2 p.m. (Irish time) on the relevant Dealing Day or such other time as the Directors may determine and notify to Shareholders in advance, provided always that the Dealing Deadline is no later than the Valuation Point.

“Equity Participation”

includes for the purpose of the investment restrictions set out in this Supplement:

- (1) shares in a company (which may not include depositary receipts and Real Estate Investment Trusts (“REITs”)) that are admitted to official trading on a stock exchange or admitted to, or included in another organized market which fulfils the criteria of a “regulated market” as defined in Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments; and/or
- (2) shares in a company other than a real estate company which is (i) resident in a Member State or in a member state of the European Economic Area, and where it is subject to, and not exempt from corporate income tax; or (ii) is a resident in any other state and subject to corporate income tax of at least 15%; and/or
- (3) units of a UCITS and/or of other collective investments schemes which fulfil the definition of an alternative investment fund (“AIF”) pursuant to Directive 2011/61/EU of the European Parliament and of the Council of 8 June 2011 on Alternative Investment Fund Managers, that are not partnerships, which, as disclosed in their respective investment terms, are permanently invested with a minimum of at least 51% of their values in equity participations (an “Equity Fund”) with 51% of the units of Equity Funds held by the Fund being taken into account as equity participations; and/or
- (4) units of a UCITS and/or of an AIF that are not partnerships, which, as disclosed in their respective investment terms, are permanently invested with a minimum of at least 25% of their values in equity participations (a “Mixed Fund”) with 25% of the units of Mixed Funds held by the Fund being taken into account as equity participations; and/or
- (5) units of Equity Funds or Mixed Funds that disclose their equity participation ratio in their respective investment terms; and/or
- (6) units of Equity Funds or Mixed Funds that report their equity participation ratio on a daily basis.

|                                          |                                                                                                                                                                                                           |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <u>“Manager”</u>                         | means Carne Global Fund Managers (Ireland) Limited or such other person as may be appointed in accordance with the requirements of the Central Bank to provide management services to the ICAV.           |
| <u>“Minimum Holding”</u>                 | means the minimum number of Shares required to be held by Shareholders having such value as may from time to time be specified by the Directors in relation to each Class and set out in this Supplement. |
| <u>“Minimum Initial Subscription”</u>    | means the amount specified in respect of each Class in this Supplement. The Directors may, in their absolute discretion, waive such minimum initial subscription amount.                                  |
| <u>“Minimum Subsequent Subscription”</u> | means the amount specified in respect of each Class in this Supplement. The Directors may, in their absolute discretion, waive such minimum subsequent subscription amount.                               |
| <u>“Sub-Investment Manager”</u>          | means Qblue Balanced A/S.                                                                                                                                                                                 |
| <u>“Recognised Market”</u>               | means any stock exchange or market set out in Appendix II to the Prospectus.                                                                                                                              |
| <u>“Valuation Day”</u>                   | means the relevant Dealing Day.                                                                                                                                                                           |
| <u>“Valuation Point”</u>                 | means the close of business in the relevant market on the Valuation Day (or such other time as the Directors may determine provided that this may not be before the Dealing Deadline).                    |

All other defined terms used in this Supplement shall have the same meaning as in the Prospectus.

## 2. **Base Currency**

The Base Currency shall be United States Dollars (USD). The Net Asset Value per Share will be published and settlement and dealing will be effected in the currency denomination of each Class as set out in section 9 of this Supplement.

## 3. **Investment Objective**

The investment objective of the Fund is to provide long-term capital growth, investing globally in the shares of companies that the Sub-Investment Manager believes contribute positively to social and environmental factors, as further detailed in the section headed “Investment Strategy” below.

There can be no assurance that the Fund will achieve its investment objective and losses may be incurred.

#### 4. Investment Policy

The investment strategy of the Fund is based on the economic rationale that the societal value of companies – defined as the sum of private value (traditional company intrinsic value) and public value (sum of positive/negative public externalities, such as air and water pollution, climate and public health impact, gender equality, etc.) – is currently not fully reflected in the valuation of companies. As the public value of business activities increasingly get included in company valuations, it is the Sub-Investment Managers' belief that companies with superior sustainability profiles will outperform their peers. Increased investor awareness and new regulation is in the view of the Sub-Investment Manager likely to improve funding conditions for companies with superior sustainability profiles, whereas companies with poor sustainability profiles may end up as stranded assets.

The sustainability policy deployed by the Sub-Investment Manager is based on a three-step process:

##### Step 1: Engagements and Exclusions

The first step is to identify the companies in the investment universe to engage with or to exclude. The Sub-Investment Manager believes that engagement is generally the best strategy for contributing to improving sustainability and responsible behaviour in companies. The engagement process includes but is not limited to (1) exercising voting rights as a shareholder and (2) company dialogue. In selecting the companies which the Sub-Investment Manager choose to engage with, the criteria considered are:

- The importance of the sustainability issue in question; the extent to which the issue forms a sustainability risk – meaning an ESG event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment - and/or has a material adverse environmental or social impacts is considered;
- The likelihood of achieving a positive impact or improvement by engaging; and
- The size of the Sub-Investment Manager's investment in the company.

The Sub-Investment Manager does not invest in:

- Companies that intentionally and repeatedly violate rules laid down by national authorities on the markets in which the company operates or by central international organizations generally endorsed by the global community.
- Companies covered by EU or UN sanctions.
- Securities issued by companies domiciled in countries where the sustainability risk with regards to money laundering, bribery, terrorist financing and tax avoidance are deemed unacceptable by the Sub-Investment Manager.

##### Step 2: Industry Sustainability Risk Assessment

The second step is to identify industries or sub-sectors with unwanted inherent sustainability risks where mitigation is deemed insurmountable. Investment in these industries or sub-sectors typically come with an uncompensated risk, making such investment less attractive from a financial point of view as well. As governments, consumers and investors increasingly focus on these negative externalities and

adverse impacts associated with certain industries, the companies in such industries might face future economic sanctions as well as reputational risks, both being harmful to their business models.

The Sub-Investment Manager excludes companies with direct revenue exposure to the following industries or sub-sectors (as defined below) using the exclusion criteria and thresholds set out below:

| Industry / sub-sectors | Exclusion Criteria and Thresholds                                                                                                                                                                                                                                                  |
|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Tobacco                | Companies that manufacture tobacco products.<br><br>0% revenue threshold criteria.                                                                                                                                                                                                 |
| Thermal coal mining    | Companies that derive 5% or more of its revenue from the mining of thermal coal and its sale to external parties.                                                                                                                                                                  |
| Nuclear Weapons        | Companies with primary involvement in Nuclear Warheads & Missiles, Nuclear Systems, Nuclear intended-use components and Nuclear Exclusive Delivery Platforms, Components of Nuclear Exclusive Delivery Platforms, Nuclear fissile materials.<br><br>0% revenue threshold criteria. |
| Controversial Weapons  | Companies with an industry tie to landmines, cluster munitions, chemical weapons or biological weapons. Note: industry tie includes ownership, manufacture or investment.<br><br>Landmines do not include related safety products.<br><br>0% revenue threshold criteria.           |
| Oil Sands Extraction   | Companies that derive 5% or more of its revenue from oil sands extraction.                                                                                                                                                                                                         |
| Adult Entertainment    | Companies that derive 5% or more of its revenue from production and/or distribution of adult entertainment. Companies that derive revenue for retailing adult entertainment are not excluded.                                                                                      |
| Arctic Drilling        | Companies that derive 5% or more of its revenue from onshore or offshore oil and gas production in the Arctic region. The definition of Arctic is geographical and includes production activities north of the 66.5 latitude.                                                      |

### Step 3: Measurement of Sustainability Risk – the Sustainability Cube™

The Sub-investment Manager then identifies companies with a strong sustainability standard using a proprietary sustainability model named the Sustainability Cube™, where all companies in the investment universe are scored and ranked according to their sustainability standards. Low scores are given to companies associated with a high level of sustainability risk and low level of sustainability opportunities, and high

scores are given to companies with a low level of sustainability risk and a high level of sustainable opportunities.

In designing the Sustainability Cube™ framework and assigning a score, the objective has been to create a robust and balanced measurement. The scoring methodology of the Sustainability Cube™ measures sustainability along several dimensions, with different indicators being considered in each dimension in order to attain the sustainable investment objective of the Fund. Dimensions include, but are not limited to:

- **Climate transition score:** current carbon footprint, carbon targets, decarbonization initiatives and development of products and services supporting greenhouse gas emission reduction.
- **ESG industry leadership score:** current ESG score, ESG progress score and controversies screening.
- **Alignment with UN SDGs score:** UN SDG revenue, measured as a percent of total revenue that can be associated with sustainable impact categories and UN SDG coverage, measured as the number of UN SDGs with related company revenues.

In addition to measuring companies' current status along these dimensions, the Sustainability Cube™ score also evaluates how well companies are positioned for the transition to a more sustainable economy, as measured by company strategy and development of sustainable products and services.

### *Investment Universe*

The initial investment universe consists of approximately 2,700 companies located worldwide which are listed or traded on Recognised Markets. The Fund may select constituents from the MSCI World Index (the "Index"), which covers approximately 85% of the free float-adjusted market capitalization in each country however, as the Fund is actively managed, securities selection is not constrained by this benchmark.

### *Portfolio Construction*

The Fund aims to achieve its objective by investing in companies that, as measured by the Sub-Investment Manager's proprietary sustainability model (the Sustainability Cube™), are environmental, social, and Governance ("ESG") industry leaders, best positioned for the transition to a low carbon economy and aligned with the United Nations Sustainable Development Goals ("UN SDGs"). Further information on the Sustainability Cube™ is set out below.

Beside sustainability considerations, the Sub-Investment Manager uses its proprietary equity risk factor framework (factors include but are not limited to value, yield, profitability, momentum and low risk) for the selection of securities for investments by the Fund.

In constructing the desired global equity portfolio for the Fund, the Sub-Investment Manager deploys a systematic and step-by-step approach. Having defined the investable universe of the Fund, the Sub-Investment Manager starts the process by reducing the investable universe by means of excluding companies with undesired sustainability and/or equity factor exposures (i.e. companies with the worst multi-factor rank based on the Sub-investment Manager's proprietary equity risk factor framework are excluded). Companies in the resulting universe are thereafter ranked based on the Sustainability Cube™ score, and a certain percentage, no more than top 50%, of the

highest scoring companies in each industry in each region are selected for the portfolio. This part of the investment process is an important step towards achieving the sustainability objective of the Fund.

Thereafter, the Sub-Investment Manager deploys a multi-step conviction weighting methodology, based predominately on the Sustainability Cube™ score, meaning the higher such Sustainability Cube™ score the higher portfolio weight, with the aim to control and manage individual company exposures, intra-regional and global sector exposures as well as exposures to different global regions.

There is no predetermined focus on industry sector or geography although concentrations may emerge through stock selection.

The Fund will invest at least 90% of its net assets excluding cash and cash equivalents in equity and equity related securities and money market instruments (as set out below). Under normal circumstances, in order to attain the sustainable investment objective, the Fund is generally expected to invest at least 90% of its equity exposure in companies classified as sustainable investments as defined under the SFDR. The Fund will have a maximum exposure limit of 10% per company. The portfolio construction process is iterated on an ongoing basis and the portfolio is rebalanced if changes to portfolio constituent weights are above a defined threshold.

The Fund may also invest in short-term government issued bills and notes, certificates of deposits, money market funds, overnight deposits, rated A-2 or better than Standard & Poor's Corporation or Prime-2 by Moody's Investor Service, Inc. Under normal conditions, the Fund may hold some cash and money market instruments for ancillary purposes so that it can pay its expenses, satisfy redemption requests or take advantage of investment opportunities. The Fund may also invest in American Depositary Receipts ("ADRs") and up to 6% of its net assets in REITs.

Target companies will be listed on or dealt in a Recognised Market (details of which are set out in Appendix II to the Prospectus).

The Fund may invest in open-ended collective investment schemes ("CIS") which provide exposure to securities that are consistent with the investment policy of the Fund within the limit on investment in open-ended CIS i.e. no more than 10%, in aggregate, of the Net Asset Value of the Fund. The Fund does not intend to but may also invest in closed-ended CIS, which qualify as transferable securities for the purposes of the UCITS Regulations. Investment in CIS will be made where it is more efficient and cost effective for the Fund or where direct investment is not available.

Subject to the investment restrictions set out below, the aim of the Fund is to invest, on an ongoing basis and directly, at least 51% of its Net Asset Value in Equity Participations (the "Equity Participation Ratio"). The Equity Participation Ratio does not include Equity Participations which are acquired pursuant to securities lending transactions that the Fund may participate in.

The Fund may take long positions up to 110% of the Fund's Net Asset Value and may take short positions, via derivative instruments only, up to 10% of the Fund's Net Asset Value.

At all times the Fund will be subject to the UCITS Regulations, the Central Bank UCITS Regulations and the UCITS investment restrictions set out therein (including those relating to the eligibility of assets for investment by a UCITS) along with the following additional investment restrictions:

- The Fund will not invest in other funds managed by the Sub-Investment Manager.

- The Fund will not invest more than 10% of Net Asset Value in CIS, including money market funds.

The Fund is operated on a non-currency hedging basis meaning currency exposures other than Base Currency are not systematically hedged into the Base Currency. Net Asset Value calculations in Base Currency will be calculated using current spot rates on a daily basis. The Fund will predominately hold USD denominated equities.

#### *Further Detail on the Use of Financial Derivative Instruments*

The Fund will not use financial derivative instruments (“FDI”) for investment purposes but may use FDI for the purpose of efficient portfolio management (see below under the section entitled “Efficient Portfolio Management”).

#### *The Benchmark*

The Fund is actively managed and is managed by reference to the MSCI World NR USD (the “Benchmark”).

The Benchmark captures large and mid-cap representation across 23 developed markets countries. With 1,583 constituents, the Benchmark covers approximately 85% of the free float-adjusted market capitalization in each country. The Benchmark is relevant in the context of the Fund’s investment policy as the Fund invests mainly in global equities. While the Fund measures performance against the Benchmark, it does not target any particular level of outperformance of the Benchmark as an objective. Performance of the Fund is measured against the Benchmark for comparative purposes only. As the Fund is actively managed (meaning that the Investment Manager has discretion over the composition of the Fund’s portfolio subject to its stated investment objective and policy as set out above), securities selection is not constrained by the Benchmark. The strategy pursued by the Fund does not impose limits on the extent to which portfolio holdings and/or weights must adhere to or may diverge from the composition of the Benchmark. While not required to make any investment in constituent securities of the Benchmark, the Fund is nonetheless likely to have exposure to a number of its constituent securities. The Fund has full flexibility to invest in securities not represented in the Benchmark.

## **5. EU Sustainable Finance Disclosure Regulation**

As an EU entity, the Manager is subject to the SFDR. The Manager, in conjunction with the Investment Manager, has categorised the Fund as meeting the provisions set out in Article 9 of SFDR for products which has sustainable investment as its objective. Further information on this categorisation and description of the Fund’s consideration of sustainability risks and the likely impacts of sustainability risks on the returns of the Fund is set out in Appendix I of the Supplement.

This section should be read in conjunction with the section headed “EU Sustainable Finance Disclosure Regulation” in the Prospectus.

The Manager has delegated portfolio management to the Investment Manager. The Investment Manager has implemented a Sustainability Risks Policy, in respect of the integration of sustainability risks in its investment decision-making process and a Principal Adverse Impacts Policy which sets out how the ICAV will identify and prioritise adverse sustainability impacts and indicators, in its investment due diligence processes. A summary description of the key features of each of the policies is set out in the section headed “EU Sustainable Finance Disclosure Regulation” of the Prospectus.



## 6. **Profile of a Typical Investor**

The Fund is suitable for investors seeking exposure to sustainable investments with a capital growth over a medium to long-term horizon who are prepared to accept a medium level of volatility from time to time. Those investors should be willing to assume the risk of short term share price fluctuations and losses that are typical for an aggressive growth fund focusing on stocks of issuers in developing and emerging markets. The Fund is not designed for investors needing current income. The Fund is not a complete investment program. Investors should carefully consider their personal investment goals and risk tolerance before investing in the Fund.

## 7. **Investment and Borrowing Restrictions**

The investment restrictions applicable to the Fund are set out in Appendix III to the Prospectus and in the investment policy above. The limits on investments are deemed to apply at the time of purchase of the investments. If these limits are subsequently exceeded for reasons beyond the control of the ICAV or as a result of the exercise of subscription rights, the Manager will adopt as a priority objective the remedying of that situation, taking due account of the interests of Shareholders.

### *Borrowing and Leverage Restrictions*

The ICAV may from time to time borrow up to 10% of the Net Asset Value of the Fund on a temporary basis if the Directors, in their absolute discretion, consider that such borrowing is necessary or desirable for liquidity purposes. The ICAV may from time to time secure such borrowings by pledging, mortgaging or charging the net assets of the Fund in accordance with the provisions of the UCITS Regulations.

The Fund may be leveraged up to 10% of its Net Asset Value as a result of its investments and efficient portfolio management.

## 8. **Efficient Portfolio Management**

The Fund may, employ techniques and instruments (FDI) for the purposes of efficient portfolio management and hedging under the conditions and within the limits laid down by the Central Bank from time to time. The Sub-Investment Manager will look to ensure that the techniques and instruments used are economically appropriate in that they will be realised in a cost-effective way. The types of FDI that the Fund may use are futures for both long and short exposure, forwards and equity swaps for hedging purposes. Details of such instruments that the Fund may use are outlined below.

### *Futures*

Futures are contracts to buy or sell a standard quantity of a specific asset (or, in some cases, receive or pay cash based on the performance of an underlying asset, instrument or index) at a pre-determined future date and at a price agreed through a transaction undertaken on an exchange. Unlike physical securities they are bought or sold on margin and thus require a smaller upfront payment to gain the same amount of exposure to the selected underlying investment. The Fund will primarily use futures to gain short-term equity exposure or hedge against such exposure as part of an efficient cash and liquidity management of the Fund. The indices which the Fund may use to gain indirect exposure to equities or to hedge its equity exposure will be the major indices in world equity markets, such as the Index. The use of indices shall in each case be within the conditions and limits set out in the Central Bank's guidance entitled "UCITS Financial Indices" and where indices are used, the Sub-Investment Manager shall not use indices that rebalance more frequently than monthly. Equity securities will be the primary underlying asset where such instruments are used but

any other transferable securities provided for in the investment policy, such as debt securities, could also constitute the underlying assets for such instruments.

### *Forwards*

A forward contract locks in the price at which an asset may be purchased or sold on a future date. In forward foreign exchange contracts, the contract holders are obligated to buy or sell from another a specified amount of one currency at a specified price (exchange rate) with another currency on a specified future date. Forward contracts cannot be transferred but they can be 'closed out' by entering into a reverse contract. Forward foreign exchange contracts may be used for hedging in connection with hedged currency classes of Shares. In a spot transaction, the purchase or sale of currency takes place straight away at the current market exchange rate instead of at a future date.

### *Swaps*

A swap is an OTC agreement between two parties to exchange a series of cash flows or returns on an underlying financial instrument for a set period of time.

Typical cash flow and return series exchanged in a swap include the return from an equity security. Swap legs can be denominated in the same or a different currency. Any swaps will be entered into with counterparties that meet the UCITS eligible counterparty criteria as set out in the UCITS Regulations. Such counterparties will be identified in the Fund's financial statements. For the avoidance of doubt, such counterparty shall not assume any discretion or approval control over the composition or management of the Sub-Fund's investment portfolio.

The Fund may use swaps to hedge against the movements of a particular market or financial instrument or to gain exposure to the ETFs, equities and equity related securities, instead of using a physical security.

### *Currency Hedging – at the Share Class level*

The Fund may for hedging purposes enter into equity swaps and currency forwards to endeavour to hedge against declines in the values of one or more Share Classes of the Fund as a result of changes in currency exchange rates. All hedging transactions will be clearly attributable to a specific Share Class. Therefore, currency exposures of different Share Classes with different base currencies will not be combined or offset and currency exposures of assets of the Fund will not be allocated to separate Share Classes. Furthermore, if the ICAV on behalf of the Fund enters a FDI with an Approved Counterparty, the Fund could be exposed to credit risk from the creditworthiness of the counterparty.

It is expected that the extent to which such currency exposure will be hedged will range from 95% to 105% of the Net Asset Value attributable to the relevant Share Class. Where the value of the hedges in place in respect of a given Share Class is less or more than 100% of the Net Asset Value attributable to that Share Class, the Sub-Investment Manager will keep the situation under review such that over-hedged positions do not exceed 105% of the Net Asset Value. Positions materially in excess of 100% of the Net Asset Value will not be carried forward from month to month. Similarly, under-hedged positions will be monitored to ensure that such positions do not fall short of 95% of the Net Asset Value of the relevant Class. Under-hedged positions will be kept under review to ensure that they are not carried forward from month to month. While it is not the intention of the Fund, over-hedged or under-hedged positions may arise due to factors outside the control of the Fund.

The ICAV may incur transaction costs in respect of entering into any currency hedging. Any costs and gains/losses of the hedging transactions will accrue solely to the relevant Share Class.

#### *Currency Hedging - at the instrument level*

The Fund may enter into forward currency forwards for the purposes of hedging currency risks associated with underlying assets denominated in a non-Base Currency. The aim of such transactions will be to alter the currency characteristics of the relevant assets held by the Fund. The use of FDI and efficient portfolio management techniques for the purposes outlined above will expose the Fund to the risks disclosed under the section of the Prospectus entitled "Risk Factors".

The Manager employs a Risk Management Process which enables it to accurately measure, monitor and manage the various risks associated with FDI and on the basis that the Fund may use a limited number of simple derivative instruments for non-complex hedging or investment strategies, the Manager will use the commitment approach for the purpose of calculating global exposure in respect of the Fund. Responsibility for the Risk Management Process lies with the Manager which has delegated the day-to-day responsibilities, including oversight and reporting, to the Investment Manager.

## 9. Share Classes

Shares will be issued to investors as Shares of a Class in this Fund. The Directors may, whether on the establishment of this Fund or from time to time, with prior notification to, and clearance by the Central Bank, create more than one Class of Shares in this Fund. The Directors may in their absolute discretion differentiate between Classes of Shares, without limitation, as to currency denomination of a particular Class, dividend policy, hedging strategies, if any, applied to the designated currency of a particular Class, fees and expenses, or the Minimum Initial Subscription or Minimum Holding applicable.

The following Classes of Shares in the Fund are available for subscription:

| Class | Currency Denomination | Investment Management Fee | Minimum Initial Subscription | Minimum Subsequent Subscription | Minimum Holding | Minimum Redemption | Accumulating/Distributing | Hedged |
|-------|-----------------------|---------------------------|------------------------------|---------------------------------|-----------------|--------------------|---------------------------|--------|
| C     | USD                   | 0.60%                     | USD \$1,000,000              | USD \$10,000                    | USD \$100,000   | USD \$15,000       | Accumulating              | -      |
| CD    | USD                   | 0.60%                     | USD \$1,000,000              | USD \$10,000                    | USD \$100,000   | USD \$15,000       | Distributing              | -      |
| CE    | EUR                   | 0.60%                     | EUR €1,000,000               | EUR €10,000                     | EUR €100,000    | EUR €15,000        | Accumulating              | -      |
| CED   | EUR                   | 0.60%                     | EUR €1,000,000               | EUR €10,000                     | EUR €100,000    | EUR €15,000        | Distributing              | -      |
| CEH   | EUR                   | 0.60%                     | EUR €1,000,000               | EUR €10,000                     | EUR €100,000    | EUR €15,000        | Accumulating              | Yes    |
| CEHD  | EUR                   | 0.60%                     | EUR €1,000,000               | EUR €10,000                     | EUR €100,000    | EUR €15,000        | Distributing              | Yes    |
| CG    | GBP                   | 0.60%                     | GBP £1,000,000               | GBP £10,000                     | GBP £100,000    | GBP £15,000        | Accumulating              | -      |
| CGD   | GBP                   | 0.60%                     | GBP £1,000,000               | GBP £10,000                     | GBP £100,000    | GBP £15,000        | Distributing              | -      |
| CGH   | GBP                   | 0.60%                     | GBP £1,000,000               | GBP £10,000                     | GBP £100,000    | GBP £15,000        | Accumulating              | Yes    |
| CGHD  | GBP                   | 0.60%                     | GBP £1,000,000               | GBP £10,000                     | GBP £100,000    | GBP £15,000        | Distributing              | Yes    |
| CDK   | DKK                   | 0.60%                     | DKK 6,000,000                | DKK 60,000                      | DKK 6,000,000   | DKK 90,000         | Accumulating              | -      |
| CDKD  | DKK                   | 0.60%                     | DKK 6,000,000                | DKK 60,000                      | DKK 6,000,000   | DKK 90,000         | Distributing              | -      |
| CDKH  | DKK                   | 0.60%                     | DKK 6,000,000                | DKK 60,000                      | DKK 6,000,000   | DKK 90,000         | Accumulating              | Yes    |

| Class | Currency Denomination | Investment Management Fee | Minimum Initial Subscription | Minimum Subsequent Subscription | Minimum Holding  | Minimum Redemption | Accumulating/ Distributing | Hedged |
|-------|-----------------------|---------------------------|------------------------------|---------------------------------|------------------|--------------------|----------------------------|--------|
| C1    | USD                   | 0.50%                     | USD \$10,000,000             | USD \$10,000                    | USD \$10,000,000 | USD \$15,000       | Accumulating               | -      |
| CD1   | USD                   | 0.50%                     | USD \$10,000,000             | USD \$10,000                    | USD \$10,000,000 | USD \$15,000       | Distributing               | -      |
| CE1   | EUR                   | 0.50%                     | EUR €10,000,000              | EUR €10,000                     | EUR €10,000,000  | EUR €15,000        | Accumulating               | -      |
| CED1  | EUR                   | 0.50%                     | EUR €10,000,000              | EUR €10,000                     | EUR €10,000,000  | EUR €15,000        | Distributing               | -      |
| CEH1  | EUR                   | 0.50%                     | EUR €10,000,000              | EUR €10,000                     | EUR €10,000,000  | EUR €15,000        | Accumulating               | Yes    |
| CEHD1 | EUR                   | 0.50%                     | EUR €10,000,000              | EUR €10,000                     | EUR €10,000,000  | EUR €15,000        | Distributing               | Yes    |
| CG1   | GBP                   | 0.50%                     | GBP £10,000,000              | GBP £10,000                     | GBP £10,000,000  | GBP £15,000        | Accumulating               | -      |
| CGD1  | GBP                   | 0.50%                     | GBP £10,000,000              | GBP £10,000                     | GBP £10,000,000  | GBP £15,000        | Distributing               | -      |
| CGH1  | GBP                   | 0.50%                     | GBP £10,000,000              | GBP £10,000                     | GBP £10,000,000  | GBP £15,000        | Accumulating               | Yes    |
| CGHD1 | GBP                   | 0.50%                     | GBP £10,000,000              | GBP £10,000                     | GBP £10,000,000  | GBP £15,000        | Distributing               | Yes    |
| CDK1  | DKK                   | 0.50%                     | DKK 60,000,000               | DKK 60,000                      | DKK 60,000,000   | DKK 90,000         | Accumulating               | -      |
| CDKD1 | DKK                   | 0.50%                     | DKK 60,000,000               | DKK 60,000                      | DKK 60,000,000   | DKK 90,000         | Distributing               | -      |
| CDKH1 | DKK                   | 0.50%                     | DKK 60,000,000               | DKK 60,000                      | DKK 60,000,000   | DKK 90,000         | Accumulating               | Yes    |
| C2    | USD                   | 0.45%                     | USD \$20,000,000             | USD \$10,000                    | USD \$20,000,000 | USD \$15,000       | Accumulating               | -      |
| CD2   | USD                   | 0.45%                     | USD \$20,000,000             | USD \$10,000                    | USD \$20,000,000 | USD \$15,000       | Distributing               | -      |
| CE2   | EUR                   | 0.45%                     | EUR €20,000,000              | EUR €10,000                     | EUR €20,000,000  | EUR €15,000        | Accumulating               | -      |
| CED2  | EUR                   | 0.45%                     | EUR €20,000,000              | EUR €10,000                     | EUR €20,000,000  | EUR €15,000        | Distributing               | -      |
| CEH2  | EUR                   | 0.45%                     | EUR €20,000,000              | EUR €10,000                     | EUR €20,000,000  | EUR €15,000        | Accumulating               | Yes    |
| CEHD2 | EUR                   | 0.45%                     | EUR €20,000,000              | EUR €10,000                     | EUR €20,000,000  | EUR €15,000        | Distributing               | Yes    |
| CG2   | GBP                   | 0.45%                     | GBP £20,000,000              | GBP £10,000                     | GBP £20,000,000  | GBP £15,000        | Accumulating               | -      |
| CGD2  | GBP                   | 0.45%                     | GBP £20,000,000              | GBP £10,000                     | GBP £20,000,000  | GBP £15,000        | Distributing               | -      |
| CGH2  | GBP                   | 0.45%                     | GBP £20,000,000              | GBP £10,000                     | GBP £20,000,000  | GBP £15,000        | Accumulating               | Yes    |
| CGHD2 | GBP                   | 0.45%                     | GBP £20,000,000              | GBP £10,000                     | GBP £20,000,000  | GBP £15,000        | Distributing               | Yes    |
| CDK2  | DKK                   | 0.45%                     | DKK 120,000,000              | DKK 60,000                      | DKK 120,000,000  | DKK 90,000         | Accumulating               |        |
| CDKD2 | DKK                   | 0.45%                     | DKK 120,000,000              | DKK 60,000                      | DKK 120,000,000  | DKK 90,000         | Distributing               |        |
| CDKH2 | DKK                   | 0.45%                     | DKK 120,000,000              | DKK 60,000                      | DKK 120,000,000  | DKK 90,000         | Accumulating               | Yes    |
| X1    | USD                   | 0.40%                     | USD \$50,000,000             | USD \$10,000                    | USD \$50,000,000 | USD \$15,000       | Accumulating               | -      |
| XD1   | USD                   | 0.40%                     | USD \$50,000,000             | USD \$10,000                    | USD \$50,000,000 | USD \$15,000       | Distributing               | -      |
| XE1   | EUR                   | 0.40%                     | EUR €50,000,000              | EUR €10,000                     | EUR €50,000,000  | EUR €15,000        | Accumulating               | -      |
| XED1  | EUR                   | 0.40%                     | EUR €50,000,000              | EUR €10,000                     | EUR €50,000,000  | EUR €15,000        | Distributing               | -      |
| XEH1  | EUR                   | 0.40%                     | EUR €50,000,000              | EUR €10,000                     | EUR €50,000,000  | EUR €15,000        | Accumulating               | Yes    |
| XEHD1 | EUR                   | 0.40%                     | EUR €50,000,000              | EUR €10,000                     | EUR €50,000,000  | EUR €15,000        | Distributing               | Yes    |
| XG1   | GBP                   | 0.40%                     | GBP £50,000,000              | GBP £10,000                     | GBP £50,000,000  | GBP £15,000        | Accumulating               | -      |
| XGD1  | GBP                   | 0.40%                     | GBP £50,000,000              | GBP £10,000                     | GBP £50,000,000  | GBP £15,000        | Distributing               | -      |
| XGH1  | GBP                   | 0.40%                     | GBP £50,000,000              | GBP £10,000                     | GBP £50,000,000  | GBP £15,000        | Accumulating               | Yes    |
| XGHD1 | GBP                   | 0.40%                     | GBP £50,000,000              | GBP £10,000                     | GBP £50,000,000  | GBP £15,000        | Distributing               | Yes    |
| XSG1  | SGD                   | 0.40%                     | SGD 70,000,000               | SGD 10,000                      | SGD 70,000,000   | SGD 15,000         | Accumulating               | -      |
| XDK1  | DKK                   | 0.40%                     | DKK 300,000,000              | DKK 60,000                      | DKK 300,000,000  | DKK 90,000         | Accumulating               | -      |

| Class | Currency Denomination | Investment Management Fee | Minimum Initial Subscription | Minimum Subsequent Subscription | Minimum Holding   | Minimum Redemption | Accumulating/ Distributing | Hedged |
|-------|-----------------------|---------------------------|------------------------------|---------------------------------|-------------------|--------------------|----------------------------|--------|
| XDKD1 | DKK                   | 0.40%                     | DKK 300,000,000              | DKK 60,000                      | DKK 300,000,000   | DKK 90,000         | Distributing               | -      |
| XDKH1 | DKK                   | 0.40%                     | DKK 300,000,000              | DKK 60,000                      | DKK 300,000,000   | DKK 90,000         | Accumulating               | Yes    |
| Y1    | USD                   | 0.30%                     | USD \$100,000,000            | USD \$10,000                    | USD \$100,000,000 | USD \$15,000       | Accumulating               | -      |
| YD1   | USD                   | 0.30%                     | USD \$100,000,000            | USD \$10,000                    | USD \$100,000,000 | USD \$15,000       | Distributing               | -      |
| YE1   | EUR                   | 0.30%                     | EUR €100,000,000             | EUR €10,000                     | EUR €100,000,000  | EUR €15,000        | Accumulating               | -      |
| YED1  | EUR                   | 0.30%                     | EUR €100,000,000             | EUR €10,000                     | EUR €100,000,000  | EUR €15,000        | Distributing               | -      |
| YEH1  | EUR                   | 0.30%                     | EUR €100,000,000             | EUR €10,000                     | EUR €100,000,000  | EUR €15,000        | Accumulating               | Yes    |
| YEHD1 | EUR                   | 0.30%                     | EUR €100,000,000             | EUR €10,000                     | EUR €100,000,000  | EUR €15,000        | Distributing               | Yes    |
| YG1   | GBP                   | 0.30%                     | GBP £100,000,000             | GBP £10,000                     | GBP £100,000,000  | GBP £15,000        | Accumulating               | -      |
| YGD1  | GBP                   | 0.30%                     | GBP £100,000,000             | GBP £10,000                     | GBP £100,000,000  | GBP £15,000        | Distributing               | -      |
| YGH1  | GBP                   | 0.30%                     | GBP £100,000,000             | GBP £10,000                     | GBP £100,000,000  | GBP £15,000        | Accumulating               | Yes    |
| YGHD1 | GBP                   | 0.30%                     | GBP £100,000,000             | GBP £10,000                     | GBP £100,000,000  | GBP £15,000        | Distributing               | Yes    |
| YDK1  | DKK                   | 0.30%                     | DKK 600,000,000              | DKK 60,000                      | DKK 600,000,000   | DKK 90,000         | Accumulating               | -      |
| YDKD1 | DKK                   | 0.30%                     | DKK 600,000,000              | DKK 60,000                      | DKK 600,000,000   | DKK 90,000         | Distributing               | -      |
| YDKH1 | DKK                   | 0.30%                     | DKK 600,000,000              | DKK 60,000                      | DKK 600,000,000   | DKK 90,000         | Accumulating               | Yes    |
| Z1    | USD                   | Up to 0.30%               | USD \$150,000,000            | USD \$10,000                    | USD \$150,000,000 | USD \$15,000       | Accumulating               | -      |
| ZD1   | USD                   | Up to 0.30%               | USD \$150,000,000            | USD \$10,000                    | USD \$150,000,000 | USD \$15,000       | Distributing               | -      |
| ZE1   | EUR                   | Up to 0.30%               | EUR €150,000,000             | EUR €10,000                     | EUR €150,000,000  | EUR €15,000        | Accumulating               | -      |
| ZED1  | EUR                   | Up to 0.30%               | EUR €150,000,000             | EUR €10,000                     | EUR €150,000,000  | EUR €15,000        | Distributing               | -      |
| ZEH1  | EUR                   | Up to 0.30%               | EUR €150,000,000             | EUR €10,000                     | EUR €150,000,000  | EUR €15,000        | Accumulating               | Yes    |
| ZEHD1 | EUR                   | Up to 0.30%               | EUR €150,000,000             | EUR €10,000                     | EUR €150,000,000  | EUR €15,000        | Distributing               | Yes    |
| ZG1   | GBP                   | Up to 0.30%               | GBP £150,000,000             | GBP £10,000                     | GBP £150,000,000  | GBP £15,000        | Accumulating               | -      |
| ZGD1  | GBP                   | Up to 0.30%               | GBP £150,000,000             | GBP £10,000                     | GBP £150,000,000  | GBP £15,000        | Distributing               | -      |
| ZGH1  | GBP                   | Up to 0.30%               | GBP £150,000,000             | GBP £10,000                     | GBP £150,000,000  | GBP £15,000        | Accumulating               | Yes    |
| ZGHD1 | GBP                   | Up to 0.30%               | GBP £150,000,000             | GBP £10,000                     | GBP £150,000,000  | GBP £15,000        | Distributing               | Yes    |
| ZDK1  | DKK                   | Up to 0.30%               | DKK 900,000,000              | DKK 60,000                      | DKK 900,000,000   | DKK 90,000         | Accumulating               | -      |
| ZDKD1 | DKK                   | Up to 0.30%               | DKK 900,000,000              | DKK 60,000                      | DKK 900,000,000   | DKK 90,000         | Distributing               | -      |
| ZDKH1 | DKK                   | Up to 0.30%               | DKK 900,000,000              | DKK 60,000                      | DKK 900,000,000   | DKK 90,000         | Accumulating               | Yes    |
| A     | USD                   | 0.95%                     | USD \$15,000                 | USD \$2,500                     | USD \$15,000      | USD \$15,000       | Accumulating               | -      |
| AD    | USD                   | 0.95%                     | USD \$15,000                 | USD \$2,500                     | USD \$15,000      | USD \$15,000       | Distributing               | -      |
| AE    | EUR                   | 0.95%                     | EUR €15,000                  | EUR €2,500                      | EUR €15,000       | EUR €15,000        | Accumulating               | -      |
| AED   | EUR                   | 0.95%                     | EUR €15,000                  | EUR €2,500                      | EUR €15,000       | EUR €15,000        | Distributing               | -      |
| AEH   | EUR                   | 0.95%                     | EUR €15,000                  | EUR €2,500                      | EUR €15,000       | EUR €15,000        | Accumulating               | Yes    |
| AEHD  | EUR                   | 0.95%                     | EUR €15,000                  | EUR €2,500                      | EUR €15,000       | EUR €15,000        | Distributing               | Yes    |
| AG    | GBP                   | 0.95%                     | GBP £15,000                  | GBP £2,500                      | GBP £15,000       | GBP £15,000        | Accumulating               | -      |
| AGD   | GBP                   | 0.95%                     | GBP £15,000                  | GBP £2,500                      | GBP £15,000       | GBP £15,000        | Distributing               | -      |
| AGH   | GBP                   | 0.95%                     | GBP £15,000                  | GBP £2,500                      | GBP £15,000       | GBP £15,000        | Accumulating               | Yes    |
| AGHD  | GBP                   | 0.95%                     | GBP £15,000                  | GBP £2,500                      | GBP £15,000       | GBP £15,000        | Distributing               | Yes    |

| Class | Currency Denomination | Investment Management Fee | Minimum Initial Subscription | Minimum Subsequent Subscription | Minimum Holding  | Minimum Redemption | Accumulating/Distributing | Hedged |
|-------|-----------------------|---------------------------|------------------------------|---------------------------------|------------------|--------------------|---------------------------|--------|
| ADK   | DKK                   | 0.95%                     | DKK 90,000                   | DKK 10,000                      | DKK 90,000       | DKK 90,000         | Accumulating              | -      |
| ADKD  | DKK                   | 0.95%                     | DKK 90,000                   | DKK 10,000                      | DKK 90,000       | DKK 90,000         | Distributing              | -      |
| ADKH  | DKK                   | 0.95%                     | DKK 90,000                   | DKK 10,000                      | DKK 90,000       | DKK 90,000         | Accumulating              | Yes    |
| B     | USD                   | 1.50%                     | USD \$15,000                 | USD \$2,500                     | USD \$15,000     | USD \$15,000       | Accumulating              | -      |
| H*    | USD                   | Up to 0.80%               | USD \$2,000,000              | USD \$10,000                    | USD \$100,000    | USD \$15,000       | Accumulating              | -      |
| HE*   | EUR                   | Up to 0.80%               | EUR €2,000,000               | EUR €10,000                     | EUR €100,000     | EUR €15,000        | Accumulating              | -      |
| HG*   | GBP                   | Up to 0.80%               | GBP £2,000,000               | GBP £10,000                     | GBP £100,000     | GBP £15,000        | Accumulating              | -      |
| HDK*  | DKK                   | Up to 0.80%               | DKK 2,000,000                | DKK 10,000                      | DKK 100,000      | DKK 15,000         | Accumulating              | -      |
| I     | USD                   | 0.80%                     | USD \$2,000,000              | USD \$10,000                    | USD \$2,000,000  | USD \$15,000       | Accumulating              | -      |
| ID    | USD                   | 0.80%                     | USD \$2,000,000              | USD \$10,000                    | USD \$2,000,000  | USD \$15,000       | Distributing              | -      |
| IE    | EUR                   | 0.80%                     | EUR €2,000,000               | EUR €10,000                     | EUR €2,000,000   | EUR €15,000        | Accumulating              | -      |
| IED   | EUR                   | 0.80%                     | EUR €2,000,000               | EUR €10,000                     | EUR €2,000,000   | EUR €15,000        | Distributing              | -      |
| IEH   | EUR                   | 0.80%                     | EUR €2,000,000               | EUR €10,000                     | EUR €2,000,000   | EUR €15,000        | Accumulating              | Yes    |
| IEHD  | EUR                   | 0.80%                     | EUR €2,000,000               | EUR €10,000                     | EUR €2,000,000   | EUR €15,000        | Distributing              | Yes    |
| IG    | GBP                   | 0.80%                     | GBP £2,000,000               | GBP £10,000                     | GBP £2,000,000   | GBP £15,000        | Accumulating              | -      |
| IGD   | GBP                   | 0.80%                     | GBP £2,000,000               | GBP £10,000                     | GBP £2,000,000   | GBP £15,000        | Distributing              | -      |
| IGH   | GBP                   | 0.80%                     | GBP £2,000,000               | GBP £10,000                     | GBP £2,000,000   | GBP £15,000        | Accumulating              | Yes    |
| IGHD  | GBP                   | 0.80%                     | GBP £2,000,000               | GBP £10,000                     | GBP £2,000,000   | GBP £15,000        | Distributing              | Yes    |
| IDK   | DKK                   | 0.80%                     | DKK 12,000,000               | DKK 60,000                      | DKK 12,000,000   | DKK 90,000         | Accumulating              | -      |
| IDKD  | DKK                   | 0.80%                     | DKK 12,000,000               | DKK 60,000                      | DKK 12,000,000   | DKK 90,000         | Distributing              | -      |
| IDKH  | DKK                   | 0.80%                     | DKK 12,000,000               | DKK 60,000                      | DKK 12,000,000   | DKK 90,000         | Accumulating              | Yes    |
| I2    | USD                   | 0.70%                     | USD \$10,000,000             | USD \$10,000                    | USD \$10,000,000 | USD \$15,000       | Accumulating              | -      |
| ID2   | USD                   | 0.70%                     | USD \$10,000,000             | USD \$10,000                    | USD \$10,000,000 | USD \$15,000       | Distributing              | -      |
| IE2   | EUR                   | 0.70%                     | EUR €10,000,000              | EUR €10,000                     | EUR €10,000,000  | EUR €15,000        | Accumulating              | -      |
| IED2  | EUR                   | 0.70%                     | EUR €10,000,000              | EUR €10,000                     | EUR €10,000,000  | EUR €15,000        | Distributing              | -      |
| IEH2  | EUR                   | 0.70%                     | EUR €10,000,000              | EUR €10,000                     | EUR €10,000,000  | EUR €15,000        | Accumulating              | Yes    |
| IEHD2 | EUR                   | 0.70%                     | EUR €10,000,000              | EUR €10,000                     | EUR €10,000,000  | EUR €15,000        | Distributing              | Yes    |
| IG2   | GBP                   | 0.70%                     | GBP £10,000,000              | GBP £10,000                     | GBP £10,000,000  | GBP £15,000        | Accumulating              | -      |
| IGD2  | GBP                   | 0.70%                     | GBP £10,000,000              | GBP £10,000                     | GBP £10,000,000  | GBP £15,000        | Distributing              | -      |
| IGH2  | GBP                   | 0.70%                     | GBP £10,000,000              | GBP £10,000                     | GBP £10,000,000  | GBP £15,000        | Accumulating              | Yes    |
| IGHD2 | GBP                   | 0.70%                     | GBP £10,000,000              | GBP £10,000                     | GBP £10,000,000  | GBP £15,000        | Distributing              | Yes    |
| IDK2  | DKK                   | 0.70%                     | DKK 60,000,000               | DKK 60,000                      | DKK 60,000,000   | DKK 90,000         | Accumulating              | -      |
| IDKD2 | DKK                   | 0.70%                     | DKK 60,000,000               | DKK 60,000                      | DKK 60,000,000   | DKK 90,000         | Distributing              | -      |
| IDKH2 | DKK                   | 0.70%                     | DKK 60,000,000               | DKK 60,000                      | DKK 60,000,000   | DKK 90,000         | Accumulating              | Yes    |
| S     | USD                   | 0.60%                     | USD \$20,000,000             | USD \$10,000                    | USD \$20,000,000 | USD \$15,000       | Accumulating              | -      |
| SD    | USD                   | 0.60%                     | USD \$20,000,000             | USD \$10,000                    | USD \$20,000,000 | USD \$15,000       | Distributing              | -      |
| SE    | EUR                   | 0.60%                     | EUR €20,000,000              | EUR €10,000                     | EUR €20,000,000  | EUR €15,000        | Accumulating              | -      |
| SED   | EUR                   | 0.60%                     | EUR €20,000,000              | EUR €10,000                     | EUR €20,000,000  | EUR €15,000        | Distributing              | -      |

| Class | Currency Denomination | Investment Management Fee | Minimum Initial Subscription | Minimum Subsequent Subscription | Minimum Holding   | Minimum Redemption | Accumulating/ Distributing | Hedged |
|-------|-----------------------|---------------------------|------------------------------|---------------------------------|-------------------|--------------------|----------------------------|--------|
| SEH   | EUR                   | 0.60%                     | EUR €20,000,000              | EUR €10,000                     | EUR €20,000,000   | EUR €15,000        | Accumulating               | Yes    |
| SEHD  | EUR                   | 0.60%                     | EUR €20,000,000              | EUR €10,000                     | EUR €20,000,000   | EUR €15,000        | Distributing               | Yes    |
| SSEK  | SEK                   | 0.60%                     | SEK 220,000,000              | SEK 110,000                     | SEK 220,000,000   | SEK 160,000        | Accumulating               | -      |
| SG    | GBP                   | 0.60%                     | GBP £20,000,000              | GBP £10,000                     | GBP £20,000,000   | GBP £15,000        | Accumulating               | -      |
| SGD   | GBP                   | 0.60%                     | GBP £20,000,000              | GBP £10,000                     | GBP £20,000,000   | GBP £15,000        | Distributing               | -      |
| SGH   | GBP                   | 0.60%                     | GBP £20,000,000              | GBP £10,000                     | GBP £20,000,000   | GBP £15,000        | Accumulating               | Yes    |
| SGHD  | GBP                   | 0.60%                     | GBP £20,000,000              | GBP £10,000                     | GBP £20,000,000   | GBP £15,000        | Distributing               | Yes    |
| SDK   | DKK                   | 0.60%                     | DKK 120,000,000              | DKK 60,000                      | DKK 120,000,000   | DKK 90,000         | Accumulating               | -      |
| SDKD  | DKK                   | 0.60%                     | DKK 120,000,000              | DKK 60,000                      | DKK 120,000,000   | DKK 90,000         | Distributing               | -      |
| SDKH  | DKK                   | 0.60%                     | DKK 120,000,000              | DKK 60,000                      | DKK 120,000,000   | DKK 90,000         | Accumulating               | Yes    |
| X     | USD                   | 0.50%                     | USD \$50,000,000             | USD \$10,000                    | USD \$50,000,000  | USD \$15,000       | Accumulating               | -      |
| XD    | USD                   | 0.50%                     | USD \$50,000,000             | USD \$10,000                    | USD \$50,000,000  | USD \$15,000       | Distributing               | -      |
| XE    | EUR                   | 0.50%                     | EUR €50,000,000              | EUR €10,000                     | EUR €50,000,000   | EUR €15,000        | Accumulating               | -      |
| XED   | EUR                   | 0.50%                     | EUR €50,000,000              | EUR €10,000                     | EUR €50,000,000   | EUR €15,000        | Distributing               | -      |
| XEH   | EUR                   | 0.50%                     | EUR €50,000,000              | EUR €10,000                     | EUR €50,000,000   | EUR €15,000        | Accumulating               | Yes    |
| XEHD  | EUR                   | 0.50%                     | EUR €50,000,000              | EUR €10,000                     | EUR €50,000,000   | EUR €15,000        | Distributing               | Yes    |
| XG    | GBP                   | 0.50%                     | GBP £50,000,000              | GBP £10,000                     | GBP £50,000,000   | GBP £15,000        | Accumulating               | -      |
| XGD   | GBP                   | 0.50%                     | GBP £50,000,000              | GBP £10,000                     | GBP £50,000,000   | GBP £15,000        | Distributing               | -      |
| XGH   | GBP                   | 0.50%                     | GBP £50,000,000              | GBP £10,000                     | GBP £50,000,000   | GBP £15,000        | Accumulating               | Yes    |
| XGHD  | GBP                   | 0.50%                     | GBP £50,000,000              | GBP £10,000                     | GBP £50,000,000   | GBP £15,000        | Distributing               | Yes    |
| XDK   | DKK                   | 0.50%                     | DKK 300,000,000              | DKK 60,000                      | DKK 300,000,000   | DKK 90,000         | Accumulating               | -      |
| XDKD  | DKK                   | 0.50%                     | DKK 300,000,000              | DKK 60,000                      | DKK 300,000,000   | DKK 90,000         | Distributing               | -      |
| XDKH  | DKK                   | 0.50%                     | DKK 300,000,000              | DKK 60,000                      | DKK 300,000,000   | DKK 90,000         | Accumulating               | Yes    |
| Y     | USD                   | 0.35%                     | USD \$100,000,000            | USD \$10,000                    | USD \$100,000,000 | USD \$15,000       | Accumulating               | -      |
| YD    | USD                   | 0.35%                     | USD \$100,000,000            | USD \$10,000                    | USD \$100,000,000 | USD \$15,000       | Distributing               | -      |
| YE    | EUR                   | 0.35%                     | EUR €100,000,000             | EUR €10,000                     | EUR €100,000,000  | EUR €15,000        | Accumulating               | -      |
| YED   | EUR                   | 0.35%                     | EUR €100,000,000             | EUR €10,000                     | EUR €100,000,000  | EUR €15,000        | Distributing               | -      |
| YEH   | EUR                   | 0.35%                     | EUR €100,000,000             | EUR €10,000                     | EUR €100,000,000  | EUR €15,000        | Accumulating               | Yes    |
| YEHD  | EUR                   | 0.35%                     | EUR €100,000,000             | EUR €10,000                     | EUR €100,000,000  | EUR €15,000        | Distributing               | Yes    |
| YG    | GBP                   | 0.35%                     | GBP £100,000,000             | GBP £10,000                     | GBP £100,000,000  | GBP £15,000        | Accumulating               | -      |
| YGD   | GBP                   | 0.35%                     | GBP £100,000,000             | GBP £10,000                     | GBP £100,000,000  | GBP £15,000        | Distributing               | -      |
| YGH   | GBP                   | 0.35%                     | GBP £100,000,000             | GBP £10,000                     | GBP £100,000,000  | GBP £15,000        | Accumulating               | Yes    |
| YGHD  | GBP                   | 0.35%                     | GBP £100,000,000             | GBP £10,000                     | GBP £100,000,000  | GBP £15,000        | Distributing               | Yes    |
| YDK   | DKK                   | 0.35%                     | DKK 600,000,000              | DKK 60,000                      | DKK 600,000,000   | DKK 90,000         | Accumulating               | -      |
| YDKD  | DKK                   | 0.35%                     | DKK 600,000,000              | DKK 60,000                      | DKK 600,000,000   | DKK 90,000         | Distributing               | -      |
| YDKH  | DKK                   | 0.35%                     | DKK 600,000,000              | DKK 60,000                      | DKK 600,000,000   | DKK 90,000         | Accumulating               | Yes    |
| Z     | USD                   | Up to 0.35%               | USD \$150,000,000            | USD \$10,000                    | USD \$150,000,000 | USD \$15,000       | Accumulating               | -      |
| ZD    | USD                   | Up to 0.35%               | USD \$150,000,000            | USD \$10,000                    | USD \$150,000,000 | USD \$15,000       | Distributing               | -      |

| Class | Currency Denomination | Investment Management Fee | Minimum Initial Subscription | Minimum Subsequent Subscription | Minimum Holding  | Minimum Redemption | Accumulating/ Distributing | Hedged |
|-------|-----------------------|---------------------------|------------------------------|---------------------------------|------------------|--------------------|----------------------------|--------|
| ZE    | EUR                   | Up to 0.35%               | EUR €150,000,000             | EUR €10,000                     | EUR €150,000,000 | EUR €15,000        | Accumulating               | -      |
| ZED   | EUR                   | Up to 0.35%               | EUR €150,000,000             | EUR €10,000                     | EUR €150,000,000 | EUR €15,000        | Distributing               | -      |
| ZEH   | EUR                   | Up to 0.35%               | EUR €150,000,000             | EUR €10,000                     | EUR €150,000,000 | EUR €15,000        | Accumulating               | Yes    |
| ZEHD  | EUR                   | Up to 0.35%               | EUR €150,000,000             | EUR €10,000                     | EUR €150,000,000 | EUR €15,000        | Distributing               | Yes    |
| ZG    | GBP                   | Up to 0.35%               | GBP £150,000,000             | GBP £10,000                     | GBP £150,000,000 | GBP £15,000        | Accumulating               | -      |
| ZGD   | GBP                   | Up to 0.35%               | GBP £150,000,000             | GBP £10,000                     | GBP £150,000,000 | GBP £15,000        | Distributing               | -      |
| ZGH   | GBP                   | Up to 0.35%               | GBP £150,000,000             | GBP £10,000                     | GBP £150,000,000 | GBP £15,000        | Accumulating               | Yes    |
| ZGHD  | GBP                   | Up to 0.35%               | GBP £150,000,000             | GBP £10,000                     | GBP £150,000,000 | GBP £15,000        | Distributing               | Yes    |
| ZDK   | DKK                   | Up to 0.35%               | DKK 900,000,000              | DKK 60,000                      | DKK 900,000,000  | DKK 90,000         | Accumulating               | -      |
| ZDKD  | DKK                   | Up to 0.35%               | DKK 900,000,000              | DKK 60,000                      | DKK 900,000,000  | DKK 90,000         | Distributing               | -      |
| ZDKH  | DKK                   | Up to 0.35%               | DKK 900,000,000              | DKK 60,000                      | DKK 900,000,000  | DKK 90,000         | Accumulating               | Yes    |

*\* Shares in Classes H, HE, HG and HDK are restricted to employees of the Investment Manager and Sub-Investment Manager.*

## 10. Offer

The initial offer period for the following Share Classes has closed and Shares in such Classes are now available at the prevailing Net Asset Value per Share: C, C2, CE, CE2, CDK, CE1, XSG1, Y1 and Z1.

During the initial offer period, detailed below, Shares in all other Classes will be issued at an initial price of DKK100, EUR€100, GBP£100, USD\$100, SEK100 or SGD\$100 depending on the denomination of that particular Share Class.

The initial offer period for Shares in Class SSEK as well as for any unlaunched Shares will begin at 9.00 am (Irish time) on 19 June 2023 and will conclude for each Class of Shares upon the earlier of:

- i. the first investment by a Shareholder in a Class; or
- ii. 2.00 pm (Irish time) on 18 December 2023; or
- iii. such earlier date as the Directors in their discretion may determine

The Central Bank will be notified in advance of any extension of the initial offer period if subscriptions for Shares have been received. In the event that no subscriptions have been received and the initial offer period is being extended, or where the initial offer period is being shortened, the Central Bank will be notified in accordance with its requirements. After receipt of a first investment by a Shareholder in a Class or after the closing of the initial offer period, Shares will be issued at prices calculated with reference to the latest available Net Asset Value per Share.

## 11. Application for Shares

Applications for Shares may be made to the Administrator (whose details are set out in the Application Form). Applications received by the Administrator prior to the Dealing Deadline for any Dealing Day, or by an intermediary approved by the Directors for such purpose, provided such intermediary confirms to the Administrator that such



Applications were received prior to the Dealing Deadline, will be processed on that Dealing Day. Any applications received after the Dealing Deadline for a particular Dealing Day will be processed on the following Dealing Day, unless the Directors in their absolute discretion, in exceptional circumstances, otherwise determine to accept one or more applications received after the Dealing Deadline for processing on that Dealing Day, provided that such application(s) have been received prior to the Valuation Point for the particular Dealing Day.

#### *Timing of Payment*

Payment in respect of subscriptions must be received in cleared funds by the Administrator 2 Business Days post the Dealing Deadline provided that the Directors reserve the right to defer the issue of Shares until receipt of cleared subscription monies by the Fund. If payment in cleared funds in respect of a subscription has not been received by the relevant time, the Directors or its delegate may cancel the allotment. In addition, the Directors have the right to sell all or part of the investor's holding of Shares in the Fund in order to meet such charges.

This section should be read in conjunction with the section headed "Application for Shares" in the Prospectus.

## **12. Redemption of Shares**

Requests for the redemption of Shares should be made to the Administrator (whose details are set out in the Application Form) on behalf of the ICAV by facsimile or written communication and should include such information as may be specified from time to time by the Directors or their delegate. Requests for redemption received prior to the Dealing Deadline for any Dealing Day will be processed with on that Dealing Day. Any requests for redemption received after the Dealing Deadline for a Dealing Day will be processed on the next Dealing Day, unless the Directors in their absolute discretion, in exceptional circumstances, determine otherwise provided that such redemption request(s) have been received prior to the Valuation Point for the particular Dealing Day. Redemption requests will only be accepted for processing where cleared funds and completed documents including documentation relating to money laundering prevention checks are in place from original subscriptions. No redemption payment will be made from an investor's holding until the original Application Form and all documentation required by or on behalf of the ICAV (including any documents in connection with anti-money laundering procedures) has been received from the investor and the anti-money laundering procedures have been completed.

The minimum value of Shares which a Shareholder may redeem in any one redemption transaction is set out in Section 9 of this Supplement. In the event of a Shareholder requesting a redemption which would, if carried out, leave the Shareholder holding Shares of a Class having a Net Asset Value less than the relevant Minimum Holding, the ICAV may, if it thinks fit, redeem the whole of the Shareholder's holding.

The redemption price per Share shall be the Net Asset Value per Share. It is not the current intention of the Directors to charge a redemption fee, however, the Fund may, at the discretion of the Directors, impose a redemption fee of up to 3% of the redemption proceeds. In the event of a redemption fee being charged, Shareholders should view their investment as medium to long-term.

#### *Timing of Payment*

It is the intention that redemption proceeds in respect of Shares will be paid within 3 Business Days of the Dealing Day provided that all the required documentation has

been furnished to and received by the Administrator. The maximum period between submission of a redemption request and payment of redemption proceeds cannot exceed 10 Business Days.

This section should be read in conjunction with the section headed “Redemption of Shares” in the Prospectus.

### 13. **Sub-Investment Manager**

The Investment Manager has appointed Qblue Balanced A/S of Højbro Plads 10, DK-1200 Copenhagen K, Denmark to act as sub-investment manager pursuant to a sub-investment management agreement dated 20 October 2021. The Sub-Investment Manager will provide discretionary investment management services in relation to the Fund subject to overall supervision of the Investment Manager. The Sub-Investment Manager is authorised as an alternative investment fund manager under supervision of the Danish Financial Supervisory Authority.

The Sub-Investment Manager principal business and occupation is to provide investment management services to clients.

### 14. **Fees and Expenses**

#### *Investment Manager's Fees*

The fee applicable to each Class of Shares payable to the Investment Manager is as set out above in section 9 of this Supplement. This fee shall accrue daily and be payable monthly in arrears.

#### *Sub-Investment Manager's Fees*

The fees and expenses of the Sub-Investment Manager shall be paid out of the Investment Manager's fee. The Fund will be liable for the dealing costs relating to the purchase and sale of investments by the Sub-Investment Manager.

#### *Manager's Fees*

The fees and expenses of the Manager are set out in the Prospectus under the heading “Fees and Expenses”.

#### (A) *Administrator's Fees*

The Administrator shall be entitled to receive out of the assets of the Fund a maximum annual fee, accrued daily and calculated and paid at a rate of 0.05% per annum of the Net Asset Value of the Fund.

The Administrator will also be entitled to a separate registrar and transfer agency fee, as agreed between the ICAV and the Administrator. This fee is accrued at each Valuation Point, payable monthly in arrears and is based on standard market rates, subject to a minimum charge of USD\$12,000 per annum. This fee is transaction based and therefore the maximum fee is subject to change. However, the maximum charge is \$15 per transaction. All Fund expenses, including the Administrator's registrar and transfer agency fee, will be available to investors via the Fund's 'EMT' (European MiFID Template) report available from the Investment Manager.

The Administrator will also be entitled to an annual aggregate fee of \$750 for the preparation of the interim and year-end financial statements of the Fund.

The Administrator will also be entitled to recover out of pocket expenses (plus VAT, thereon, if any) reasonably incurred on behalf of the Fund out of the assets of the Fund on an actual cost basis.

(B) *Depositary's Fees*

The Depositary shall be entitled to receive a maximum annual depositary fee in the range of 0.02% to 0.035% per annum of the Net Asset Value of the Fund, accrued at each Valuation Point and payable monthly in arrears subject to a minimum fee of US\$7,500 per Fund per annum as aggregated across all sub-funds of the ICAV. The Fund shall also pay custody fees ranging from 0.005% to 0.70% calculated by reference to the market value of the investments that the Fund may make in each relevant market. The Depositary's fees are accrued at each Valuation Point, payable monthly in arrears, and subject to a minimum charge of US\$12,000 per annum. The Depositary is also entitled to transaction and cash service charges and to recover properly vouched out-of-pocket expenses out of the assets of the Fund (plus VAT thereon, if any), including expenses of any sub-custodian appointed by it which shall be at normal commercial rates.

*Distributors' Fees*

Fees and expenses of the Distributor and any further distributors (together the "Distributors") appointed by the Manager on behalf of the ICAV or a Fund will be at normal commercial rates and may be borne by the ICAV or the Fund in respect of which the Distributors have been appointed. The fee payable to the Investment Manager will be reduced by the amount of the Distributors' fees paid, if any.

*General*

The Directors do not intend to charge any sales commission or conversion or redemption fee and will give one month's notice to Shareholders of any intention to charge any such fees, subject to the approval of the Central Bank.

The Fund shall bear the fees and expenses relating to the establishment of the Fund which are estimated to amount to approximately €25,000 and may be amortised over the first five Accounting Periods of the Fund or such other period as the Directors may determine and in such manner as the Directors in their absolute discretion deem fair.

Otherwise than as set out above, the fees and operating expenses of the ICAV are set out in detail under the heading "Fees and Expenses" in the Prospectus.

15. **Dividends and Distributions**

The income and earnings and gains of Classes which are accumulating classes per the table in Section 9 of this Supplement will be accumulated and reinvested on behalf of the Shareholders. It is not currently intended to distribute dividends to Shareholders in these Classes.

It is the Directors' current intention to declare and distribute to Shareholders the income and earnings and gains of Classes which are distributing classes per the table in Section 9 of this Supplement.

The Accounting Date of the ICAV is currently the last day in September each year, and any dividend payable on the Shares of Classes which are distributing classes per the table in Section 9 of this Supplement will normally be declared on a quarterly basis (being January, April, July and October) and paid within four months or at such other

times as determined by the Directors in accordance with the provisions of the Prospectus and the Articles.

This section should be read in conjunction with the section headed “Dividend Policy” in the Prospectus.

## 16. **Risk Factors**

The attention of investors is drawn to the section headed “Risk Factors” in the Prospectus.

### *Emerging Markets*

The Fund may invest a small proportion in emerging markets. Investment in such markets involves risk factors and special considerations (including but not limited to those listed in this paragraph) which may not be typically associated with investing in more developed markets. Political or economic change and instability may be more likely to occur and have a greater effect on the economies and markets of emerging countries. Adverse government policies, taxation, restrictions on foreign investment and on currency convertibility and repatriation, currency fluctuations and other developments in the laws and regulations of emerging countries in which investments may be made, including expropriation, nationalisation or other confiscation could result in loss to the Fund. By comparison with more developed securities markets, most emerging countries securities markets are comparatively small, less liquid and more volatile. In addition, settlement, clearing and registration procedures may be underdeveloped enhancing the risks of error, fraud or default. Furthermore, the legal infrastructure and accounting, auditing and reporting standards in emerging markets may not provide the same degree of investor information or protection as would generally apply to major markets.

### *Bank Deposits*

Shares in the Fund are not bank deposits and are not insured or guaranteed by any government or any government agency or other guarantee schemes which protect the holders of bank deposits. The value of a holding in the Fund would be expected to fluctuate more than a bank deposit.

### *American Depositary Receipts (ADRs)*

ADRs are certificates evidencing ownership of shares of a foreign issuer that are issued by depositary banks and generally trade on an established market. ADRs are subject to many of the risks associated with investing directly in foreign securities, including, among other things, political, social and economic developments abroad, currency movements and different legal, regulatory and tax environments.

### *Real Estate Investment Trusts (REITs)*

REITs may be subject to certain risks associated with the direct ownership of real estate, including declines in the value of real estate, risks related to general and local economic conditions, overbuilding and increased competition, increases in property taxes and operating expenses and variations in rental income. REITs often pay significant dividends to their shareholders based upon available funds from operations, which will suffer withholding tax when paid to an Irish entity.

### *Share Currency Designation Risk*

A Class of Shares of the Fund may be designated in a currency other than the Base Currency of the Fund. Changes in the exchange rate between the Base Currency and such designated currency may lead to a depreciation of the value of such Shares as expressed in the designated currency. The Sub-Investment Manager may try but is not obliged to mitigate this risk by using financial instruments such as those described under the heading “Currency Risk”, as set out in the Prospectus, provided that such instruments shall in no case exceed 105% of the Net Asset Value attributable to the relevant Class of Shares of the Fund. Investors should be aware that this strategy may substantially limit Shareholders of the relevant Class from benefiting if the designated currency falls against the Base Currency and/or the currency/currencies in which the assets of the Fund are denominated. In such circumstances Shareholders of the relevant Class of Shares of the Fund may be exposed to fluctuations in the Net Asset Value per Share reflecting the gains/losses on and the costs of the relevant financial instruments. Financial instruments used to implement such strategies shall be assets/liabilities of the Fund as a whole. However, the gains/losses on and the costs of the relevant financial instruments will accrue solely to the relevant Class of Shares of the Fund.

### *Capital Erosion Risk*

Certain Share Classes may make distributions from capital. Investors should note that the focus on income may erode capital and diminish the Fund’s ability to sustain future capital growth. In this regard, distributions from capital made during the life of the Fund to an applicable Share Class should be understood as a type of capital reimbursement.

## **17. Publication of Net Asset Value per Share**

In addition to the publication of the Net Asset Value per Share on the internet at [www.bloomberg.com](http://www.bloomberg.com), information relating to the Fund will be made available on Fundinfo.com, which is a publication organ in Switzerland and Germany ([www.fundinfo.com](http://www.fundinfo.com)).

## **Appendix I**

### **Sustainability Related Disclosures**

#### **How are sustainability risks integrated into investment decisions?**

Sustainability risks are embedded and integrated into the entire investment process as described above.

Firstly, as part of the Sub-Investment Manager's process to identify which companies in the investment universe to engage with or exclude, the Sub-Investment Manager considers, amongst other factors, the importance of a sustainability issue and the extent to which the issue forms a sustainability risk - meaning an ESG event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment.

Secondly, the Sub-Investment Manager avoids investing in high sustainability risk companies by excluding companies that intentionally and repeatedly violate rules laid down by national and international organisations, covered by EU or UN sanctions, and securities issued by companies domiciled in countries where the sustainability risk is deemed unacceptable. The Sub-Investment Manager then identifies industries and sub-sectors with unwanted inherent sustainability risks, excluding companies with a certain direct revenue exposure to such industries or sub/sectors.

Thirdly, the Sub-investment Manager identifies companies with a strong sustainability standard using the Sustainability Cube™, where all companies in the investment universe are scored and ranked according to their sustainability standards. Low scores are given to companies associated with a high level of sustainability risk and low level of sustainability opportunities, and high scores are given to companies with a low level of sustainability risk and a high level of sustainable opportunities.

#### **What is the result of the assessment of the likely impacts of sustainability risks on the returns of the Fund?**

Sustainability risks may occur in a manner that is not anticipated by the Sub-Investment Manager, there may be a sudden, material negative impact on the value of an investment and hence the returns of the Fund.

As a result of the assessment of the impact of sustainability risks on the returns of the Fund, the Sub-Investment Manager identified that the portfolio companies may be exposed to certain ESG risks, but since the Sub-Investment Manager only invests in the most sustainable companies, as measured by the Sustainability Cube™ score, the most important source of sustainability risk is lack of high-quality data on the relevant sustainability indicators used by the Sub-Investment Manager.

The processes described in step one (Engagement and Exclusions) and step two (Industry Sustainability Risks Assessment) of the investment policy of the Fund are designed to significantly reduce sustainability risks. The remaining sustainability risk in the investable universe differs considerably between companies, this is tackled as described in step three (Measurement of Sustainability Risk – the Sustainability Cube™) of the investment policy of the Fund where low scores are given to companies associated with a high level of sustainability risk and low level of sustainability opportunities.

Companies considered as potential investments have to go through the entire three step process which aims to exclude companies highly exposed to sustainability risks, subsequent portfolio weights are also influenced by the level of sustainability risks and opportunities. As a result of the integration of sustainability factors and assessment of risks as described above

the Sub-Investment Manager believes that the likely impacts of sustainability risks on returns of the Fund are mitigated.

## Appendix II

**Template 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:** Qblue Global Sustainable Leaders Fund

**Legal entity identifier:** 54930044JKI8BK4ULR38

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

**Does this financial product have a sustainable investment objective?**

● ● ☒ Yes

**x** It will make a minimum of **sustainable investments with an environmental objective: 35%**

☐ 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: 35%**

☒ ☐ ☐ **No**

☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_\_% 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?**

The investment objective of the Fund is to provide long-term capital growth, investing globally in the shares of companies that the Sub-Investment Manager believes contribute positively to social and environmental factors. The Fund aims to achieve its objective by investing in companies that, as measured by the Sub-Investment Manager's proprietary sustainability model (the Sustainability Cube™), are ESG industry leaders, best positioned for the transition to a low carbon economy and aligned with the UN SDGs.

***What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?***

Attainment of the sustainable investment objective is measured using the combined Sustainability Cube™ score which include, but is not limited to, the following dimensions:

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



- **Climate transition (climate):** indicators include, current carbon footprint, carbon targets, decarbonization initiatives and development of products and services supporting greenhouse gas emission reduction
- **ESG industry leadership (ESG):** current ESG score, ESG progress score and controversies screening
- **Alignment with UN SDGs (SDG):** UN SDG revenue, measured as company revenues aligned with the UN SDGs, Development of products and services supporting the UN SDGs

Evaluation of sustainability characteristics within these dimensions is assessed through three different approaches:

- *Actual:* Assessment of current positive and negative sustainability impacts. Indicators include current carbon emissions, as well as current revenues and products aligned with the measured sustainability dimension
- *Progress:* Measures how well the company is positioned for and contributes to the transition to a more sustainable economy. Indicators include contribution to relevant innovation, as well as goals and targets for reducing future sustainability impacts and risks
- *Sentiment:* Measures how well the company's sustainability efforts are perceived by the public? Indicators are based on published news articles from trusted sources, such as financial media, think tanks, and NGOs

The Sustainability Cube™ framework aggregates *Actual*, *Progress*, and *Sentiment* scores within each sustainability dimension (Climate, ESG, and SDG). The combined Sustainability Cube™ score is calculated as the geometric average of the scores from the three sustainability dimensions. The combined Sustainability Cube™ score is used to measure attainment of the sustainable investment objective.

The sustainable investment objective, is attained when, at all times, the capital weighted average Sustainability Cube™ Score of the portfolio companies, within each industry (as per MSCI GICS level 1) within each region, is better than the 90th percentile of the sustainability scores – that is, the sustainable investment objective is attained when the investee companies are among the 10% best rated companies (within the investment universe for that region and industry).

Principal adverse impacts indicators (“PAIs”) are included in the *Actual* component of the Sustainability Cube™ score, and hence part of measuring the attainment of the sustainable investment objective.

### ***How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?***

In order not to do significant harm to environmental or social objectives, the Sub-Investment Manager takes principal adverse sustainability impacts (PAIs) into account in several steps of the investment process.

Company engagement and exclusion: Companies in the investment universe are screened for potential adverse impacts on sustainability factors. The Sub-Investment Manager decides if flagged companies are to be excluded from the investment universe or if progress can be made by engaging with the company.

### **Exclusions:**

**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.

- Norms based exclusions: Intentionally and repeatedly violate rules laid down by national authorities on the markets in which the financial product invests or by central international organizations generally endorsed by the global community. This includes, but is not limited to:
  - UN Global Compact
  - OECD Guidelines for Multinational Enterprises
- Country exclusions: Domiciled in countries covered by EU or UN sanctions, as well as countries where the sustainability risk with regards to money laundering, bribery, terrorist financing and tax avoidance are deemed unacceptable. The list of excluded countries is updated on an ongoing basis.
- Industry/Sector exclusions: Companies with business activities in industries with excessive risk of principal adverse sustainability impacts. This includes, but is not limited to, the following industries:
  - Tobacco
  - Thermal coal mining
  - Nuclear weapons
  - Controversial weapons
  - Oil sand extraction
  - Adult entertainment
  - Arctic drilling and exploration

Sustainability Cube™ score: the Sub-Investment Manager evaluates the sustainability characteristics of all companies in the investment universe using their own proprietary sustainability model, the Sustainability Cube™. The model includes several principal sustainability impact indicators on environmental, social and governance issues. The Sustainability Cube™ model supports the “do no significant harm principle” by:

- Excluding companies with the 10% worst social scores
- Only selecting companies for investment if they are among the 10% best rated within their region and industry. If a company at a later stage falls below the 15% best companies, the company position is closed out

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

The Sub-Investment Manager considers PAIs of investment decisions on sustainability factors in several steps of the investment process:

- Identification of which companies to engage with and to exclude
- Identification and exclusion of excessive sustainability risk industries
- Identification of countries ineligible for investment (country exclusion)
- Selection of investee companies, PAI indicators are sub-components in the combined Sustainability Cube™ score, and hence involved in the selection of portfolio companies.

Data coverage on PAIs is incomplete and data quality varies across indicators, but the field is going through a significant development. The Sub-Investment Manager closely monitors this development and incorporates additional indicators as data coverage and quality improves.

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

The Sub-Investment Manager does not invest in companies that intentionally and repeatedly violate rules laid down by national authorities on the markets in which the company operates or by central international organizations generally endorsed by the global community. This includes but is not limited to UN Global Compact and OECD Guidelines for Multinational Enterprises.



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



Yes

*Principal adverse impacts on sustainability factors are used in several steps of the investment process to “not do significant harm”(PAIs) as described above. Information on principal adverse impacts is available in the financial statements of the Fund.*

*In addition to this, companies with low PAI indicators are assigned a higher Sustainability Cube™ score, which in turn make them more likely to be included in the portfolio. Consequently, the Sustainability Cube™ framework reduces the overall adverse impacts of the investment portfolio.*



No



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

The financial product invests in developed market liquid equity securities subject to the exclusions described in the section ‘No significant harm to the sustainable investment objective’.

Companies in the investment universe are ranked based on the Sustainability Cube™ score, and the 10% highest scoring companies in each industry in each region are selected for the portfolio. If a company at a later stage falls below the 15% best companies, the company position is closed out. This part of the investment process is an important step towards achieving the sustainability objective of the financial product of investing in companies that the Sub-Investment Manager believes contribute positively to environmental and social factors.

Thereafter, the Sub-Investment Manager deploy a multi-step conviction weighting methodology, based predominately on the Sustainability Cube™ score, meaning the higher such Sustainability Cube™ score the higher portfolio weight.

Company dialogue is an important part of the Sub-Investment Manager’s sustainability framework, as they believe engagement is generally the best strategy for contributing to improving sustainability and responsible behaviour in companies. As a general rule, the Sub-Investment Manager intends to exercise its voting rights in investee companies. The Sub-Investment Manager aims to protect and grow the value of investments by ensuring that the portfolio companies diligently mitigate risks and have the lowest possible capital costs, by acting responsible, and at the same time encouraging companies to grow earnings by pursuing sustainable opportunities that support the goals of society and the global community. This forms the basis for the principles for exercising the voting rights.

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

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

● **What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?**

- The Sub-Investment Manager does not invest in securities issued by companies that:
- Norms based exclusions: Intentionally and repeatedly violate rules laid down by national authorities on the markets in which the Fund operates or by central international organizations generally endorsed by the global community. This includes, but is not limited to, UN Global Compact and OECD Guidelines for Multinational Enterprises
- Country exclusions: Domiciled in countries deemed ineligible for investment by the Sub-Investment Manager. The list of countries ineligible for investment includes countries covered by EU or UN sanctions, as well as countries where the sustainability risk with regards to money laundering, bribery, terrorist financing and tax avoidance are deemed unacceptable

Industry/Sector exclusions: Companies that have a direct revenue exposure to the following industries or sub-sectors (as defined below) using the exclusion criteria and thresholds set out below:

| Industry/sub-sectors<br>Exclusion Criteria and<br>Thresholds | Industry/sub-sectors Exclusion Criteria<br>and Thresholds                                                                                                                                                                                                                   |
|--------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Tobacco                                                      | Companies that manufacture tobacco products. 0% revenue threshold criteria.                                                                                                                                                                                                 |
| Thermal coal mining                                          | Companies that derive 5% or more of its revenue from the mining of thermal coal and its sale to external parties.                                                                                                                                                           |
| Nuclear Weapons                                              | Companies with primary involvement in Nuclear Warheads & Missiles, Nuclear Systems, Nuclear intended-use components and Nuclear Exclusive Delivery Platforms, Components of Nuclear Exclusive Delivery Platforms, Nuclear fissile materials. 0% revenue threshold criteria. |
| Controversial Weapons                                        | Companies with an industry tie to landmines, cluster munitions, chemical weapons, or biological weapons. Note: industry tie includes ownership, manufacture, or investment. Landmines do not include related safety products. 0% revenue threshold criteria.                |
| Oil Sands Extraction                                         | Companies that derive 5% or more of its revenue from oil sands extraction.                                                                                                                                                                                                  |
| Adult Entertainment                                          | Companies that derive 5% or more of its revenue from production and/or distribution of adult entertainment. Companies that derive revenue for retailing adult entertainment are not excluded.                                                                               |
| Arctic Drilling                                              | Companies that derive 5% or more of its revenue from onshore or offshore oil and gas production in the Arctic region. The definition                                                                                                                                        |

| Industry/sub-sectors<br>Exclusion Criteria and<br>Thresholds | Industry/sub-sectors Exclusion Criteria<br>and Thresholds                                |
|--------------------------------------------------------------|------------------------------------------------------------------------------------------|
|                                                              | of Arctic is geographical and includes production activities north of the 66.5 latitude. |

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

The Sub-Investment Manager assesses governance practices of investee companies when identifying companies for engagement and exclusions. Moreover, assessment of governance practices of investee companies is naturally integrated into the selection process of investee companies.

- Engagement and exclusions
  - The Sub-Investment Manager excludes companies which intentionally and repeatedly violate rules laid down by national authorities on the markets in which the Fund operates or by central international organizations generally endorsed by the global community
  - This includes, but is not limited to, UN Global Compact and OECD Guidelines for Multinational Enterprises
- Selection of investee companies
  - Corporate governance is a key element of the ESG industry leadership dimension of the Sustainability Cube™ score, as well as sub-components of the UN SDG dimension
  - Investee companies needs to be among the most sustainable companies, as measured by the Sustainability Cube™, in order to be included in the portfolio
- The Sub-Investment Manager is a signatory to the UN Principles for Responsible Investment (the “UNPRI”). As a signatory to the UNPRI the good governance practices of investee companies are assessed prior to making an investment and periodically thereafter.



**What is the asset allocation and the minimum share of sustainable investments?**

The Sub-Investment Manager classifies an investment as sustainable, ie an activity contributing to environmental and social factors, as defined under the SFDR, if the combined Sustainability Cube™ score of the investee company ranks in the top 25% within its region and industry. The sustainable investment objective is attained when (at all times) the portfolio weighted score of investee companies is higher than the 90th percentile (top 10%) in that region and industry

The combined Sustainability Cube™ score measures the combined contribution to both environmental and social objectives, and the Sub-Investment Manager believes that a superior broad sustainability profile is the most credible indicator for superior contribution to both environmental and social objectives.

The Sub-Investment Manager believes that sustainable investments, as defined above, contribute to both social and environmental factors. As sustainable investments need to be classified as either environmental or social under SFDR,

**Asset allocation**  
describes the share  
of investments in  
specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

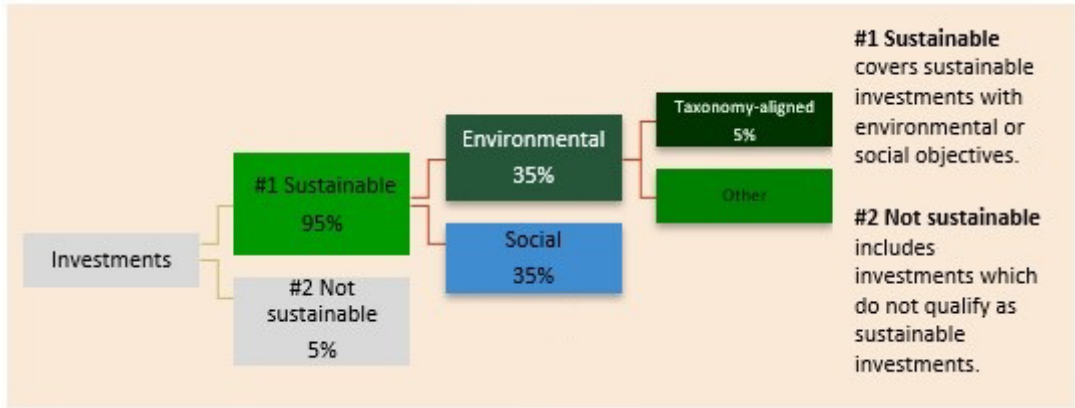
**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

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



the Sub-Investment Manager uses the ranking of the Climate Transition component of the Sustainability Cube™ to calculate contribution to environmental factors and the ranking of the UN SDG component of the Sustainability Cube™ to calculate contribution to social factors. The relative degree of contribution to environmental and social factors will determine the split of sustainable investment into environmental investments and social investments. At any given point in time, the sum of environmental investments and social investments will be equal to the total amount of sustainable investments, but the split between environmental investments and social investments may vary over time.

Under normal circumstances, in order to attain the sustainable investment objective, the Fund is generally expected to invest at least 95% of its equity exposure in companies classified as sustainable investments as defined above. The Fund may also hold cash or cash equivalents, and the Fund may use derivative instruments for the purposes of efficient portfolio management and hedging under the conditions and within the limits laid down by the Central Bank.



● **How does the use of derivatives attain the sustainable investment objective?**

Not applicable, derivatives are not used for investment purposes.

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

The minimum degree to which investments in the Fund are in environmentally sustainable economic activities (“taxonomy aligned”) is 5%.

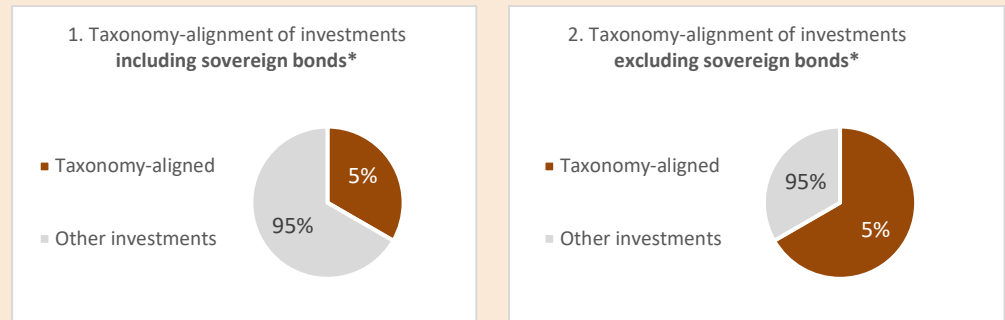
Data for measuring economic activities contributing to objective (a)-(f) in Article 9 of Regulation (EU) 2020/852, are still under development. As data coverage and data quality improves over time, the Sub-Investment Manger expects to increase the minimum commitment to sustainable investments with an environmental objective aligned with the EU Taxonomy.

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

\*For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures



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



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

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

The minimum degree to which investments in the Fund are in transitional and enabling activities ("taxonomy enabled") is 0%.



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

The Fund is expected to invest minimum 35% of its equity exposure in sustainable investments with an environmental objective. At least 5% of these investments with an environmental objective will be in taxonomy aligned activities.

The sum of environmental and social investments will, under normal circumstances, be at least 95%. There may be occasions where the environmental and social objectives are not split equally and a significant share of the 95% threshold will be made up by investments with an environmental or social objective, in such circumstances the minimum 35% will be met by the objective in which has been deemed less material by the sub-investment manager, due to the nature of the Fund's investment process the ratio of environmental and social investments may vary between industry to industry and company to company.

But since the investment strategy does not control a fixed split between environmental and social investments, the Sub-Investment Manager can only commit to a minimum share of environmental investments of 35% at any given time.



### **What is the minimum share of sustainable investments with a social objective?**

The Fund is expected to invest 35% of its equity exposure in sustainable investments with a social objective.



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

The sum of environmental and social investments will, under normal circumstances, be at least 95%. There may be occasions where the environmental and social objectives are not split equally and a significant share of the 95% threshold will be made up by investments with an environmental or social objective, in such circumstances the minimum 35% will be met by the objective in which has been deemed less material by the sub-investment manager, due to the nature of the Fund's investment process the ratio of environmental and social investments may vary between industry to industry and company to company.

But since the investment strategy does not control a fixed split between environmental and social investments, the Sub-Investment Manager can only commit to a minimum share of social investments of 35% at any given time.

**What investments are included under “#2 Not sustainable”, what is their purpose and are there any minimum environmental or social safeguards?**

The purpose of any investments that may be classified as “#2 other” within the SFDR (which include investments which do not qualify as sustainable investments) are used for efficient portfolio management, liquidity management or hedging purposes.



**Is a specific index designated as a reference benchmark to meet the sustainable investment objective?**

No, the Fund does not have a sustainable designated reference benchmark to meet its sustainable investment objective. The Fund is actively managed.

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

N/A

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

N/A

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

N/A

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

N/A



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**

<https://www.heptagon-capital.com/qblue-global-sustainable-leaders-fund/>