2025/454-O8683-0-PC
2025-05-20

SIDERA FUNDS

SICAV

Société d'investissement à capital variable (SICAV)

PROSPECTUS

May 2025

An undertaking for collective investment
in transferable securities (UCITS)
in the form of an open-ended investment
company with variable share capital.

Subject to the Luxembourg law
of 17 December 2010 relating
to undertakings for collective investment,
as amended.

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1. INTRODUCTION

This Prospectus contains information about **Sidera Funds SICAV** that a prospective investor should consider before investing in the Fund and should be retained for future reference.

The Fund is a public limited company (*société anonyme*) incorporated under the laws of the Grand Duchy of Luxembourg as an investment company with variable share capital (*société d'investissement à capital variable*). The Fund is subject to Part I of the Luxembourg law of 17 December 2010 relating to undertakings for collective investment, as amended or supplemented from time to time.

The Fund has been authorised by the *Commission de Surveillance du Secteur Financier* (CSSF) which is the Luxembourg supervisory authority of the financial market. However, such authorisation does not require the CSSF to approve or disapprove either the adequacy or accuracy of this Prospectus or the portfolio of assets held by the Fund. Any declaration to the contrary should be considered as unauthorised and illegal.

The Fund is a single legal entity incorporated as an umbrella fund comprised of separate Sub-Funds. Shares in the Fund are shares in a specific Sub-Fund. The Fund may issue Shares of different Share Classes in each Sub-Fund. Such Share Classes may each have specific characteristics. Certain Share Classes may be reserved to certain categories of investors. Investors should refer to the Supplement for further information on characteristics of Share Classes.

The Fund has been incorporated in Luxembourg on 23 November 2015. The Fund is registered with the Luxembourg Trade and Companies Register under number B 201846. The latest version of the Articles of Association was published in the *Mémorial C, Recueil des Sociétés et Associations* of the Grand-Duchy of Luxembourg on 9 December 2015.

Neither delivery of the Prospectus nor anything stated herein should be taken to imply that any information contained herein is correct as of any time subsequent to the date hereof. The Prospectus does not constitute an offer to sell or a solicitation of an offer to buy any Shares in any jurisdiction in which such offer, solicitation or sale would be unlawful or to any person to whom it is unlawful to make such offer, solicitation or sale.

The information contained in this Prospectus is supplemented by the financial statements and further information contained in the latest Annual Report and Semi-Annual Report of the Fund, copies of which may be requested free of charge at the registered office of the Fund and on www.siderafunds.com.

No distributor, agent, salesman or other person has been authorised to give any information or to make any representation other than those contained in the Prospectus and in the documents referred to herein in connection with the offer of Shares and, if given or made, such information or representation must not be relied upon as having been authorised.

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

The distribution of the Prospectus and/or the offer and sale of the Shares in certain jurisdictions or to certain investors may be restricted or prohibited by law. No Shares may be acquired or held by, on behalf or for the account or benefit of, Prohibited Persons. In particular, the Board of Directors has decided that US Persons would be considered as Prohibited Persons and the Shares will not be offered from within the United States or to investors who are US Persons.

The Fund must comply with applicable international and Luxembourg laws and regulations regarding the prevention of money laundering and terrorist financing. In particular, anti-money laundering measures in force in the Grand Duchy of Luxembourg require the Fund or its agent to establish and verify the identity of subscribers for Shares (as well as the identity of any intended beneficial owners of the Shares if they are not the subscribers) and the origin of subscription proceeds and to monitor the relationship on an ongoing basis. Failure to provide information or documentation may result in delays in, or rejection of, any subscription or conversion application and/or delays in any redemption application.

An investment in the Shares is only suitable for investors who have sufficient knowledge, experience and/or access to professional advisers to make their own financial, legal, tax and accounting evaluation of the risks of an investment in the Shares and who have sufficient resources to be able to bear any losses that may result from an investment in the Shares. Investors should consider their own personal circumstances and seek additional advice from their financial adviser or other professional adviser as to possible financial, legal, tax and accounting consequences which they might encounter under the laws of the countries of their citizenship, residence, or domicile and which might be relevant to the subscription, purchase, holding, redemption, conversion or disposal of the Shares of the Fund.

THE VALUE OF THE SHARES MAY FALL AS WELL AS RISE AND AN INVESTOR MAY NOT GET BACK THE AMOUNT INITIALLY INVESTED. INVESTING IN THE FUND INVOLVES RISK INCLUDING THE POSSIBLE LOSS OF CAPITAL.

2. DIRECTORY

Registered office of the Fund

3, rue Jean Piret
L-2350 Luxembourg,
Grand Duchy of Luxembourg

Board of Directors

Sophie Mosnier (Independent Director – Chairman of the Board)
Independent Director
41 rue du Cimetière
L-3350 Leudelange
Grand Duchy of Luxembourg

Tracey McDermott (Independent Director)
Independent Director
8 An der Uecht
L-5371 Schuttrange
Grand Duchy of Luxembourg

Giuseppe Lusignani (Director)
Chairman
ARCA Fondi SGR S.p.A.
Via Disciplini 3
I-20123 Milan
Italy

Alberto Zorzi (Director)
Chief Investment Officer
ARCA Fondi SGR S.p.A.
Via Disciplini 3
I-20123 Milan
Italy

Francesco Frattola (Director)
Chief Operating Officer
ARCA Fondi SGR S.p.A.
Via Disciplini 3
I-20123 Milan
Italy

Lorenzo Giavenni (Director)
Institutional Products and Sales
ARCA Fondi SGR S.p.A.
Via Disciplini 3
I-20123 Milan
Italy

Board of Directors of the Management Company

John Alldis (Director, Chairman)
Carne Global Fund Managers (Luxembourg) S.A.
3, rue Jean Piret
L-2350 Luxembourg
Grand Duchy of Luxembourg

Veronica Buffoni (Director)
Carne Global Fund Managers (Luxembourg) S.A.
9, Industriestrasse
6300 Zug
Switzerland

Jacqueline O'Connor (Director)
Independent Non-Executive Director
74, Trees Road, Mount Merrion
A94 Y9KO, Dublin
Ireland

Anouk Agnes (Director)
Independent Non-Executive Director
22, rue Charles Darwin
L-1433, Luxembourg
Grand Duchy of Luxembourg

Glenn Thorpe (Director)

Carne Global Financial Services Limited
85, Gresham StreetEC2V 7NQ, London
United Kingdom

Investment Managers

Arca Fondi Sgr S.p.A.
Via Disciplini 3
I-20123 Milan
Italy

Goldman Sachs Asset Management International
Plumtree Court, 25 Shoe Lane
London EC4A 4AU
United Kingdom

Paying Agent

BNP Paribas, Luxembourg Branch
60, avenue J.F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

Management Company Carne Global Fund Managers (Luxembourg) S.A. 3, rue Jean Piret L-2350 Luxembourg, Grand Duchy of Luxembourg **Conducting Officers of the Management Company** <u>Christophe Douche (Conducting Officer)</u> Risk Management Carne Global Fund Managers (Luxembourg) S.A. <u>Cord Rodewald (Conducting Officer)</u> Compliance and AML/CFT Carne Global Fund Managers (Luxembourg) S.A. <u>N.J. Whelan (Conducting Officer)</u> Finance Carne Global Fund Managers (Luxembourg) S.A. <u>Gregory Kayl (Conducting Officer)</u> UCI Administration Carne Global Fund Managers (Luxembourg) S.A. <u>Ankit Jain (Conducting Officer)</u> IT and Branch Oversight Carne Global Fund Managers (Luxembourg) S.A. <u>Shpresa Miftari (Conducting Officer)</u> Valuation Carne Global Fund Managers (Luxembourg) S.A. <u>Quentin Didier Gabriel (Conducting Officer)</u> Portfolio Management Carne Global Fund Managers (Luxembourg) S.A. <u>Anne-Pascale Feis (Conducting Officer)</u> Distribution Carne Global Fund Managers (Luxembourg) S.A.	**Global Distributor** Arca Fondi SGR S.p.A. Via Disciplini 3 I-20123 Milan Italy **UCI Administrator** BNP Paribas, Luxembourg Branch 60, avenue J.F. Kennedy L-1855 Luxembourg Grand Duchy of Luxembourg **Auditor** PricewaterhouseCoopers, *Société coopérative* 2, rue Gerhard Mercator L-1014 Luxembourg Grand Duchy of Luxembourg **Legal adviser as to matters of Luxembourg law** Arendt & Medernach S.A. 41A, Avenue John F. Kennedy L-2082 Luxembourg Grand Duchy of Luxembourg

Depositary BNP Paribas, Luxembourg Branch 60, avenue J.F. Kennedy L-1855 Luxembourg Grand Duchy of Luxembourg	

3. DEFINITIONS

1915 Law	the Luxembourg law of 10 August 1915 on commercial companies, as may be amended from time to time.
1993 Law	the Luxembourg law of 5 April 1993 on the financial sector, as may be amended from time to time.
2004 Law	the Luxembourg law of 12 November 2004 on the fight against money laundering and terrorist financing, as may be amended from time to time.
2010 AML/CFT Regulation	the Grand-Ducal Regulation of 1 February 2010 providing detail on certain provisions of the 2004 Law.
2010 Law	the Luxembourg law of 17 December 2010 relating to undertakings for collective investment, as may be amended from time to time.
Administrative Agreement	the agreement entered into between the Fund, the Management Company and the UCI Administrator governing the appointment of the UCI Administrator, as may be amended or supplemented from time to time.
UCI Administrator	the UCI administrator appointed by the Management Company in accordance with the provisions of the 2010 Law and the Administration Agreement, as identified in the Directory.
AML/CFT Rules	the Luxembourg laws and regulations in relation to the fight against money laundering and terrorist financing, including but not limited to the 2004 Law, the 2010 AML/CFT Regulation, CSSF Regulation N°12-02 of 14 December 2012 on the fight against money laundering and terrorist financing and relevant CSSF Circulars in the field of anti-money laundering and counter terrorist financing, including but not limited to CSSF Circular 18/698 on the authorization and organization of investment fund managers incorporated under Luxembourg law.
Annual Report	the report issued by the Fund as of the end of the latest financial year in accordance with the 2010 Law.
Articles of Association	the articles of association of the Fund, as may be amended from time to time.
Benchmark	a benchmark within the meaning of Article 3(1)(3) of the Benchmark Regulation.
Benchmark Administrator	the administrator that has control over the provision of the relevant Benchmark in line with Article 3(1)(6) of the Benchmark Regulation.
Benchmark Regulation	Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds, as may be amended or supplemented from time to time
Board of Directors	the board of directors of the Fund.
Brussels I (Recast)	Regulation (EU) No 1215/2015 of the European Parliament and of the Council of 12 December 2012 on jurisdiction and the recognition and enforcement of judgements in civil and commercial matters (recast).
Business Day	any day on which banks are open the whole day for non-automated business in Luxembourg and in such other countries or cities as may be specified for a Sub-Fund or Share Class in a Supplement.
Capitalisation Shares	Shares with respect to which the Fund does not intend to distribute dividends.

Conversion Day	the day or days on which Original Shares may be converted into New Shares, being a day which is a Redemption Day for the Original Shares and, if that day is not a Subscription Day for the New Shares, the day which is the immediately following Subscription Day for the New Shares, provided that the Cut-Off Time for a Conversion Day shall be the earlier of the Cut-Off Time for redemption of the Original Shares on that Redemption Day and the Cut-Off Time for subscription to the New Shares on that Subscription Day. For the avoidance of doubt, the Conversion Day may be a different day for the Original Shares and the New Shares.
Conversion Fee	a fee which the Fund may charge upon conversion of Shares and which is equal to the positive difference, if any, between the Subscription Fee applicable to the New Shares and the Subscription Fee paid on the Original Shares, or such lower amount as specified for each Share Class in the Supplement, where applicable.
Conversion Form	the forms and other documents, as issued or accepted by the Fund from time to time, which the Fund requires the investor or the person acting on behalf of the investor to complete, sign, and return to the Fund or its agent, with the supporting documentation, in order to request the conversion of all or part of his Shares.
CRS-Law	Luxembourg law of 18 December 2015 implementing Council Directive 2014/107/EU of 9 December 2014 as regards mandatory automatic exchange of information in the field of taxation.
CSSF	the *Commission de Surveillance du Secteur Financier*, the Luxembourg supervisory authority of the financial sector.
CTB	Climate Transition Benchmarks
CTB Exclusions	the exclusions applying to administrators of Climate Transition Benchmarks set out in article 12(1)(a) to (c) of Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020, as amended, modified or supplemented from time to time.
Cut-Off Time	for any Subscription Day, Redemption Day or Conversion Day, the day and time by which an application for subscription, redemption or conversion, as applicable, must in principle be received by the Fund in order for the application to be processed, if accepted, by reference to the Net Asset Value per Share calculated as of that Subscription Day, Redemption Day or Conversion Day, as applicable. The Cut-Off Time is specified for each Sub-Fund or Share Class in the Supplement.
Data Service Provider	the service provider in charge of data related services such as gathering, archiving or making available to the Investment Manager the relevant data for a Sub-Fund.
Data Service Provider Fee	the fee payable by the Fund for covering the activities of the Data Service Provider as described in section 9.6 (Operating and Administrative expenses) of this Prospectus.
Depositary	the depositary bank appointed by the Fund in accordance with the provisions of the 2010 Law and the Depositary Agreement, as identified in the Directory.
Depositary Agreement	the agreement entered into between the Fund, the Management Company and the Depositary governing the appointment of the Depositary, as may be amended or supplemented from time to time.
Directive 2005/60/EC	Directive 2005/60/EC of the European Parliament and of the Council of 26 October 2005 on the prevention of the use of the financial system for the purpose of money laundering and terrorist financing as may be amended from time to time.

Directive 2013/34/EU	Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC, as may be amended from time to time.
Directive 2013/36/EU	Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC, as may be amended from time to time.
Distressed Debt Securities	means securities whereby its issuer has failed to make a contractual payment as it falls due, is subject to bankruptcy or equivalent procedures or is undertaking an involuntary debt restructuring. The Investment Manager will be guided by rating agencies, the ISDA Credit Derivatives Determinations Committee and other external data providers but may at times diverge from their opinions. In particular, the Investment Manager will not consider the contractually provided suspension of coupon payments on additional tier 1 instruments such as preference shares or contingent convertible bonds as an indication of distress. If distressed debt securities are envisaged in a Sub-Fund's investment policy, typically such Sub-Fund would not invest more than 10% of its net assets into distressed debt securities, unless otherwise stated in the Sub-Fund's Supplement.
Distribution Shares	Shares with respect to which the Fund intends to distribute dividends and which confer on their holder the right to receive such dividends, if and when declared by the Fund.
Duration Hedged Share Classes	Share Classes for which a duration hedging strategy is implemented, as further described in the Prospectus. Duration Hedged Share Classes are identified in the Supplements.
Distributors	intermediaries appointed by the Fund or the Global Distributor to distribute the Shares.
EEA	European Economic Area
Eligible Investor	an investor who satisfies all additional eligibility requirements for a specific Sub-Fund or Share Class, as specified for the Sub-Fund or Share Class in the Supplement.
EMIR	Regulation (EU) 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories, as may be amended from time to time.
ESMA	the European Securities and Markets Authority.
EU	the European Union.
EUR	the lawful currency of the Member States of the European Union that adopt the single currency in accordance with the Treaty establishing the European Community, as amended by the Treaty on European Union.
FATCA	the provisions of the United States Hiring Incentives to Restore Employment (HIRE) Act of 18 March 2010, set out in Sections 1471 to 1474 of the US Internal Revenue Code, as amended, and any US Treasury regulations issued thereunder, US Internal Revenue Service rulings or other official guidance pertaining thereto, commonly referred to as the Foreign Account Tax Compliance Act (FATCA).

Feeder Fund	as the context indicates, a Sub-Fund or another UCITS or sub-fund thereof qualifying as a feeder fund in the meaning of the 2010 Law.
Fund	Sidera Funds SICAV
GDPR	Regulation (EU) n°2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data
Global Distributor	the global distribution agent appointed by the Management Company in accordance with the provisions of the 2010 Law and the Global Distribution Agreement, as identified in the Directory.
Global Distribution Agreement	the agreement entered into between the Management Company, the Fund and the Global Distributor governing the appointment of the Global Distributor, as may be amended or supplemented from time to time.
High-on-High (HoH)	the highest (adjusted) Net Asset Value per Share (adjusted for any previously distributed dividends) recorded in any previous crystallization date (as mentioned under section 9.3 below).
Initial Offer	the first day or period on or during which Shares of a Share Class will be or were available for subscription.
Initial Offer Price	the price at which Shares may be subscribed for on or during the Initial Offer.
Institutional Investor	an institutional investor as defined by the administrative practice of the CSSF.
Investment Management Agreement	the agreement entered into between the Management Company, the Fund and the Investment Manager governing the appointment of the Investment Manager, as may be amended or supplemented from time to time.
Investment Manager	the investment managers appointed by the Management Company in accordance with the provisions of the 2010 Law and the Investment Management Agreement, as identified in the Directory.
KID	Key information document
Lugano Convention	The Convention of Lugano of 30 October 2007 on jurisdiction and the enforcement of judgments in civil and commercial matters.
Management Fee	the fee payable by the Fund for covering the activities of the Management Company, the Investment Manager and the Global Distributor as described in section 9.2 (Management Fee) of this Prospectus.
Management Company	the management company appointed by the Fund in accordance with the provisions of the 2010 Law and the Management Company Agreement, as identified in the Directory.
Management Company Agreement	the agreement entered into between the Fund and the Management Company governing the appointment of the Management Company, as may be amended or supplemented from time to time.
Master Fund	as the context indicates, a Sub-Fund or another UCITS or sub-fund thereof qualifying as a master fund in the meaning of the 2010 Law.
MiFID II	Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (recast), as may be amended from time to time.
Member States	Member States of the European Union
Money Market Instrument	instruments normally dealt in on the money market which are liquid and have a value which can be accurately determined at any time.
Net Asset Value	as the context indicates, the net asset value of the Fund, a Sub-Fund, or a Share Class determined in accordance with the provisions of this Prospectus.

Net Asset Value per Share	the Net Asset Value of a Share Class in a Sub-Fund divided by the total number of Shares of that Share Class which are in issue as of the Valuation Day for which the Net Asset Value per Share is calculated.
New Shares	Shares described in section 7.6 (Conversion of Shares) of this Prospectus.
OECD	the Organisation for Economic Cooperation and Development.
Original Shares	Shares described in section 7.6 (Conversion of Shares) of this Prospectus.
PAB	Paris Aligned Benchmarks.
PAB Exclusions	the exclusions applying to administrators of Paris Aligned Benchmarks set out in article 12(1)(a) to (g) of Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020, as amended, modified or supplemented from time to time.
Paying Agent	the paying agent appointed by the Fund, as identified in the Directory.
Performance Fee	the fee which may be payable to the Investment Manager depending on the performance of certain Sub-Funds or Share Classes, where applicable, as described in section 9.3 (Performance Fee).
PRIIPs Regulations	Regulation (EU) 1286/2014 of the European Parliament and the Council of 26 November 2014 on key information documents for packaged retail and insurance-based investment products (PRIIPs), as may be amended from time to time and Commission Delegated Regulation (EU) 2017/653 of 8 March 2017 supplementing Regulation (EU) No 1286/2014 of the European Parliament and of the Council on key information documents for packaged retail and insurance-based investment products (PRIIPs) by laying down regulatory technical standards with regard to the presentation, content, review and revision of key information documents and the conditions for fulfilling the requirement to provide such documents, as may be amended from time to time.
Prohibited Person	any person considered as a Prohibited Person in the opinion of the Board of Directors according to the criteria set out in the Articles of Association and section 7.10 (Prohibited Persons) of the Prospectus.
Professional Investor	an investor who qualifies as a “professional client” within the meaning of Article 4(1)(10) of the MiFID II and its Annex II.
Prospectus	this prospectus including all Supplements, as may be amended from time to time.
RBO	register of beneficial owners (*registre des bénéficiaires effectifs*) established by the RBO Law.
RBO Law	Luxembourg law of 13 January 2019 establishing a register of beneficial owners.
Redemption Day	a Valuation Day on which Shares may be redeemed by the Fund at a Redemption Price determined by reference to the Net Asset Value per Share calculated as of that Valuation Day. Redemption Days are specified for each Sub-Fund or Share Class in the Supplement.
Redemption Fee	a fee which the Fund may charge upon redemption of Shares, equal to a percentage of the Redemption Price or such other amount specified for each Sub-Fund or Share Class in the Supplement, where applicable.

Redemption Form	the forms and other documents, as issued or accepted by the Fund from time to time, which the Fund requires the investor or the person acting on behalf of the investor to complete, sign, and return to the Fund or its agent, with the supporting documentation, in order to request the redemption of all or part of his Shares.
Redemption Price	the price at which the Fund may redeem Shares on a Redemption Day, as determined for each Sub-Fund or Share Class on the basis of the Net Asset Value per Share as of that Redemption Day and in accordance with the provisions of this Prospectus.
Redemption Settlement Period	the period of time, as specified for each Sub-Fund or Share Class in the Supplement, by the end of which the Fund will normally pay the Redemption Price (less any Redemption Fee) to redeeming investors, subject to the further provisions of this Prospectus.
Reference Currency	as the context indicates, (i) in relation to the Fund, the Euro, or (ii) in relation to a Sub-Fund, the currency in which the assets and liabilities of the Sub-Fund are valued and reported, as specified in each Supplement, or (iii) in relation to a Sub-Fund or Share Class, the currency in which the Shares of that Sub-Fund or Share Class are denominated, as specified in each Supplement.
Regulated Market	a regulated market within the meaning of MiFID.
SFDR	Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector, as may be amended from time to time.
SFDR RTS	Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing SFDR with regard to regulatory technical standards (RTS) specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in precontractual documents, on websites and in periodic reports, as may be amended from time to time.
SFDR RTS Annex	the annex for each Sub-Fund that promote environmental and/or social characteristics in accordance with Article 8 of the SFDR as disclosed at the end of the Prospectus in the form prescribed by the SFDR RTS.
Semi-Annual Report	the report issued by the Fund as of the first half of the current financial year in accordance with the 2010 Law.
Share Class	a class of Shares of a Sub-Fund created by the Board of Directors, as described in section 7.1 (Shares, Sub-Funds and Share Classes) of this Prospectus. For the purposes of this Prospectus, each Sub-Fund shall be deemed to comprise at least one Share Class.
Shares	shares of a Sub-Fund or Share Class issued by the Fund.
Sub-Fund	a sub-fund of the Fund, as described in section 7.1 (Shares, Sub-Funds and Share Classes) of this Prospectus.
Subscription Day	a Valuation Day on which investors may subscribe for Shares at a Subscription Price determined by reference to the Net Asset Value per Share calculated as of that Valuation Day. Subscription Days are specified for each Sub-Fund or Share Class in the Supplement.

Subscription Fee	a fee which the Fund may charge upon subscription for Shares, equal to a percentage of the Subscription Price or such other amount specified for each Sub-Fund or Share Class in the Supplement, where applicable.
Subscription Form	the forms and other documents, as issued or accepted by the Fund from time to time, which the Fund requires the investor or the person acting on behalf of the investor to complete, sign, and return to the Fund or its agent, with the supporting documentation, in order to make an initial and/or additional application for subscription to Shares.
Subscription Price	the price at which investors may subscribe for Shares on a Subscription Day, as determined for each Sub-Fund or Share Class on the basis of the Net Asset Value per Share as of that Subscription Day and in accordance with the provisions of this Prospectus.
Subscription Settlement Period	the period of time by the end of which the subscriber is required to pay the Subscription Price (plus any Subscription Fee) to the Fund. The Subscription Settlement Period is specified for each Sub-Fund or Share Class in the Supplement.
Supplement	the supplement(s) to this Prospectus for each specific Sub-Fund, which form part of this Prospectus.
Sustainability Factors	environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.
Sustainability Risk	an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investments made by each Sub-Fund or on the performance and returns of each Sub-Fund.
Swing Factor	is defined in section 8.2 (Valuation procedure) of this Prospectus.
Swing Threshold	is defined in section 8.2 (Valuation procedure) of this Prospectus.
Target Sub-Fund	a Sub-Fund into which another Sub-Fund has invested in accordance with the provisions of this Prospectus.
Taxonomy Regulation	Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and SFDR, as may be amended from time to time.
Transferable Security	shares in companies and other securities equivalent to shares in companies, bonds and other forms of securitised debt, and any other negotiable securities which carry the right to acquire any such transferable securities by subscription or exchange.
UCI	undertaking for collective investment within the meaning of Article 1(2)(a) and (b) of the UCITS Directive, being an open-ended undertaking with the sole object of collective investment of capital raised from the public, in accordance with the principle of risk-spreading, in transferable securities and other liquid financial assets.
UCITS	undertaking for collective investment in transferable securities
UCITS Directive	Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities (UCITS) (recast), as may be amended from time to time.

US Person or United States Person	any person who: (i) is a United States person within the meaning of Section 7701(a)(30) of the US Internal Revenue Code of 1986, as amended, and the Treasury Regulations promulgated thereunder; (ii) is a US person within the meaning of Regulation S under the US Securities Act of 1933 (17 CFR § 230.902(k)); (iii) is not a Non-United States person within the meaning of Rule 4.7 of the US Commodity Futures Trading Commission Regulations (17 CFR § 4.7(a)(1)(iv)); (iv) is in the United States within the meaning of Rule 202(a)(30)-1 under the US Investment Advisers Act of 1940, as amended; or (v) any trust, entity or other structure formed for the purpose of allowing US Persons to invest in the Fund "United States Persons" or "US Persons" shall be construed accordingly.
Valuation Day	a Business Day as of which the Net Asset Value per Share is calculated, as specified in the Supplement.

4. INVESTMENT STRATEGY AND RESTRICTIONS

Each Sub-Fund has a specific investment objective and policy described in its Supplement. The investments of each Sub-Fund must comply with the provisions of the 2010 Law. The investment restrictions and policies set out in this section apply to all Sub-Funds, without prejudice to any specific rules adopted for a Sub-Fund, as described in its Supplement where applicable. The Board of Directors may impose additional investment guidelines for each Sub-Fund from time to time, for instance where it is necessary to comply with local laws and regulations in countries where Shares are distributed. Each Sub-Fund should be regarded as a separate UCITS for the purposes of this section and all asset percentages are measured as a percentage of the total net assets of the relevant Sub-Fund.

4.1 Authorised investments

4.1.1 The investments of each Sub-Fund must comprise only one or more of the following.

(A) Transferable Securities and Money Market Instruments admitted to or dealt in on a Regulated Market.

(B) Transferable Securities and Money Market Instruments dealt in on another market in a Member State that is regulated, operates regularly and is recognised and open to the public.

(C) Transferable Securities and Money Market Instruments admitted to the official listing on a stock exchange in a Non-Member State (i.e. stock exchanges or other regulated markets in any country of the Americas, Europe, Africa, Asia and Oceania) or dealt in on another market in a Non-Member State, being a member state of the OECD or the Group of twenty (G20), the Republic of Singapore, the Hong Kong Special Administrative Region of the People's Republic of China, which is regulated, operates regularly and is recognised and open to the public.

(D) Recently issued Transferable Securities and Money Market Instruments, provided that the terms of issue include an undertaking that application will be made for admission to official listing on a stock exchange or dealing on a Regulated Market or another regulated market referred to in paragraphs (A) to (C) of this section, and that such admission is secured within one year of issue.

(E) Shares or units of UCITS or other UCI, whether or not established in a Member State, provided that the following conditions are satisfied:

(1) such other UCI are authorised under laws which provide that they are subject to supervision considered by the CSSF to be equivalent to that laid down in EU law, and that cooperation between authorities is sufficiently ensured;

(2) the level of protection for shareholders or unitholders in such other UCI is equivalent to that provided for shareholders or unitholders in a UCITS, and in particular that the rules on asset segregation, borrowing, lending, and uncovered sales of Transferable Securities and Money Market Instruments are equivalent to the requirements of the UCITS Directive;

(3) the business of the other UCI is reported in semi-annual and annual reports to enable an assessment of the assets and liabilities, income and operations over the reporting period; and

(4) no more than 10% of the assets of the UCITS or the other UCI whose acquisition is contemplated can, according to their constitutive documents, be invested in aggregate in shares or units of other UCITS or other UCI.

(F) Deposits with credit institution which has its registered office in a Member State or a credit institution located in a third-country which is subject to prudential rules considered by the CSSF as equivalent to those laid down in EU law, which are repayable on demand or have the right to be withdrawn and maturing in no more than twelve months.

(G) Financial derivative instruments, including equivalent cash-settled instruments, listed on a stock exchange or dealt in on a Regulated Market or another regulated market referred to in paragraphs (A) to (C) of this section, or financial derivative instruments dealt in over-the-counter (OTC) provided that:

(1) the underlying consists of assets covered by this section 4.1.1 including instruments with one or more characteristics of those assets, and/or financial indices, interest rates, foreign exchange rates or currencies, in which a Sub-Fund may invest according to its investment objective;

(2) the counterparties to OTC derivative transactions are institutions subject to prudential supervision, and belonging to the categories approved by the CSSF; and

(3) the OTC derivatives are subject to reliable and verifiable valuation on a daily basis and can be sold, liquidated or closed by an offsetting transaction at any time at their fair value at the initiative of the Fund.

(H) Money Market Instruments other than those dealt in on a Regulated Market or dealt in on another market in a non-Member State which is regulated, operates regularly and is recognised and open to the public, provided that the issue or the issuer of such instruments is itself regulated for the purpose of protecting investors and savings, and that such instruments are:

(1) issued or guaranteed by a central, regional or local authority or by a central bank of a Member State, the European Central Bank, the European Union or the European Investment Bank, a non-Member State or, in case of a federal State, by one of the members making up the federation, or by a public international body to which one or more Member States belong;

(2) issued by an undertaking any securities of which are listed on a stock exchange or dealt in on a Regulated Market or another regulated market referred to in paragraphs (A) to (C) of this section;

(3) issued or guaranteed by an establishment subject to prudential supervision, in accordance with criteria defined by EU law, or by an establishment which is subject to and complies with prudential rules considered by the CSSF to be at least as stringent as those laid down by EU law; or

4.1.2 issued by other bodies provided that investments in such instruments are subject to investor protection equivalent to that set out in paragraphs (H)(1) to (H)(3) of this section and provided that the issuer is a company whose capital and reserves amount to at least EUR 10,000,000 and which presents and publishes its annual accounts in accordance with Directive 2013/34/EU, is an entity which, within a group of companies which includes one or several listed companies, is dedicated to the financing of the group or is an entity which is dedicated to the financing of securitisation vehicles which benefit from a banking liquidity line.

4.1.3 Each Sub-Fund may invest up to 10% of its net assets in Transferable Securities and Money Market Instruments other than those identified in paragraphs (A) to (D) and (H) of this section.

4.1.4 Each Sub-Fund may hold ancillary liquid assets within a limit of 20% of its Net Asset Value. The above mentioned 20% limit may only be temporarily breached for a period of time strictly necessary when, because of exceptionally unfavourable market conditions or other exceptional circumstances, such breach is justified having regard to the interests of the investors. Liquid assets held to cover exposure to financial derivative instruments do not fall under this restriction. Bank deposits, money market instruments or money market funds that meet the criteria of Article 41(1) of the 2010 Law are not considered to be included in the ancillary liquid assets under Article 41(2) b) of the 2010 Law. Ancillary liquid assets are limited to bank deposits at sight, such as cash held in current accounts with a bank accessible at any time, in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets provided under Article 41(1) of the 2010 Law or for a period of time strictly necessary in case of unfavourable market conditions. A Sub-Fund may not invest more than 20% of its Net Asset Value in bank deposits at sight made with a same body.

4.1.5 Each Sub-Fund may borrow up to 10% of its net assets on a temporary basis. Collateral arrangements to cover exposure to financial derivative instruments are not considered borrowings for the purposes of this restriction. Each Sub-Fund may also acquire foreign currency by means of a back-to-back loan.

4.1.6 The Fund may acquire movable and immovable property which is essential for the direct pursuit of its business. Each Sub-Fund may borrow up to 10% of its net assets for this purpose. However, the total amount of borrowing for this purpose and any borrowing on a temporary basis permitted by section 4.1.5 above may not exceed 15% of the net assets of the Sub-Fund.

4.1.7 Each Sub-Fund may invest into shares issued by other Sub-Funds of the Fund (called Target Sub-Funds) provided that, during the period of investment:

(A) the Target Sub-Fund does not, in turn, invest in the investing Sub-Fund and no more than 10% of the net assets of the Target Sub-Fund may be invested in other Sub-Funds;

(B) the voting rights attached to such Shares of the Target Sub-Fund are suspended; and

(C) the value of such Shares of the Target Sub-Fund will not be taken into consideration for the calculation of the Net Asset Value of the Fund for the purposes of verifying the minimum threshold of net assets imposed by the 2010 Law.

4.2 Prohibited investments

4.2.1 The Sub-Funds may not acquire commodities or precious metals or certificates representing them or hold any option, right or interest therein. Investments in debt instruments linked to, or backed by the performance of, commodities or precious metals do not fall under this restriction.

4.2.2 Except as set out in section 4.1.6, the Sub-Funds may not invest in real estate or hold any option, right or interest in real estate. Investments in debt instruments linked to or backed by the performance of real estate or interests therein, or shares or debt instruments issued by companies which invest in real estate or interests therein, are not affected by this restriction.

4.2.3 The Sub-Funds may not grant loans or guarantees in favour of a third party. Such restriction will not prevent any Sub-Fund from investing in Transferable Securities, Money Market Instruments, units of UCITS or other UCI or financial derivative instruments referenced in section 4.1.1 which are not fully paid-up. Furthermore, such restriction will not prevent any Sub-Fund from entering into repurchase, reverse repurchase or securities lending transactions as described in section 4.6 (Efficient portfolio management techniques) below.

4.2.4 The Sub-Funds may not enter into uncovered sales of Transferable Securities, Money Market Instruments, units of UCITS or other UCI or financial derivative instruments referenced in section 4.1.1.

4.3 Risk diversification limits

4.3.1 If an issuer or body is a legal entity with multiple sub-funds or compartments where the assets of each sub-fund or compartment are exclusively reserved to the investors of that sub-fund or compartment and to those creditors whose claim has arisen in connection with the creation, operation and liquidation of that sub-fund or compartment, each sub-fund or compartment is to be considered as a separate issuer or body for the purpose of the application of the risk diversification rules.

Transferable Securities and Money Market Instruments

4.3.2 No Sub-Fund may purchase additional Transferable Securities or Money Market Instruments of any single issuer if, upon such purchase:

(A) more than 10% of its net assets would consist of Transferable Securities or Money Market Instruments of such issuer; or

(B) the total value of all Transferable Securities and Money Market Instruments of issuers in which it invests more than 5% of its net assets would exceed 40% of its net assets.

4.3.3 The limit of 10% set out in section 4.3.2, paragraph (A) is increased to 25% in respect of qualifying debt securities which fall under the definition of covered bonds in point (1) of Article 3 of Directive (EU) 2019/2162 of the European Parliament and of the Council and for debt securities that were issued before 8 July 2022 by a credit institution which has its registered office in a Member State and which, under applicable law, is submitted to specific public control in order to protect the holders of such qualifying debt securities ("Covered Bonds"). In particular, the proceeds from the issue of Covered Bonds issued before 8 July 2022 must be invested, in accordance with applicable law, in assets which are capable of covering claims attached to such bonds until their maturity and which, in case of bankruptcy of the issuer, would be used on a priority basis for the repayment of principal and payment of accrued interest. To the extent a Sub-Fund invests more than 5% of its net assets in Covered Bonds, the total value of such investments may not exceed 80% of its net assets. Covered Bonds are not included in the calculation of the limit of 40% set out in section 4.3.2, paragraph (B).

4.3.4 The limit of 10% set out in section 4.3.2, paragraph (A) is increased to 35% in respect of Transferable Securities and Money Market Instruments issued or guaranteed by a Member State, by its local authorities, by any non-Member State or by a public international body of which one or more Member States are members. Such securities are not included in the calculation of the limit of 40% set out in section 4.3.2, paragraph (B).

4.3.5 Notwithstanding the limits set out above, each Sub-Fund is authorised to invest, in accordance with the principle of risk spreading, up to 100% of its net assets in Transferable Securities and Money Market Instruments issued or guaranteed by a Member State, by one of its local authorities, by a member State of the OECD or the Group of Twenty (G20), by the Republic of Singapore, by the Hong Kong Special Administrative Region of the People's Republic of China or by a public international body of which one or more Member States are members, provided that the Sub-Fund holds in its portfolio securities from at least six different issues and that securities from any issue do not account for more than 30% of the net assets of the Sub-Fund.

Financial derivative instruments and efficient portfolio management techniques

4.3.6 The counterparty risk exposure arising from OTC derivative transactions and efficient portfolio management techniques (as described below) undertaken with a single body for the benefit of a Sub-Fund may not exceed 10% of the net assets of the Sub-Fund where the counterparty is a credit institution which has its registered office in a Member State or a credit institution located in a third-country which is subject to prudential rules considered by the CSSF as equivalent to those laid down in EU law, or 5% of its net assets in other cases.

Bank deposits

4.3.7 Each Sub-Fund may invest up to 20% of its net assets in deposits made with a single body.

Combined limits

4.3.8 Notwithstanding the individual limits set out in sections 4.3.2, 4.3.6 and 4.3.7, a Sub-Fund may not combine, where this would lead to an exposure of more than 20% of its net assets to a single body:

(A) investments in Transferable Securities or Money Market Instruments issued by that body;

(B) bank deposits made with that body; and

(C) counterparty exposure arising from OTC financial derivative instruments and efficient portfolio management techniques (as described below) undertaken with that body.

4.3.9 The limits set out in sections 4.3.2 to 4.3.7 (with the exception of section 4.3.5) may not be combined: investments in Transferable Securities or Money Market Instruments, bank deposits, counterparty exposure arising from OTC financial derivative instruments and efficient portfolio management techniques, issued by or undertaken with, a single issuer or body, each in accordance with the limits set out in sections 4.3.2 to 4.3.7 (with the exception of section 4.3.5) may not exceed a total of 35% of the net assets of the Sub-Fund.

4.3.10 For the purposes of the combined limits set out in sections 4.3.7 and 4.3.9, issuers or bodies that are part of the same group of companies are considered as a single issuer or body. A group of companies comprises all companies which are included in the same group for the purposes of consolidated accounts, as defined in accordance with Directive 2013/34/EU or in accordance with recognised international accounting rules.

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

Index-replicating Sub-Funds

4.3.12 Without prejudice to the limits laid down in section 4.4 (Control limits) below, the limits set out in section 4.3.2 are raised to 20% for investments in Transferable Securities or Money Market Instruments issued by a single issuer where the investment objective of the Sub-Fund is to replicate the composition of a certain financial index of stock or debt securities which is recognised by the CSSF.

4.3.13 The limit of 20% set out in the preceding section is raised to 35% where that proves to be justified by exceptional market conditions, in particular in regulated markets where certain Transferable Securities or Money Market Instruments are highly dominant, provided that any investment up to this 35% limit is only permitted for a single issuer.

4.3.14 A financial index is an index which complies, at all times, with the following conditions: the composition of the index is diversified in accordance with the limits set out in sections 4.3.12 and 4.3.13, the index represents an adequate Benchmark for the market to which it refers, and the index is published in an appropriate manner. These conditions are further specified in and supplemented by regulations and guidance issued by the CSSF from time to time.

Shares or units of UCITS or other UCI

4.3.15 Unless otherwise specified in its Supplement, no Sub-Fund is permitted to invest in aggregate more than 10% of its net assets in units of UCITS or other UCI, as specified in its Supplement.

If specified in the Supplement that a Sub-Fund is permitted to invest in aggregate more than 10% of its net assets in units of UCITS or other UCI, the following applies:

(A) investments made in shares or units of a single other UCITS or other UCI may not exceed 20% of the net assets of the Sub-Fund; and

(B) investments made in units of other UCI may not, in aggregate, exceed 30% of the net assets of the Sub-Fund.

4.3.16 The underlying assets of the UCITS or other UCI into which a Sub-Fund invests do not have to be combined with any other direct or indirect investment of the Sub-Fund into such assets for the purposes of the limits set out in section 4.3 (Risk diversification limits) above.

4.3.17 If a Sub-Fund invests in units of UCITS or other UCI that are managed, directly or by delegation, by the Investment Manager or the Management Company or by any other company which is linked to the Investment Manager or the Management Company by common management or control, or by a substantial direct or indirect holding, the Investment Manager, the Management Company or the other company may not charge subscription, redemption or portfolio management fees on account of the Sub-Fund's investment in the units of such UCITS and/or other UCI.

4.3.18 If a Sub-Fund invests a substantial proportion of its assets in UCITS or other UCI, the Supplement will disclose the maximum level of the management fees that may be charged both to the Sub-Fund itself and to the UCITS or other UCI in which it intends to invest. The Fund will disclose in the Annual Report the maximum proportion of management fees charged to both the Sub-Fund itself and the UCITS or other UCI in which the Sub-Fund invests.

4.3.19 Each Sub-Fund may, subject to the conditions provided for in the Articles of Incorporation as well as this Prospectus, subscribe, acquire and/or hold securities to be issued or issued by one or more Sub-Funds of the Fund without the Fund being subject to the requirements of the 1915 Law with respect to the subscription, acquisition and/or the holding by a company of its own Shares, under the condition however that:

(A) the target Sub-Fund does not, in turn, invest in the Sub-Fund invested in this target Sub-Fund;

(B) no more than 10% of the assets of the target Sub-Fund whose acquisition is contemplated may, pursuant to the Articles of Incorporation be invested in aggregate in units of other target Sub-funds of the same Fund;

(C) voting rights, if any, attaching to the relevant securities are suspended for as long as they are held by the Sub-Fund concerned and without prejudice to the appropriate processing in the accounts and the periodic reports; and

(D) in any event, for as long as these securities are held by the Fund, their value will not be taken into consideration of the calculation of the net assets of the Fund for the purposes of verifying the minimum threshold of the net assets imposed by the 2010 Law;

(E) there is no duplication of management/subscription or repurchase fees between those at the level of the Sub-Fund of the Fund having invested in the target Sub-Fund, and this target Sub-Fund.

Derogation

4.3.20 During the first six (6) months following its launch, a new Sub-Fund may derogate from the limits set out in this section 4.3 (Risk diversification limits) above, provided that the principle of risk-spreading is complied with.

4.4 Control limits

4.4.1 The Fund may not acquire such amount of shares carrying voting rights which would enable the Fund to exercise legal or management control or to exercise a significant influence over the management of the issuer.

4.4.2 The Fund may acquire no more than 10% of the outstanding non-voting shares of the same issuer.

4.4.3 The Fund may acquire no more than:

(A) 10% of the outstanding debt securities of the same issuer;

(B) 10% of the Money Market Instruments of any single issuer; or

(C) 25% of the outstanding units of the same UCITS or other UCI.

4.4.4 The limits set out in section 4.4.3 may be disregarded at the time of acquisition if at that time the gross amount of the debt securities or Money Market Instruments or the net amount of the instruments in issue cannot be calculated.

4.4.5 The limits set out in sections 4.4.1 to 4.4.3 do not apply in respect of:

(A) Transferable Securities and Money Market Instruments issued or guaranteed by a Member State or by its local authorities;

(B) Transferable Securities and Money Market Instruments issued or guaranteed by any non-Member State;

(C) Transferable Securities and Money Market Instruments issued by a public international body of which one or more Member States are members;

(D) shares in the capital of a company which is incorporated under or organised pursuant to the laws of a non-Member State provided that (i) such company invests its assets principally in securities issued by issuers having their registered office in that State, (ii) pursuant to the laws of that State a participation by the relevant Sub-Fund in the equity of such company constitutes the only possible way to purchase securities of issuers of that State, and (iii) such company observes in its investments policy the restrictions set out in section 4.3 (Risk diversification limits) above (with the exceptions of sections 4.3.5 and 4.3.12 to 4.3.14) and sections 4.4.1 to 4.4.3; and

(E) shares held by the Fund in the capital of subsidiary companies which carry on the business of management, advice or marketing in the country where the subsidiary is established, in regard to the redemption of shares at the request of shareholders exclusively on its or their behalf.

4.5 Financial derivative instruments

4.5.1 General

Each Sub-Fund may use financial derivative instruments such as options, futures, forwards and swaps or any variation or combination of such instruments, for hedging or investment purposes, in accordance with the conditions set out in this section 4 and the investment objective and policy of the Sub-Fund, as set out in its Supplement. The use of financial derivative instruments may not, under any circumstances, cause a Sub-Fund to deviate from its investment objective.

Financial derivative instruments used by any Sub-Fund may include, without limitation, the following categories of instruments.

(A) Options: an option is an agreement that gives the buyer, who pays a fee or premium, the right but not the obligation to buy or sell a specified amount of a certain underlying at an agreed price (the strike or exercise price) on or until the expiration of the contract. A call option is an option to buy, and a put option an option to sell.

(B) Futures contracts: a futures contract is an agreement to buy or sell a stated amount of a security, currency, index (including an eligible commodity index) or other asset at a specific future date and at a pre-agreed price.

(C) Forward agreements: a forward agreement is a customised, bilateral agreement to exchange an asset or cash flows at a specified future settlement date at a forward price agreed on the trade date. One party to the forward is the buyer (long), who agrees to pay the forward price on the settlement date; the other is the seller (short), who agrees to receive the forward price.

(D) Interest rate swaps: an interest rate swap is an agreement to exchange interest rate cash flows, calculated on a notional principal amount, at specified intervals (payment dates) during the life of the agreement.

(E) Swaptions: a swaption is an agreement that gives the buyer, who pays a fee or premium, the right but not the obligation to enter into an interest rate swap at a present interest rate within a specified period of time.

(F) Credit default swaps: a credit default swap or CDS is a credit derivative agreement that gives the buyer protection, usually the full recovery, in case the reference entity or debt obligation defaults or suffers a credit event. In return the seller of the CDS receives from the buyer a regular fee, called the spread.

(G) Total return swaps: a total return swap is an agreement in which one party (total return payer) transfers the total economic performance of a reference obligation to the other party (total return receiver). Total economic performance includes income from interest and fees, gains or losses from market movements, and credit losses.

(H) Contracts for differences: a contract for differences or CFD is an agreement between two parties to pay the other the change in the price of an underlying asset. Depending on which way the price moves, one party pays the other the difference from the time the contract was agreed to the point in time where it ends.

Each Sub-Fund must hold at any time sufficient liquid assets to cover its financial obligations arising under financial derivative instruments used.

The global exposure of a Sub-Fund to financial derivative instruments and efficient portfolio management techniques may not exceed the Net Asset Value of the Sub-Fund, as further described in section 4.8 (Global exposure limits) below.

The exposure of a Sub-Fund to underlying assets referenced by financial derivative instruments, combined with any direct investment in such assets, may not exceed in aggregate the investment limits set out in section 4.3 (Risk diversification limits) above. However, to the extent a Sub-Fund invests in financial derivative instruments referencing financial indices (as described in section 4.5.3) the exposure of the Sub-Fund to the underlying assets of the financial indices do not have to be combined with any direct or indirect investment of the Sub-

Fund in such assets for the purposes of the limits set out in section 4.3 (Risk diversification limits) above.

Where a Transferable Security or Money Market Instrument embeds a financial derivative instrument, the latter must be taken into account in complying with the risk diversification rules, global exposure limits and information requirements of this section 4 applicable to financial derivative instruments.

4.5.2 OTC financial derivative instruments

Each Sub-Fund may invest into financial derivative instruments that are traded ‘over-the-counter’ or OTC including, without limitation, total return swaps or other financial derivative instruments with similar characteristics, in accordance with its investment objective and policy and the conditions set out in this section 4. Such OTC financial derivative instruments will be safe-kept with the Depositary.

The counterparties to OTC financial derivative instruments will be selected among financial institutions from OECD member states subject to prudential supervision (such as credit institutions or investment firms) and specialised in the relevant type of transaction, being of good reputation and having a minimum rating of BBB. The identity of the counterparties will be disclosed in the Annual Report. The counterparties will have no discretion over the composition or management of the portfolio of the Sub-Fund or the underlying assets of the financial derivative instruments.

The Management Company uses a process for accurate and independent assessment of the value of OTC financial derivative instruments in accordance with applicable laws and regulations.

In order to limit the exposure of a Sub-Fund to the risk of default of the counterparty under OTC financial derivative instruments, the Sub-Fund may receive cash or other assets as collateral, as further specified in section 4.7 (Collateral policy) below.

4.5.3 Derivatives referencing financial indices

Each Sub-Fund may use financial derivative instruments to replicate or gain exposure to one or more financial indices in accordance with its investment objective and policy. The underlying assets of financial indices may comprise eligible assets described in section 4.1 (Authorised investments) above and instruments with one or more characteristics of those assets, as well as interest rates, foreign exchange rates or currencies, other financial indices and/or other assets, such as commodities or real estate.

For the purposes of this Prospectus, a ‘financial index’ is an index which complies, at all times, with the following conditions: the composition of the index is sufficiently diversified (each component of a financial index may represent up to 20% of the index, except that one single component may represent up to 35% of the index where justified by exceptional market conditions), the index represents an adequate Benchmark for the market to which it refers, and the index is published in an appropriate manner. These conditions are further specified in and supplemented by regulations and guidance issued by the CSSF from time to time.

4.6 Efficient portfolio management techniques

Each Sub-Fund may opt to employ techniques and instruments (within the meaning of, and under the conditions set out in, applicable laws, regulations and CSSF circulars issued from time to time, in particular, but not limited to, circulars CSSF 08/356 and 14/592, ESMA guidelines 2014/937 and Regulation (EU) 2015/2365) relating to Transferable Securities and Money Market Instruments, such as securities lending, repurchase and reverse repurchase transactions, provided that such techniques and instruments are used for the purposes of efficient portfolio management. The use of such techniques and instruments should not result in a change of the declared investment objective of any Sub-Fund or substantially increase the stated risk profile of the Sub-Fund.

In order to limit the exposure of a Sub-Fund to the risk of default of the counterparty under a securities lending, repurchase or reverse repurchase transaction, the Sub-Fund will receive cash or other assets as collateral, as further specified in section 4.7 (Collateral policy) below.

Each Sub-Fund may incur costs and fees in connection with efficient portfolio management techniques. In particular, a Sub-Fund may pay fees to agents and other intermediaries, which may be affiliated with the Depositary or the Investment Manager to the extent permitted under applicable laws and regulations, in consideration for the functions and risks they assume. The amount of these fees may be fixed or variable. Information on direct and indirect operational costs and fees incurred by each Sub-Fund in this respect, as well as the identity of the entities to which such costs and fees are paid and any affiliation they may have with the Depositary or the Investment Manager, if applicable, will be available in the Annual Report. Except for securities lending transactions, all revenues arising from efficient portfolio management techniques, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund, unless otherwise specified in the relevant Sub-Fund Supplement.

4.6.1 Securities lending

Securities lending transactions consist of transactions whereby a Sub-Fund will lend a security to a counterparty for an agreed fee. Where specified in its Supplement, a Sub-Fund may enter into securities lending transactions as lender of securities or instruments as a yield enhancement strategy. Securities lending serve to optimize the performance of the Sub-fund and revenues generated by their use are added to the return generated by the portfolio. The securities will be safe-kept with the Depositary. Securities lending transactions are, in particular, subject to the following conditions:

(A) the counterparty must be a credit institution from an OECD member state subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by EU law, be of good reputation and have a minimum rating of BBB;

(B) a Sub-Fund may only lend securities to a borrower either directly, through a standardised system organised by a recognised clearing institution or through a lending system organised by a financial institution subject to prudential supervision rules considered by the CSSF as equivalent to those provided by EU law and specialised in this type of transaction; and

(C) a Sub-Fund may only enter into securities lending transactions provided that it is entitled at any time, under the terms of the agreement, to request the return of the securities lent or to terminate the agreement.

The Fund has appointed BNP Paribas a company incorporated under French laws as a *société anonyme* with registered office at 16, boulevard des Italiens, 75009 Paris, France, registered with the Paris Trade and Companies' Register under number RCS-662 042 449 as agent for securities lending for the Sub-Funds that engage in securities lending.

4.6.2 Repurchase and reverse repurchase transactions

Repurchase agreements consist in transactions whereby a Sub-Fund will sell securities to a counterparty and agree to buy them back from the counterparty at an agreed price in the future. Reverse repurchase agreements consist in transactions whereby a Sub-Fund will purchase securities from a counterparty and agree to sell them back to the counterparty at an agreed price in the future. Where specified in its Supplement, a Sub-Fund may also enter into transactions that consist in the purchase or sale of securities with a clause giving the counterparty or the Sub-Fund, as applicable, the right to repurchase the securities from the Sub-Fund or the counterparty, as applicable, at a price and term specified by the parties in their contractual arrangements.

Where specified in its Supplement, a Sub-Fund may enter into repurchase transactions and reverse repurchase transactions as a yield enhancement strategy. Repurchase and reverse repurchase transactions serve to optimize the performance of the Sub-fund and revenues generated by their use are added to the return generated by the portfolio. Depending on market conditions, repurchase and reverse repurchase transactions can also be used to deal with cash needs and optimize leverage. Such transactions are, in particular, subject to the following conditions:

(A) the counterparty must be a credit institution from an OECD member state subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by EU law, be of good reputation and have a minimum rating of BBB; and

(B) the Sub-Fund must be able, at any time, to terminate the agreement or recall the full amount of cash in a reverse repurchase agreement (on either an accrued basis or a mark-to-market basis) or any securities subject to a repurchase agreement. Fixed-term transactions that do not exceed seven days should be considered as arrangements on terms that allow the assets to be recalled at any time by the Sub-Fund.

4.7 Collateral policy

This section sets out the policy adopted by the Board of Directors for the management of collateral received for the benefit of each Sub-Fund in the context of OTC financial derivatives instruments and efficient portfolio management techniques (securities lending, repurchase and reverse repurchase transactions). All cash or assets received by a Sub-Fund in the context of efficient portfolio management techniques will be considered as collateral for the purposes of this section. Such collateral will be safe-kept with the Depositary.

4.7.1 Eligible collateral

Collateral received for the benefit of a Sub-Fund may be used to reduce its counterparty risk exposure if it complies with the conditions set out in applicable laws and regulations. In particular, collateral received for the benefit of a Sub-Fund should comply with the following conditions:

(A) collateral other than cash should be of high quality, highly liquid and traded on a regulated market or multilateral trading facility with transparent pricing in order that it can be sold quickly at a price that is close to pre-sale valuation;

(B) collateral should be valued at least on a daily basis and assets that exhibit high price volatility should not be accepted as collateral unless suitably conservative haircuts are in place, as further specified below;

(C) collateral should be issued by an entity that is independent from the counterparty and is expected not to display a high correlation with the performance of the counterparty;

(D) collateral should be sufficiently diversified in terms of countries, markets and issuers. The maximum exposure of a Sub-Fund to any given issuer included in the basket of collateral received is limited to 20% of the Net Asset Value of the Sub-Fund. When the Sub-Fund is exposed to different counterparties, collateral received should be aggregated to calculate the 20% limit of exposure to a single issuer. By way of derogation, this limit may be exceeded and up to 100% of the collateral received by a Sub-Fund may consist in Transferable Securities and Money Market Instruments issued or guaranteed by a Member State, by one of its local authorities, by a member state of the OECD or the Group of Twenty (G20), by the Republic of Singapore, by the Hong Kong Special Administrative Region of the People's Republic of China or by a public international body of which one or more Member States are members, provided that such securities or instruments are part of a basket of collateral comprised of securities or instruments of at least six different issues and that securities or instruments from any one issue do not account for more than 30% of the Net Asset Value of the Sub-Fund.

(E) where there is a title transfer, collateral received should be held by the Depositary. For other types of collateral arrangement, collateral can be held by a third party custodian which is subject to prudential supervision and which is unrelated to the provider of the collateral;

(F) collateral should be capable of being fully enforced by the Fund at any time without reference to or approval from the counterparty.

Where applicable, collateral received should also comply with the control limits set out in section 4.4 (Control limits) above.

Subject to the above conditions, permitted forms of collateral include: cash in Euro and/or negotiable debt obligations issued by high quality government and supranational issuers.

4.7.2 Level of collateral

The level of collateral required for OTC financial derivatives transactions and efficient portfolio management techniques will be determined as per the agreements in place with the individual counterparties, taking into account factors including the nature and characteristics of transactions, the creditworthiness and identity of counterparties and prevailing market conditions. At all times the counterparty exposure not covered by collateral will remain below the applicable counterparty risk limits set out in this Prospectus.

It is expected that the amount of collateral posted by a counterparty in favour of each Sub-Fund will be such that the net exposure of the relevant Sub-Fund to that counterparty arising from OTC financial derivatives transactions and efficient portfolio management techniques is aimed to be zero percent (0%) of its Net Asset Value on each Valuation Day. The actual level of collateral is defined on a case-by-case basis within bilateral agreements (such as CSA, GMRA, etc) with the single counterparties.

4.7.3 Haircut policy

Collateral will be valued, on a daily basis, using available market prices and taking into account appropriate discounts which will be determined for each asset class based on the haircut policy adopted by the Board of Directors. The policy takes into account a variety of factors, depending on the nature of the collateral received, such as the issuer's credit standing, the maturity, currency, price volatility of the assets and, where applicable, the outcome of liquidity stress tests carried out under normal and exceptional liquidity conditions.

In accordance with its haircut policy, the Board of Directors expects that the discount percentages specified in the table below will be used in the calculation of the value of collateral received by the Sub-Fund:

Category of collateral	Haircut percentage
Cash in eligible currencies (EUR, GBP, USD)	0%
High quality Government and supranational bonds	1% minimum, to be determined on a case-by-case basis
Other permitted forms of collateral	2% minimum, to be determined on a case-by-case basis

4.7.4 Stress tests

Where a Sub-Fund receives collateral for at least 30% of its assets, regular stress tests will be carried out under normal and exceptional liquidity conditions to assess the liquidity risk attached to the collateral. The liquidity stress testing policy includes, without limitation, (i) design of stress test scenario analysis including calibration, certification and sensitivity analysis; (ii) empirical approach to impact assessment, including back-testing of liquidity risk estimates; (iii) reporting frequency and limit/loss tolerance thresholds; and (iv) mitigation actions to reduce loss, including haircut policy and gap risk protection.

4.7.5 Reinvestment of collateral

Non-cash collateral received for the benefit of a Sub-Fund may not be sold, re-invested or pledged. Cash collateral received for the benefit of a Sub-Fund can only be:

(A) placed on deposit with a credit institution which has its registered office in a Member State or a credit institution located in a third-country which is subject to prudential rules considered by the CSSF as equivalent to those laid down in EU law;

(B) invested in high-quality government bonds;

(C) used for the purpose of reverse repurchase transactions provided the transactions are with credit institutions subject to prudential supervision and the Fund is able to recall at any time the full amount of cash on accrued basis; and/or

(D) invested in short-term money market funds as defined in the Guidelines on a Common Definition of European Money Market Funds issued by ESMA (CESR/10-049) as may be amended from time to time.

Re-invested cash collateral should be diversified in accordance with the diversification requirements applicable to non-cash collateral as set out above. Re-investment of cash collateral involves certain risks for the Sub-Fund, as described in section 5 (General Risk Factors) below.

4.8 Global exposure limits

4.8.1 General

In accordance with Luxembourg laws and regulations, the Management Company has adopted and implemented a risk management process which enables it to monitor and measure at any time the risk of the positions and their contribution to the overall risk profile of the Sub-Fund.

The global exposure of a Sub-Fund to financial derivative instruments and efficient portfolio management techniques may not exceed the Net Asset Value of the Sub-Fund. Global exposure is calculated, at least on a daily basis, using either the commitment approach or the value-at-risk or “VaR” approach, as further explained below. Global exposure is a measure designed to limit either the incremental exposure and leverage generated by a Sub-Fund through the use of financial derivative instruments and efficient portfolio management techniques (where the Sub-Fund uses the commitment approach) or the market risk of the Sub-Fund’s portfolio (where the Sub-Fund uses the VaR approach). The method used by each Sub-Fund to calculate global exposure is mentioned in its Supplement.

4.8.2 Commitment approach

Under the commitment approach, all financial derivative positions of the Sub-Fund are converted into the market value of the equivalent position in the underlying assets. Netting and hedging arrangements may be taken into account when calculating global exposure, where these arrangements do not disregard obvious and material risks and result in a clear reduction in risk exposure. Under this approach, the global exposure of a Sub-Fund is limited to 100% of its Net Asset Value.

4.8.3 VaR approach

In financial mathematics and financial risk management, VaR is a widely used risk measure of the risk of loss on a specific portfolio of financial assets. For a given investment portfolio, probability and time horizon, VaR measures the potential loss that could arise over a given time interval under normal market conditions, and at a given confidence level. The calculation of VaR is conducted on the basis of a one-sided confidence interval of 99% and a holding period of 20 Business Days. The exposure of the Sub-Fund is subject to periodic stress tests.

VaR limits are set using an absolute or relative approach. The Board of Directors will decide which VaR approach is the most appropriate methodology given the risk profile and investment strategy of the Sub-Fund. The VaR approach selected for each Sub-Fund using VaR is specified in its Supplement.

The absolute VaR approach is generally appropriate in the absence of an identifiable reference portfolio or Benchmark for the Sub-Fund (for instance, where the Sub-Fund has an absolute return target). Under the absolute VaR approach a limit is set as a percentage of the Net Asset Value of the Sub-Fund. Based on the above calculation parameters, the absolute VaR of each Sub-Fund is limited to 20% of its Net Asset Value. The Management Company may set a lower limit if appropriate.

The relative VaR approach is used for Sub-Funds where a leverage-free VaR Benchmark or reference portfolio may be defined, reflecting the investment strategy of the Sub-Fund. The relative VaR of a Sub-Fund is expressed as a multiple of the VaR of the defined Benchmark or reference portfolio and is limited to no more than twice the VaR on that Benchmark or reference portfolio. The VaR Benchmark or reference portfolio of the Sub-Fund, which may be different from the Benchmark used for other purposes, is specified in its Supplement.

4.9 Leverage

4.9.1 Unless otherwise indicated in its Supplement, a Sub-Fund may use leverage to increase its exposure through the use of financial derivative instruments. Leverage may be used at the discretion of the Investment Manager in accordance with the investment objective and policy of each Sub-Fund and its defined risk profile. Leverage involves certain risks for the Sub-Fund, as further described in section 5 (General Risk Factors) below. Leverage is monitored on a regular basis by the Management Company.

Under applicable laws and regulations, the level of leverage is defined as the sum of the absolute value of the notional amount of all financial derivative instruments used by the Sub-Fund, as well as any additional exposure generated by the reinvestment of cash collateral in relation to efficient portfolio management techniques. The expected level of leverage, expressed as a percentage of the Net Asset Value of the Sub-Fund, is disclosed for each Sub-Fund in its Supplement.

The “sum of notionals” methodology, which is mandatory under applicable laws and regulations, does not allow for the offset of hedging transactions and other risk mitigation strategies involving financial derivative instruments, such as currency hedging or duration management. Similarly, the “sum of notionals” methodology does not allow for the netting of derivative positions. As a result, strategies that aim to reduce risks may contribute to an increased level of leverage for the Sub-Fund.

In order to take into account the specific use of financial derivative instruments and their contribution to the risks of the Sub-Fund, the expected level of leverage disclosed in the Supplement, based on the “sum of notionals” methodology, may be supplemented by expected leverage figures calculated on the basis of the commitment approach, as described above, which takes into account hedging and netting arrangements**.**

4.10 Breach of investment limits

The Sub-Funds need not comply with the limits set out above in this section 4 when exercising subscription rights attached to Transferable Securities and Money Market Instruments which form part of its assets.

If the limits set out above in this section 4 are exceeded for reasons beyond the control of the Fund or as a result of the exercise of subscription rights, the Fund must adopt as a priority objective in its sales transactions the remedying of that situation, taking due account of the interest of investors.

5. GENERAL RISK FACTORS

The performance of the Shares depends on the performance of the investments of the Sub-Fund, which may increase or decrease in value. The past performance of the Shares is not an assurance or guarantee of future performance. The value of the Shares at any time could be significantly lower than the initial investment and investors may lose a portion or even the entire amount originally invested.

Investment objectives express an intended result only. Unless otherwise specified in a Supplement, the Shares do not include any element of capital protection and the Fund gives no assurance or guarantee to any investors as to the performance of the Shares. Depending on market conditions and a variety of other factors outside the control of the Fund, investment objectives may become more difficult or even impossible to achieve. The Fund gives no assurance or guarantee to any investors as to as to the likelihood of achieving the investment objective of a Sub-Fund.

An investment in the Shares is only suitable for investors who have sufficient knowledge, experience and/or access to professional advisors to make their own financial, legal, tax and accounting evaluation of the risks of an investment in the Shares and who have sufficient resources to be able to bear any losses that may result from an investment in the Shares. Investors should consider their own personal circumstances and seek additional advice from their financial adviser or other professional adviser as to possible financial, legal, tax and accounting consequences which they might encounter under the laws of the countries of their citizenship, residence, or domicile and which might be relevant to the subscription, purchase, holding, redemption, conversion or disposal of the Shares of the Fund.

Investors should also carefully consider all of the information set out in this Prospectus and the Supplement of the Sub-Fund before making an investment decision with respect to Shares of any Sub-Fund or Share Class. The following sections are of general nature and describe certain risks that are generally relevant to an investment in Shares of any Sub-Fund or Share Class. Other risks may be described in the Supplement. This section and the Supplements do not purport to be a complete explanation of all risks involved in an investment in the Shares of any Sub-Fund or Share Class and other risks may also be or become relevant from time to time.

5.1 Market risk

Market risk is understood as the risk of loss for a Sub-Fund resulting from fluctuation in the market value of positions in its portfolio attributable to changes in market variables, such as general economic conditions, interest rates, foreign exchange rates, or the creditworthiness of the issuer of a financial instrument. This is a general risk that applies to all investments, meaning that the value of a particular investment may go down as well as up in response to changes in market variables. Although it is intended that each Sub-Fund will be diversified with a view to reducing market risk, the investments of a Sub-Fund will remain subject to fluctuations in market variables and the risks inherent in investing in financial markets.

5.2 Economic risk

The value of investments held by a Sub-Fund may decline in value due to factors affecting financial markets generally, such as real or perceived adverse economic conditions, changes in the general outlook for revenues or corporate earnings, changes in interest or currency rates, or adverse investor sentiment generally. The value of investments may also decline due to factors affecting a particular, industry, area or sector, such as changes in production costs and competitive conditions. During a general downturn in the economy, multiple asset classes may decline in value simultaneously. Economic downturn can be difficult to predict. When the economy performs well, there can be no assurance that investments held by a Sub-Fund will benefit from the advance.

5.3 Interest rate risk

The performance of a Sub-Fund may be influenced by changes in the general level of interest rates. Generally, the value of fixed income instruments will change inversely with changes in interest rates: when interest rates rise, the value of fixed income instruments generally can be expected to fall and vice versa. Fixed income securities with longer-term maturities tend to be more sensitive to interest rate changes than shorter-term securities. In accordance with its investment objective and policy, a Sub-Fund may attempt to hedge or reduce interest rate risk, generally through the use of interest rate futures or other derivatives. In particular, Duration Hedged Share Classes seek to limit the impact of interest rate movements by reference to a specified duration. However, it may not be possible or practical to hedge or reduce such risk at all times.

5.4 Foreign exchange risk

Each Sub-Fund investing in securities denominated in currencies other than its Reference Currency may be subject to foreign exchange risk. As the assets of each Sub-Fund are valued in its Reference Currency, changes in the value of the Reference Currency compared to other currencies will affect the value, in the Reference Currency, of any securities denominated in such other currencies. Foreign exchange exposure may increase the volatility of investments relative to investments denominated in the Reference Currency. In accordance with its investment objective and policy, a Sub-Fund may attempt to hedge or reduce foreign exchange risk, generally through the use of derivatives. However, it may not be possible or practical to hedge or reduce such risk at all times.

In addition, a Share Class that is denominated in a Reference Currency other than the Reference Currency of the Sub-Fund exposes the investor to the risk of fluctuations between the Reference Currency of the Share Class and that of the Sub-Fund. Currency Hedged Share Classes seek to limit the impact of such fluctuations through currency hedging transactions. However, there can be no assurance that the currency hedging policy will be successful at all times. This exposure is in addition to foreign exchange risk, if any, incurred by the Sub-Fund with respect to investments denominated in other currencies than its Reference Currency, as described above.

5.5 Credit risk

Sub-Funds investing in fixed income instruments will be exposed to the creditworthiness of the issuers of the instruments and their ability to make principal and interest payments when due in accordance with the terms and conditions of the instruments. The creditworthiness or perceived creditworthiness of an issuer may affect the market value of fixed income instruments. Issuers with higher credit risk typically offer higher yields for this added risk, whereas issuers with lower credit risk typically offer lower yields. Generally, government debt is considered to be the safest in terms of credit risk, while corporate debt involves a higher credit risk. Related to that is the risk of downgrade by a rating agency. Rating agencies are private undertakings providing ratings for a variety of fixed income instruments based on the creditworthiness of their issuers. The agencies may change the rating of issuers or instruments from time to time due to financial, economic, political, or other factors, which, if the change represents a downgrade, can adversely impact the market value of the affected instruments.

5.6 Commodities risk

Where specified in the Supplements, certain Sub-Funds may invest in instruments providing exposure to the commodities market, including financial derivative instruments referencing commodities indices and financial instruments or funds linked to, or backed by the performance of, commodities. Investments in financial derivatives related to commodities can be highly volatile: market prices of commodities derivatives may fluctuate rapidly. The price of commodities derivatives may fluctuate based on numerous factors, including changes in supply and demand (whether actual or perceived, anticipated or unanticipated) and other trading considerations generally or in the relevant commodity, domestic and international political, monetary and economic events and policies, and other public or private policies, actions or inactions, natural events such as weather conditions, agricultural factors, diseases, or technological developments. The current or "spot" prices of commodities may also affect the prices of futures contracts in respect of the relevant commodity.

5.7 Volatility

The volatility of a financial instrument is a measure of the variations in the price of that instrument over time. A higher volatility means that the price of the instrument can change significantly over a short time period in either direction. Each Sub-Fund may make investments in instruments or markets that are likely to experience high levels of volatility. This may cause the Net Asset Value per Share to experience significant increases or decreases in value over short periods of time.

5.8 Leverage

Leverage refers to the use of borrowed funds or financial derivative instruments to increase exposure to an asset in excess of the capital amount invested in that asset. Each Sub-Fund is subject to strict restrictions on borrowings which are generally not permitted for investment purposes. However, in accordance with its investment objective and policy, a Sub-Fund may use financial derivative instruments to gain additional market exposure to underlying assets in excess of its Net Asset Value, thereby creating a leverage effect. While leverage presents opportunities for increasing gains of a Sub-Fund, it also has the effect of potentially increasing losses incurred by the Sub-Fund. The maximum expected level of leverage of each Sub-Fund calculating its global exposure under the VaR approach is disclosed in the Supplement. For regulatory purposes, leverage must be calculated by reference to the gross notional amounts of the derivatives use. A relatively high notional amount may be required in order to achieve the desired level of exposure to the underlying assets. This may be the case in particular for short-term interest rate derivatives to the extent their sensitivity to interest rate changes is low relative to other assets.

5.9 Short positions

Certain Sub-Funds may use financial derivative instruments such as swaps, futures and forwards in order to obtain a short exposure to certain securities or other assets. A synthetic short position replicates the economic effect of a transaction in which a fund sells a security or asset it does not own but has borrowed, in anticipation that the market price of that security or asset will decline. When a Sub-Fund initiates such a synthetic short position in a security or asset that it does not own, it enters into a derivative-based transaction with a counterparty or broker-dealer and closes that transaction on or before its expiry date through the receipt or payment of any gains or losses resulting from the transaction. If the price of the security or asset on which the synthetic short position is written increases between the time of the initiation of the synthetic short position and the time at which the position is closed, the Sub-fund will incur a loss; conversely, if the price declines, the Sub-Fund will realise a gain. Any gain will be decreased and any loss increased by transactional costs and fees. Although a Sub-Fund's gain is limited to the price at which it opened the synthetic short position, its potential loss may be substantially higher. Stop loss policies are typically employed to limit losses. Each Sub-Fund is required to maintain sufficiently liquid assets to cover any obligations arising from its short positions at any time.

5.10 Liquidity risk

Liquidity refers to the speed and ease with which investments can be sold or liquidated or a position closed. On the asset side, liquidity risk refers to the inability of a Sub-Fund to dispose of investments at a price equal or close to their estimated value within a reasonable period of time. On the liability side, liquidity risk refers to the inability of a Sub-Fund to raise sufficient cash to meet a redemption request due to its inability to dispose of investments. In principle, each Sub-Fund will only make investments for which a liquid market exists or which can otherwise be sold, liquidated or closed at any time within a reasonable period of time. However, in certain circumstances, investments may become less liquid or illiquid due to a variety of factors including adverse conditions affecting a particular issuer, counterparty, or the market generally, and legal, regulatory or contractual restrictions on the sale of certain instruments. In addition, a Sub-Fund may invest in financial instruments traded over-the-counter or OTC, which generally tend to be less liquid than instruments that are listed and traded on exchanges. Market quotations for less liquid or illiquid instruments may be more volatile than for liquid instruments and/or subject to larger spreads between bid and ask prices. Difficulties in disposing of investments may result in a loss for a Sub-Fund and/or compromise the ability of the Sub-Fund to meet a redemption request.

5.11 Counterparty risk

Counterparty risk refers to the risk of loss for a Sub-Fund resulting from the fact that the counterparty to a transaction entered into by the Sub-Fund may default on its contractual obligations. There can be no assurance that an issuer or counterparty will not be subject to credit or other difficulties leading to a default on its contractual obligations and the loss of all or part of the amounts due to the Sub-Fund. This risk may arise at any time the assets of a Sub-Fund are deposited, extended, committed, invested or otherwise exposed through actual or implied contractual agreements. For instance, counterparty risk may arise when a Sub-Fund has deposited cash with a financial institution, invests into debt securities and other fixed income instruments, enters into OTC financial derivative instruments, or enters into securities lending, repurchase and reverse repurchase agreements.

5.12 Sustainability risk

Sustainability Risk is an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investments made by each Sub-Fund or on the performance and returns of each Sub-Fund. Such Sustainability Risk is principally linked to climate-related events resulting from climate change (i.e. physical risks) or to the society’s response to climate change (i.e. transition risks), which may result in unanticipated losses that could affect the Sub-Fund’s investments and financial condition. Social events (e.g. inequality, inclusiveness, labour relations, investment in human capital, accident prevention, changing customer behavior, etc.) or governance shortcomings (e.g. recurrent significant breach of international agreements, bribery issues, products quality and safety, selling practices, etc.) may also translate into Sustainability Risks.

5.13 Operational risk

Operational risk means the risk of loss for the Fund resulting from inadequate internal processes and failures in relation to people and systems of the Fund, the Management Company and/or its agents and service providers, or from external events, and includes legal and documentation risk and risk resulting from the trading, settlement and valuation procedures operated on behalf of the Fund.

5.13.1 Valuation

Certain Sub-Funds may hold investments for which market prices or quotations are not available or representative, or which are not quoted, listed or traded on an exchange or regulated market. In addition, in certain circumstances, investments may become less liquid or illiquid. Such investments will be valued at their probable realisation value estimated with care and in good faith by the Board of Directors using any valuation method approved by the Board of Directors. Such investments are inherently difficult to value and are the subject of substantial uncertainty. There is no assurance that the estimates resulting from the valuation process will reflect the actual sales or liquidation prices of investments.

5.13.2 Laws and regulations

The Fund may be subject to a number of legal and regulatory risks, including contradictory interpretations or applications of laws, incomplete, unclear and changing laws, restrictions on general public access to regulations, practices and customs, ignorance or breaches of laws on the part of counterparties and other market participants, incomplete or incorrect transaction documents, lack of established or effective avenues for legal redress, inadequate investor protection, or lack of enforcement of existing laws. Difficulties in asserting, protecting and enforcing rights may have a material adverse effect on the Sub-Funds and their operations.

5.13.3 FATCA

The Fund may be subject to regulations imposed by foreign regulators, in particular, the United States Hiring Incentives to Restore Employment Act (Hire Act) which was enacted into U.S. law in March 2010. It includes provisions generally known as FATCA. FATCA provisions generally impose a reporting to the U.S. Internal Revenue Service of non-U.S. financial institutions that do not comply with FATCA and U.S. persons' direct and indirect ownership of non-U.S. accounts and non-U.S. entities. Failure to provide the requested information will lead to a 30% withholding tax applying to certain U.S. source income (including dividends and interest) and gross proceeds from the sale or other disposal of property that can produce U.S. source interest or dividends.

Under the FATCA, the Fund will be treated as a Foreign Financial Institution (within the meaning of FATCA). As such, the Fund may require all shareholders to provide documentary evidence of their tax residence and all other information deemed necessary to comply with the above mentioned regulations.

Should the Fund become subject to a withholding tax as a result of FATCA, the value of the Shares held by all shareholders may be materially affected.

Furthermore, the Fund may also be required to withhold tax on certain payments to its investors who would not be compliant with FATCA (i.e., the so-called foreign passthru payments withholding tax obligation).

Despite anything else herein contained and as far as permitted by Luxembourg law, the Fund shall have the right to:

- Withhold any taxes or similar charges that it is legally required to withhold by applicable laws and regulations in respect of any shareholding in the Fund
- Require any shareholder or beneficial owner of the Shares to promptly furnish such personal data as may be required by the Fund in its discretion in order to comply with applicable laws and regulations and/or to promptly determine the amount of withholding to be retained;
- Divulge any such personal information to any tax authority, as may be required by applicable laws or regulations or requested by such authority; and
- Delay payments of any dividend or redemption proceeds to an investor until the Fund holds sufficient information to comply with applicable laws and regulations or determine the correct amount to be withheld.

5.13.4 Segregation of Sub-Funds

The Fund is a single legal entity incorporated as an "umbrella fund" comprised of separate Sub-Funds. Under Luxembourg law, each Sub-Fund represents a segregated pool of assets and liabilities. By operation of the law, the rights and claims of creditors and counterparties of the Fund arising in respect of the creation, operation or liquidation of a Sub-Fund will be limited to the assets allocated to that Sub-Fund. However, while these provisions are binding in a Luxembourg court, these provisions have not been tested in other jurisdictions, and a creditor or counterparty might seek to attach or seize assets of a Sub-Fund in satisfaction of an obligation owed in relation to another Sub-Fund in a jurisdiction which would not recognise the principle of segregation of liability between Sub-Funds. Moreover, under Luxembourg law, there is no legal segregation of assets and liabilities between Share Classes of the same Sub-Fund. In the event that, for any reason, assets allocated to a Share Class become insufficient to pay for the liabilities allocated to that Share Class, the assets allocated to other Share Classes of the Sub-Fund will be used to pay for those liabilities. As a result, the Net Asset Value of the other Share Classes may also be reduced.

5.14 Certain financial instruments and investment techniques

5.14.1 Financial derivative instruments

a) Financial derivative instruments in general

An investment in derivatives may involve additional risks for investors. These additional risks may arise as a result of any or all of the following: (i) leverage factors associated with transactions in the Sub-Fund; and/or (ii) the creditworthiness of the counterparties to such derivative transactions; and/or (iii) the potential illiquidity of the markets for derivative instruments. To the extent that derivative instruments are utilised for speculative purposes, the overall risk of loss to the Sub-Fund may be increased. To the extent that derivative instruments are utilised for hedging purposes, the risk of loss to the Sub-Fund may be increased where the value of the derivative instrument and the value of the security or position which it is hedging are insufficiently correlated. However, where a derivative transaction is entered into by the Sub-Fund in respect of a specific Share Class, any losses sustained in respect of such transaction will be internally attributed by the UCI Administrator to the relevant Share Class. Certain derivatives may require collateral to be transferred to another party and where additional collateral is called by such other party the Investment Manager may be required to realise assets comprised in a Sub-Fund which it would not have sought to realise had there not been a requirement to transfer or pledge additional collateral.

b) OTC financial derivative instruments

In general, there is less government regulation and supervision of transactions in OTC markets than of transactions entered into on organised exchanges. OTC derivatives are executed directly with the counterparty rather than through a recognised exchange and clearing house. Counterparties to OTC derivatives are not afforded the same protections as may apply to those trading on recognised exchanges, such as the performance guarantee of a clearing house.

The principal risk when engaging in OTC financial derivative instruments (such as non-exchange traded options, forwards, swaps or contracts for difference) is the risk of default by a counterparty who has become insolvent or is otherwise unable or refuses to honour its obligations as required by the terms of the instrument. OTC derivatives may expose a Sub-Fund to the risk that the counterparty will not settle a transaction in accordance with its terms, or will delay the settlement of the transaction, because of a dispute over the terms of the contract (whether or not *bona fide*) or because of the insolvency, bankruptcy or other credit or liquidity problems of the counterparty. Counterparty risk is generally mitigated by the transfer or pledge of collateral in favour of the Sub-Fund. The value of the collateral may fluctuate, however, and it may be difficult to sell, so there are no assurances that the value of collateral held will be sufficient to cover the amount owed to a Fund.

The Fund may enter into OTC derivatives cleared through a clearinghouse that serves as a central counterparty. Central clearing is designed to reduce counterparty risk and increase liquidity compared to bilaterally-cleared OTC derivatives, but it does not eliminate those risks completely. The central counterparty will require margin from the clearing broker which will in turn require margin from the Fund. There is a risk of loss by a Fund of its initial and variation margin deposits in the event of default of the clearing broker with which the Fund has an open position or if margin is not identified and correctly report to the particular Fund, in particular where margin is held in an omnibus account maintained by the clearing broker with the central counterparty. In the event that the clearing broker becomes insolvent, the Fund may not be able to transfer or "port" its positions to another clearing broker.

EMIR requires certain eligible OTC derivatives to be submitted for clearing to regulated central clearing counterparties and the reporting of certain details to trade repositories. In addition, EMIR imposes requirements for appropriate procedures and arrangements to measure, monitor and mitigate operational and counterparty risk in respect of OTC derivatives which are not subject to mandatory clearing. Ultimately, these requirements are likely to include the exchange and segregation of collateral by the parties, including by the Fund. While some of the obligations under EMIR have come into force, a number of the requirements are subject to phase-in periods and certain key issues have not been finalised by the date of this Prospectus. It is as yet unclear how the OTC derivatives market will adapt to the new regulatory regime. ESMA has published an opinion calling for the UCITS Directive to be amended to reflect the requirements of EMIR and in particular the EMIR clearing obligation. However, it is unclear whether, when and in what form such amendments would take effect. Accordingly, it is difficult to predict the full impact of EMIR on the Fund, which may include an increase in the overall costs of entering into and maintaining OTC derivatives.

Investors should be aware that the regulatory changes arising from EMIR and other applicable laws requiring central clearing of OTC derivatives may in due course adversely affect the ability of the Sub-Funds to adhere to their respective investment policies and achieve their investment objective.

Investments in OTC derivatives may be subject to the risk of differing valuations arising out of different permitted valuation methods. Although the Fund has implemented appropriate valuation procedures to determine and verify the value of OTC derivatives, certain transactions are complex and valuation may only be provided by a limited number of market participants who may also be acting as the counterparty to the transactions. Inaccurate valuation can result in inaccurate recognition of gains or losses and counterparty exposure.

Unlike exchange-traded derivatives, which are standardised with respect to their terms and conditions, OTC derivatives are generally established through negotiation with the other party to the instrument. While this type of arrangement allows greater flexibility to tailor the instrument to the needs of the parties, OTC derivatives may involve greater legal risk than exchange-traded instruments, as there may be a risk of loss if the agreement is deemed not to be legally enforceable or not documented correctly. There also may be a legal or documentation risk that the parties may disagree as to the proper interpretation of the terms of the agreement. However, these risks are generally mitigated, to a certain extent, by the use of industry-standard agreements such as those published by the International Swaps and Derivatives Association (ISDA).

5.14.2 Securities lending and repurchase and reverse repurchase transactions

Securities lending, repurchase or reverse repurchase transactions involve certain risks and there can be no assurance that the objective sought to be obtained from the use of such techniques will be achieved.

The principal risk when engaging in securities lending, repurchase or reverse repurchase transactions is the risk of default by a counterparty who has become insolvent or is otherwise unable or refuses to honour its obligations to return securities or cash to the Sub-Fund as required by the terms of the transaction. Counterparty risk is generally mitigated by the transfer or pledge of collateral in favour of the Sub-Fund. However, there are certain risks associated with collateral management, including difficulties in selling collateral and/or losses incurred upon realization of collateral, as described below.

Securities lending, repurchase or reverse repurchase transactions also entail liquidity risks due, *inter alia*, to locking cash or securities positions in transactions of excessive size or duration relative to the liquidity profile of the Sub-Fund or delays in recovering cash or securities paid to the counterparty. These circumstances may delay or restrict the ability of the Fund to meet redemption requests. The Sub-Fund may also incur operational risks such as, *inter alia*, non-settlement or delay in settlement of instructions, failure or delays in satisfying delivery obligations under sales of securities, and legal risks related to the documentation used in respect of such transactions.

The Sub-Funds may enter into securities lending, repurchase or reverse repurchase transactions with other companies in the same group of companies as the Investment Manager. Affiliated counterparties, if any, will perform their obligations under any securities lending, repurchase or reverse repurchase transactions concluded with a Sub-Fund in a commercially reasonable manner. In addition, the Investment Manager will select counterparties and enter into transactions in accordance with best execution principles. However, investors should be aware that the Investment Manager may face conflicts between its role and its own interests or that of affiliated counterparties.

The use of securities lending, repurchase or reverse repurchase transactions, and their consequences for the Sub-Funds, are substantially affected by legal requirements. No assurance can be given that future legislation, administrative rulings or court decisions will not adversely affect the Sub-Funds. Furthermore, certain transactions are entered into on the basis of complex legal documents. Such documents may be difficult to enforce or may be the subject of a dispute as to interpretation in certain circumstances. Whilst the rights and obligations of the parties to a legal document may be governed by Luxembourg law, in certain circumstances (for example insolvency proceedings) other legal systems may take priority which may affect the enforceability of existing transactions. The Sub-Funds assets are held in custody by the Depositary, which exposes the Sub-Funds to custodian risk. This means that the Sub-Funds are exposed to the risk of loss of assets placed in custody as a result of insolvency, negligence or fraudulent trading by the Depositary.

5.14.3 Collateral management

Counterparty risk arising from investments in OTC financial derivative instruments and securities lending, repurchase and reverse repurchase agreements is generally mitigated by the transfer or pledge of collateral in favour of the Sub-Fund. However, transactions may not be fully collateralised. Fees and returns due to the Sub-Fund may not be collateralised. If a counterparty defaults, the Sub-Fund may need to sell non-cash collateral received at prevailing market prices. In such a case, the Sub-Fund could realise a loss due, *inter alia*, to inaccurate pricing or monitoring of the collateral, adverse market movements, deterioration in the credit rating of issuers of the collateral or illiquidity of the market on which the collateral is traded. Difficulties in selling collateral may delay or restrict the ability of the Sub-Fund to meet redemption requests.

A Sub-Fund may also incur a loss in reinvesting cash collateral received, where permitted. Such a loss may arise due to a decline in the value of the investments made. A decline in the value of such investments would reduce the amount of collateral available to be returned by the Sub-Fund to the counterparty as required by the terms of the transaction. The Sub-Fund would be required to cover the difference in value between the collateral originally received and the amount available to be returned to the counterparty, thereby resulting in a loss to the Sub-Fund.

5.14.4 Asset-backed securities (ABS) and mortgage-backed securities (MBS)

Certain Sub-Funds may invest in mortgage related securities such as mortgage derivatives, structured notes, mortgage-backed and asset-backed securities. Mortgage-related securities may include securities which represent claims on cash flows from loans on residential properties and loans on commercial properties for commercial mortgage-backed securities. Investing in mortgage-related securities generally entails credit, prepayment (i.e. the risk associated with the early unscheduled payment of principal on a fixed-income security) liquidity and default risk. In general, rising interest rates tend to increase the duration of these securities making them more sensitive to changes in interest rates. In times of rising interest rates, a fund invested in mortgage-related securities may exhibit increased volatility. Mortgage-related securities may be subject to prepayment risk particularly in times of decreasing interest rates. This may reduce the returns of the fund as that money is reinvested at the prevailing lower interest rate.

Some Sub-Funds may invest in asset-backed securities (ABS) – securities which are primarily serviced by payment flows generated by a pool assets such as credit cards, auto loans, student loans, small business loans and receivables. Asset-backed securities are subject to prepayment risk (i.e. the risk associated with the early unscheduled payment of principal on a fixed-income security), default risk and are sensitive to changes in interest rates. In times of rising interest rates asset-backed securities may exhibit increased volatility.

5.14.5 Collateralised loan obligations (CLOs)

A collateralised loan obligation (CLO) is a particular type of securitised and structured assets: it is a securitized and structured security with respect to which the related underlying portfolio of assets (or, in the case of a synthetic securitized and structured assets obligation, the related underlying portfolio of reference obligations) consists generally of commercial and/or industrial loans (including "middle market" loans) to sub-investment grade companies and/or credit default swaps and total return swaps that reference such assets.

Such loans are typically negotiated by one or more commercial banks or other financial institutions and syndicated among a group of commercial banks and financial institutions. Corporate loans are typically at the most senior level of the capital structure, and are often secured by specific collateral, including, but not limited to, trademarks, patents, accounts receivable, inventory, equipment, buildings, real estate, franchises and common and preferred stock of the obligor and its subsidiaries. The corporate loans included in the securitized and structured assets collateral or referenced in a securitized and structured assets security may be of a type generally incurred by the borrowers thereunder in connection with a highly leveraged transaction, often to finance internal growth, acquisitions, mergers, stock purchases, or for other reasons. As a result of the additional debt incurred by the borrower in the course of the transactions, the borrower's creditworthiness is often judged by rating agencies to be below investment grade. Certain of the loans included in the securitized and structured assets collateral or referenced in a securitized and structured security may be subordinated to other obligations of the borrower. In order to induce the banks and institutional investors to invest in a borrower's loan facility, and to offer a favourable interest rate, the borrower often provides the banks and institutional investors with extensive information about its business, which is not generally available to the public. Because of the provision of confidential information, the unique and customised nature of a loan agreement, and the private syndication of the loan, loans are not as easily purchased or sold as a publicly traded security and historically the trading volume in the loan market has been small relative to the high yield bond market.

Corporate loans often provide for restrictive covenants designed to limit the activities of the borrower in an effort to protect the right of lenders to receive timely payments of interest on, and repayment of principal of, the loans. Such covenants may include restrictions on dividend payments, specific mandatory minimum financial ratios, limits on total debt and other financial tests. A breach of covenant (after giving effect to any cure period) in a loan that is not waived by the lending syndicate normally is an event of acceleration that allows the syndicate to demand immediate repayment in full of the outstanding loan. Loans usually have shorter terms than more junior obligations and may require mandatory prepayments from excess cash flow, asset dispositions and offerings of debt and/or equity securities.

The majority of corporate loans bear interest based on a floating rate index, the certificate of deposit rate, a prime or base rate (each as defined in the applicable loan agreement) or other index, which may reset daily (as most prime or base rate indices do) or offer the borrower a choice of one-, two-, three-, six-, nine- or twelve-month interest and rate reset periods. The purchaser of a loan may receive certain syndication or participation fees in connection with its acquisition. Other fees payable in respect of a loan, which are separate from interest payments on such loan, may include facility, commitment, amendment and prepayment fees.

Purchasers of corporate loans are predominantly investment and commercial banks that have applied their experience in high yield securities to the commercial and industrial loan market, acting as both principal and broker. The range of investors for loans has broadened to include money managers, insurance companies, arbitrageurs, bankruptcy investors and mutual funds seeking increased potential total returns and portfolio managers of trusts or special purpose companies issuing collateralised bond and loan obligations. There can be no assurance, however, that future levels of supply and demand in loan trading will provide the degree of liquidity that currently exists in the high yield debt securities market.

CLOs are often tranched into different securities or synthetic exposures offering investors different levels of risk return profiles on the same underlying portfolio: according to how the portfolio’s interest, principal and recovery payments are directed to the different tranches (‘waterfall’), a tranche may represent a senior or subordinated (senior or junior) claim on the income flows from the underlying portfolio.

5.14.6 Distressed Debt Securities

Some Sub-Funds may hold Distressed Debt Securities. These securities may be the subject of bankruptcy proceedings or otherwise in default as to the repayment of principal and/or payment of interest or are rated in the lower rating categories (Ca or lower by Moody's or CC or lower by Standard & Poor's) or are unrated securities considered by the Investment Manager of the relevant Sub-Fund to be of comparable quality. Distressed Debt Securities are speculative and involve significant risk. Distressed Debt Securities frequently do not produce income while they are outstanding and may require the Sub-Fund to bear certain extraordinary expenses in order to protect and recover its holding. Therefore, to the extent the Sub-Fund seeks capital appreciation, the Sub-Fund's ability to achieve current income for its shareholders may be diminished by its holding of Distressed Debt Securities. The Sub-Fund also will be subject to significant uncertainty as to when and in what manner and for what value the obligations evidenced by the Distressed Debt Securities will eventually be satisfied (e.g., through a liquidation of the obligor's assets, an exchange offer or plan of reorganisation involving the Distressed Debt Securities or a payment of some amount in satisfaction of the obligation). In addition, even if an exchange offer is made or a plan of reorganisation is adopted with respect to Distressed Debt Securities held by the Sub-Fund, there can be no assurance that the securities or other assets received by the Sub-Fund in connection with such exchange offer or plan of reorganisation will not have a lower value or income potential than may have been initially anticipated. Moreover, any securities received by the Sub-Fund upon completion of an exchange offer or plan of reorganisation may be restricted as to resale. As a result of the Sub-Fund's participation in negotiations with respect to any exchange offer or plan of reorganisation with respect to an issuer of Distressed Debt Securities, the Sub-Fund may be restricted from disposing quickly of such securities.

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

Investments in the PRC are currently subject to certain additional risks, particularly regarding the ability to deal in securities in the PRC. Dealing in certain PRC securities is restricted to licensed investors and the ability of the investor to repatriate its capital invested in those securities may be limited at times. The Fund may choose to gain exposure to PRC securities indirectly.

The PRC is one of the world's largest global emerging markets. The economy in the PRC, which has been in a state of transition from a planned economy to a more market orientated economy, differs from the economies of most developed countries and investing in the PRC may be subject to greater risk of loss than investments in developed markets. This is due to, among other things, greater market volatility, lower trading volume, political and economic instability, greater risk of market shut down, greater control of foreign exchange and more limitations on foreign investment policy than those typically found in a developed market. There may be substantial government intervention in the PRC economy, including restrictions on investment in companies or industries deemed sensitive to relevant national interests. The PRC government and regulators may also intervene in the financial markets, such as by the imposition of trading restrictions, which may affect the trading of PRC securities. The companies in which the relevant Sub-Fund invests may be held to lower disclosure, corporate governance, accounting and reporting standards than companies in more developed markets. In addition, some of the securities held by the relevant Sub-Fund may be subject to higher transaction and other costs, foreign ownership limits, the imposition of withholding or other taxes, or may have liquidity issues which make such securities more difficult to sell at reasonable prices. These factors may have an unpredictable impact on the relevant Sub-Fund's investments and increase the volatility and hence the risk of a loss to the value of an investment in the relevant Sub-Fund.

As with any fund investing in an emerging market country, the relevant Sub-Fund investing in the PRC may be subject to greater risk of loss than a fund investing in a developed market country. The PRC economy has experienced significant and rapid growth in the past twenty (20) years. However, such growth may or may not continue, and may not apply evenly across different geographic locations and sectors of the PRC economy. Economic growth has also been accompanied by periods of high inflation. The PRC government has implemented various measures from time to time to control inflation and restrain the rate of economic growth of the PRC economy. Furthermore, the PRC government has carried out economic reforms to achieve decentralization and utilization of market forces to develop the economy of the PRC. These reforms have resulted in significant economic growth and social progress. There can, however, be no assurance that the PRC government will continue to pursue such economic policies or, if it does, that those policies will continue to be successful. Any such adjustment and modification of those economic policies may have an adverse impact on the securities markets in PRC and therefore on the performance of the relevant Sub-Fund.

These factors may increase the volatility of any such Sub-Fund (depending on its degree of investment in the PRC) and hence the risk of loss to the value of your investment.

Any political changes, social instability and adverse diplomatic developments which may take place in, or in relation to, the PRC could result in significant fluctuation in the price of China securities acquired.

5.15 Sanctions

Certain countries or designated persons or entities may, from time to time, be subject to sanctions and other restrictive measures imposed by states or supranational authorities (for example, but not limited to, the European Union or the United Nations), or their agencies (collectively, "**Sanctions**").

Sanctions may be imposed among others on foreign governments, state-owned enterprises, sovereign wealth funds, specified companies or economic sectors, as well as non-state actors or designated persons associated with any of the foregoing. Sanctions may take different forms, including but not limited to trade embargoes, prohibitions or restrictions to conduct trade or provide services to targeted countries or entities, as well as seizures, asset freezes and/or the prohibition to provide or receive funds, goods or services to or from designated persons.

Sanctions may adversely affect companies or economic sectors in which the Fund, or any of its Sub-Funds, may from time to time invest. A Sub-Fund could experience, among others, a decrease in value of securities of any issuer due to the imposition of Sanctions, whether directed towards such issuer, an economic sector in which such issuer is active, other companies or entities with which such issuer conducts business, or towards the financial system of a certain country. Because of Sanctions, the Investment Managers may be forced to sell certain securities at unattractive prices, at inopportune moments and/or in unfavourable circumstances where it may not have done so in the absence of Sanctions. Even though the Investment Managers will make reasonable efforts, acting in the best interest of the investors, to sell such securities under optimal conditions, such forced sales could potentially result in losses for the Sub-Funds concerned. Depending on the circumstances, such losses could be considerable. A Sub-Fund may also experience adverse consequences due to an asset freeze or other restrictive measures directed at other companies, including but not limited to any entity that serves as a counterparty to derivatives, or as a sub-custodian, paying agent or other service provider to the Fund or any of its Sub-Funds. The imposition of Sanctions may require the Investment Managers to sell securities, terminate ongoing agreements, lose access to certain markets or essential market infrastructure, cause some or all of a Sub-Fund's assets to become unavailable, freeze cash or other assets belonging to the Sub-Fund and/or adversely affect the cash flows associated with any investment or transaction.

The Fund, the Management Company, the Depositary, the Investment Managers, any other Fund's service providers and their affiliates (collectively, the "**Fund Parties**") are required to comply with all applicable sanctions laws and regulations in the countries in which the Fund Parties conduct business (recognizing that certain of the sanctions regimes have implications for cross-border or foreign activities) and will implement the necessary policies and procedures to this effect (collectively, "**Sanctions Policies**"). The investors should note that these Sanctions Policies will be developed by the Fund Parties in their discretion and best judgment and may involve protective or preventive measures that go beyond the strict requirements of applicable laws and regulations imposing any Sanctions, which may further negatively impact the investments of the Fund.

5.16 Armed conflicts

At a future date following its investments, a Sub-Fund may find itself in a situation where it has exposure to issuers that are based or have business operations or assets in a region where an armed conflict, caused either by state actors or by non-state actors, is occurring. As a consequence of such armed conflict, trade, payment infrastructure, control over investments and business operations may be significantly impeded, and, as such, investments in such region may suffer extensive losses. Such Sub-Fund may suffer losses because of the adverse impact of such armed conflict on the Sub-Fund's investments in such a region or in an issuer with either business operations or assets in such a region.

6. MANAGEMENT AND ADMINISTRATION

6.1 The Board of Directors

The members of the Board of Directors will be elected by the general meeting of Shareholders subject to the approval of the CSSF. The Board of Directors is vested with the broadest powers to act on behalf of the Fund and to take any actions necessary or useful to fulfil the Fund's corporate purpose, subject to the powers expressly assigned by law or the Articles of Association to the general meeting of Shareholders.

The Board of Directors is responsible for conducting the overall management and business affairs of the Fund in accordance with the Articles of Association. In particular, the Board of Directors is responsible for defining the investment objective and policy of the Sub-Funds and their risk profile, subject to the principle of risk diversification, and for the overall supervision of the management and administration of the Fund, including the selection and supervision of the Management Company and the general monitoring of the performance and operations of the Fund.

For the current composition of the Board of Directors, please refer to the Directory.

6.2 The Management Company

The Fund has appointed the Management Company as its management company in accordance with the provisions of the 2010 Law pursuant to the Management Company Agreement.

The Management Company is a *société anonyme* incorporated on 17 September 2009 under Luxembourg law, having its registered office at 3, rue Jean Piret, L-2350 Luxembourg, Grand Duchy of Luxembourg, under the name Carne Global Fund Managers (Luxembourg) S.A.

The Management Company is authorised and regulated by the CSSF in Luxembourg under Luxembourg law. Its main business activity is to perform the functions of a UCITS management company in accordance with Luxembourg law. The initial share capital of the Management Company amounts to EUR 625,000. The share capital is held by Carne Global Fund Managers (Ireland) Ltd.

The relationship between the Fund and the Management Company is subject to the terms of the Management Company Agreement. Under the terms of the Management Company Agreement, the Management Company is responsible for the investment management and administration of the Fund as well as the marketing of the Shares, subject to the overall supervision of the Board of Directors. The Management Company is in charge of the day-to-day business activities of the Fund. The Management Company has authority to act on behalf of the Fund within its function.

The Management Company is also acting as domiciliary agent for the Fund pursuant to a letter of engagement of ancillary services.

For the purpose of a more efficient conduct of its business, the Management Company may delegate to third parties the power to carry out some of its functions on its behalf in accordance with applicable laws and regulations of Luxembourg. The delegated functions shall remain under the supervision and responsibility of the Management Company and the delegation shall not prevent the Management Company from acting, or the Fund from being managed, in the best interests of the investors. The delegation to third parties is subject to the prior approval of the CSSF.

In conducting its activities, the Management Company shall act honestly and fairly, with due skill, care and diligence, in the best interests of the Fund, its investors, and the integrity of the market. In accordance with applicable laws and regulations, the Management Company has adopted and maintains sound internal governance, administrative and accounting procedures. It maintains effective, permanent and independent compliance and internal audit functions. The Management Company is organised in such a way as to minimise the risk of the Fund's interests being prejudiced by conflicts of interest between the Management Company and/or its clients.

The Management Company Agreement has no fixed duration and each party may, in principle, terminate the agreement on not less than three (3) calendar months' prior written notice. The Management Company Agreement may also be terminated on shorter notice in certain circumstances, for instance where one party commits a material breach of its obligations. The Management Company Agreement contains provisions exempting the Management Company from liability and indemnifying the Management Company in certain circumstances. However, the liability of the Management Company towards the Fund will not be affected by any delegation of functions by the Management Company.

6.3 The Investment Managers

With the consent of the Fund, the Management Company has appointed several Investment Managers to perform investment management function for the Sub-Funds pursuant to the terms of the Investment Management Agreement in place with each Investment Manager.

ARCA Fondi SGR S.p.A., whose registered office is at Via Disciplini 3, 20123 Milan, Italy, is an independent asset management company operating in Italy incorporated under the laws of Italy on 24 July 2015, having taken over the business activity of ARCA SGR S.p.A. with effect as of 1 July 2016, the latter having been incorporated in October 1983 and having acted as investment manager of the Fund until 30 June 2016. The Investment Manager is authorised and regulated by the Bank of Italy and Consob in Italy. Its main business activity is asset management.

Since its incorporation in 1983, ARCA SGR S.p.A. as predecessor of ARCA Fondi SGR S.p.A. has been at the forefront of the fund management industry with respect to the creation of new products, including global and specialist products such as an open pension funds, controlled risk funds, bond products providing for income distribution. With a highly innovative product range and the introduction of multi-manager solutions, ARCA SGR S.p.A. has managed to satisfy the changing needs of Italian investors in recent years as well to develop business with numerous new customers in various market segments. Today, ARCA Fondi SGR S.p.A. as successor of ARCA SGR S.p.A. has approximately over 30 billion Euro assets under management.

Goldman Sachs Asset Management International (GSAM), whose registered office is at Plumtree Court, 25 Shoe Lane, London EC4A 4AU, United Kingdom, is part of The Goldman Sachs Group, Inc and is regulated by the FCA and is a registered investment adviser under the Advisers Act. Established in 1988, Goldman Sachs Asset Management is one of the world's leading investment managers and GSAM currently serves a wide range of clients including mutual funds, private and public pension funds, governmental entities, endowments, foundations, banks, insurance companies, corporations, and private investors and family groups. With over 1.7 trillion dollars in asset under supervision, 2,000 professionals across 35 offices worldwide, GSAM provides institutional and individual investors with investment and advisory solutions, with strategies spanning across asset classes, industries, and geographies. GSAM is committed to excel at both fundamental and quantitative research, to employ team-driven, research-intensive, disciplined and risk-managed investment processes and to deliver outstanding long-term investment performance.

The relationship between the Fund, the Management Company and each Investment Manager is subject to the terms of the Investment Management Agreement in place with each Investment Manager. Under the terms of the respective Investment Management Agreement, each Investment Manager has full discretion, subject to the overall review and control of the Management Company and, ultimately, the Board of Directors, to manage the assets of each Sub-Fund on a discretionary basis, in accordance with the investment objective and policy of the Sub-Fund and any additional investment restrictions or guidelines imposed by the Board of Directors. Within this function, the Investment Manager has authority to act on behalf of the Fund. For the purposes of managing the assets of a Sub-Fund, the Investment Manager can also rely on data furnished by a Data Service Provider. A Data Service Provider Fee can be charged to the Sub-Fund, as further specified 9.6 (Operating and Administrative expenses) of this Prospectus and in the Sub-Fund's Supplement.

The Investment Management Agreement has no fixed duration and each party may, in principle, terminate the agreement on not less than three (3) calendar months' prior written notice. The Investment Management Agreement may be terminated by the Management Company with immediate effect if this is deemed by the Management Company to be in the interest of the investors.

The Investment Management Agreement contains provisions exempting the Investment Manager from liability and indemnifying the Investment Manager in certain circumstances. In particular, the Investment Manager will not be responsible for any loss of assets and investments of the Fund, except to the extent that such loss is due to the Investment Managers' negligence, wilful default or fraud or that of any of its directors, officers, employees or agents**.** The liability of each Investment Manager towards the Management Company will not be affected by any delegation of functions by the Investment Manager.

6.4 The Global Distributor

With the consent of the Fund, the Management Company has appointed ARCA Fondi SGR S.p.A., whose registered office is at Via Disciplini 3, 20123 Milan, Italy, as the Global Distributor pursuant to the Global Distribution Agreement.

ARCA Fondi SGR S.p.A. is one independent asset management company operating in Italy incorporated under the laws of Italy on 24 July 2015, having taken over the business activity of ARCA SGR S.p.A. with effect as of 1 July 2016, the latter having been incorporated in October 1983 and having acted as global distributor of the Fund until 30 June 2016. The Global Distributor is authorised and regulated by the Bank of Italy and Consob in Italy. The ARCA Fondi SGR S.p.A. distribution network is one of the most important and extensive networks in

Italy, consisting of more than 120 financial institutions operating through more than 8,000 branches, a team of independent financial advisors, and on-line channels.

The relationship between the Fund, the Management Company and the Global Distributor is subject to the terms of the Global Distribution Agreement. Under the terms of the Global Distribution Agreement, the Global Distributor is responsible for the marketing and distribution of the Shares in Luxembourg and other jurisdictions approved by the Board of Directors. The Global Distributor has the authority to appoint distributors and sales agents on behalf of the Fund to market and distribute the Shares.

The Global Distribution Agreement has no fixed duration and each party may, in principle, terminate the agreement on not less than three (3) calendar months prior written notice. The Global Distribution Agreement may also be terminated on shorter notice in certain circumstances, for instance where one party commits a material breach of its obligations. The Global Distribution Agreement may be terminated by the Management Company with immediate effect if this is deemed by the Management Company to be in the interest of the investors. The Global Distribution Agreement contains provisions exempting the Global Distributor from liability and indemnifying the Global Distributor in certain circumstances. However, the liability of the Global Distributor towards the Management Company and the Fund will not be affected by any delegation of functions by the Global Distributor.

The Management Company and the Fund reserve the right to change the distribution arrangements described above by agreement with the Global Distributor and/or to appoint one or more other service providers to carry out the functions of global distributor. Investors will be notified in due course of any appointment of an alternative global distributor.

6.5 The Depositary and Paying Agent

BNP Paribas, Luxembourg Branch is a branch of BNP Paribas. BNP Paribas is a licensed bank incorporated in France as a *société anonyme* (public limited company) registered with the *Registre du commerce et des sociétés de Paris* (Trade and Companies' Register) under number No. 662 042 449, authorised by the *Autorité de Contrôle Prudentiel et de Résolution* (the "**ACPR**") and supervised by the *Autorité des Marchés Financiers* (the "**AMF**"), with its registered address at 16, Boulevard des Italiens, 75009 Paris, France, acting through its Luxembourg Branch, whose office is at 60, avenue J.F. Kennedy, L-1855 Luxembourg, Grand-Duchy of Luxembourg, registered with the Luxembourg Trade and Companies' Register under number B23968 and supervised by the CSSF.

BNP Paribas, Luxembourg Branch has been appointed as depositary of the Fund under the terms of a written agreement dated 2 October 2024 between BNP Paribas, Luxembourg Branch (the "**Depositary**"), the Management Company and the Fund (the "**Depositary Agreement**").

The Depositary performs three types of functions, namely (i) the oversight duties (as defined in Art 34(1) of the 2010 Law), (ii) the monitoring of the cash flows of the Fund (as set out in Art 34(2) of the 2010 Law) and (iii) the safekeeping of the Fund's assets (as set out in Art 34(3) of the 2010 Law).

Under its oversight duties, the Depositary is required to:

(1) ensure that the sale, issue, repurchase, redemption and cancellation of Shares effected on behalf of the Fund are carried out in accordance with the 2010 Law or with the Articles of Association,

(2) ensure that the value of the Shares is calculated in accordance with the 2010 Law and the Articles of Association,

(3) carry out the instructions of the Fund or the Management Company acting on behalf of the Fund, unless they conflict with the 2010 Law or the Articles of Association,

(4) ensure that in transactions involving the Fund's assets, the consideration is remitted to the Fund within the usual time limits;

(5) ensure that the Fund's revenues are allocated in accordance with the 2010 Law and its Articles of Association.

The overriding objective of the Depositary is to protect the interests of the shareholders of the Fund, which always prevail over any commercial interests.

Conflicts of interest may arise if and when the Management Company or the Fund maintain other business relationships with BNP Paribas, Luxembourg Branch in parallel with the appointment of BNP Paribas, Luxembourg Branch as Depositary of the Fund.

Such other business relationships may cover services in relation to

- Outsourcing/delegation of middle or back-office functions (*e.g.*, trade processing, position keeping, post trade investment compliance monitoring, collateral management, OTC valuation, fund administration inclusive of net asset value calculation, transfer agency, fund dealing services) where BNP Paribas or its affiliates act as agent of the Fund or the Management Company, or
- Selection of BNP Paribas or its affiliates as counterparty or ancillary service provider for matters such as foreign exchange execution, securities lending, bridge financing.

The Depositary is required to ensure that any transaction relating to such business relationships between the Depositary and an entity within the same group as the Depositary is conducted at arm's length and is in the best interests of shareholders of the Fund.

In order to address any situations of conflicts of interest, the Depositary has implemented and maintains a management of conflicts of interest policy, aiming namely at:

- Identifying and analysing potential situations of conflicts of interest;
- Recording, managing and monitoring the conflict of interest situations either in:
  - Relying on the permanent measures in place to address conflicts of interest such as segregation of duties, separation of reporting lines, insider lists for staff members;
  - Implementing a case-by-case management to (i) take the appropriate preventive measures such as drawing up a new watch list, implementing a new Chinese wall, (*i.e.*, by separating functionally and hierarchically the performance of its Depositary duties from other activities), making sure that operations are carried out at arm's

length and/or informing the concerned shareholders of the Fund, or (ii) refuse to carry out the activity giving rise to the conflict of interest;

- Implementing a deontological policy;
- recording of a cartography of conflict of interests permitting to create an inventory of the permanent measures put in place to protect the Fund's interests; or
- setting up internal procedures in relation to, for instance (i) the appointment of service providers which may generate conflicts of interests, (ii) new products/activities of the Depositary in order to assess any situation entailing a conflict of interest.

In the event that conflicts of interest do arise, the Depositary will undertake to use its reasonable endeavours to resolve any such conflicts of interest fairly (having regard to its respective obligations and duties) and to ensure that the Fund and the shareholders of the Fund are fairly treated.

The Depositary may delegate to third parties the safekeeping of the Fund's assets subject to the conditions laid down in the applicable laws and regulations and the provisions of the Depositary Agreement. The process of appointing such delegates and their continuing oversight follows the highest quality standards, including the management of any potential conflict of interest that should arise from such an appointment. Such delegates must be subject to effective prudential regulation (including minimum capital requirements, supervision in the jurisdiction concerned and external periodic audit) for the custody of financial instruments. The Depositary's liability shall not be affected by any such delegation.

A potential risk of conflicts of interest may occur in situations where the delegates may enter into or have a separate commercial and/or business relationships with the Depositary in parallel to the custody delegation relationship.

In order to prevent such potential conflicts of interest from cristalizing, the Depositary has implemented and maintains an internal organisation whereby such separate commercial and / or business relationships have no bearings on the choice of the delegate or the monitoring of the delegates' performance under the delegation agreement.

A list of these delegates and sub-delegates for its safekeeping duties is available in the website: https://securities.cib.bnpparibas/regulatory-publications/

Such list may be updated from time to time.

Updated information on the Depositary's custody duties, a list of delegations and sub-delegations and conflicts of interest that may arise, may be obtained, free of charge and upon request, from the Depositary.

The Depositary, being part of a group providing clients with a worldwide network covering different time zones, may entrust parts of its operational processes to other BNP Paribas Group entities and/or third parties, whilst keeping ultimate accountability and responsibility in Luxembourg. The entities involved in the support of internal organisation, banking services, UCI administrator service are listed in the website: https://securities.cib.bnpparibas/luxembourg/ under the Publication Corner. Further information on the Depositary's international operating model linked to the Fund may be provided upon request by the Fund and/or the Management Company.

As of the date of this Prospectus, it shall be noted that the Fund has not appointed any prime broker. In case of an appointment of a prime broker by the Fund and further to the Depositary's prior approval, the Prospectus shall be amended in order to disclose information on this prime broker.

6.6 The UCI Administrator

With the consent of the Fund, the Management Company has appointed BNP Paribas, Luxembourg Branch, as UCI administrator of the Fund (the "**UCI Administrator**") pursuant to the Administrative Agreement dated 2 October 2024.

The UCI Administrator is an authorized credit institution in Luxembourg under Chapter 1 of Part 1 of the Luxembourg law of 5 April 1993 on the financial sector. It is authorized by the European Central Bank (ECB) and subject to the prudential supervision of the ECB and the CSSF with its business address at 60 avenue J.F. Kennedy, L-1855, Luxembourg, Grand Duchy of Luxembourg and registered with the Luxembourg Trade and Companies Register under number B23968.The relationship between the Fund, the Management Company and the UCI Administrator is subject to the terms of the Administrative Agreement. Under the terms of the Administrative Agreement, the UCI Administrator will carry out all general administrative duties related to the administration of the Fund required by Luxembourg law, calculate the Net Asset Value per Share, maintain the accounting records of the Fund, as well as process all subscriptions, redemptions, conversions, and transfers of Shares, and register these transactions in the register of Shareholders. In addition, the UCI Administrator is also responsible for collecting the required information and performing verifications on investors to comply with applicable anti-money laundering rules and regulations.

The UCI Administrator is not responsible for any investment decisions of the Fund or the effect of such investment decisions on the performance of the Fund.

The Administrative Agreement has no fixed duration and each party may, in principle, terminate the agreement on not less than ninety (90) days prior written notice. The Administrative Agreement may also be terminated on shorter notice in certain circumstances, for instance where one party commits a material breach of its obligations. The Administrative Agreement may be terminated by the Management Company with immediate effect if this is deemed by the Management Company to be in the interest of the investors. The Administrative Agreement contains provisions exempting the UCI Administrator from liability and indemnifying the UCI Administrator in certain circumstances. However, the liability of the UCI Administrator towards the Management Company and the Fund will not be affected by any delegation of functions by the UCI Administrator.

The Management Company and the Fund reserve the right to change the administration arrangements described above by agreement with the UCI Administrator and/or to appoint another service provider in Luxembourg to carry out the functions of UCI administrator. Investors will be notified in due course.

6.7 The Auditor

The Fund has appointed PricewaterhouseCoopers, *Société cooperative*, as its approved statutory auditor (*réviseur d'entreprises agréé*) within the meaning of the 2010 Law. The Auditor is elected by the general meeting of Shareholders. The Auditor will inspect the accounting information contained in the Annual Report and fulfil other duties prescribed by the 2010 Law.

6.8 Conflicts of interest

The Board of Directors, the Management Company, the Investment Manager, the Depositary, the UCI Administrator and the other service providers of the Fund, and/or their respective affiliates, members, employees or any person connected with them may be subject to various conflicts of interest in their relationships with the Fund.

As further described in the Articles of Incorporation, any Director of the Fund who has, directly or indirectly, an interest in a transaction submitted to the approval of the Board of Directors which conflicts with the Fund's interest, must inform the Board of Directors. The Director may not take part in the discussions on and may not vote on the transaction. Where, by reason of a conflicting interest, the number of directors required in order to validly deliberate is not met, the Board of Directors may submit the decision on this specific item to the general meeting of shareholders.

The Management Company, the Fund, the Investment Manager, the UCI Administrator and the Depositary have adopted and implemented a conflicts of interest policy and have made appropriate organisational and administrative arrangements to identify and manage conflicts of interests so as to minimise the risk of the Fund's interests being prejudiced, and if they cannot be avoided, ensure that the Fund's investors are treated fairly. Further information on the conflicts of interest policy may be obtained from the internet website of the Management Company.

As part of the normal course of global custody business, the Depositary may from time to time have entered into arrangements with other clients, funds or other third parties, including affiliates for the provision of safekeeping and related services and as a result, potential conflict of interest situations may, from time to time, arise between the Depositary and its safekeeping delegates, for example, where an appointed delegate is an affiliated group company and is providing a product or service to a fund and has a financial or business interest in such product or service or where an appointed delegate is an affiliated group company which receives remuneration for other related custodial products or services it provides to the Company e.g. foreign exchange, securities lending, pricing or valuation services.

The Depositary has also policies and procedures in place in relation to the management of conflicts of interest between the Depositary, the Fund and the Management Company that may arise where a group link as defined in the applicable regulations exists between them. It may be the case for example where the Management Company has delegated certain administrative functions to an entity within the same corporate group as the Depositary.

In the event of any potential conflict of interest which may arise during the normal course of business, the Depositary will at all times have regard to its obligations under applicable laws. Additionally, in order to address any situations of conflicts of interest, the Depositary has implemented and maintains a management of conflicts of interest policy, with the aim of (a) identifying and analysing potential situations of conflicts of interest; and (b) recording, managing and monitoring the conflict of interest situations by (i) relying on permanent measures to address conflicts of interest such as maintaining separate legal entities, segregating duties, separating reporting lines and maintaining insider lists for staff members;

or (ii) implementing appropriate procedures on a case-by-case basis, such as establishing new information barriers, ensuring that operations are carried out at arm's length and/or informing the concerned Shareholders of the Company.

The Depositary has established a functional and hierarchical separation between the performance of its UCITS depositary functions and the performance of other tasks on behalf of the Company.

6.9 Best execution

The Management Company and the Investment Managers have adopted a "best execution" policy with the objective of obtaining the best possible result for the Fund when executing decisions to deal on behalf of the Fund or placing orders to deal on behalf of the Fund with other entities for execution. Further information on the best execution policies may be obtained from the internet website of the Management Company and the Investment Manager.

7. SHARES

7.1 Shares, Sub-Funds and Share Classes

7.1.1 Shares

The share capital of the Fund is represented by fully paid up Shares of no par value. The share capital of the Fund is at all times equal to the Net Asset Value of the Fund, which is the total Net Asset Value of all Sub-Funds expressed in the Reference Currency of the Fund. The share capital of the Fund must at all times be at least equal to the minimum required by the 2010 Law, which is currently 1,250,000 EUR.

The Shares will be issued in registered form only. Written confirmation of registration will be issued upon request and at the expense of the requesting shareholder. The registration of a shareholder in the register of shareholders of the Fund evidences the shareholder's ownership right towards the Fund.

Shares may also be eligible for clearing and settlement by Clearstream, Euroclear and/or other recognised securities clearing and settlement systems. In such case, Shares may be held and transferred through securities accounts maintained within such systems in accordance with applicable laws and regulations, and the operating rules of the systems. The Fund will recognise only one single shareholder per Share. In case a Share is owned by several persons, they must appoint a single representative who will represent them towards the Fund. The Fund has the right to suspend the exercise of all rights attached to that Share until such representative has been appointed.

The Shares carry no preferential or pre-emptive rights: the Fund is authorised without limitation to issue an unlimited number of fully paid up Shares on any Valuation Day without reserving to existing investors a preferential or pre-emptive right to subscribe for the Shares to be issued.

Each Share entitles the shareholder to one (1) vote at all general meetings of shareholders of the Fund and at all meetings of the Sub-Fund or Share Class concerned.

Fractions of Shares will be issued up to three (3) decimal places. Such fractional Shares will be entitled to participate on a *pro rata* basis in the net assets attributable to the Sub-Fund or Share Class to which they belong in accordance with their terms, as set out in this Prospectus. Fractions of Shares do not confer any voting rights on their holders. However, if the sum of the fractional Shares held by the same shareholder in the same Share Class represents one or more entire Shares, such shareholder will benefit from the corresponding voting right attached to the number of entire Shares.

Shares are each entitled to participate in the net assets allocated to the relevant Sub-Fund or Share Class in accordance with their terms, as set out in the Supplements. Shares will be issued on each Subscription Day immediately after the time of valuation and entitled to participate in the net assets of the Sub-Fund or Share Class as of that point, as described in more detail in section 7.4 (Subscription for Shares) below. Shares will be redeemed on each Redemption Day at the time of valuation and entitled to participate in the net assets of the Sub-Fund or Share Class until and including that point, as described in more detail in section 7.5 (Redemption of Shares) below.

Shares redeemed will generally be cancelled unless the Fund decides otherwise.

7.1.2 Sub-Funds

The Fund is a single legal entity incorporated as an umbrella fund comprised of separate Sub-Funds. Each Share issued by the Fund is a share in a specific Sub-Fund. Each Sub-Fund has a specific investment objective and policy as further described in its Supplement. A separate portfolio of assets is maintained for each Sub-Fund and invested for its exclusive benefit in accordance with its investment objective and policy.

With regard to third parties, in particular towards the Fund's creditors, each Sub-Fund shall be exclusively responsible for all liabilities attributable to it. As a consequence, the assets of each Sub-Fund may only be used to meet the debts, liabilities and obligations attributable to that Sub-Fund. In the event that, for any reason, the liabilities arising in respect of the creation, operation and liquidation of a Sub-Fund exceed the assets allocated to it, creditors will have no recourse against the assets of any other Sub-Fund to satisfy such deficit. Assets and liabilities are allocated to each Sub-Fund in accordance with the provisions of the Articles of Association, as set out in section 8.1 below.

Each Sub-Fund may be established for an unlimited or limited duration as specified in its Supplement. In the latter case, upon expiry of the term, the Fund may extend the duration of the Sub-Fund once or several times. Investors will be notified at each extension. At the expiry of the duration of a Sub-Fund, the Fund will redeem all the Shares in that Sub-Fund. The Supplement will indicate the duration of each Sub-Fund and its extension, where applicable.

Additional Sub-Funds may be established from time to time without the consent of investors in other Sub-Funds. A new Supplement will be added to this Prospectus for each new Sub-Fund established.

7.1.3 Share Classes

The Sub-Funds may offer several Share Classes, as set out in the Supplements. Each Share Class within a Sub-Fund may have different features such as the fee structure, minimum subscription or holding amounts, currency, different hedging techniques or distribution policy or other distinctive features, or be offered or reserved to different types of investors. Investors will be able to choose the Share Class with the features most suitable to their individual circumstances.

In particular, the Sub-Funds may offer Currency Hedged Share Classes. The Fund may use various techniques and instruments, such as forward contracts and currency swaps, in accordance with the provisions of the Prospectus, intended to limit the impact of exchange rate movements between the Reference Currency of the Sub-Fund and that of a Currency Hedged Share Class on the performance of such Share Class. The costs and any benefit of currency hedging transactions will be allocated solely to the Currency Hedged Share Class to which the hedging relates.

The Sub-Funds may also offer Duration Hedged Share Classes. Duration is a measurement of the sensitivity of the price of a fixed income investment to a change in interest rates. Securities with longer durations tend to be more sensitive to changes in interest rates than securities with shorter durations. The Fund may use various techniques and instruments, such as interest rate futures and interest rate swaps, in accordance with the provisions of the Prospectus, intended to limit the impact of interest rate movements on the performance of

Duration Hedged Share Classes. The costs and any benefit of duration hedging transactions will be allocated solely to the Duration Hedged Share Class to which the hedging relates.

Currency Hedged Share Classes and Duration Hedged Share Classes involve certain risks, as described in section 5 (General Risk Factors) above. For the avoidance of doubt, certain Share Classes may qualify as Currency Hedged Share Classes and Duration Hedged Share Classes.

Each Share Class may be created for an unlimited or limited duration, as specified in the Supplement. In the latter case, upon expiry of the term, the Fund may extend the duration of the Share Class once or several times. Investors will be notified at each extension. At the expiry of the duration of a Share Class, the Fund will redeem all the Shares in that Share Class. The Supplement will indicate the duration of each Share Class and its extension, where applicable.

Additional Share Classes may be established in any Sub-Fund from time to time without the approval of investors. New Share Classes will be added to the relevant Supplement. Such new Share Classes may be issued on terms and conditions that differ from the existing Share Classes. The list and details of the Share Classes established within each Sub-Fund, if any, are set out in the Supplements. The list of active Share Classes currently available for subscription in each jurisdiction may be obtained from a Distributor upon request or on www.siderafunds.com.

7.1.4 Change of rights, restrictions and characteristics of Sub-Funds and Share Classes

The rights and restrictions attached to Shares may be modified from time to time, subject to the provisions of the Articles of Association. Any changes to the Articles of Association will require a resolution of the general meeting of shareholders, as further described in section 10.2 (Meetings of shareholders) below.

Subject to the above, the Board of Directors may change the characteristics of any existing Sub-Fund, including its objective and policy, or any existing Share Class, without the consent of investors. In accordance with applicable laws and regulations, investors in the Sub-Fund or Share Class will be informed about the changes and, where required, will be given prior notice of any proposed material changes in order for them to request the redemption of their Shares should they disagree. This Prospectus will be updated as appropriate.

7.2 Dividend distribution policy

Each Sub-Fund may comprise distributing Shares and non-distributing Shares. The Supplement shall indicate whether Shares confer the right to dividend distributions (Distribution Shares) or do not confer this right (Capitalisation Shares). Distribution Shares and Capitalisation Shares issued within the same Sub-Fund will be represented by different Share Classes.

Capitalisation Shares capitalise their entire earnings whereas Distribution Shares pay dividends. Whenever dividends are distributed to holders of Distribution Shares, their Net Asset Value per Share will be reduced by an amount equal to the amount of the dividend per Share distributed, whereas the Net Asset Value per Share of Capitalisation Shares will remain unaffected by the distribution made to holders of Distribution Shares.

The Fund shall determine how the earnings of Distribution Shares shall be distributed and may declare distributions from time to time, at such time and in relation to such periods as the Fund shall determine, in the form of cash, in accordance with the dividend distribution policy adopted for such Distribution Shares as described in the Supplement**.** The dividend distribution policy may vary between Distribution Shares within the same or different Sub-Funds. Dividend distributions are not guaranteed with respect to any Share Class. In any event, no distribution may be made if, as a result, the total Net Asset Value of the Fund would fall below the minimum share capital required by the 2010 Law which is currently EUR 1,250,000.

7.3 Eligible Investors

Shares may only be acquired or held by investors who satisfy all eligibility requirements for a specific Sub-Fund or Share Class, if any, as specified for the Sub-Fund or Share Class in the Supplement (an Eligible Investor). Certain Sub-Funds or Shares Classes may indeed be reserved to specified categories of investors such as Institutional Investors, investors investing through a specified distribution channel or investors who are residents of or domiciled in specific jurisdictions.

The Board of Directors has decided that any investor not qualifying as an Eligible Investor will be considered as a Prohibited Person, in addition to those persons described in section 7.10 (Prohibited Persons) below. The Fund may decline to issue any Shares and to accept any transfer of Shares, where it appears that such issue or transfer would or might result in Shares being acquired or held by, on behalf or for the account or benefit of, Prohibited Persons. The Fund may compulsorily redeem all Shares held by, on behalf or for the account or benefit of, Prohibited Persons in accordance with the procedure set out in this Prospectus (see section 7.10 (Prohibited Persons) below).

7.4 Subscription for Shares

Applications for subscriptions can be submitted for each Subscription Day provided that a complete application is submitted by the Cut-Off Time for that Subscription Day. Applications will be processed, if accepted, at the Subscription Price applicable to that Subscription Day. The Subscription Price (plus any Subscription Fee) must be settled by the end of the Subscription Settlement Period. The subscription procedure is further described below. Shares will be issued on the Subscription Day and entitled to participate in the Net Asset Value of the Share Class from their issue. The Subscription Day, Cut-Off Time, and Subscription Settlement Period for each Sub-Fund or Share Class are specified in the Supplement.

7.4.1 Subscription application

Shares in any new Sub-Fund or Share Class may be available for subscription during an Initial Offer and will be issued on the first Subscription Day following the Initial Offer at the Initial Offer Price. Information on the Initial Offer and the Initial Offer Price of any new Sub-Fund or Share Class will be set out in the Supplement and be available from the UCI Administrator or a Distributor upon request and on www.siderafunds.com. The Fund may reschedule the Initial Offer and/or amend the Initial Offer Price.

Shares will be available for subscription on each Subscription Day at a Subscription Price equal to the Net Asset Value per Share for that Subscription Day rounded up or down to **three (3)** decimal places. The Net Asset Value per Share for the Subscription Day at which an application will be processed is unknown to the investors when they place their subscription applications.

The Fund may charge a Subscription Fee on subscriptions for Shares, as set out in section 9.1 (Subscription Fee and Redemption Fee) below, which will be added to the Subscription Price. The Subscription Fee is equal to a percentage of the Subscription Price or such other amount specified for each Sub-Fund or Share Class in the Supplement, where applicable.

Investors wishing to subscribe for Shares of a Sub-Fund or Share Class will be requested to complete a Subscription Form in which they commit to subscribe and pay for the Shares. The liability of each investor in respect of the Shares subscribed will be limited to the Subscription Price (plus any Subscription Fee). The Subscription Form must be submitted to the UCI Administrator or the Global Distributor or Distributor following the instructions on such form. The Subscription Form is available from the UCI Administrator or a Distributor on request or on www.siderafunds.com.

The Fund will only process subscription applications that it considers clear and complete. Applications will be considered complete only if the Fund has received all information and supporting documentation it deems necessary to process the application. The Fund may delay the acceptance of unclear or incomplete applications until reception of all necessary information and supporting documentation in a form satisfactory to the Fund. Unclear or incomplete applications may lead to delays in their execution. The Fund will not accept liability for any loss suffered by applicants as a result of unclear or incomplete applications. No interest will be paid to investors on subscription proceeds received by the Fund prior to receiving clear and complete applications.

Applications must be submitted to the UCI Administrator or to the Global Distributor or a Distributor by the Cut-Off Time for the Subscription Day, as specified in the Supplement, in order for such applications to be processed, if accepted, at the Subscription Price applicable to that Subscription Day. Applications received after the Cut-Off Time will be treated as deemed applications received by the Cut-Off Time for the next Subscription Day. However, the Fund may accept subscription applications received after the Cut-Off Time subject to certain conditions, as set out in section 7.9 (Late trading, market timing and other prohibited practices) below.

The Fund reserves the right to accept or refuse any application in whole or in part at its discretion. Without limitation, the Fund may refuse an application for subscription where the Fund determines that the Shares would or might be held by, on behalf or for the account or benefit of, Prohibited Persons. In such event, subscription proceeds received by the Fund will be returned to the applicant as soon as practicable, at the risks and costs of the applicant, without interest.

The issue of Shares of a Sub-Fund or Share Class shall be suspended whenever the determination of the Net Asset Value per Share of such Sub-Fund or Share Class is suspended by the Fund, as described in section 8.4 (Temporary suspension of the Net Asset Value calculation) below. The issue of Shares of a Share Class may also be suspended at the discretion of the Board of Directors, in the best interest of the Fund, notably under other exceptional circumstances.

7.4.2 Settlement of subscription

The Subscription Price (plus any Subscription Fee) must be paid in the Reference Currency of the Share Class.

Cleared funds equal to the full amount of the Subscription Price (plus any Subscription Fee) must be received by the Fund by the end of the Subscription Settlement Period specified in the Supplement. Settlement details are available in the Subscription Form.

If the payment of the Subscription Price (plus any Subscription Fee) has not been received by the end of the Subscription Settlement Period, any pending application for Shares may be rejected or, if the application had previously been accepted by the Fund, any allocation of Shares made on the basis of the application may be cancelled by a compulsory redemption of the Shares at the applicable Redemption Price (less any Redemption Fee). The UCI Administrator will inform the applicant that the application has been rejected or the subscription cancelled, as applicable, and the money received after the end of the Subscription Settlement Period, if any, will be returned to the applicant at its risks and costs, without interest.

The Fund reserves the right to require indemnification from the applicant against any losses, costs or expenses arising as a result of any failure to settle the Subscription Price (plus any Subscription Fee) by the end of the Subscription Settlement Period. The Fund may pay such losses, costs or expenses out of the proceeds of any compulsory redemption described above and/or redeem all or part of the investor's other Shares, if any, in order to pay for such losses, costs or expenses.

7.4.3 Subscription in kind

The Fund may agree to issue Shares as consideration for a "contribution in kind" of assets with an aggregate value equal to the Subscription Price (plus any Subscription Fee), provided that such assets comply with the investment objective and policy of the Sub-Fund and any restrictions and conditions imposed by applicable laws and regulations. In accepting or rejecting such a contribution at any given time, the Fund shall take into account the interest of other investors of the Sub-Fund and the principle of fair treatment. To the extent required by applicable laws and regulations, any contribution in kind will be valued independently in a special report issued by the Auditor or any other authorised statutory auditor (*réviseur d'entreprises agréé*) agreed by the Fund. The Fund and the contributing investor will agree on specific settlement procedures. Any costs incurred in connection with a contribution in kind, including the costs of issuing a valuation report, shall be borne by the contributing investor or by such other third party as agreed by the Fund or in any other way which the Board of Directors considers fair to all investors of the Sub-Fund.

7.5 Redemption of Shares

Applications for redemptions can be submitted by investors for each Redemption Day provided that a complete application is submitted by the Cut-Off Time for that Redemption Day. Applications will be processed, if accepted, at the Redemption Price applicable to that Redemption Day. The Redemption Price (less any Redemption Fee) will normally be paid by the end of the Redemption Settlement Period. The redemption procedure is further described below. Shares will be redeemed on the Redemption Day and entitled to participate in the net assets of the Sub-Fund or Share Class until their redemption. The Redemption Day, Cut-Off

Time, and Redemption Settlement Period for each Sub-Fund or Share Class are specified in the Supplement.

7.5.1 Redemption application

Investors may apply for redemption of all or any of their Shares on each Redemption Day at a Redemption Price equal to the Net Asset Value per Share for that Redemption Day rounded to three (3) decimal places. The Net Asset Value per Share for the Redemption Day at which an application will be processed is unknown to the investors when they place their redemption applications.

The Fund may charge a Redemption Fee on redemptions of Shares, as set out in section 9.1 (Subscription Fee and Redemption Fee) below, which will be deducted from the payment of the Redemption Price. The Redemption Fee is equal to a maximum percentage of the Redemption Price or such other amount as specified for each Sub-Fund or Share Class in the Supplement, where applicable.

Investors wishing to redeem their Shares in part or in whole must submit a Redemption Form. The Redemption Form must be submitted to the UCI Administrator or Global Distributor or a Distributor following the instructions on such form. The Redemption Form is available from the UCI Administrator or the Global Distributor or a Distributor on request or on www.siderafunds.com.

The Fund will only process redemption applications that it considers clear and complete. Applications will be considered complete only if the Fund has received all information and supporting documentation it deems necessary to process the application. Unclear or incomplete applications may lead to delays in their execution. The Fund will not accept liability for any loss suffered by applicants as a result of unclear or incomplete applications.

Applications must be submitted to the UCI Administrator or Global Distributor or a Distributor by the Cut-Off Time for the Redemption Day, as specified in the Supplement, in order for such applications to be processed, if accepted, at the Redemption Price applicable to that Redemption Day. Applications received after the Cut-Off Time will be treated as deemed applications received by the Cut-Off Time for the next Redemption Day. However, the Fund may accept redemption applications received after the Cut-Off Time subject to certain conditions, as set out in section 7.9 (Late trading, market timing and other prohibited practices) below.

The redemption of Shares of a Sub-Fund or Share Class shall be suspended whenever the determination of the Net Asset Value per Share of such Sub-Fund or Share Class is suspended by the Fund, as described in section 8.4 (Temporary suspension of the Net Asset Value calculation) below. The redemption of Shares of a Sub-Fund or Share Class may also be suspended in other exceptional cases where the circumstances and the best interest of the investors so require.

7.5.2 Settlement of redemption

Redemption proceeds equal to the full amount of the Redemption Price (less any Redemption Fee) will normally be paid by the end of the Redemption Settlement Period specified in the Supplement. Different settlement procedures may apply in certain jurisdictions in which Shares are distributed due to constraints under local laws and regulations. Investors should contact their local paying agent for further information. The Fund is not responsible for any delays or charges incurred at any receiving bank or clearing system.

Payment of redemption proceeds will be made by wire transfer on the bank account of the redeeming investor and at its risks and costs. Redemption proceeds will be paid in the Reference Currency of the Sub-Fund or the Share Class.

The Fund reserves the right to postpone the payment of redemption proceeds after the end of the normal Redemption Settlement Period when there is insufficient liquidity or in other exceptional circumstances. If redemption proceeds cannot be paid by the end of the Redemption Settlement Period, the payment will be made as soon as reasonably practicable thereafter. The Fund may also delay the settlement of redemptions until reception of all information and supporting documentation deemed necessary to process the application, as described above. In any event, no redemption proceeds will be paid unless and until cleared funds equal to the full amount of the Subscription Price (plus any Subscription Fee) due but not yet paid for the Shares to be redeemed has been received by the Fund. No interest will be paid to investors on redemption proceeds paid after the end of the Redemption Settlement Period.

7.5.3 Redemption in kind

The Fund may, in order to facilitate the settlement of substantial redemption applications or in other exceptional circumstances, propose to an investor a “redemption in kind” whereby the investor receives a portfolio of assets of the Sub-Fund of equivalent value to the Redemption Price (less any Redemption Fee). In such circumstances the investor must specifically consent to the redemption in kind and may always request a cash redemption payment instead. In proposing or accepting a request for redemption in kind at any given time, the Fund shall take into account the interest of other investors of the Sub-Fund and the principle of fair treatment. Where the investor accepts a redemption in kind, he will receive a selection of assets of the Sub-Fund. To the extent required by applicable laws and regulations, any redemption in kind will be valued independently in a special report issued by the Auditor or any other authorised statutory auditor (*réviseur d’entreprises agréé*) agreed by the Fund. The Fund and the redeeming investor will agree on specific settlement procedures. Any costs incurred in connection with a redemption in kind, including the costs of issuing a valuation report, shall be borne by the redeeming investor or by such other third party as agreed by the Fund or in any other way which the Board of Directors considers fair to all investors of the Sub-Fund.

Upon request of an investor, the Fund may agree, in its sole discretion, to establish an account outside of the Fund, in the name of the investor, into which the portfolio of assets can be transferred. The account will be used to sell the assets and pay the sales proceeds to the redeeming investor in cash. Any costs and expenses relating to the opening and maintenance of the account will be borne by the redeeming investor. Investors may incur brokerage and/or local tax charges on the sale of the assets. There may be a difference between the net amount of the sales proceeds paid to the investor and the Redemption Price (less any Redemption Fee) for the Shares redeemed, due to market conditions and/or the difference between the prices used to calculate the Net Asset Value and bid prices received on the sale of the assets.

7.6 Conversion of Shares

Applications for conversions of Shares of any Share Class (called the Original Shares) into Shares of another Share Class of the same or another Sub-Fund (called the New Shares) can be submitted for each Conversion Day provided that a complete application is submitted by the Cut-Off Time for that Conversion Day. The number of New Shares issued upon a conversion will be based on the respective Net Asset Values per Share of the Original Shares and the New Shares for the Conversion Day (which, for the avoidance of doubt, may be a different day for the Original Shares and the New Shares). The Original Shares will be redeemed and the New Shares will be issued on the Conversion Day. The conversion procedure is further described below.

7.6.1 Conversion application

Unless set out otherwise in the Supplement, investors may apply for conversion of Original Shares into New Shares on each Conversion Day. However, the right to convert the Original Shares is subject to compliance with any investor eligibility requirements applicable to the New Shares. In addition, conversion applications are subject to the provisions on (i) the minimum initial or additional subscription amounts applicable to the New Shares and (ii) the minimum holding amount applicable to the Original Shares. If no minimum holding amount to the Original Shares is specified in the Supplement, conversion applications are subject to the provisions on the minimum initial or additional subscription amounts applicable to the New Shares.

The number of New Shares issued upon a conversion will be based upon the respective Net Asset Values of the Original Shares and the New Shares for the Conversion Day. These Net Asset Values are unknown to the investors when they place their conversion application.

The Fund may charge a Conversion Fee on conversions of Shares, as set out in section 9.1 (Subscription Fee and Redemption Fee) below and specified in the Supplement. For the avoidance of doubt, no Subscription Fee or Redemption Fee will apply on conversions in addition to the Conversion Fee, if any.

Investors wishing to convert their Shares must submit a Conversion Form. The Conversion Form must be submitted to the UCI Administrator or the Global Distributor or a Distributor following the instructions on such form. The Conversion Form is available from the UCI Administrator or the Global Distributor or a Distributor on request or on www.siderafunds.com.

The Fund will only process conversion applications that it considers clear and complete. Applications will be considered complete only if the Fund has received all information and supporting documentation it deems necessary to process the application. The Fund may delay the acceptance of unclear or incomplete applications until reception of all necessary information and supporting documentation in a form satisfactory to the Fund. Unclear or incomplete applications may lead to delays in their execution. The Fund will not accept liability for any loss suffered by applicants as a result of unclear or incomplete applications.

Applications must be submitted to the UCI Administrator by the Cut-Off Time for the Conversion Day, as specified in the Supplement, in order for such applications to be processed, if accepted, at a conversation rate based on the respective Net Asset Values of the Original Shares and the New Shares on the Conversion Day. Applications received after the Cut-Off Time will be treated as deemed applications received by the Cut-Off Time for the next

Conversion Day. However, the Fund may accept conversion applications received after the Cut-Off Time subject to certain conditions, as set out in section 7.9 (Late trading, market timing and other prohibited practices) below.

The Fund reserves the right to reject any application for conversion of Shares into New Shares, in whole or in part, including, without limitation, where the Fund decides to close the Sub-Fund or Share Class to new subscriptions or new investors. In any event, no conversion application will be processed unless and until cleared funds equal to the full amount of the Subscription Price (plus any Subscription Fee) for the Original Shares has been received by the Fund.

The conversion of Shares shall be suspended whenever the determination of the Net Asset Value per Share of the Original Shares or the New Shares is suspended by the Fund in accordance with section 8.4 (Temporary suspension of the Net Asset Value calculation) below, or when the redemption of Original Shares or the subscription for New Shares is suspended in accordance with the Articles of Association and this Prospectus.

7.6.2 Conversion rate

The rate at which the Original Shares are converted into New Shares is determined on the basis of the following formula:

$A = (B \times C \times D) / E$

where:

A is the number of New Shares to be allocated;
B is the number of Original Shares to be converted into New Shares;
C is the Net Asset Value per Share of the Original Shares for the Conversion Day;
D is the exchange rate, as determined by the Fund, between the Reference Currency of the Original Shares and that of the New Shares. Where the Reference Currencies are the same, D equals one (1); and
E is the Net Asset Value per Share of the New Shares for the Conversion Day.

A Conversion Fee may be applied, if and to the extent set out in the Supplement. The Conversion Fee is equal to the positive difference, if any, between the Subscription Fee applicable to the New Shares and the Subscription Fee paid on the Original Shares, or such lower amount as specified for each Share Class in the Supplement, where applicable.

7.7 Transfer of Shares

7.7.1 Conditions and limitations on transfer of Shares

Shares are freely transferable subject to the restrictions set out in the Articles of Association and this Prospectus. In particular, the Fund may deny giving effect to any transfer of Shares if it determines that such transfer would result in the Shares being held by, on behalf or for the account or benefit of, Prohibited Persons.

Subject to the above, the transfer of Shares will normally be given effect by the Fund by way of declaration of transfer entered in the register of shareholders of the Fund following the delivery to the UCI Administrator of an instrument of transfer duly completed and executed by the transferor and the transferee, in a form accepted by the Fund.

The Fund will only give effect to Share transfers that it considers clear and complete. The UCI Administrator may require from the transferor and/or the transferee all of the information and supporting documentation it deems necessary to give effect to the transfer. Investors are advised to contact the UCI Administrator prior to requesting a transfer to ensure that they have all the correct documentation for the transaction. The Fund may delay the acceptance of unclear or incomplete transfer orders until reception of all necessary information and supporting documentation in a form satisfactory to the Fund. Unclear or incomplete transfer orders may lead to delays in their execution. The Fund will not accept liability for any loss suffered by transferors and/or transferees as a result of unclear or incomplete transfer orders.

Shares which are eligible for clearing and settlement by Clearstream, Euroclear and/or other recognised securities clearing and settlement systems] may also be transferred through securities accounts maintained within such system[s] in accordance with applicable laws and regulations, and the operating rules of the system[s].

7.7.2 Trading of Shares on a stock exchange

Shares of certain Share Classes may be listed and admitted to trading on the Luxembourg Stock Exchange or other market segments or stock exchanges as the Fund may determine from time to time. The Supplement will specify if Shares are or are intended to be listed. Although the Shares must be freely negotiable and transferable upon their listing and admission to trading on such stock exchanges (and trades carried out on such stock exchanges cannot be cancelled by the Fund) the restrictions of ownership and conditions on holding Shares (as set out in this Prospectus and the Articles of Association) will nevertheless apply to any person to which Shares are transferred on such stock exchanges. The holding at any time of any Shares by, on behalf of or for the account or benefit of, a Prohibited Person may result in the compulsory redemption of such Shares in accordance with the provisions of this Prospectus and the Articles of Association.

Listed Shares will be eligible for clearing and settlement by Clearstream and/or Euroclear.

The Fund does not expect that an active secondary market will develop in the listed Shares on the Luxembourg Stock Exchange**.** The listing and admission to trading on such stock exchanges does not constitute a warranty or representation by the stock exchange as to the competence of the service providers to or any other party connected with the Fund or the suitability of the Fund for investment or for any other purpose.

7.8 Special considerations

7.8.1 Minimum subscription and holding amounts

The subscription for Shares may be subject to a minimum initial subscription amount and/or additional subscription amount, as specified for each Share Class in the Supplement. The Fund may reject any application for subscription for or conversion into Shares of a Share Class which does not meet the applicable minimum initial subscription amount or additional subscription amount for that Share Class, if any.

In addition, the holding of Shares may be subject to a minimum holding amount, as/if specified for each Share Class in the Supplement. Where applicable, the Fund may treat any application for redemption or conversion of part of a holding of Shares in a Share Class as a deemed application for redemption or conversion of the entire holding of the redeeming investor in that Share Class if, as a result of such application, the Net Asset Value of the Shares retained by the investor in that Share Class would fall below the applicable minimum holding amount. Alternatively, the Fund may grant a grace period to the investor so as to allow him to increase his holding to at least the minimum holding amount.

The Fund may further deny giving effect to any transfer of Shares if, as a result of such transfer, the Net Asset Value of the Shares retained by the transferor in a Share Class would fall below the minimum holding amount for that Share Class, or if the Net Asset Value of the Shares acquired by the transferee in a Share Class would be less than the minimum initial or additional subscription amounts, as applicable. In such cases, the Fund will notify the transferor that it will not give effect to the transfer of the Shares.

Alternatively, the Fund has the discretion, from time to time, to waive any applicable minimum initial subscription amount, minimum additional subscription amount and/or minimum holding amount provided that investors are treated fairly.

7.8.2 Minimum or maximum level of assets under management

The Fund may decide to cancel the launch of a Sub-Fund or Share Class before the end of the Initial Offer where that Sub-Fund or Share Class has not reached the minimum or expected level of assets under management for such Sub-Fund or Share Class to be operated in an economically efficient manner. In such event, applications for subscription will be refused and subscription proceeds previously received by the Fund will be returned to the applicant.

Where applications for redemptions or conversions out of a Sub-Fund or Share Class on a particular Redemption Day or Conversion Day represent the total number of Shares in issue in that Sub-Fund or Share Class, or the remaining number of Shares in issue after such redemptions or conversions would represent a total Net Asset Value below the minimum level of assets under management required for such Sub-Fund or Share Class to be managed and/or administered in an efficient manner, the Fund may decide to terminate and liquidate the Sub-Fund or Share Class in accordance with the procedure set out in section 10.9 (Liquidation) below. In such a case, all remaining Shares of the Sub-Fund or Share Class will be redeemed.

The Fund may also decide to close a Sub-Fund or Share Class to new subscriptions or new investors where that Sub-Fund or Share Class has reached its maximum or expected level of assets under management. In such event, applications for subscription will be refused, in whole or in part, and subscription proceeds previously received by the Fund will be returned to the applicant.

7.8.3 Suspension of issue, redemption or conversion of Shares

The issue, redemption or conversion of Shares in a Share Class shall be suspended whenever the determination of the Net Asset Value per Share of such Share Class is suspended by the Fund in accordance with section 8.4 (Temporary suspension of the Net Asset Value calculation) below and in other circumstances specified in the Articles of Association and this Prospectus.

Suspended subscriptions, redemptions and conversions will be treated as deemed applications for subscriptions, redemptions or conversions in respect of the first Subscription Day, Redemption Day or Conversion Day following the end of the suspension period unless the investors have withdrawn their applications for subscription, redemption or conversion by written notification received by the Fund before the end of the suspension period.

7.8.4 Deferral of redemption or conversion of Shares

If on any given Redemption Day or Conversion Day, applications for redemption or conversion of Shares out of a Sub-Fund or Share Class represent in aggregate more than ten percent (10%) of the Net Asset Value of the Sub-Fund or Share Class, the Fund may decide that part (on a *pro rata* basis) or all of such requests for redemption or conversion will be deferred to the next or subsequent Redemption Days or Conversion Days for a period generally not exceeding ten (10) Business Days until the application is processed in full. On a next or subsequent Redemption Day or Conversion Day, deferred redemption or conversion requests will be met in priority to requests submitted in respect of such Redemption Day or Conversion Day.

The Fund also reserves the right to postpone the payment of redemption proceeds after the end of the normal Redemption Settlement Period in accordance with the provisions set out in section 7.5 (Redemption of Shares) above.

As an alternative to deferring applications for redemptions, the Fund may propose to an investor, who accepts, to settle a redemption application, in whole or in part, by a distribution in kind of certain assets of the Sub-Fund or Share Class in lieu of cash, subject to the conditions set out in section 7.5 (Redemption of Shares) above.

7.9 Late trading, market timing and other prohibited practices

The Fund does not permit late trading practices as such practices may adversely affect the interests of investors. In general, late trading is to be understood as the acceptance of a subscription, redemption or conversion order for Shares after the Cut-Off Time for a Subscription Day, Redemption Day or Conversion Day and the execution of such order at a price based on the Net Asset Value applicable to such same day. However, as mentioned above, the Fund may accept subscription, conversion or redemption applications received after the Cut-Off Time, in circumstances where the subscription, redemption or conversion applications are dealt with on an unknown Net Asset Value basis, provided that it is in the interest of the Sub-Fund and that investors are fairly treated. In particular, the Fund may waive the Cut-Off Time where a Distributor submits the application to the UCI Administrator after the Cut-Off Time provided that such application has been received by the Distributor from the investor in advance of the Cut-Off Time.

Subscriptions and conversions of Shares should be made for investment purposes only. The Fund does not permit market timing or other excessive trading practices. Market timing is to be understood as an arbitrage method by which an investor systematically subscribes and redeems or converts Shares of the same Sub-Fund or Share Class within a short time period, by taking advantage of time differences and/or imperfections or deficiencies in the method of determination of the Net Asset Value. Excessive, short-term (market timing) trading practices may disrupt portfolio management strategies and harm fund performance. To minimise harm to the Fund and other investors, the Fund has the right to reject any subscription or conversion order, or levy in addition to any Subscription Fee, Redemption Fee or Conversion Fee which may be charged according to the Supplement, a fee of up to two percent (2%) of the value of the order for the benefit of the Sub-Fund or Share Class, from any investor who is engaging or is suspected of engaging in excessive trading, or has a history of excessive trading, or if an investor's trading, in the opinion of the Board of Directors, has been or may be disruptive to the Fund. In making this judgment, the Board of Directors may consider trading done in multiple accounts under common ownership or control.

The Fund also has the power to compulsorily redeem all Shares held by, on behalf or for the account or benefit of, an investor who is or has been engaged in, or is suspected of being engaged in, late trading, market timing or other excessive trading, in accordance with the procedure set out in this Prospectus. The Board of Directors considers such persons as Prohibited Persons.

The Fund will not be held liable for any loss resulting from rejected orders or compulsory redemptions.

7.10 Prohibited Persons

The Articles of Association give powers to the Board of Directors to restrict or prevent the legal or beneficial ownership of Shares or prohibit certain practices such as late trading and market timing by any person (individual, corporation, partnership or other entity), if in the opinion of the Board of Directors such ownership or practices may (i) result in a breach of any provisions of the Articles of Association, the Prospectus or the laws or regulations of any jurisdiction, or (ii) require the Fund, the Management Company or the Investment Manager to be registered under any laws or regulations whether as an investment fund or otherwise, or cause the Fund to be required to comply with any registration requirements in respect of any of its Shares, whether in the United States of America or any other jurisdiction, or (iii) may cause the Fund, the Management Company or the Investment Manager or the investors any legal, regulatory, taxation, administrative or financial disadvantages which they would not have otherwise incurred (a Prohibited Person).

The Board of Directors has decided that US Persons would be considered as Prohibited Persons. By signing a Subscription Form, an applicant will certify, represent, warrant and agree that he is not a US Person or that the Shares applied for are not being acquired directly or indirectly by, on behalf or for the account or benefit of, a US Person and that he will not transfer any of the shares or any interest therein to a US Person. An applicant will further certify, represent, warrant and agree that the applicant will notify the UCI Administrator or the Fund (as the case may be) in the event that either the applicant becomes a US Person or holds the Shares on behalf of, or for the account or benefit of, a US Person. If an applicant's status changes and it becomes a US Person, it must immediately notify the UCI Administrator.

The Board of Directors has also decided that any person not qualifying as an Eligible Investor will be considered as a Prohibited Person.

Furthermore, the Board of Directors has decided that any person who is or has been engaged in, or is suspected of being engaged in, late trading, market timing or other excessive trading, directly or indirectly, as described in section 7.9 (Late trading, market timing and other prohibited practices) above, will be considered as a Prohibited Person.

The Fund may decline to issue any Shares and to accept any transfer of Shares, where it appears that such issue or transfer would or might result in Shares being acquired or held by, on behalf or for the account or benefit of, Prohibited Persons. The Fund may require at any time any investor or prospective investor to provide the Fund with any information, together with supporting documentation, which the Fund may consider necessary for the purpose of determining whether the issue or transfer would result in Shares being held by, on behalf or for the account or benefit of, a Prohibited Person.

The Fund may compulsorily redeem all Shares held by, on behalf or for the account or benefit of, Prohibited Persons. In such cases, the Fund will notify the investor of the reasons which justify the compulsory redemption of Shares, the number of Shares to be redeemed and the indicative Redemption Day on which the compulsory redemption will occur. The Redemption Price shall be determined in accordance with section 7.5 (Redemption of Shares) above.

The Fund may also grant a grace period to the investor for remedying the situation causing the compulsory redemption, for instance by transferring the Shares to one or more investors who are not Prohibited Persons and do not act on behalf or for the account or benefit of, Prohibited Persons, and/or propose to convert the Shares held by any investor who fails to satisfy the investor eligibility requirements for a Shares Class into Shares of another Share Class available for such investor.

The Fund reserves the right to require the investor to indemnify the Fund against any losses, costs or expenses arising as a result of any Shares being held by, on behalf or for the account or benefit of, a Prohibited Person. The Fund may pay such losses, costs or expenses out of the proceeds of any compulsory redemption described above and/or redeem all or part of the investor’s other Shares, if any, in order to pay for such losses, costs or expenses.

7.11 Prevention of money laundering

Pursuant to the applicable provisions of Luxembourg laws and regulations in relation to the fight against money laundering and terrorist financing, obligations have been imposed on the Fund as well as on other professionals of the financial sector to prevent the use of funds for money laundering and financing of terrorism purposes.

The Fund and the Management Company will ensure their compliance with the applicable AML/CFT Rules, including but not limited to the 2004 Law, the 2010 AML/CFT Regulation, CSSF Regulation N°12-02 of 14 December 2012 on the fight against money laundering and terrorist financing and relevant CSSF Circulars in the field of AML/CFT, including but not limited to CSSF Circular 18/698 on the authorization and organization of investment fund managers incorporated under Luxembourg law.

In accordance with the AML/CFT Rules, the Fund and the Management Company are required to apply due diligence measures on the investors (including on their ultimate beneficial owner(s)), their delegates and the assets of the Fund in accordance with their respective policies and procedures put in place from time to time.

Among others, the AML/CFT Rules require a detailed verification of a prospective investor's identity. In this context, the Fund and the Management Company, or the UCI Administrator or any Distributor, nominee or any other type of intermediary (as the case may be), acting under the responsibility and supervision of the Fund and the Fund will require prospective investors to provide them with any information, confirmation and documentation deemed necessary in their reasonable judgment, applying a risk-based approach, to proceed such identification.

The Fund and the UCI Administrator reserve the right to request such information as is necessary to verify the identity of a prospective or current investor. In the event of delay or failure by a prospective investor to produce any information required for verification purposes, the Fund and the UCI Administrator are entitled to refuse the application and will not be liable for any interest, costs or compensation. Similarly, when Shares are issued, they cannot be redeemed or converted until full details of registration and anti-money laundering documents have been completed.

The Fund and the UCI Administrator moreover reserve the right to reject an application, for any reason, in whole or in part in which event the application monies (if any) or any balance thereof will, to the extent permissible, be returned without unnecessary delay to the prospective investor by transfer to the prospective investor's designated account or by post at the prospective investor's risk, provided the identity of the prospective investor can be properly verified pursuant to the AML/CFT Rules. In such event, the Fund and the Management Company will not be liable for any interest, costs or compensation.

In addition, the Fund and the Management Company, or the UCI Administrator or any Distributor, nominee or any other type of intermediary (as the case may be), acting under the responsibility and supervision of the Fund and the Management Company, may request investors to provide additional or updated identification documents from time to time pursuant to on-going client due diligence requirements under the AML/CFT Rules, and investors shall be required and accept to comply with such requests.

Failure to provide proper information, confirmation or documentation may, among others, result in (i) the rejection of subscriptions, (ii) the withholding of redemption proceeds by the Fund or (iii) the withholding of outstanding dividend payments. Moreover, prospective or current investors who fail to comply with the above requirements may be subject to additional administrative or criminal sanctions under applicable laws, including but not limited to the laws of the Grand Duchy of Luxembourg. None of the Fund, the Management Company, the UCI Administrator or any Distributor, nominee or any other type of intermediary (as the case may be) has any liability to an investor for delays or failure to process subscriptions, redemptions or dividend payments as a result of the investor providing no or only incomplete documentation. The Fund and the Management Company moreover reserve all rights and remedies available under applicable law to ensure their compliance with the AML/CFT Rules.

Pursuant to the RBO Law, the Fund is required to collect and make available certain information on its beneficial owner(s) (as defined in the AML/CFT Rules). Such information includes, among others, first and last name, nationality, country of residence, personal or professional address, national identification number and information on the nature and the scope of the beneficial ownership interest held by each beneficial owner in the Fund. The Fund is further required, among others, (i) to make such information available upon request to certain Luxembourg national authorities (including the CSSF, the *Commissariat aux Assurances*, the *Cellule de Renseignement Financier*, Luxembourg tax and other national authorities as defined in the RBO Law) and upon motivated request of other professionals of the financial sector subject to the AML/CFT Rules, and (ii) to register such information in a publicly available central register of beneficial owners, the RBO.

That being said, the Fund or a beneficial owner may however, on a case by case basis and in accordance with the provisions of the RBO Law, formulate a motivated request with the administrator of the RBO to limit the access to the information relating to them, e.g. in cases where such access could cause a disproportionate risk to the beneficial owner, a risk of fraud, kidnapping, blackmail, extortion, harassment or intimidation towards the beneficial owner, or where the beneficial owner is a minor or otherwise incapacitated. The decision to restrict access to the RBO does, however, not apply to the Luxembourg national authorities, nor to credit instructions, financial institutions, bailiffs and notaries acting in their capacity as public officers, which can thus always consult the RBO.

In light of the above RBO Law requirements, any persons willing to invest in the Fund and any beneficial owner(s) of such persons (i) are required to provide, and agree to provide, the Fund and the case being the Management Company, the UCI Administrator or their Distributor, nominee or any other type of intermediary (as the case may be), with the necessary information in order to allow the Fund to comply with its obligations in terms of beneficial owner identification, registration and publication under the RBO Law (regardless of applicable rules regarding professional secrecy, banking secrecy, confidentiality or other similar rules or arrangements), and (ii) accept that such information will be made available among others to Luxembourg national authorities and other professionals of the financial sector as well as to the public, with certain limitations, through the RBO.

Under the RBO Law, criminal sanctions may be imposed on the Fund in case of its failure to comply with the obligations to collect and make available the required information, but also on any beneficial owner(s) that fail to make all relevant necessary information available to the Fund.

8. VALUATION AND NET ASSET VALUE CALCULATION

The Net Asset Value of each Sub-Fund and Share Class is determined by performing a valuation of the assets and liabilities of the Fund and allocating them to the Sub-Funds and Share Classes, in order to calculate the Net Asset Value per Share of each Share Class of each Sub-Fund. The method for the valuation of the assets and liabilities, the allocation to the Sub-Funds and Share Classes, and the calculation of the Net Asset Value is set out in the Articles of Association and is also described in this section of the Prospectus.

8.1 Calculation of the Net Asset Value

The Net Asset Value per Share shall be determined by the UCI Administrator as of each Valuation Day and at least twice a month. It shall be calculated by dividing the Net Asset Value of the Share Class of a Sub-Fund by the total number of Shares of such Share Class in issue as of that Valuation Day. The Net Asset Value per Share shall be expressed in the Reference Currency of the Share Class and may be rounded up or down to three (3) decimal places.

The Net Asset Value of a Share Class is equal to the value of the assets allocated to such Share Class within a Sub-Fund less the value of the liabilities allocated to such Share Class, both being calculated as of each Valuation Day according to the valuation procedure described below.

The Net Asset Value of a Sub-Fund is equal to the value of the assets allocated to such Sub-Fund less the value of the liabilities allocated to such Sub-Fund, both calculated as of each Valuation Day in the Reference Currency of the Sub-Fund according to the valuation procedure described below.

The Net Asset Value of the Fund will at all times be equal to the sum of the Net Asset Values of all Sub-Funds expressed in the Reference Currency of the Fund. The Net Asset Value of the Fund must at all times be at least equal to the minimum share capital required by the 2010 Law which is currently EUR 1,250,000, except during the first six (6) months after the approval of the Fund by the CSSF.

8.2 Valuation procedure

8.2.1 General

The assets and liabilities of the Fund will be valued in accordance with the Articles of Association and the provisions outlined below.

The Board of Directors may apply, in good faith and in accordance with generally accepted valuation principles and procedures, other valuation principles or alternative methods of valuation that it considers appropriate in order to determine the probable realisation value of any asset if applying the rules described below appears inappropriate or impracticable.

The Board of Directors may adjust the value of any asset if the Board of Directors determines that such adjustment is required to reflect its fair value taking into account its denomination, maturity, liquidity, applicable or anticipated interest rates or dividend distributions or any other relevant considerations.

If, after the time of determination of the Net Asset Value but before publication of the Net Asset Value for a Valuation Day, there has been a material change affecting the exchanges or markets on which a substantial portion of the investments of a Sub-Fund are quoted, listed or traded, the Board of Directors may cancel the first valuation and carry out a second valuation in order to safeguard the interest of investors. In such a case, the Net Asset Value used for processing subscription, redemption and conversion applications for that Valuation Day will be based on the second calculation.

For the purpose of calculating the Net Asset Value in accordance with the valuation principles set out below, the Board of Directors has authorised the UCI Administrator to rely in whole or in part upon valuations provided by available pricing sources for the relevant asset, including data vendors and pricing agencies (such as Bloomberg or Reuters), fund administrators, brokers, dealers and valuation specialists, provided that such pricing sources are considered reliable and appropriate and provided that there is no manifest error or negligence in such valuations. In the event that valuations are not available or valuations may not correctly be assessed using such pricing sources, the UCI Administrator will rely upon valuation methods and determinations provided by the Board of Directors.

The Board of Directors and the UCI Administrator may consult with and seek the advice of the Investment Manager in valuing the Fund’s assets. Where the Board of Directors considers it necessary, it may seek the assistance of a valuation committee whose task will be the prudent estimation of certain assets’ values in good faith.

In the absence of fraud, bad faith, gross negligence or manifest error, any decision taken in accordance with the Articles of Association and the Prospectus by the Board of Directors or any agent appointed by the Board of Directors in connection with the valuation of the Fund’s assets and the calculation of the Net Asset Value of the Fund, a Sub-Fund or a Share Class, the Net Asset Value per Share will be final and binding on the Fund and on all investors, and neither the Board of Directors nor any agent appointed by the Board of Directors shall incur any individual liability or responsibility for any determination made or other action taken or omitted by them in this connection.

8.2.2 Assets of the Fund

Subject to the rules on the allocation to Sub-Funds and Share Classes below, the assets of the Fund shall include the following:

1) all cash on hand or on deposit, including any outstanding accrued interest;

2) all bills and any types of notes or accounts receivable, including outstanding proceeds of any disposal of financial instruments;

3) all securities and financial instruments, including shares, bonds, notes, certificates of deposit, debenture stocks, options or subscription rights, warrants, money market instruments and all other investments belonging to the Fund;

4) all dividends and distributions payable to the Fund either in cash or in the form of stocks and shares (which will normally be recorded in the Fund’s books as of the ex-dividend date, provided that the Fund may adjust the value of the security accordingly);

5) all outstanding accrued interest on any interest-bearing instruments belonging to the Fund, unless this interest is included in the principal amount of such instruments;

6) the formation expenses of the Fund or a Sub-Fund, to the extent that such expenses have not already been written off; and

7) all other assets of any kind and nature including expenses paid in advance.

8.2.3 Liabilities of the Fund

Subject to the rules on the allocation to Sub-Funds and Share Classes below, the liabilities of the Fund shall include the following:

1) all loans, bills or accounts payable, accrued interest on loans (including accrued fees for commitment for such loans);

2) all known liabilities, whether or not already due, including all contractual obligations that have reached their term, involving payments made either in cash or in the form of assets, including the amount of any dividends declared by the Fund but not yet paid;

3) a provision for any tax accrued to the Valuation Day and any other provisions authorised or approved by the Fund; and

4) all other liabilities of the Fund of any kind recorded in accordance with applicable accounting rules, except liabilities represented by Shares. In determining the amount of such liabilities, the Fund will take into account all expenses, fees, costs and charges payable by the Fund as set out in section 9 (Fees and expenses) below.

Adequate provisions shall be made for unpaid administrative and other expenses of a regular or recurring nature based on an estimated amount accrued for the applicable period. Any off-balance sheet liabilities shall duly be taken into account in accordance with fair and prudent criteria.

The fees and expenses incurred in connection with the formation of the Fund will be borne by the Fund and may be amortised over a period of up to five (5) years. The formation expenses of each new Sub-Fund will be borne by such Sub-Fund and may be amortised over a period of up to five (5) years. New Sub-Funds created after the incorporation and launch of the Fund will participate in the non-amortised costs of establishment of the Fund.

8.2.4 Valuation principles

In accordance with the Articles of Association, the valuation of the assets of the Fund will be conducted as follows:

1) The value of any cash on hand or on deposit, bills or notes payable, accounts receivable, prepaid expenses, cash dividends and interest accrued but not yet received shall be equal to the entire nominal or face amount thereof, unless the same is unlikely to be paid or received in full, in which case the value thereof shall be determined after making such discount as the Board of Directors may consider appropriate in such case to reflect the true value thereof.

2) Transferable Securities and Money Market Instruments which are quoted, listed or traded on an exchange or regulated market will be valued, unless otherwise provided under paragraphs 3) and 6) below, at the last available market price or quotation, prior to the time of valuation, on the exchange or regulated market where the securities or

instruments are primarily quoted, listed or traded. Where securities or instruments are quoted, listed or traded on more than one exchange or regulated market, the Board of Directors will determine on which exchange or regulated market the securities or instruments are primarily quoted, listed or traded and the market prices or quotations on such exchange or regulated market will be used for the purpose of their valuation. Transferable Securities and Money Market Instruments for which market prices or quotations are not available or representative, or which are not quoted, listed or traded on an exchange or regulated market, will be valued at their probable realisation value estimated with care and in good faith by the Board of Directors using any valuation method approved by the Board of Directors.

3) Notwithstanding paragraph 2) above, where permitted under applicable laws and regulations, Money Market Instruments may be valued using an amortisation method whereby instruments are valued at their acquisition cost as adjusted for amortisation of premium or accrual of discount on a constant basis until maturity, regardless of the impact of fluctuating interest rates on the market value of the instruments. The amortisation method will only be used if it is not expected to result in a material discrepancy between the market value of the instruments and their value calculated according to the amortisation method.

4) Financial derivative instruments which are quoted, listed or traded on an exchange or regulated market will be valued at the last available closing or settlement price or quotation, prior to the time of valuation, on the exchange or regulated market where the instruments are primarily quoted, listed or traded. Where instruments are quoted, listed or traded on more than one exchange or regulated market, the Board of Directors will determine on which exchange or regulated market the instruments are primarily quoted, listed or traded and the closing or settlement prices or quotations on such exchange or regulated market will be used for the purpose of their valuation. Financial derivative instruments for which closing or settlement prices or quotations are not available or representative will be valued at their probable realisation value estimated with care and in good faith by the Board of Directors using any valuation method approved by the Board of Directors.

5) Financial derivative instruments which are traded “over-the-counter” (OTC) will be valued daily at their fair market value, on the basis of valuations provided by the counterparty which will be approved or verified on a regular basis independently from the counterparty. Alternatively, OTC financial derivative instruments may be valued on the basis of independent pricing services or valuation models approved by the Board of Directors which follow international best practice and valuation principles. Any such valuation will be reconciled to the counterparty valuation on a regular basis independently from the counterparty, and significant differences will be promptly investigated and explained.

6) Notwithstanding paragraph 2) above, shares or units in target investment funds (including UCITS and UCI) will be valued at their latest available official net asset value, as reported or provided by or on behalf of the investment fund or at their latest available unofficial or estimated net asset value if more recent than the latest available official net asset value, provided that the Board of Directors is satisfied of the reliability of such unofficial net asset value. The Net Asset Value calculated on the basis of unofficial net

asset values of the target investment fund may differ from the Net Asset Value which would have been calculated, on the same Valuation Day, on the basis of the official net asset value of the target investment fund. Alternatively, shares or units in target investment funds which are quoted, listed or traded on an exchange or regulated market may be valued in accordance with the provisions of paragraph 2) above.

7) The value of any other asset not specifically referenced above will be the probable realisation value estimated with care and in good faith by the Board of Directors using any valuation method approved by the Board of Directors.

8.2.5 Allocation of assets and liabilities to Sub-Funds and Share Classes

Assets and liabilities of the Fund will be allocated to each Sub-Fund and Share Class in accordance with the provisions of the Articles of Association, as set out below, and the Supplement of the Sub-Fund.

1) The proceeds from the issue of Shares of a Sub-Fund or Share Class, all assets in which such proceeds are invested or reinvested and all income, earnings, profits or assets attributable to or deriving from such investments, as well as all increase or decrease in the value thereof, will be allocated to that Sub-Fund or Share Class and recorded in its books. The assets allocated to each Share Class of the same Sub-Fund will be invested together in accordance with the investment objective, policy, and strategy of that Sub-Fund, subject to the specific features and terms of issue of each Share Class of that Sub-Fund, as specified in its Supplement (see section 7.1 (Shares, Sub-Funds and Share Classes) above).

2) All liabilities of the Fund attributable to the assets allocated to a Sub-Fund or Share Class or incurred in connection with the creation, operation or liquidation of a Sub-Fund or Share Class will be charged to that Sub-Fund or Share Class and, together with any increase or decrease in the value thereof, will be allocated to that Sub-Fund or Share Class and recorded in its books. In particular and without limitation, the costs and any benefit of any Share Class specific feature will be allocated solely to the Share Class to which the specific feature relates.

3) Any assets or liabilities not attributable to a particular Sub-Fund or Share Class may be allocated by the Board of Directors in good faith and in a manner which is fair to investors generally and will normally be allocated to all Sub-Funds or Share Classes *pro rata* to their Net Asset Value.

Subject to the above, the Board of Directors may at any time vary the allocation of assets and liabilities previously allocated to a Sub-Fund or Share Class.

8.2.6 Additional rules for assets and liabilities of the Fund

In calculating the Net Asset Value of each Sub-Fund or Share Class the following principles will apply.

1) Each Share agreed to be issued by the Fund on each Subscription Day will be deemed to be in issue and existing immediately after the time of valuation on the Subscription Day. From such time and until the Subscription Price is received by the Fund, the assets of the Sub-Fund or Share Class concerned will be deemed to include a claim of that

Sub-Fund or Share Class for the amount of any cash or other property to be received in respect of the issue of such Shares. The Net Asset Value of the Sub-Fund or Share Class will be increased by such amount immediately after the time of valuation on the Subscription Day.

2) Each Share agreed to be redeemed by the Fund on each Redemption Day will be deemed to be in issue and existing until and including the time of valuation on the Redemption Day. Immediately after the time of valuation and until the Redemption Price is paid by the Fund, the liabilities of the Sub-Fund or Share Class concerned will be deemed to include a debt of that Sub-Fund or Share Class for the amount of any cash or other property to be paid in respect of the redemption of such Shares. The Net Asset Value of the Sub-Fund or Share Class will be decreased by such amount immediately after the time of valuation on the Redemption Day.

3) Following a declaration of dividends for Distribution Shares on a Valuation Day determined by the Fund to be the distribution accounting date, the Net Asset Value of the Sub-Fund or Share Class will be decreased by such amount as of the time of valuation on that Valuation Day.

4) Where assets have been agreed to be purchased or sold but such purchase or sale has not been completed at the time of valuation on a given Valuation Day, such assets will be included in or excluded from the assets of the Fund, and the gross purchase price payable or net sale price receivable will be excluded from or included in the assets of the Fund, as if such purchase or sale had been duly completed at the time of valuation on that Valuation Day, unless the Fund has reason to believe that such purchase or sale will not be completed in accordance with its terms. If the exact value or nature of such assets or price is not known at the time of valuation on the Valuation Day, its value will be estimated by the Fund in accordance with the valuation principles described above.

5) The value of any asset or liability denominated or expressed in a currency other than the Reference Currency of the Fund, Sub-Fund or Share Class will be converted, as applicable, into the Reference Currency of the Fund, Sub-Fund or Share Class at the prevailing foreign exchange rate at the time of valuation on the Valuation Day concerned which the Board of Directors considers appropriate.

8.2.7 Adjustments

In certain circumstances, subscriptions, redemptions, and conversions in a Sub-Fund may have a negative impact on the Net Asset Value per Share. Where subscriptions, redemptions, and conversions in a Sub-Fund cause the Sub-Fund to buy and/or sell underlying investments, the value of these investments may be affected by bid/offer spreads, trading costs and related expenses including transaction charges, brokerage fees, and taxes. This investment activity may have a negative impact on the Net Asset Value per Share called “dilution”. In order to protect existing or remaining investors from the potential effect of dilution, the Fund may apply a “swing pricing” methodology as further explained below.

If the total subscriptions or redemptions of all the share classes of a Sub-Fund on a single trading day come to a net capital inflow or outflow, the respective Sub-Fund's net asset value may be increased or reduced accordingly (so-called single swing pricing). The maximum adjustment amounts to 2% of the Net Asset Value per Share, unless otherwise set out for each Sub-Fund in the Supplement Estimated transaction costs and tax charges that may be incurred by the Sub-Fund as well as the estimated bid/offer spread of the assets in which the Sub-Fund invests may be taken into account. The adjustment leads to an increase in net asset value if the net movements result in a rise in the number of shares in the concerned Sub-fund. It results in a reduction of net asset value if the net movements bring about a fall in the number of shares. The Board of Directors of the Fund can set a threshold value for each Sub-Fund. This may consist in the net movement on a Trading Day in relation to the Net fund assets or to an absolute amount in the currency of the Sub-Fund concerned. The Net Asset Value would be adjusted only if this threshold were to be exceeded on a trading day.

The Board of Directors will determine if a partial swing or full swing is adopted. If a partial swing is adopted, the Net Asset Value per Share will be adjusted upwards or downwards if net subscriptions or redemptions in a Sub-Fund exceed a certain threshold set by the Board of Directors from time to time for each Sub-Fund (called the Swing Threshold). If a full swing is adopted, no Swing Threshold will apply.

The Swing Factor will have the following effect on subscriptions or redemptions:

1) on a Sub-Fund experiencing levels of net subscriptions on a Valuation Day (i.e. subscriptions are greater in value than redemptions) (in excess of the Swing Threshold, where applicable) the Net Asset Value per Share will be adjusted upwards by the Swing Factor; and

2) on a Sub-Fund experiencing levels of net redemptions on a Valuation Day (i.e. redemptions are greater in value than subscriptions) (in excess of the Swing Threshold, where applicable) the Net Asset Value per Share will be adjusted downwards by the Swing Factor.

The Board of Directors may decide, in respect of any Sub-Fund and/or Valuation Day, to apply on a temporary basis an adjustment greater than 2% of the then applicable Net Asset Value per Share in exceptional circumstances (e.g. high market volatility and/or illiquidity, exceptional market conditions, market disruptions, etc.) where the Board of Directors can justify that this is representative of prevailing market conditions and that this is in the best interests of Shareholders. Such adjustment is calculated in conformity with the procedures established by the Board of Directors. The Board of Directors must communicate this decision to current as well as new investors through the usual communication channels and on www.siderafunds.com.

The volatility of the Net Asset Value of the Sub-Fund might not reflect the true portfolio performance (and therefore might deviate from the Sub-Fund's Benchmark, where applicable) as a consequence of the application of swing pricing.

8.3 Publication of the Net Asset Value

The publication of the Net Asset Values will take place on the next Business Day after a Valuation Day unless otherwise provided for in the Supplement. The Net Asset Value per Share of each Share Class within each Sub-Fund will be available from the UCI Administrator and/or Distributors during normal business hours and is published on www.siderafunds.com. The Net

Asset Value per Share of any Share Class or Sub-Fund which is listed on the Luxembourg Stock Exchange or any other exchange will be notified to such exchange upon calculation.

8.4 Temporary suspension of the Net Asset Value calculation

The Board of Directors, upon consultation with the Management Company, may temporarily suspend the calculation and publication of the Net Asset Value per Share of any Share Class in any Sub-Fund and/or where applicable, the issue, redemption and conversion of Shares of any Share Class in any Sub-Fund in the following cases:

1) when any exchange or regulated market that supplies the price of the assets of a Sub-Fund is closed for reasons other than for ordinary holidays, or in the event that transactions on such exchange or market are suspended, subject to restrictions, or impossible to execute in volumes allowing the determination of fair prices;

2) when the information or calculation sources normally used to determine the value of the assets of a Sub-Fund are unavailable;

3) during any period when any breakdown or malfunction occurs in the means of communication network or IT media normally employed in determining the price or value of the assets of a Sub-Fund, or which is required to calculate the Net Asset Value per Share;

4) when exchange, capital transfer or other restrictions prevent the execution of transactions of a Sub-Fund or prevent the execution of transactions at normal rates of exchange and conditions for such transactions;

5) when exchange, capital transfer or other restrictions prevent the repatriation of assets of a Sub-Fund for the purpose of making payments on the redemption of Shares or prevent the execution of such repatriation at normal rates of exchange and conditions for such repatriation;

6) when the legal, political, economic, military or monetary environment, or an event of force majeure, prevent the Fund from being able to manage the assets of a Sub-Fund in a normal manner and/or prevent the determination of their value in a reasonable manner;

7) when there is a suspension of the net asset value calculation or of the issue, redemption or conversion rights by the investment fund(s) in which a Sub-Fund is invested;

8) following the suspension of the net asset value calculation and/or the issue, redemption and conversion at the level of a Master Fund in which a Sub-Fund invests as a Feeder Fund;

9) when, for any other reason, the prices or values of the assets of a Sub-Fund cannot be promptly or accurately ascertained or when it is otherwise impossible to dispose of the assets of the Sub-Fund in the usual way and/or without materially prejudicing the interests of investors;

10) in the event of a notice to shareholders of the Fund convening an extraordinary general meeting of shareholders for the purpose of dissolving and liquidating the Fund or informing them about the termination and liquidation of a Sub-Fund or Share Class, and

more generally, during the process of liquidation of the Fund, a Sub-Fund or Share Class;

11) during the process of establishing exchange ratios in the context of a merger, a contribution of assets, an asset or share split or any other restructuring transaction;

12) during any period when the dealing of the Shares of a Sub-Fund or Share Class on any relevant stock exchange where such Shares are listed is suspended or restricted or closed; and

13) in exceptional circumstances, whenever the Board of Directors considers it necessary in order to avoid irreversible negative effects on the Fund, a Sub-Fund or Share Class, in compliance with the principle of fair treatment of investors in their best interests.

In the event of exceptional circumstances which could adversely affect the interest of investors or where significant requests for subscription, redemption or conversion of Shares are received for a Sub-Fund or Share Class, the Board of Directors reserves the right to determine the Net Asset Value per Share for that Sub-Fund or Share Class only after the Fund has completed the necessary investments or divestments in securities or other assets for the Sub-Fund or Share Class concerned.

The issue, redemption and conversion of Shares in the any Share Class will also be suspended during any such period when the Net Asset Value of such Share Class is not calculated and published.

Any decision to suspend the calculation and publication of the Net Asset Value per Share and/or where applicable, the issue, redemption and conversion of Shares of a Share Class, will be published and/or communicated to investors as required by applicable laws and regulations in Luxembourg and other jurisdictions where the Shares are distributed and posted on www.siderafunds.com where appropriate.

The suspension of the calculation of the Net Asset Value and/or, where applicable, of the subscription, redemption and/or conversion of Shares in any Sub-Fund or Share Class will have no effect on the calculation of the Net Asset Value and/or, where applicable, of the subscription, redemption and/or conversion of Shares in any other Sub-Fund or Share Class.

Suspended subscription, redemption, and conversion applications will be treated as deemed applications for subscriptions, redemptions or conversions in respect of the first Subscription Day, Redemption Day or Conversion Day following the end of the suspension period unless the investors have withdrawn their applications for subscription, redemption or conversion by written notification received by the UCI Administrator before the end of the suspension period.

9. FEES AND EXPENSES

9.1 Subscription Fee and Redemption Fee

Subscriptions for Shares may be subject to a Subscription Fee and redemptions of Shares may be subject to a Redemption Fee both calculated as specified in the Supplement, where applicable. Conversions of Shares may be subject to a Conversion Fee calculated as specified in the Supplement, where applicable. For the avoidance of doubt, no Subscription Fee or Redemption Fee will apply on conversions in addition to the Conversion Fee, if any.

The Subscription Fee, Redemption Fee and Conversion Fee will be paid to the Fund and/or to the sub-distributor and/or to specific intermediaries. The Fund and/or the sub-distributor and/or specific intermediaries may in their discretion waive all or part of the Subscription Fee, Redemption Fee or Conversion Fee, in compliance with the principle of equal treatment of investors submitting their request the same day.

Should a Sub-Fund qualify as a Master Fund, no Subscription Fee, Redemption Fee or Conversion Fee will be charged in respect of subscription, redemption or conversion requests of any Feeder Fund of that Master Fund.

Banks and other financial intermediaries appointed by or acting on behalf of the investors may charge administration and/or other fees or commissions to the investors pursuant to arrangements between those banks or other financial intermediaries and the investors. The Fund has no control over such arrangements.

9.2 Management Fee

The Fund will be charged with a Management Fee, out of which the Management Company, the Investment Manager and the Global Distributor are paid. The Management Fee is calculated as a percentage of the average Net Asset Value of each Sub-Fund or Share Class and paid out of the assets of the Fund and allocated to each Sub-Fund and Share Class (as described in section 8.2.5 (Allocation of assets and liabilities to Sub-Funds and Share Classes) above). The Management Fee will accrue on each Valuation Day and will be payable monthly in arrears at the rate specified in the Supplement for each Sub-Fund or Share Class and is subject to any customary increases in line with general market practice from time to time.

The Management Company, Investment Manager and Global Distributor will also be entitled to reimbursement of reasonable out-of-pocket expenses properly incurred in carrying out its duties.

For each Sub-Fund or Share Class the Management Fee cannot exceed the levels indicated in the Supplements. The Management Fee covers investment management, administration and marketing services (including distribution) performed by the Management Company, the investment manager and the global distributor. With respect to the services provided by the UCI Administrator appointed by the Management Company, the administration fee will be charged to the Sub-Fund (see section 9.4 - Fees of the Depositary and the UCI Administrator).

In addition, the Management Company is entitled to receive certain other fees described in a separate engagement letter entered into between the Management Company and the Fund for certain ancillary services provided to the Fund and relating to the core services of the

Management Company, such as, but not limited to Fund domiciliation and corporate secretarial services.

9.3 Performance Fee

The Investment Manager may be entitled to receive a Performance Fee with respect to certain Sub-Funds or Share Classes. The payment and size of the Performance Fee depends on the performance of the Sub-Fund or Share Class over a specified reference period, which is defined as the time horizon during which the performance is measured and compared with the performance of the reference indicator and at the end of which the mechanism for the compensation for past underperformance (or negative performance) can be reset (the "**Performance Reference Period**").

The Performance Fee is paid out of the assets of the Fund and allocated to the relevant Sub-Funds and Share Classes as described in section 8.2.5 (Allocation of assets and liabilities to Sub-Funds and Share Classes) above. Details regarding the calculation and payment of Performance Fees are described below.

If Shares were redeemed (this applies only for the Benchmark model as further described below) or converted into other Shares of any Class of one Sub-Fund or any Class of another existing Sub-Fund of the Fund or of another UCI during the financial year and a Performance Fee is accrued for those Shares, such Performance Fee will be crystallized respectively at the date of redemption (Benchmark model only) or conversion and it will be considered as payable to the Investment Manager as specified for each model, unless the Investment Manager decides to waive the Performance Fee.

In case of merger of funds, the crystallisation of the Performance Fees of the merging fund should be authorised subject to the best interest of investors of both the merging and the receiving fund. For instance, in case where all involved funds are managed by the same manager Performance Fees should normally not crystallize, unless otherwise justified by the manager. In any event, no Performance Fee shall crystallise where one Sub-Fund or a Share Class of this Sub-Fund is merged with a newly established receiving UCITS or sub-fund with no performance history and with an investment policy not substantially different from that of the Sub-Fund. In that case, the Performance Reference Period of the Sub-Fund shall continue applying in the receiving UCITS or Sub-Fund.

Any Performance Fee will be charged on the basis of the unswung Net Asset Value (in case the Sub-Fund applies the swing pricing methodology further explained under section 8.2.7. (Adjustments) above).

The Crystallisation Date (as defined below) should be the same for all Share Classes of a Sub-Fund that levies a Performance Fee.

There are two (2) models applied for the calculation methodology of the Performance Fee depending on the type of the Sub-Funds:

- Benchmark model for market Sub-Funds; and
- Index cum spread + HoH for total/absolute return Sub-Funds.

9.3.1 Benchmark model

For Sub-Funds using the Benchmark model, the following applies.

Under the Benchmark model, the accrued Performance Fee, if any, becomes payable to the Investment Manager annually (the "**Crystallisation Frequency**"), meaning that the Performance Fee will be crystallised at the end of the financial year of the Fund (the "**Crystallisation Date**") on the basis of outperforming the Benchmark(s) of the Sub-Fund and subject to the conditions set out below.

If the Crystallisation Date is not a Business Day, it designates the last Business Day in December. The Performance Fee is paid to the Investment Manager as soon as reasonably possible after the Crystallisation Date and upon final determination of the UCI Administrator.

The Performance Fee shall be calculated and accrued at each Valuation Day on the basis of the Net Asset Value per Share (calculated net of all costs but prior to the deduction of any accrued Performance Fee as well as adjusted for any previously distributed dividends).

The amount of the Performance Fee depends on the total return performance of the Net Asset Value per Share of the relevant Share Class compared to maximum of zero and the performance of the relevant Benchmark (the "**Overperformance**").

For a specific Share Class, the Performance Fee equals 20% of the Overperformance (net of previous underperformance), which is then applied to the Net Asset Value of the relevant Share Class on the start date of the Performance Reference Period multiplied by the number of Shares on the last Valuation Day. Artificial increases resulting from new subscriptions are excluded when calculating the Sub-Fund's performance.

The Performance Reference Period is extended until previous underperformances are clawed back, over the last five (5) financial years on a rolling basis. Any underperformance incurred during the Performance Reference Period is recovered before a Performance Fee becomes payable. As such, a Performance Fee may be crystallised during the Performance Reference Period only if both of the following conditions are met:

- the performance of the Share Class that levies a Performance Fee is positive; and
- the Overperformance of the Share Class that levies a Performance Fee (net of previous underperformance or loss) is positive.

For the relevant Share Class, a cap is applied to the Performance Fee. The cap is equal to the Net Asset Value multiplied by a fixed percentage (which is the Management Fee rate as stated in each Supplement).

For this model, a Performance Fee, if any, can be crystallised after at least twelve (12) months from the creation of a new Sub-Fund and/or new Share Class (i.e., at the end of the next financial year following the creation of a new Sub-Fund and/or new Share Class). The same applies when a Performance Fee is introduced as per this model for an existing Sub-Fund and/or Share Class.

The past performance of the Sub-Fund against the relevant performance benchmark is disclosed on https://www.arcafondi.it/s/investimenti.

Example

We report a numeric example to illustrate actual calculations (hypothetical values).

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8
Portfolio return (1)	3,00%	-2,00%	-1,00%	-0,70%	2,00%	1,50%	2,50%	20,00%
Benchmark return (2)	1,00%	-1,70%	-0,40%	-0,30%	1,00%	1,00%	1,00%	9,00%
Overperformance = (1) - max[(2),0]	2,00%	-2,00%	-1,00%	-0,70%	1,00%	0,50%	1,50%	11,00%
Underperformace to be recovered in the current year	0,00%	0,00%	-2,00%	-3,00%	-3,70%	-2,70%	-1,70%	-0,20%
% Fee cap	2,00%	2,00%	2,00%	2,00%	2,00%	2,00%	2,00%	2,00%
% Performance fee before fee cap	0,40%	-	-	-	-	-	-	2,16%
% Performance fee after fee cap	0,40%	-	-	-	-	-	-	2,00%

9.3.2 Index cum spread + HoH

For Sub-Funds using the index cum spread + HoH model, the following applies.

Under the index cum spread + HoH model, the Performance Fee is calculated and crystallised daily (the “**Crystallisation Frequency**”), meaning that the Performance Fee will be crystallised on each Valuation Day (the “**Crystallisation Date**”) on the basis of outperforming the Performance Fee Threshold (as defined below) provided that the Net Asset Value per Share exceed the Net Asset Value per Share at which the Performance Fee was last crystallised (“**High-on-High**” or “**HoH**”) and subject to the conditions set out below.

The daily crystallised Performance Fee, if any, will be paid to the Investment Manager at the beginning of each month as soon as reasonably possible after the last Crystallisation Date of the previous month and upon final determination of the UCI Administrator.

The Performance Fee shall be calculated and accrued at each Valuation Day on the basis of the Net Asset Value per Share (calculated net of all costs but prior to the deduction of any accrued Performance Fee as well as adjusted for any previously distributed dividends).

The amount of the Performance Fee depends on the total return performance of the Net Asset Value per Share of the relevant Share Class compared to maximum of zero and the Performance Fee Threshold (the “**Overperformance**”). The “**Performance Fee Threshold**” is the so-called “index cum spread” return which is computed as the sum between (i) the variation in terms of percentage of the index value and (ii) the annual spread accrual.

The annual spread is a fixed rate (expressed in percentage terms) above the index and accrued on a pro rata basis. The accrual of the annual spread is computed by multiplying the fixed rate (i.e. the annual spread) by the applicable number of days, divided by the total number of days in a year.

Both index and the fixed rate (expressed in percentage terms) applicable to the relevant Sub-Funds are set out in section 14 (Share Classes) of the relevant Sub-Funds’ Supplements.

For a specific Share Class, the Performance Fee equals 20% of the minimum between the Overperformance net of previous underperformance and the total return performance relative to the High-on-High, which is then applied to the Net Asset Value per Share of the relevant Share Class on the last Crystallisation Date on which a Performance Fee has been crystallised multiplied by the number of Shares on the last Valuation Date. Artificial increases resulting from new subscriptions are excluded when calculating the Sub-Fund’s performance.

The Performance Reference Period of the index cum spread + HoH model corresponds to the whole life of the Sub-Fund.

Any underperformance incurred since the launch date of the Sub-Fund must be recovered before a Performance Fee becomes payable. As a result, a Performance Fee cannot be accrued or paid more than once for the same level of Overperformance during the Performance Reference Period. As such, a Performance Fee may be crystallised during the Performance Reference Period only if all of the following conditions are met:

- the performance of the Share Class that levies a Performance Fee is positive; and
- the Overperformance of the Share Class that levies a Performance Fee (net of previous underperformance) is positive; and
- the performance relative to the HoH is positive.

For the relevant Share Class, a cap is applied to the Performance Fee amount. The cap is equal to the Net Asset Value multiplied by a fixed percentage (which is the Management Fee rate as stated in each Supplement, except for Sidera Funds SICAV – Income Plus B Acc whose cap applied to the Performance Fee amount will be equal to 1.00% p.a. of its Net Asset Value), adjusted for the crystallised Performance Fees over one (1) year on a rolling basis.

For this model, a Performance Fee, if any, can be crystallised after at least one (1) Valuation Day from the creation of a new Sub-Fund and/or new Share Class. The same applies when a Performance Fee is introduced as per this model for an existing Sub-Fund and/or Share Class.

Example

We report a numeric example to illustrate actual calculations (hypothetical values).

	Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7	Day 8
NAV per Share before performance fee	5,10	5,05	5,02	5,04	5,11	5,21	5,25	5,85
Portfolio return (1)	2,00%	-0,98%	-0,59%	0,40%	1,39%	1,96%	0,77%	11,43%
Performance fee threshold (2)	0,50%	-0,50%	-0,40%	0,35%	0,80%	0,25%	0,30%	1,00%
Overperformance = (1) - max[(2),0]	1,50%	-0,98%	-0,59%	0,05%	0,59%	1,71%	0,47%	10,43%
Overperformance in the reference period	1,50%	-0,98%	-1,57%	-1,18%	-0,05%	1,66%	0,47%	10,43%
High-on-High	5,00	5,10	5,10	5,10	5,10	5,10	5,21	5,25
% Adjusted fee cap	1,75%	1,45%	1,45%	1,45%	1,46%	1,46%	1,14%	1,12%
% Performance fee before fee cap	0,30%	-	-	-	-	0,33%	0,09%	2,09%
% Performance fee after fee cap	0,30%	-	-	-	-	0,33%	0,09%	1,12%

9.4 Fees of the Depositary and the UCI Administrator

The Depositary and the UCI Administrator will be entitled to receive an annual fee equal to a percentage of the average Net Asset Value of each Sub-Fund or Share Class which will not exceed 0.20% p.a., subject to a **minimum amount of 12’000 EUR p.a. for the Depositary and a minimum amount of 24’000 EUR p.a. for the UCI Administrator applied at umbrella level proportionally to each Sub-Fund’s Net Asset Value**.

The Depositary and UCI Administrator fee will accrue on each Valuation Day and will be payable monthly in arrears out of the assets of the Fund and allocated to each Sub-Fund and Share Class (as described in section 8.2.5 (Allocation of assets and liabilities to Sub-Funds and Share Classes) above).

The Depositary will also be entitled to transaction fees charged on the basis of the investments made by each Sub-Fund consistent with market practice in Luxembourg, as well as other banking services fees related to the management of the Sub-Fund liquidity. Fees paid to the Depositary may vary depending on the nature of the investments of each Sub-Fund and the countries and/or markets in which the investments are made. The Depositary will also be entitled to reimbursement of reasonable out-of-pocket expenses properly incurred in carrying out its duties, with particular reference to the exercise of securities-related rights and specific tax services.

The UCI Administrator will also be entitled to reimbursement of reasonable out-of-pocket expenses properly incurred in carrying out its duties and transaction-based fees such as, but not limited to, transfer agent-related fees.

Further fees may be payable to the Depositary and the UCI Administrator in consideration of ancillary services rendered to the Fund and relating to the core services of the Depositary and the UCI Administrator, such as, but not limited to introduction of additional Share Classes.

9.5 Directors’ fees and expenses

The members of the Board of Directors are entitled to receive a fee in consideration for their function. The Fund will also reimburse the members of the Board of Directors for appropriate insurance coverage and expenses and other costs incurred by the members of the Board of Directors in the performance of their duties, including reasonable out-of-pocket expenses, traveling costs incurred to attend meetings of the Board of Directors, and any costs of legal proceedings unless such costs are caused by intentional or grossly negligent conduct by the member of the Board of Directors in question. The Fund may also pay fees and expenses to members of any committee established by the Board of Directors, where applicable.

9.6 Operating and Administrative Expenses

The Fund bears all ordinary operating costs and expenses incurred in the operation of the Fund or any Sub-Fund or Share Class (“**Operating and Administrative Expenses**”) including but not limited to costs and expenses incurred in connection with:

1) preparing, producing, printing, depositing, publishing and/or distributing any documents relating to the Fund, a Sub-Fund or Share Class that are required by applicable laws and regulations (such as the Articles of Association, this Prospectus, KIDs, financial reports and notices to investors) or any other documents and materials made available to investors (such as explanatory memoranda, statements, reports, factsheets and similar documents);

2) organising and holding general meetings of shareholders and preparing, printing, publishing and/or distributing notices and other communications to shareholders;

3) professional advisory services (such as legal, tax, accounting, compliance, auditing and other advisory services, included those related to the fund set up) taken by the Fund or the Management Company on behalf of the Fund (if any);

4) investment and administration services taken by the Fund or the Portfolio Manager on behalf of the Fund (including fees related to the settlement of the Sub-Fund portfolio transactions and other services utilised for portfolio, risk management and administration

purposes **and expenses incurred in obtaining investment research, systems and other services or data utilised for portfolio and risk management purposes**);

5) the authorisation of the Fund, the Sub-Funds and Share Classes, regulatory compliance obligations and reporting requirements of the Fund (such as administrative fees, filing fees, insurance costs and other types of fees and expenses incurred in the course of regulatory compliance (such as fees related to the compliance with SFDR requirements)), and all types of insurance obtained on behalf of the Fund and/or the members of the Board of Directors;

6) initial and ongoing obligations relating to the registration and/or listing of the Fund, a Sub-Fund or Share Class and the distribution of Shares in Luxembourg and abroad (such as fees charged by and expenses payable to financial regulators, distributors, correspondent banks, representatives, listing agents, paying agents, fund platforms, and other agents and/or service providers appointed in this context, as well as advisory, legal, and translation costs);

7) memberships or services provided by international organisations or industry bodies such as the Association of the Luxembourg Fund Industry (ALFI);

8) taxes, charges and duties payable to governments and local authorities (including the Luxembourg annual subscription tax (*taxe d'abonnement*) and any other taxes payable on assets, income or expenses) and any value added tax (VAT) or similar tax associated with any fees and expenses paid by the Fund; and

9) the reorganisation or liquidation of the Fund, a Sub-Fund or Share Class.

9.7 Transaction costs

Each Sub-Fund bears the costs and expenses arising from buying and selling portfolio assets and entering into other transactions in securities or other financial instruments, such as brokerage fees and commissions and all other fees, expenses, commissions, charges, premiums and interest paid to banks, brokers, execution agents or securities lending agents and/or incurred in participating in any repurchase, reverse repurchase and securities lending programs, collateral management fees and associated costs and charges, exchange fees, taxes, levies and stamp duties chargeable in connection with transactions in securities or other financial, and any other transaction-related expenses.

9.8 Extraordinary expenses

In order to safeguard the interests of the Fund and its investors, the Fund or any Sub-Fund may bear any extraordinary expenses including, without limitation, expenses related to litigation and regulatory investigations (including penalties, fines, damages and indemnifications) and the full amount of any tax, levy, duty or similar charge imposed on the Fund or Sub-Fund that would not be considered as ordinary Operating and Administrative Expenses.

9.9 Formation expenses

The fees and expenses incurred in connection with the formation of the Fund were estimated to an amount of approximately **EUR 330.000**. Such costs have been borne by the Fund or alternatively they have been borne by the Fund Promoter and then re-charged to the Fund and amortised over a period of up to five (5) years from the date of incorporation of the Fund. The formation expenses of each new Sub-Fund will be borne by such Sub-Fund and may be amortised over a period of up to five (5) years. New Sub-Funds created after the incorporation and launch of the Fund will participate in the non-amortised formation expenses of the Fund.

10. GENERAL INFORMATION

10.1 Reports and financial statements

The financial statements of the Fund will be prepared in accordance with Luxembourg GAAP.

The financial year of the Fund will begin on 1 January of each year and end on 31 December of the same year. Each year, the Fund will issue an Annual Report as of the end of the previous financial year comprising, *inter alia*, the audited financial statements of the Fund and each Sub-Fund and a report of the Board of Directors on the activities of the Fund. The Fund will also issue a Semi-Annual Report as of 30 June of the current financial year.

The Annual Report shall be made available to investors within four (4) months following the end of the reporting period and the Semi-Annual Report will be made available to investors within two (2) months following the end of the reporting period. Investors may obtain, upon request, a copy of the latest financial reports from the Fund free of charge and on www.siderafunds.com.

The Reference Currency of the Fund is the Euro. The Annual Report will comprise consolidated accounts of the Fund expressed in Euro as well as individual information on each Sub-Fund expressed in the Reference Currency of such Sub-Fund.

10.2 Meetings of shareholders

The annual general meeting of shareholders will be held each year in Luxembourg in order to approve the financial statements of the Fund for the previous financial year. The annual general meeting of shareholders will be held at the registered office of the Fund, or at such alternative location in Luxembourg as may be specified in the convening notice, within six (6) months of the end of each financial year.

Other general meetings of shareholders may be held at such place and time as indicated in the convening notice in order to decide on any other matters relating to the Fund. General meetings of shareholders of any Sub-Fund or any Share Class within a Sub-Fund may be held at such time and place as indicated in the convening notice in order to decide on any matters which relate exclusively to such Sub-Fund or Share Class.

Notices of all general meetings shall contain the date, time, place, and agenda of the meeting and shall be made through announcements filed with the Luxembourg Trade and Companies Register and published at least fifteen (15) days before the meeting, on the *Recueil Electronique des Sociétés et associations* and in a Luxembourg newspaper and sent to all registered shareholders by ordinary mail (*lettre missive*); alternatively, convening notices will be sent to registered shareholders by registered mail or by such other means as individually agreed upon with the relevant shareholders at least eight (8) calendar days prior to the meeting. Convening notices will also be published and/or communicated to investors as required by applicable laws and regulations in other jurisdictions where the Shares are distributed and posted on www.siderafunds.com. Notices will include the agenda and will specify the time and place of the meeting, the conditions of admission, and the quorum and voting requirements.

The requirements as to attendance, quorum, and majorities at all general meetings will be those laid down in the Articles of Association and in the 1915 Law. All shareholders may attend general meetings in person or by appointing another person as his proxy in writing or by facsimile, electronic mail or any other similar means of communication accepted by the Fund. A single person may represent several or even all shareholders of the Fund, a Sub-Fund or Share Class. Each Share entitles the shareholder to one (1) vote at all general meetings of shareholders of the Fund, and at all meetings of the Sub-Fund or Share Class concerned to the extent that such Share is a Share of such Sub-Fund or Share Class.

Shareholders holding together at least ten percent (10%) of the share capital or the voting rights may submit questions in writing to the Board of Directors relating to transactions in connection with the management of the Fund.

The Board of Directors may suspend the voting rights of any shareholder in breach of his obligations as described in the Articles of Association or any relevant contractual arrangement entered into by such shareholder. A shareholder may individually decide not to exercise, temporarily or permanently, all or part of his voting rights. The waiving shareholder is bound by such waiver and the waiver is mandatory for the Fund upon notification of the latter.

10.3 Investors' rights

Upon the issue of the Shares, the person whose name appears on the register of Shares will become a shareholder of the Fund in relation to the relevant Sub-Fund and Share Class. The Fund draws the investors' attention to the fact that any investor will only be able to fully exercise his investor rights directly against the Fund, notably the right to participate in general shareholders' meetings, if the investor is himself a shareholder of the Fund. In cases where an investor invests in the Fund through an intermediary who invests into the Fund in his own name but on behalf of the investor, it may not always be possible for the investor (i) to exercise certain shareholder rights directly against the Fund such as the right to participate in general meetings of shareholders or (ii) to be indemnified in case of Net Asset Value calculation errors and/or non-compliance with investment rules and/or errors at the level of the Fund. Investors are advised to seek advice in relation to their rights which may be negatively impacted.

The Articles of Association are governed by, and construed in accordance with, the laws currently into force in Luxembourg. The Subscription Form is expressed to be governed by, and construed in accordance with, the laws currently into force in Luxembourg, and contains a choice of international competence of the courts of the Grand-Duchy of Luxembourg**.**

There are no legal instruments in Luxembourg required for the recognition and enforcement of judgments rendered by a Luxembourg court. If a foreign, i.e. non-Luxembourg court, on the basis of mandatory domestic provisions, renders a judgment against the Fund, the rules of the Brussels I Regulation (Recast) (regarding judgments from EU Member States) or the rules of the Lugano Convention or of the private international law of Luxembourg (regarding judgments from non-EU Member States) concerning the recognition and enforcement of foreign judgments apply. Investors are advised to seek advice, on a case-by-case basis, on the available rules concerning the recognition and enforcement of judgments.

Absent a direct contractual relationship between the investors and the service providers mentioned in section 5.15 (Management and Administration) above, the investors will generally have no direct rights against service providers and there are only limited circumstances in which an investor can potentially bring a claim against a service provider. Instead, the proper claimant in an action in respect of which a wrongdoing is alleged to have been committed against the Fund by a service provider is, *prima facie*, the Fund itself.

10.4 Changes to this Prospectus

The Board of Directors, in close cooperation with the Management Company, may from time to time amend this Prospectus to reflect various changes it deems necessary and in the best interest of the Fund, such as implementing changes to laws and regulations, changes to a Sub-Fund's objective and policy or changes to fees and costs charged to a Sub-Fund or Share Class. Any amendment of this Prospectus will require approval by the CSSF prior to taking effect. In accordance with applicable laws and regulations, investors in the Sub-Fund or Share Class will be informed about the changes and, where required, will be given prior notice of any proposed material changes in order for them to request the redemption of their Shares should they disagree. Where it is not required that investors in a Sub-Fund or Share Class shall be given notice of any proposed non-material changes, these investors may have access to the proposed changes upon request and on www.siderafunds.com.

10.5 Documents available

Investors may, upon request, obtain a copy of the Articles of Association, this Prospectus, the applicable KID, the latest Annual Report or Semi-Annual Report as well as of the agreements with the Management Company, the UCI Administrator, the Investment Managers, the Global Distributor and the Depositary and Paying Agent from the Fund free of charge.

Starting as of 1 January 2023 and in accordance with the PRIIPs Regulations, a KID will be published for each Share Class where such Share Class is available to retail investors in the EEA.

A retail investor within the meaning of the preceding paragraph means any person who is a retail client as defined in article 4(1), point (11), of MiFID II (referred to herein as a "**Retail Investor**").

A KID will be handed over to Retail Investors and professional investors, where Shares are made available, offered or sold in the EEA, in good time prior to their subscription in the Fund. In accordance with the PRIIPs Regulations, the KID will be provided to Retail Investors and professional investors (i) by using a durable medium other than paper or (ii) on https://funds.carnegroup.com/siderafunds but also on www.siderafunds.com in which cases it can also be obtained, upon request, in paper form from the Fund free of charge.

The Management Company and the Investment Managers have adopted a "best execution" policy with the objective of obtaining the best possible result for the Fund when executing decisions to deal on behalf of the Fund or placing orders to deal on behalf of the Fund with other entities for execution. Further information on the best execution policy may be obtained from the Management Company upon request.

The Investment Manager has a strategy for determining when and how voting rights attached to ownership of a Sub-Fund's investments are to be exercised for the exclusive benefit of the Sub-Fund. A summary of this strategy as well as the details of the actions taken on the basis of this strategy in relation to each Sub-Fund may be obtained from the Investment Manager upon request and on.

10.6 Complaints

Any investor having a complaint to make about the operations of the Fund may file a complaint by writing to the Management Company. Details on the complaints handling procedure may be obtained from the Management Company upon request and on www.carnegroup.com.

10.7 Data protection

In accordance with the applicable Luxembourg data protection law and the Regulation n°2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "GDPR") and any applicable national data protection laws (including but not limited to the Luxembourg law of 1st August 2018 organizing the National Commission for data protection and the general system on data protection, as amended from time to time) (collectively the "Data Protection Laws"), the Fund, as data controller, collects, stores and processes, by electronic or other means, the data supplied by investors and/or prospective investors (or if the investor and/or the prospective investor is a legal person, any natural person related to it such as its contact person(s), employee(s), trustee(s), nominee(s), agent(s), representative(s) and/or beneficial owner(s)) ("Data Subjects") for the purposes outlined below.

The data processed includes but it is not limited to the Data Subject's name, age, gender, contact details (including postal or email address), phone number, date of birth, nationality, citizenship, profession, identity number/social security number, passport number, identity card with photo, proof of address, fax number, banking details, account numbers, invested amount and holdings in the Fund of investors, tax identifiers, tax status, tax certificates, source of wealth, source of funds, PEP status, sanctions status, income, related parties, power of attorney status, client communications and any information regarding the dealing in shares (subscription, conversion, redemption and transfer) ("Personal Data").

As part of its compliance with legal obligations such as AML/KYC, the Fund may be required to process special categories of Personal Data as defined by the GDPR, including Personal Data relating to political opinions as well as criminal convictions and offences. Personal data relating to political opinions of Data Subjects having a public political exposure will be processed by the Fund on the basis of article 9, (2), e) and/or g) of the GDPR as applicable (i.e. respectively the personal data have manifestly been made public by the data subject and is necessary for reasons of substantial public interest).

The Data Subject may at his/her discretion refuse to communicate Personal Data to the Fund. In this case, however, the Fund may reject a request for Shares if the relevant Personal Data is necessary to such subscription of Shares.

Investors and/or prospective investors who are legal persons undertake and guarantee to process Personal Data and to supply such Personal Data to the Fund in compliance with the Data Protection Laws, including, where appropriate, informing the relevant Data Subjects of the contents of the present section, in accordance with Articles 12, 13 and/or 14 of the GDPR.

Personal Data supplied by Data Subjects are processed in order to subscribe for Shares in the Fund (i.e., to perform any pre-contractual measures as well as the contract entered into by the Data Subjects), for the legitimate interests of the Fund and to comply with the legal obligations imposed on the Fund.

In particular, the Personal Data supplied by Data Subjects is processed for the purposes of processing subscriptions, redemptions and conversions of Shares and payments of dividends to investors, account administration, client relationship management, performing controls on excessive trading and market timing practices, tax identification as may be required under Luxembourg or foreign laws and regulations (including laws and regulations relating to FATCA or CRS) and compliance with applicable anti-money laundering rules. Data supplied by shareholders is also processed for the purpose of maintaining the register of shareholders of the Fund or for mandatory registrations with other registers including among other the Luxembourg register of beneficial owners.

The "legitimate interests" of the Fund referred to above are:

(a) client relationship management and marketing purposes as described in the above paragraph of this clause;

(b) the provision of the proof, in the event of a dispute, of a transaction or any commercial communication as well as in connection with any proposed purchase, merger or acquisition of any part of the Fund's business;

(c) compliance with foreign laws and regulations and/or any order of a foreign court, government, supervisory, regulatory or tax authority;

(d) risk management;

(e) processing Personal Data of employees or other representatives of investors and/or prospective investors which are legal persons; and

(f) exercising the business of the Fund in accordance with reasonable market standards.

The Personal Data may also be processed by the Fund's data processors (the "Recipients") which, in the context of the above mentioned purposes, refer to the Management Company, the Depositary, the UCI Administrator, the Paying Agent, the Investment Manager, the Global Distributor and Distributors, the Auditor and the legal adviser, other prospective or existing investors, any third party that acquires, or is interested in acquiring or securitizing, all or part of the Fund's assets or shares, or that succeeds to it in carrying on all or a part of its businesses, or services provided to it, whether by merger, acquisition, reorganization or otherwise as well as any other third party supporting the activities of the Fund. The Recipients may, under their own responsibility, disclose the Personal Data to their agents and/or delegates ("Sub-Recipients"), which shall process the Personal Data for the sole purposes of assisting the Recipients in providing their services to the Fund and/or assisting the Recipients in fulfilling their own legal obligations.

Personal Data transferred to the Recipients are in principle processed in the EEA. However, some of the investors' information may be processed by the Fund or the third parties outside of the EEA, including countries such as the United States and India. Where Personal Data is being processed outside of the EEA, the Fund takes additional steps to ensure that the Personal Data is protected to at least an equivalent level as would be applied by EEA data privacy laws. In particular, where the Recipients are located in a country outside the EEA which benefit from an adequacy decision of the European Commission, the Personal Data are transferred to the Recipients upon such adequacy decision. Where the Recipients are located outside the EEA in a country which does not ensure an adequate level of protection for Personal Data or does not benefit from an adequacy decision of the European Commission, the Fund has entered into legally binding transfer agreements with the relevant Recipients in the form of the European Commission approved model clauses or any other appropriate safeguards pursuant to the GDPR, as well as, if necessary, supplementary measures. In this respect, the Data Subjects have a right to request copies of the relevant document for enabling the Personal Data transfer(s) towards such countries by writing to the Fund.

The Recipients and Sub-Recipients may, as the case may be, process the Personal Data as data processors (when processing the Personal Data on behalf and upon instructions of the Fund and/or the Recipients), or as distinct data controllers (when processing the Personal Data for their own purposes, namely fulfilling their own legal obligations).

The Fund may also transfer Personal Data to third-parties such as governmental, judicial, prosecution or regulatory agencies and/or authorities as well as official national registers, including tax authorities, in or outside the European Union, in accordance with applicable laws and regulations. In particular, such Personal Data may be disclosed to the Luxembourg tax authorities, which in turn may acting as data controller, disclose the same to foreign tax authorities.

In accordance with the conditions laid down by the Data Protection Law, the Data Subjects acknowledge their right to:

- access their Personal Data;
- correct their Personal Data where it is inaccurate or incomplete;
- object to the processing of their Personal Data;
- restrict the use of their Personal Data;
- ask for erasure of their Personal Data;
- ask for Personal Data portability.

The Data Subjects may exercise the above rights by writing to the Fund at the following address: Sidera Funds SICAV, 3, rue Jean Piret, L-2350 Luxembourg, Grand Duchy of Luxembourg
The Data Subjects also acknowledge the existence of their right to lodge a complaint with the National Commission for Data Protection ("CNPD") at the following address: 15, Boulevard du Jazz, L-4370 Belvaux, Grand Duchy of Luxembourg.

Personal Data will not be retained for a period longer than necessary for the purpose of the data processing, subject to applicable legal minimum retention periods.

10.8 Merger and reorganisation

10.8.1 Merger of the Fund or a Sub-Fund with other UCITS

The Board of Directors may decide to proceed with a merger (within the meaning of the 2010 Law) of the Fund with one or several other Luxembourg or foreign UCITS or sub-funds thereof. The Board of Directors may also decide to proceed with a merger (within the meaning of the 2010 Law) of one or several Sub-Funds with one or several other Sub-Funds within the Fund, or with one or several other Luxembourg or foreign UCITS or sub-funds thereof. In accordance with the provisions of the 2010 Law, a merger does not require the prior consent of investors except where the Fund is the absorbed entity, which thus ceases to exist as a result of the merger: in such case, the general meeting of shareholders of the Fund must decide on the merger and its effective date. The general meeting will decide by resolution taken with no quorum requirement and adopted by a simple majority of the votes validly cast.

Notwithstanding the powers conferred on the Board of Directors by the preceding paragraph, the investors of the Fund or any Sub-Fund, as applicable, may also decide on any of the mergers described above as well as on the effective date thereof by resolution taken by the general meeting of shareholders of the Fund or Sub-Fund. The convening notice will explain the reasons for and the process of the proposed merger.

In any case, the merger will be subject to the conditions and procedures imposed by the 2010 Law, in particular concerning the common draft terms of the merger to be established by the Board of Directors and the information to be provided to investors.

10.8.2 Absorption of another UCI by the Fund or a Sub-Fund

The Board of Directors may decide to proceed with the absorption by the Fund or one or several Sub-Funds of one or several sub-funds of another Luxembourg or a foreign UCI (other than a UCITS) irrespective of their form, or any Luxembourg or foreign UCI (other than a UCITS) constituted under a non-corporate form. The exchange ratio between the Shares and the shares or units of the absorbed UCI or sub-funds thereof will be calculated on the basis of the net asset value per share or unit as of the effective date of the absorption.

Notwithstanding the powers conferred on the Board of Directors by the preceding paragraph, the investors of the Fund or any Sub-Fund, as applicable, may also decide on any of the absorptions described above as well as on the effective date thereof by resolution taken by the general meeting of shareholders of the Fund or Sub-Fund. The convening notice will explain the reasons for and the process of the proposed absorption.

The Fund may absorb another Luxembourg or foreign UCI (other than a UCITS) incorporated under a corporate form in compliance with the 1915 Law and any other applicable laws and regulations.

10.8.3 Reorganisation of Share Classes

The Board of Directors may decide to reorganise Share Classes, as further described below, in the event that, for any reason, the Board of Directors determines that:

(i) the Net Asset Value of a Share Class has decreased to, or has not reached, the minimum level for that Share Class to be managed and/or administered in an efficient manner;

(ii) changes in the legal, economic or political environment would justify such reorganisation; or

(iii) a product rationalisation would justify such reorganisation.

In such a case, the Board of Directors may decide to re-allocate the assets and liabilities of any Share Class to those of one or several other Share Classes, and to re-designate the Shares of the Share Class concerned as Shares of such other Share Class or Share Classes (following a split or consolidation of Shares, if necessary, and the payment to investors of the amount corresponding to any fractional entitlement).

Notwithstanding the powers conferred on the Board of Directors by the preceding paragraph, investors may also decide on such reorganisation by resolution taken by the general meeting of shareholders of the Share Classes. The convening notice will explain the reasons for and the process of the proposed reorganisation.

Investors will be informed of the reorganisation by way of a notice. The notice will be published and/or communicated to investors as required by applicable laws and regulations in Luxembourg and other jurisdictions where the Shares are distributed and posted on www.siderafunds.com. The notice will explain the reasons for and the process of the reorganisation.

10.9 Liquidation

10.9.1 Termination and liquidation of Sub-Funds or Share Classes

The Board of Directors may decide to compulsorily redeem all the Shares of any Sub-Fund or Share Class and thereby terminate and liquidate any Sub-Fund or Share Class in the event that, for any reason, the Board of Directors determines that:

(i) the Net Asset Value of a Sub-Fund or Share Class has decreased to, or has not reached, the minimum level for that Sub-Fund or Share Class to be managed and/or administered in an efficient manner;

(ii) changes in the legal, economic or political environment would justify such liquidation; or

(iii) a product rationalisation would justify such liquidation.

Investors will be informed of the decision to terminate a Sub-Fund or Share Class by way of a notice. The notice will be published and/or communicated to investors as required by applicable laws and regulations in Luxembourg and other jurisdictions where the Shares are distributed and posted on www.siderafunds.com. The notice will explain the reasons for and the process of the termination and liquidation.

Notwithstanding the powers conferred on the Board of Directors by the preceding paragraph, the investors of any Sub-Fund or Share Class, as applicable, may also decide on such termination by resolution taken by the general meeting of shareholders of the Sub-Fund or Share Class and have the Fund redeem compulsorily all the Shares of the Sub-Fund or Share Class at the Net Asset Value per Share for the applicable Valuation Day. The convening notice will explain the reasons for and the process of the proposed termination and liquidation.

Actual realisation prices of investments, realisation expenses and liquidation costs will be taken into account in calculating the Net Asset Value applicable to the compulsory redemption. Investors in the Sub-Fund or Share Class concerned will generally be authorised to continue requesting the redemption or conversion of their Shares prior to the effective date of the compulsory redemption, unless the Board of Directors determines that it would not be in the best interest of investors in that Sub-Fund or Share Class or could jeopardise the fair treatment of investors.

All Shares redeemed will generally be cancelled. Redemption proceeds which have not been claimed by investors upon the compulsory redemption will be deposited in escrow at the *Caisse* *de Consignation* in Luxembourg in accordance with applicable laws and regulations. Proceeds not claimed within the statutory period will be forfeited in accordance with applicable laws and regulations.

The termination and liquidation of a Sub-Fund or Share Class will have no influence on the existence of any other Sub-Fund or Share Class. The decision to terminate and liquidate the last Sub-Fund existing in the Fund will result in the dissolution and liquidation of the Fund in accordance with the provisions of the Articles of Association.

10.9.2 Dissolution and liquidation of the Fund

The Fund is incorporated for an unlimited period. It may be dissolved at any time with or without cause by a resolution of the general meeting of shareholders adopted in compliance with applicable laws.

The compulsory dissolution of the Fund may be ordered by Luxembourg competent courts in circumstances provided by the 2010 Law and the 1915 Law.

As soon as the decision to dissolve the Fund is taken, the issue, redemption or conversion of Shares in all Sub-Funds is prohibited. The liquidation will be carried out in accordance with the provisions of the 2010 Law and 1915 Law. Liquidation proceeds which have not been claimed by investors at the time of the closure of the liquidation will be deposited in escrow at the *Caisse de Consignation* in Luxembourg. Proceeds not claimed within the statutory period will be forfeited in accordance with applicable laws and regulations.

10.10 Remuneration policy

The board of directors of the Management Company has adopted a remuneration policy, the objectives of which are to ensure that the remuneration is in line with the applicable regulations, and more specifically with the provisions defined under (i) the UCITS Directive 2014/91/EU, the ESMA final report on sound remuneration policies under the UCITS Directive and AIFMD published on 31 March 2016, (ii) the Alternative Investment Fund Managers (AIFM) Directive 2011/61/EU, transposed into the Luxembourg AIFM Law dated from 12 July 2013, as amended from time to time, the ESMA guidelines on sound remuneration policies under the AIFM published on 11 February 2013 and (iii) the CSSF Circular 10/437 on Guidelines concerning the remuneration policies in the financial sector issued on 1 February 2010. Such remuneration policy is reviewed at least annually.

The policy promotes a sound and effective risk management environment, is in line with the interests of the investor and discourages risk-taking which is inconsistent with the risk profiles rules or instruments of incorporation of such UCITS.

The policy furthermore fosters compliance with the Management Company's and the UCITS' strategies, objectives, values and interests including measures to avoid conflict of interests.

This approach furthermore focuses amongst others on:

- The assessment of performance which is set in a multi-year framework appropriate to the holding periods recommended to the investors of the Sub-Funds in order to ensure that the assessment process is based on the longer-term performance of the Fund and its investment risks and that the actual payment of performance-based components of remuneration is spread over the same period.

- The remuneration of all staff members which is appropriately balanced between fixed and variable elements. The fixed component of the remuneration represents a sufficient high proportion of the total remuneration and allows a fully flexible bonus strategy, including the possibility to pay no variable remuneration component. The fixed remuneration is determined by taking into consideration the role of the individual employee, including responsibility and job complexity, performance and local market conditions. It is also to be noted that the company may, on its own discretion, offer fringe benefits to some employees which are an integral component of the fixed remuneration.

Any relevant disclosures shall be made in the annual reports of the Management Company in accordance with the provisions of the UCITS Directive 2014/91/EU.

Investors can find more details about the up-to-date remuneration policy of the Management Company, including, but not limited to, a description of how remuneration and benefits are calculated, the identity of persons responsible for awarding the remuneration and benefits, including the composition of the remuneration committee (if any), are available on www.carnegroup.com. A paper copy of such document is available free of charge from the Management Company upon request.

11. LUXEMBOURG TAXATION

The following information is of a general nature only and is based on the Fund's understanding of certain aspects of the laws and practices in force in Luxembourg as of the date of this Prospectus. It does not purport to be a comprehensive description of all tax considerations that may be relevant to an investment decision. It is included herein solely for preliminary information purposes. It is not intended to be, nor should it be construed to be, legal or tax advice. It is a description of the essential material Luxembourg tax consequences with respect to the subscribing for, purchasing, owning and disposing of Shares and may not include tax considerations that arise from rules of general application or that are generally assumed to be known investors. This summary is based on the laws in force in Luxembourg on the date of the Prospectus and is subject to any changes in law that may take effect after such date, even with retroactive or retrospective effect.

Prospective investors should consult their own professional advisors as to the particular consequences of subscribing for, purchasing, owning and disposing of Shares, including the application and effect of any federal, state or local taxes under the tax laws of Luxembourg and their countries of citizenship, residence, domicile or incorporation.

Investors should be aware that the residence concept used under the respective headings below applies for Luxembourg income tax assessment purposes only. Any reference in the present section to a tax, duty, levy, impost or other charge or withholding of a similar nature refers to Luxembourg tax law and/or concepts only. Also, a reference to Luxembourg income tax generally encompasses corporate income tax (*impôt sur le revenu des collectivités*), municipal business tax (*impôt commercial communal*), the solidarity surcharge (*contribution au fonds pour l'emploi*), as well as personal income tax (*impôt sur le revenu des personnes physiques*). Corporate taxpayers may further be subject to net wealth tax (*impôt sur la fortune*) as well as other duties, levies or taxes. Corporate income tax, municipal business tax, net wealth tax and the solidarity surcharge apply to most corporate taxpayers that are resident in Luxembourg for tax purposes. Corporate taxpayers may further be subject to a top-up tax arising under any legislation implementing OECD (2021), Tax Challenges Arising from Digitalisation of the Economy – Global Anti-Base Erosion Model Rules (Pillar Two): Inclusive Framework on BEPS, OECD/G20 Base Erosion and Profit Shifting Project, OECD Publishing, Paris (the "**OECD Pillar 2 Model Rules**"), Council Directive (EU) 2022/2523 of 14 December 2022 on ensuring a global minimum level of taxation for multinational enterprise groups and large-scale domestic groups in the Union (the "**Pillar 2 Directive**"), the Luxembourg law of 22 December 2023 implementing the Pillar 2 Directive (the "**Pillar 2 Law**") or similar rules (the "**Pillar 2 Laws**"). Individual taxpayers are generally subject to personal income tax and the solidarity surcharge. Under certain circumstances, where an individual taxpayer acts in the course of the management of a professional or business undertaking, municipal business tax may apply as well.

11.1 Taxation of the Fund in Luxembourg

11.1.1 Income and net wealth taxes

Under current Luxembourg tax law, the Fund is neither subject to corporate income tax and municipal business tax (including the solidarity surcharge) nor net wealth tax (including the minimum net wealth tax) in Luxembourg.

11.1.2 Withholding tax

Under current Luxembourg tax law, there is no withholding tax on any distribution, redemption or payment made by the Fund to its shareholders in relation to their Shares. There is also no withholding tax on the distribution of liquidation proceeds to the shareholders.

11.1.3 Subscription tax

The Fund is as a rule subject in Luxembourg to a subscription tax (*taxe d'abonnement*) of 0.05% per annum, such tax being payable quarterly. The taxable base for the subscription tax is the aggregate net assets of the Fund valued on the last day of each quarter of the calendar year.

However, the rate is reduced to 0.01% per annum for:

- undertakings for collective investment ("**UCIs**") and individual compartments of umbrella UCIs that are authorised as money market funds in accordance with Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017 on money market funds;

- individual compartments of UCIs with multiple compartments subject to the 2010 Law on UCIs and individual classes of securities issued within a UCI or within a compartment of a UCI with multiple compartments, provided that the securities of these compartments or classes are reserved for one or more institutional investors.

Under certain conditions, reduced rates ranging from 0.04% to 0.01% may also be available for the portion of the net assets of a UCI or of an individual compartment of a UCI with multiple compartments that are invested in sustainable economic activities (as defined in Article 3 of the Taxonomy Regulation).

In order to benefit from the above exemptions, UCIs must separately disclose the value of the eligible net assets in their periodic subscription tax returns.

Further, the following are exempt from the subscription tax:

- the value of the assets represented by units held in other UCIs, provided that such units have already been subject to the subscription tax provided for by Article 174 of the 2010 Law or in Article 68 of the amended law of 13 February 2007 on specialised investment funds, or Article 46 of the amended law of 23 July on reserved alternative investment funds.

  In order to benefit from this exemption, UCIs which hold such units must indicate their value separately in their periodic subscription tax returns.

- UCIs, as well as individual compartments of UCIs with multiple compartments (i) whose securities are reserved for institutional investors, and (ii) that are authorised as short-term money market funds in accordance with Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017 on money market funds, and (iii) that have obtained the highest possible rating from a recognised rating agency.

If several classes of securities exist within the UCI or the compartment, the exemption only applies to classes whose securities are reserved for institutional investors.

- UCIs as well as individual compartments of UCIs with multiple compartments whose securities are reserved for (i) institutions for occupational retirement pension or similar investment vehicles set up at the initiative of one or more employers for the benefit of their employees, (ii) companies of one or more employers investing the funds they hold, to provide retirement benefits to their employees, and (iii) investors in the context of a pan-European Personal Pension Product established under Regulation (EU) 2019/1238 of the European Parliament and of the Council of 20 June 2019 on a pan-European Personal Pension Product (PEPP).

  If there are several classes of securities within the UCI or compartment, the exemption applies only to those classes whose securities are reserved for these investors.

- UCIs as well as individual compartments of UCIs with multiple compartments whose main object is the investment in microfinance institutions.

- UCIs as well as individual compartments of UCIs with multiple compartments (i) whose securities are listed or traded on at least one stock exchange or another regulated market operating regularly, recognised and open to the public, and (ii) whose sole object is to replicate the performance of one or more indices.

  If several classes of securities exist within the UCI or the compartment, the exemption only applies to classes fulfilling the condition sub-point (i).

- UCIs and individual compartments of UCIs with multiple compartments which are approved as European long-term investment funds in accordance with Regulation (EU) 2015/760 of the European Parliament and of the Council of 29 April 2015 on European long-term investment funds.

In order to qualify for these exemptions, UCIs must separately disclose the value of the eligible net assets in their periodic subscription tax returns.

11.1.4 Withholding taxes

Under current Luxembourg tax law, there is no withholding tax on distributions, liquidation proceeds and redemption payments made by the Fund to the shareholders.

However, the Fund may be subject to withholding tax on dividends and interest payments and to tax on capital gains in the country of origin of its investments. As the Fund itself is not subject to Luxembourg corporate income tax, withholding tax levied at source, if any, would normally be a final cost. Whether the Fund may benefit from a double tax treaty concluded by Luxembourg must be analysed on a case-by-case basis. Indeed, as the Fund is structured as an investment company (as opposed to a mere co-ownership of assets), certain double tax treaties signed by Luxembourg may directly be applicable to the Fund.

11.1.5 Value added tax

In Luxembourg, regulated investment funds such as the Fund are considered as taxable persons for value added tax ("**VAT**") purposes without any input VAT deduction right. A VAT exemption applies in Luxembourg for services qualifying as fund management services. Other services supplied to the Fund could potentially trigger VAT and require the VAT registration of the Fund in Luxembourg. As a result of such VAT registration, the Fund will be in a position to fulfil its duty to self-assess the VAT regarded as due in Luxembourg on taxable services (or goods to some extent) purchased from abroad.

No VAT liability arises in principle in Luxembourg in respect of payments made by the Fund to its shareholders to the extent that such payments are linked to their subscription to the Shares and therefore do not constitute the consideration received for taxable services supplied.

11.1.6 Top-up tax

The Fund may be subject to a top-up tax in Luxembourg if it falls within the scope of the Pillar 2 Law. Such top-up tax is currently determined under either an income inclusion rule ("**IIR**") or a qualified domestic minimum top-up tax rule ("**QDMTT**").

11.1.7 Other taxes

No stamp duty or other tax is generally payable in Luxembourg in connection with the issue of Shares by the Fund against cash.

However, a fixed registration duty of seventy-five Euro (EUR 75.-) will be due upon incorporation of the Fund in Luxembourg and any subsequent amendment to its articles of association.

11.2 Taxation of shareholders

11.2.1 General considerations

It is expected that the shareholders will be resident for tax purposes in different countries. Accordingly, no attempt is made in this Prospectus to summarise the tax consequences for each shareholder of subscribing for, purchasing, owning or disposing of Shares. These consequences will vary depending on the law and practice currently in force in the shareholders' country of citizenship, residence, domicile or incorporation, as well as their personal circumstances. shareholders that are residents or citizens of certain countries which have a tax legislation affecting foreign funds may have a current liability to tax on undistributed income and gains of the Fund. shareholders should consult their own professional advisors as to the particular consequences of subscribing for, purchasing, owning and disposing of Shares, including the application and effect of any federal, state or local taxes under the tax laws of Luxembourg and their countries of citizenship, residence, domicile or incorporation.

11.2.2 Tax residency

A shareholder will not become resident (or be deemed resident) in Luxembourg by reason only of holding and/or disposing of the Shares or executing, performing, delivering and/or enforcing its rights thereto.

11.2.3 Resident individual shareholders

Dividends and other payments derived from the Shares by a resident individual shareholder, who acts in the course of the management of either his/her private wealth or his/her professional/business activity, are subject to personal income tax at the progressive ordinary rates.

Capital gains realised on the disposal of Shares by a resident individual shareholder, acting in the course of the management of his/her private wealth, are not subject to personal income tax, unless said capital gains qualify as speculative gains or gains on a substantial participation. Capital gains are deemed to be speculative and are thus subject to personal income tax at ordinary rates if the Shares are disposed of within six (6) months of their acquisition or if their disposal precedes their acquisition. A participation is deemed to be substantial where a resident individual shareholder holds or has held, alone or together with his/her spouse or partner and/or minor children, directly or indirectly at any time within the five (5) years preceding the disposal, more than ten percent (10%) of the share capital of the Fund whose Shares are being disposed of. A shareholder is also deemed to alienate a substantial participation if he/she has acquired free of charge, within the five (5) years preceding the transfer, a participation which constituted a substantial participation in the hands of the alienator (or the alienators in the case of successive transfers free of charge within the same five-year period). Capital gains realised on a substantial participation more than six (6) months after the acquisition thereof are taxed according to the half-global rate method (i.e., the average rate applicable to the total income is calculated according to the progressive income tax rates and half of the average rate is applied to the capital gains realised on the substantial participation). A disposal may include a sale, an exchange, a contribution or any other kind of alienation of the participation.

Capital gains realised on the disposal of Shares by a resident individual shareholder, acting in the course of the management of his/her professional/business activity, are subject to personal income tax at ordinary rates. Taxable gains are determined as the difference between the sale, repurchase or redemption price and the lower of the cost or book value of the Shares sold or redeemed.

11.2.4 Resident corporate shareholders

Luxembourg resident corporate shareholders which are fully-taxable companies must include any profits and gains realised on the sale, repurchase or redemption of Shares, in their taxable profits for Luxembourg income tax assessment purposes. Taxable gains are determined as the difference between the sale, repurchase or redemption price and the lower of the cost or book value of the Shares sold or redeemed.

11.2.5 Resident shareholders benefiting from a special tax regime

Luxembourg resident corporate shareholders which benefit from a special tax regime, such as (i) specialised investment funds subject to the amended law of 13 February 2007, (ii) family wealth management companies subject to the amended law of 11 May 2007, (iii) UCIs subject to the amended law of 17 December 2010, or (iv) reserved alternative investment funds treated as specialised investment funds for Luxembourg tax purposes and subject to the amended law of 23 July 2016, are exempt from income taxes in Luxembourg and profits derived from the Shares are thus not subject to Luxembourg income taxes.

11.2.6 Non-resident shareholders

Non-resident shareholders that have neither a permanent establishment nor a permanent representative in Luxembourg to which or to whom the Shares are attributable are generally not liable to any income tax in Luxembourg in respect of the Shares (including on income received and gains realised on the sale, repurchase or redemption of the Shares).

Non-resident corporate shareholders that have a permanent establishment or a permanent representative in Luxembourg to which or to whom the Shares are attributable, must include any income received and gains realised on the sale, repurchase or redemption of Shares, in their taxable income for Luxembourg income tax assessment purposes. The same inclusion applies to non-resident individual shareholders, acting in the course of the management of a professional or business undertaking, who have a permanent establishment or a permanent representative in Luxembourg to which or to whom the Shares are attributable.

Taxable gains are determined as the difference between the sale, repurchase or redemption price and the lower of the cost or book value of the Shares sold or redeemed.

11.2.7 Net wealth tax

Luxembourg resident shareholders as well as non-resident shareholders that have a permanent establishment or a permanent representative in Luxembourg to which or to whom the Shares are attributable, are subject to Luxembourg net wealth tax on such Shares, except if such shareholders are (i) an individual, (ii) a securitization vehicle subject to the amended law of 22 March 2004 on securitization, (iii) a venture capital company subject to the amended law of 15 June 2004, (iv) a professional pension institution subject to the amended law of 13 July 2005, (v) a specialized investment fund subject to the amended law of 13 February 2007, (vi) a family wealth management company subject to the amended law of 11 May 2007, (vii) a UCI subject to the amended law of 17 December 2010, or (viii) a reserved alternative investment fund subject to the amended law of 23 July 2016.

However, (i) a securitization company subject to the amended law of 22 March 2004, (ii) a tax opaque venture capital company subject to the amended law of 15 June 2004, (iii) a professional pension institution subject to the amended law of 13 July 2005, and (iv) a tax opaque reserved alternative investment fund treated as a venture capital vehicle for Luxembourg tax purposes and subject to the amended law of 23 July 2016 remain subject to the minimum net wealth tax in Luxembourg.

11.2.8 Other taxes

Under current Luxembourg tax law, where an individual shareholder is resident in Luxembourg for inheritance tax purposes at the time of his/her death, the Shares are included in his/her taxable base for inheritance tax purposes. On the contrary, no inheritance tax is levied on the transfer of the Shares upon the death of an individual shareholder if the deceased was not resident in Luxembourg for inheritance tax purposes at the time of his/her death.

Gift tax may be due on a gift or donation of the Shares, if the gift is recorded in a Luxembourg notarial deed or otherwise registered in Luxembourg.

11.3 FATCA

Capitalised terms used in this section should have the meaning as set forth in the FATCA Law (as defined below), unless otherwise provided herein.

The Fund may be subject to the so-called FATCA legislation which generally requires reporting to the US Internal Revenue Service of non-US financial institutions that do not comply with FATCA and direct or indirect ownership by US persons of non-US entities. As part of the process of implementing FATCA, the US government has negotiated intergovernmental agreements with certain foreign jurisdictions which are intended to streamline reporting and compliance requirements for entities established in such foreign jurisdictions and subject to FATCA.

Luxembourg has entered into a Model 1 Intergovernmental Agreement implemented by the Luxembourg law of 24 July 2015, as amended or supplemented from time to time (the "**FATCA Law**"), which requires Financial Institutions located in Luxembourg to report, when required, information on Financial Accounts held by Specified US Persons, if any, to the Luxembourg tax authorities.

Under the terms of the FATCA Law, the Fund is likely to be treated as a Luxembourg Reporting Financial Institution. This status imposes on the Fund the obligation to regularly obtain and verify information on all of its shareholders. On the request of the Fund, each shareholder shall agree to provide certain information, including, in the case of a passive Non-Financial Foreign Entity ("**NFFE**"), information on the Controlling Persons of such NFFE, along with the required supporting documentation. Similarly, each shareholder shall agree to actively provide to the Fund within thirty (30) days any information that would affect its status, as for instance a new mailing address or a new residency address.

The FATCA Law may require the Fund to disclose the names, addresses and taxpayer identification number (if available) of its shareholders as well as information such as account balances, income and gross proceeds (non-exhaustive list) to the Luxembourg tax authorities for the purposes set out in the FATCA Law. Such information will be relayed by the Luxembourg tax authorities to the US Internal Revenue Service.

Shareholders qualifying as passive NFFEs undertake to inform their Controlling Persons, if applicable, of the processing of their information by the Fund.

Additionally, the Fund is responsible for the processing of personal data and each shareholder has a right to access the data communicated to the Luxembourg tax authorities and to correct such data (if necessary). Any data obtained by the Fund is to be processed in accordance with the applicable data protection legislation.

Although the Fund will attempt to satisfy any obligation imposed on it to avoid imposition of FATCA withholding tax, no assurance can be given that the Fund will be able to satisfy these obligations. If the Fund becomes subject to a withholding tax or penalties as result of the FATCA regime, the value of the shares held by the shareholders may suffer material losses. The failure for the Fund to obtain such information from each shareholder and to transmit it to the Luxembourg tax authorities may trigger the thirty percent (30%) withholding tax to be imposed on payments of US source income.

Any shareholder that fails to comply with the Fund's information or documentation requests may be charged with any taxes and/or penalties imposed on the Fund as a result of such investor's failure to provide the information or documentation and the Fund may, in its sole discretion, redeem the shares of such shareholder.

Shareholders who invest through intermediaries are reminded to check if and how their intermediaries will comply with this US withholding tax and reporting regime.

Shareholders should consult a US tax advisor or otherwise seek professional advice regarding the above requirements.

11.4 Exchange of information – Common Reporting Standard

Capitalized terms used in this section should have the meaning as set forth in the CRS Law (as defined below), unless otherwise provided herein.

The Fund may be subject to the Common Reporting Standard (the "CRS") as set out in the Luxembourg law of 18 December 2015, as amended or supplemented from time to time (the "CRS Law") implementing Directive 2014/107/EU which provides for an automatic exchange of financial account information between Member States of the European Union as well as the OECD's multilateral competent authority agreement on automatic exchange of financial account information signed on 29 October 2014 in Berlin, with effect as of 1 January 2016.

Under the terms of the CRS Law, the Fund is likely to be treated as a Luxembourg Reporting Financial Institution.

This status imposes on the Fund the obligation to annually report to the Luxembourg tax authorities personal and financial information as exhaustively set out in Annex I of the CRS Law (the "**CRS Information**") related, inter alia, to the identification of, holdings by and payments made to (i) certain shareholders qualifying as Reportable Persons and (ii) Controlling Persons of passive non-financial entities ("**NFEs**") which are themselves Reportable Persons. The CRS Information will include personal data related to the Reportable Persons.

The Fund's ability to satisfy its reporting obligations under the CRS Law will depend on each investor providing the Fund with the CRS Information, along with the required supporting documentary evidence. In this context, the Shareholders are hereby informed that, as data controller, the Fund will process the CRS Information for the purposes as set out in the CRS Law.

Shareholders qualifying as passive NFEs undertake to inform their Controlling Persons, if applicable, of the processing of the CRS Information by the Fund.

Additionally, the Fund is responsible for the processing of personal data and each shareholder has a right to access the data communicated to the Luxembourg tax authorities and to correct such data (if necessary). Any data obtained by the Fund is to be processed in accordance with the applicable data protection legislation.

The shareholders are further informed that the CRS Information related to Reportable Persons will be disclosed to the Luxembourg tax authorities annually for the purposes set out in the CRS Law. The Luxembourg tax authorities will, under their own responsibility, eventually exchange the reported information to the competent authority of the Reportable Jurisdiction(s).

In particular, Reportable Persons are informed that certain operations performed by them will be reported to them through the issuance of statements, and that part of this information will serve as a basis for the annual disclosure to the Luxembourg tax authorities.

Similarly, the Shareholders undertake to inform the Fund within thirty (30) days of receipt of these statements should any included personal data not be accurate. The Shareholders further undertake to immediately inform the Fund of, and provide the Fund with all supporting documentary evidence of any changes related to the CRS Information after occurrence of such changes.

Although the Fund will attempt to satisfy any obligation imposed on it to avoid any fines or penalties imposed by the CRS Law, no assurance can be given that the Fund will be able to satisfy these obligations. If the Fund becomes subject to a fine or penalty as a result of the CRS Law, the value of the Shares held by the shareholders may suffer material losses.

Any shareholder that fails to comply with the Fund's CRS Information or documentation requests may be held liable for penalties imposed on the Fund as a result of such shareholder's failure to provide the CRS Information or documentation and the Fund may, in its sole discretion, redeem the Shares of such shareholder.

12. BENCHMARK

Unless otherwise disclosed in this Prospectus, the indices used as Benchmarks by the Sub-Funds (as "use" is defined in the Benchmark Regulation) are, as at the date of this Prospectus, provided by Benchmark Administrators who are listed in the register of administrators and benchmarks maintained by ESMA pursuant to Article 36 of the Benchmark Regulation. Updated information whether the Benchmark is provided by an administrator included in the ESMA register of EU benchmark administrators and third country benchmarks is available from https://www.esma.europa.eu/benchmarks-register.

The Fund with the assistance of the Management Company and the Investment Manager, maintains a written plan setting out the actions that will be taken in the event that a Benchmark materially changes or ceases to be provided (the "**Contingency Plan**"), as required by article 28(2) of the Benchmark Regulation. Shareholders may access the Contingency Plan upon request at the register office of the Fund.

The Benchmarks disclosed in each Supplement are listed in the table below. They are being provided by the entity specified next to the name of the relevant Benchmark in the table below, in its capacity as Benchmark Administrator. The status of each Benchmark Administrator in relation to the register referred to in article 36 of the Benchmarks Regulation as of the date of this visa-stamped Prospectus is set out next to the name of the relevant Benchmark Administrator in the table below.

Benchmark(s)	**Benchmark Administrator**	**Status of the Benchmark Administrator**
ICE BofA Euro High Yield Index	ICE Benchmark Administration Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.
ICE BofA US High Yield Constrained Index hedged into Euro	ICE Benchmark Administration Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.
ICE BofA Global Corporate & High Yield Euro Hedged	ICE Benchmark Administration Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article

Benchmark(s)	Benchmark Administrator	Status of the Benchmark Administrator
		30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.
ICE BofA Global Government Index Euro Hedged	ICE Benchmark Administration Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.
ICE BofA Euro Treasury Bill	ICE Benchmark Administration Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.
MSCI Europe TRN	MSCI Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.
MSCI Daily Net TR World Euro	MSCI Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.
ICE BofA Euro Large Cap Corporate Duration-Matched ESG Tilt	ICE Benchmark Administration Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does

Benchmark(s)	Benchmark Administrator	Status of the Benchmark Administrator
		not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.
MSCI EUR High Yield ESG Leaders Corporate Bond	MSCI Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.
ICE BofA 1-5 Year BBB & Lower Sovereign External Debt Carbon Reduction Constrained Hedged	ICE Benchmark Administration Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.
MSCI AC World IMI Digital Economy ESG Filtered Net TR	MSCI Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.
ICE BofA Euro Subordinated Financial Index	ICE Benchmark Administration Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.

Benchmark(s)	Benchmark Administrator	Status of the Benchmark Administrator
ICE BofA Large Cap Contingent Capital Index hedged	ICE Benchmark Administration Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.
ICE BofA Euro Financial High Yield Index	ICE Benchmark Administration Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.
MSCI ACWI ESG Leaders Net Return EUR	MSCI Limited	Not listed in the register as it is an entity located in a country outside of the European Union and does not comply with the conditions laid down in article 30(1) of the Benchmark Regulation nor has it required recognition in accordance with article 32 of the Benchmark Regulation.

Following the end of the Brexit transition period, UK based Benchmark Administrators (including MSCI Limited and ICE Benchmark Administration Limited) have been deleted from the register referred to in article 36 of the Benchmark Regulation. Notwithstanding the above, the Fund can until 31 December 2025 use third-country based Benchmarks even if they are not included in the said register in accordance with article 51(5) of the Benchmark Regulation.

13. SUSTAINABILITY-RELATED DISCLOSURES

Pursuant to the SFDR, it is required to disclose the way according to which Sustainability Risks are integrated into the investment decision and the results of the assessment of the likely impacts of Sustainability Risks on the returns of the Sub-Funds.

The Sub-Funds, except for the Sidera Funds SICAV – Euro ESG Credit, Sidera Funds SICAV – Global Income Opportunities, Sidera Funds SICAV – Digital Worlds and Sidera Funds SICAV – Christian Equity, do not actively promote environmental and/or social characteristics in accordance with Article 8 of the SFDR and therefore do not maximize portfolio alignment with Sustainability Factors. All Sub-Funds, including those that do not actively promote environmental and/or social characteristics, however, remain exposed to Sustainability Risks as further described in section 5.4 (Sustainability Risk) above.

Depending on the Investment Managers and the concerned Sub-Funds, the applied risk framework may however not be specifically tailored to Sustainability Risks. Rather relevant Sustainability Risks may be considered as part of the processes adopted by the relevant Investment Managers to monitor and manage general market risks. Accordingly, the Investment Managers may at least integrate Sustainability Risks in their investment decision-making process by having regard to material sustainability events that cause or are reasonably expected to cause broad disruption to economic growth, investor sentiment and asset flows in its ongoing assessment and monitoring of financial markets and the investment risk profile of the relevant Sub-Funds as further described below and in the respective Supplements.

The disclosures required pursuant to Article 8 of the SFDR on the environmental and social characteristics promoted by Sidera Funds SICAV – Euro ESG Credit, Sidera Funds SICAV – Global Income Opportunities, Sidera Funds SICAV – Digital Worlds and Sidera Funds SICAV – Christian Equity are available in the respective SFDR RTS Annexes at the end of this Prospectus.

Unless otherwise specified in the respective Supplements, the Management Company in conjunction with the Investment Manager does not consider adverse impacts of the Sub-Funds' investment decisions on Sustainability Factors due to the current orientation of the investment objective.

13.1 Sustainability approach of Arca Fondi Sgr S.p.A

Arca Fondi Sgr S.p.A has developed an "**ESG Policy**" that aims at integrating Sustainability Factors and Sustainability Risks into the Sub-Fund's investment process.

The Sustainability Factors integration can be pursued through ESG rating developed from Arca Fondi Sgr S.p.A and based upon information collected from public and private data providers.

All Sub-Funds, including those that do not actively promote Sustainability Factors, remain exposed to Sustainability Risks as further described in section 5.4 (Sustainability Risk) above.

Investors are invited to consult the investment philosophy of Arca Fondi Sgr S.p.A available on the following website: www.siderafunds.com/en/investment-philosophy.html.

13.2 Sustainability Approach of Goldman Sachs Asset Management International

The relevant Sub-Fund may be exposed to Sustainability Risks from time to time. A Sustainability Risk is defined in the SFDR as an environmental, social or governance event or condition that could cause an actual or a potential material negative impact on the value of investments. The universe of sustainability events or conditions is very broad, and their relevance, materiality and impact on investments will depend on a number of factors such as the investment strategy pursed by the relevant Sub-Fund, asset class, asset location and asset sector. Depending on the circumstances, examples of Sustainability Risks can include physical environmental risks, climate change transition risks, supply chain disruptions, improper labour practices, lack of board diversity and corruption. If they materialise, Sustainability Risks can reduce the value of underlying investments held within the relevant Sub-Fund and could have a material impact on the performance and returns of the relevant Sub-Fund.

Goldman Sachs Asset Management International does not operate a risk framework that is specifically tailored to Sustainability Risks. Rather relevant Sustainability Risks may be considered as part of the processes adopted by Goldman Sachs Asset Management International to monitor and manage general market risks. Accordingly, Goldman Sachs Asset Management International may integrate Sustainability Risks in its investment decision making process by having regard to material sustainability events that cause or are reasonably expected to cause broad disruption to economic growth, investor sentiment and asset flows in its ongoing assessment and monitoring of financial markets and the investment risk profile of the relevant Sub-Fund. Goldman Sachs Asset Management International may utilise proprietary and/or third-party tools and research to assess and monitor market risks that are relevant to the relevant Sub-Fund.

14. SUPPLEMENT 1 – SIDERA FUNDS SICAV – EURO ESG CREDIT

1. Launch date

15 December 2015

2. Reference Currency

The Reference Currency of the Sub-Fund is EURO.

3. Investment objective

The investment objective of the Sub-Fund is to achieve capital growth in the medium term by investing mainly in corporate bonds and to generate a total rate of return in excess of a Benchmark ICE BofA Euro Large Cap Corporate Duration-Matched ESG Tilt Index (Bloomberg ELSE) (the "**ESG Index**"). The Sub-Fund is actively managed in reference to this Benchmark with significant degree of freedom.

In accordance with Article 8 of SFDR, the Sub-Fund promotes environmental and social characteristics and investments which follow good governance practices. The environmental and social characteristics promoted by the Sub-Fund consist in favouring investment in issuers whose business activities and/or conduct take an appropriate and responsible approach to ESG. Further information on the environmental and social characteristics promoted by the Sub-Fund, and on European Taxonomy-related considerations, is available in the SFDR RTS Annex 1 of this Prospectus.

As part of the investment process and in order to fully comply with the ESG considerations of the Sub-Fund, the Investment Manager has full discretion over the composition of the Sub-Fund's portfolio and may take exposure to companies, countries or sectors not included in and/or that have different weightings than the ESG Index. The Investment Manager may set discretionary internal risk thresholds which may reference deviations from the ESG Index. While it is expected that the Sub-Fund's deviation from the ESG Index will be moderate, there are no restrictions on the extent to which the Fund's performance may deviate from the one of the ESG Index.

4. Investment policy and specific restrictions

The Sub-Fund invests primarily in corporate bonds, both investment grade and high yield, issued by companies domiciled in OECD countries, denominated in G-10 country currencies, i.e. USD, Canadian Dollar, EUR, GBP. Investment in high yield bonds will never exceed the investment in investment grade bonds.

The Sub-Fund may also invest in derivatives, both exchange traded and OTC on, for instance, credit indexes, single name and/or interest rates and FX. Such derivatives usage can be for investment, hedging or efficient portfolio management purposes.

The Sub-Fund may also invest in government bonds issued by a member State of the OECD such as the Group of Ten (G10[1]), in other interest bearing securities, in units of UCITS

[1] The FX G10 includes all Euro members, the US, Japan, the UK, Canada, Australia, New Zealand, Switzerland, Norway, Sweden and Denmark.

and/or other eligible UCIs with similar investment policies, liquidity and in time deposits. In principle, the Sub-Fund may hold on a temporarily basis ancillary liquid assets up to 20 % of the Sub-Fund's Net Asset Value as specified in section 4.1.4 of the Prospectus.

The Sub-Fund may also invest:

- up to 10% of the Net Asset Value in emerging market bonds
- up to 20% of the Net Asset Value in securitized products (e.g. ABS, CLOs)
- up to 20% of the Net Asset Value in convertible bonds
- up to 20% of the Net Asset Value in contingent convertible bonds.

Investment in defaulted and distressed bonds is not expected to be meaningful and in any case it will not exceed 10% of the Net Asset Value.

Contingent convertible bonds, also called Cocos or CoCo bonds, are unlimited, principally fixed-income bonds with a hybrid character which are issued as bonds with fixed coupon payments, but which upon a trigger event are mandatorily converted into company shares or written down, provided that respective trigger events are set out in the issuing terms of the CoCo bonds.

The Sub-Fund may be indirectly exposed to equity due to the sensitivity of convertible bonds or contingent convertible bonds influenced by the price of underlying equities. The Sub-Fund may directly hold equities after exercising the conversion option attached to convertible bonds or contingent convertible bonds or following debt restructuring. Although such direct positions are not intended to be held over the long-term, the Sub-Fund is not required to sell them within a predefined period.

The currency risk will be mostly hedged. The interest rate duration of the Sub-Fund will be, on average, between three (3) and seven (7) years.

The Sub-Fund will be managed according to a core strategy which will generate the net market exposure. The core strategy’s investment process combines a top-down approach with a bottom-up selection model. Valuation criteria include fundamental, technical and risk indicators which are deemed to be statistically significant in explaining the cross section of returns. Net exposure to interest rate risk and credit risk will generally vary in 70%-130% range, while cash investments in securities will usually not exceed 100% of the Net Asset Value.

The core strategy may absorb up to 100% of the investments.

Satellite strategies will also be implemented. These strategies will usually have low correlation with the core strategy and will therefore improve on average the risk-return profile of the Sub-Fund. Satellite strategies will encompass both long only and long short positions on single issuers, sectors and indices. The above-mentioned positions will be mainly implemented via eligible futures, options and swaps, short positions always being implemented via derivatives.

A not complete list of satellite strategies includes:

- credit ‘long-short’ where a long position in a certain issuer (via corporate bond or credit default swap) is spread duration matched by a short position in another corporate issuer;

- rate curve relative value strategies where long positions in certain curve segments are duration-matched by corresponding short positions in other segments via government bonds;
- future or swaps;
- basis trade strategies where long and short positions are built for a given issuer using different financial instruments (for example bond versus credit default swap)

As a part of the investment process, the Investment Manager will allocate risk (i.e. risk contribution to VaR or other equivalent measure) to the satellite strategies while ensuring a sound balance of core and non-core strategies.

The Sub-Fund will on an ongoing basis enter into securities lending transactions as lender of securities. In circumstances where the agent for securities lending identifies opportunities based on the market developments to be in the interest of the Sub-Fund's investors and given the securities lending scheme program developed to cover potentially a substantial portion of the portfolio of the Sub-Fund, a maximum of 50% of the assets held by the Sub-Fund can be subject to securities lending transactions. Notwithstanding the above, the lending of securities remains subject to the offer capacity and the terms of the offers provided by the agent for securities lending. For these reasons, under normal circumstances, the expected percentage of the assets subject to securities lending transactions is up to 35%. A percentage of minimum 80% of the gross revenues arising from securities lending transactions will be returned to the Sub-Fund; the remaining revenues are assigned to the agent for securities lending. All direct and indirect operational costs and fees in relation to securities lending programme activities are paid from the agent's portion of the gross revenues (being the remaining revenues mentioned above).

Furthermore, the Sub-Fund will also enter into repurchase transactions and reverse repurchase transactions as buyer or seller, occasionally. The securities subject to such repurchase transactions will be safe-kept with the Depositary. In circumstances where the Investment Manager identifies opportunities to be in the interest of the Sub-Fund's investors and given the repurchase transactions and reverse repurchase transactions scheme program developed by the Investment Manager to cover potentially a substantial portion of the Sub-Fund, a maximum of 40% of the assets held by the Sub-Fund (i.e. bonds) can be subject to repurchase transactions and reverse repurchase transactions. Notwithstanding the above, the recourse to repurchase transactions and reverse repurchase transactions remains subject to the interest shown by market dealers to enter into such transactions. In addition, the Investment Manager is carefully considering the terms of the transactions in order to identify whether they are in the best possible interest of the Sub-Fund's investors. For these reasons, under normal circumstances, the expected percentage of the assets subject to repurchase transactions and reverse repurchase transactions is up to 20%. All revenues arising from repurchase transactions and reverse repurchase transactions, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

Finally, the Sub-Fund will on an ongoing basis enter into total return swaps on bond and credit indices for hedging, efficient portfolio management or investment purposes. Notably for the purposes of portfolio construction as well as for implementing active investment positions, a maximum of 50% of the assets held by the Sub-Fund can be subject to total return swaps. The expected percentage of the assets subject to total return swaps is up to

25%. All revenues arising from total return swaps, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

The Sub-Fund will not enter in margin lending transactions, buy-sell back transactions and sell-buy back transactions.

5. Investor profile

The Sub-Fund is suitable for investors who have ESG preferences, who are seeking capital appreciation over 3 years and are prepared to accept risk to their capital and at least moderate volatility in the value of their investments. Given the investment objective and policies of the Sub-Fund, the Sub-Fund is suitable for conservative investors including those who are interested in or informed about capital market topics but see investment fund as a convenient savings product. It is also suitable for more experienced investors wishing to attain defined investment objectives.

6. Specific risks

Investors should carefully read section 5 (General Risk Factors) of the Prospectus before investing in the Sub-Fund. Investors should in particular note the specific risk warnings contained in section 5.12.1 of the Prospectus regarding investing in derivatives and financial derivative instruments and in section 5.12.2 of the Prospectus regarding investing in securities lending transactions. In addition, investors should also consider the following additional risks which are specific to the Sub-Fund.

Debt securities are subject to the risk of the issuer's inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of corporate bonds can be expected to decline. Corporate bonds with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

High yield bonds are regarded as being predominately speculative as to the issuer's ability to make payments of principal and interest. Investment in such securities involves substantial risk. Issuers of high yield debt securities may be highly leveraged and may not have available to them more traditional methods of financing. An economic recession may adversely affect an issuer's financial condition and the market value of high yield debt securities issued by such entity. The issuer's ability to service its debt obligations may be adversely affected by specific issuer developments, or the issuer's inability to meet specific projected business forecasts, or the unavailability of additional financing. In the event of bankruptcy of an issuer, the Sub-Fund may experience losses and incur costs. Investments particularly those made in emerging markets may be adversely affected by the possibility of expropriation or confiscatory taxation, imposition of withholding taxes on dividend or interest payments, limitations on the removal of funds or other assets of a Portfolio, political or social instability or diplomatic developments. An issuer of securities may be domiciled in a country other than the country in whose currency the instrument is denominated. The values and relative yields of investments in the securities markets of different countries, and their associated risks, are expected to change independently of each other.

Many emerging markets are undergoing a period of rapid growth and are less regulated than the world's leading stock markets and there may be less publicly available information about companies listed on such markets than is regularly published about companies listed on other stock markets. In addition, market practices in relation to settlement of securities transactions and custody assets in emerging markets can provide increased risk to emerging markets funds.

By investing in UCITS and/or other UCIs indirectly through the Sub-Fund, the investor will bear not only his proportionate share of the Management Fee of the Sub-Fund, but also indirectly, the management and administration expenses of the underlying UCITS and/or other UCIs. The Sub-Fund may invest in units of UCITS and/or other UCIs that may be managed or sub-managed by the Investment Manager, an affiliated manager or by an unaffiliated manager. The ability of the Sub-Fund to invest in units of underlying UCITS and/or other UCIs to achieve its investment objective may be directly related to the ability of the underlying UCITS and/or other UCIs to meet their own investment objectives. The Sub-Fund will be exposed to the risks to which the underlying UCITS and/or other UCIs are exposed. These risks may include liquidity risk where the ability of the Sub-Fund to meet the liquidity requirements of its investment is directly linked to the ability of the underlying UCITS and/or other UCIs to meet their liquidity requirements.

A contingent convertible bond is a debt instrument which may be converted into the issuer's equity or be partly or wholly written off if a predefined trigger event occurs. The terms of the bond will set out specific trigger events and conversion rates. Trigger events may be outside of the issuer's control. A common trigger event is the decrease in the issuer's capital ratio below a given threshold.

Conversion may cause the value of the investment to fall significantly and irreversibly, and in some cases even to zero.

Coupon payments on certain contingent convertible bonds may be entirely discretionary and may be cancelled by the issuer at any point, for any reason, and for any length of time.

Contrary to typical capital hierarchy, contingent convertible bond investors may suffer a loss of capital before equity holders.

Most contingent convertible bonds are issued as perpetual instruments which are callable at pre-determined dates. Perpetual contingent convertible bonds may not be called on the predefined call date and investors may not receive return of principal on the call date or at any date.

There are no widely accepted standards for valuing contingent convertible bonds. The price at which bonds are sold may therefore be higher or lower than the price at which they were valued immediately before their sale.

In certain circumstances finding a ready buyer for contingent convertible bonds may be difficult and the seller may have to accept a significant discount to the expected value of the bond in order to sell it.

7. Likely impacts of Sustainability Risks on the Sub-Fund's returns

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value. As such, for a company in which a Sub-Fund invests, this may be because of damage to its reputation resulting in a consequential fall in demand for its products or services, loss of key personnel, exclusion from potential business opportunities, increased costs of doing business and/or increased cost of capital. A company may also suffer the impact of fines and other regulatory sanctions. The time and resources of the company's management team may be diverted from furthering its business into dealing with the Sustainability Risk event, including changes to business practices and dealing with investigations and litigation. Sustainability Risks events may also give rise to loss of assets and/or physical loss including damage to real estate and infrastructure. The utility and value of assets held by companies to which the respective Sub-Fund is exposed may also be adversely impacted by a Sustainability Risk event. A Sustainability Risk event may arise and impact a specific investment or may have a broader impact on an economic sector, geographical or political region or country. For instance, sector and geographic Sustainability Risk events may have an impact on the investment value of the sovereign fixed income exposure of a Sub-Fund.

8. Global exposure and level of leverage

The global exposure of the Sub-Fund is calculated and monitored under the relative VaR approach. The global exposure of the Sub-Fund may not exceed twice the VaR of a reference portfolio, being the reference Benchmark 100% ICE BofA Euro Large Cap Corporate Duration-Matched ESG Tilt Index.

The level of leverage of the Sub-Fund, based on the delta-adjusted "sum of notionals" approach, is generally not expected to exceed 500% of the Net Asset Value. The leverage is resulting in particular from investments in derivatives as well as from investments in total return swaps. The Investment Manager will regularly monitor its leverage; the average level is not expected to be permanently close to the above-mentioned threshold and it will generally fluctuate below that level. Nevertheless, the leverage of the Sub-Fund may occasionally exceed the level of 500%. Higher allocation to the satellite strategies is indeed associated with higher leverage levels. The leverage will in any event not reach or exceed 600% of the Net Asset Value.

9. Investment Manager

ARCA Fondi SGR S.p.A.

10. Valuation

Each Business Day is a Valuation Day. The Net Asset Value per Share will be calculated as of each Valuation Day. With respect to this Sub-Fund, a Business Day is any day which is defined as a Business Day in the Prospectus.

11. Subscriptions

Each Valuation Day is a Subscription Day. The Cut-Off Time for subscription applications is 1.00 pm CET of the Subscription Day. Subscription applications must be settled by the end of the Subscription Settlement Period, which is two (2) Business Days following the Subscription Day.

12. Redemptions

Each Valuation Day is a Redemption Day. The Cut-Off Time for redemption applications is 1.00 pm CET of the Redemption Day. Redemption applications will normally be settled by the end of the Redemption Settlement Period, which is two (2) Business Days following the Redemption Day.

13. Share Classes

The table below lists all Share Classes established within the Sub-Fund. Certain Share Classes may currently not be active or may be unavailable to investors in certain jurisdictions. The list of active Share Classes currently available for subscription in each jurisdiction may be obtained from the UCI Administrator and the Global Distributor upon request or on www.siderafunds.com.

Share Class name	**Sidera Funds SICAV - Euro ESG Credit B Acc**	**Sidera Funds SICAV - Euro ESG Credit A Inc**	**Sidera Funds SICAV - Euro ESG Credit A Acc**
Reference Currency	EUR	EUR	EUR
Distribution (D) or Capitalisation (C)	C	D (semi-annual)	C
Minimum Subscription	EUR 50.000	EUR 1.000	EUR 1.000
Minimum Additional Subscription	EUR 500	EUR 250 EUR 100 in case of saving plans[2]	EUR 250 EUR 100 in case of saving plans
Minimum Holding Amount	N.A.	N.A.	N.A.
Maximum Subscription Fee received by the sub-distributor	N.A.	Maximum 4% of the subscription amount	Maximum 4% of the subscription amount
Maximum Redemption Fee	N.A.	N.A.	N.A.

[2] Conditions and details of saving plans are reported in the offering materials available at local level.

Share Class name	Sidera Funds SICAV - Euro ESG Credit B Acc	Sidera Funds SICAV - Euro ESG Credit A Inc	Sidera Funds SICAV - Euro ESG Credit A Acc
Management Fee	Max 0,45% p.a.	Max 0,95% p.a.	Max 0,95% p.a.
Performance Fee	N.A.	YES, according to the methodology set out in the Section 9.3.1 of the Prospectus	YES, according to the methodology set out in the Section 9.3.1 of the Prospectus
Taxe d'abonnement	0,01% p.a.	0,05% p.a.	0,05% p.a.

14. Distribution policy

Subject to the provisions of the Prospectus, Distribution Share Classes will normally distribute dividends in accordance with the following distribution policies:

Share Classes A Inc: semi-annual, based on figures of June and in December, payable to shareholders in July and January.

15. Eligible Investors

Classes of shares:

- Class A Inc and A Acc Shares are offered to individuals and legal entities, which are residents or established in Italy. Class A shares are issued only in registered form.
- Class B Acc: Shares are reserved for legal entities qualifying as Institutional Investors and for private entities qualifying as Professional Investors. Class B Shares are issued only in registered form.

15. SUPPLEMENT 2 – SIDERA FUNDS SICAV – EQUITY EUROPE ACTIVE SELECTION

1. Launch date

15 December 2015

2. Reference Currency

The Reference Currency of the Sub-Fund is EURO.

3. Investment objective

The investment objective of the Sub-Fund is to achieve capital growth in the long term by investing mainly in equities and equity related instruments and to generate a total return in excess of the reference Benchmark being 100% MSCI Europe TRN Index (Bloomberg MSDEE15N). The Sub-Fund is actively managed in reference to this Benchmark with significant degree of freedom.

4. Investment policy and specific restrictions

The Sub-Fund invests mainly in equities or equity related instruments, listed on European markets and/or issued by companies domiciled in Europe. The Sub-Fund may also invest up to 15% of the Net Asset Value in emerging market stocks.

The Sub-Fund may invest in derivatives, both exchange traded and OTC on, for instance, stock indexes and/or single stock and/or equity related indexes (options on volatility, dividends, etc.), in units of UCITS and/or other eligible UCIs with analogous investment policies, liquidity, currencies and in time deposits. In principle, the Sub-Fund may hold on a temporarily basis ancillary liquid assets up to 20 % of the Sub-Fund's Net Asset Value as specified in section 4.1.4 of the Prospectus.

The Sub-Fund may also invest up to 49% of the Net Asset Value in corporate and government bonds or in other interest bearing securities.

Securities will be mainly denominated in European currencies.

The Sub-Fund will be managed according to a core strategy which will generate the net market exposure. The core strategy’s investment process combines a top down fundamental approach based upon macroeconomic analysis with a bottom up selection model which is quantitative in nature. The above-mentioned quantitative model identifies those stocks carrying the highest return potential while controlling risks. Valuation criteria employed include fundamental, technical and risk indicators which are deemed to be statistically significant in explaining the cross section of equity returns. Net equity exposure will generally vary in 70%-130% range, while cash equity investments will usually not exceed 100% of the Net Asset Value.

The core strategy may absorb up to 100% of the investments.

Satellite strategies will also be implemented. These strategies will usually have low correlation with the core strategy and will therefore improve on average the risk-return profile of the Sub-Fund. Satellite strategies will encompass both long only and long short positions on single stocks, sectors, indices and dividends. The above-mentioned positions will be mainly implemented via eligible futures, options and swaps, short positions always being implemented via derivatives.

A not complete list of satellite strategies includes:

- Relative value trades between/among single stocks
- Relative value trades between/among equity sectors
- Relative value trades between/among equity indices
- Option strategies (put/call spreads, calendar spreads, risk reversals, strangle straddles)
- Yield enhancement strategies (Call overwriting, Put Underwriting, etc)
- Dividend strategies (both directional and non-directional)
- Tail risk hedging strategies (mainly executed via options)

As a part of the investment process, the Investment Manager will allocate risk (i.e. risk contribution to VaR or other equivalent measure) to the satellite strategies while ensuring a sound balance of core and non-core strategies.

The Sub-Fund will on an ongoing basis enter into securities lending transactions as lender of securities. In circumstances where the agent for securities lending identifies opportunities based on the market developments to be in the interest of the Sub-Fund's investors and given the securities lending scheme program developed to cover potentially a substantial portion of the portfolio of the Sub-Fund, a maximum of 50% of the assets held by the Sub-Fund can be subject to securities lending transactions. Notwithstanding the above, the lending of securities remains subject to the offer capacity and the terms of the offers provided by the agent for securities lending. For these reasons, under normal circumstances, the expected percentage of the assets subject to securities lending transactions is up to 35%. A percentage of minimum 80% of the gross revenues arising from securities lending transactions will be returned to the Sub-Fund; the remaining revenues are assigned to the agent for securities lending. All direct and indirect operational costs and fees in relation to securities lending programme activities are paid from the agent's portion of the gross revenues (being the remaining revenues mentioned above).

Furthermore, the Sub-Fund will also enter into repurchase transactions and reverse repurchase transactions as buyer or seller, occasionally. The securities subject to such repurchase transactions will be safe-kept with the Depositary. In circumstances where the Investment Manager identifies opportunities to be in the interest of the Sub-Fund's investors , a maximum of 20% of the assets held by the Sub-Fund (i.e. bonds) can be subject to repurchase transactions and reverse repurchase transactions. Notwithstanding the above, the recourse to repurchase transactions and reverse repurchase transactions remains subject to the interest shown by market dealers to enter into such transactions. In addition, the Investment Manager is carefully considering the terms of the transactions in order to identify whether they are in the best possible interest of the Sub-Fund's investors. For these reasons, under normal circumstances, the expected percentage of the assets subject to repurchase transactions and reverse repurchase transactions is up to 10%. All revenues arising from repurchase transactions and reverse repurchase transactions, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

Finally, the Sub-Fund will on an ongoing basis enter into total return swaps on equity indices for hedging, efficient portfolio management or investment purposes. Notably for the purposes of portfolio construction as well as for implementing active investment positions, a maximum of 50% of the assets held by the Sub-Fund can be subject to total return swaps.

The expected percentage of the assets subject to total return swaps is up to 25%. All revenues arising from total return swaps, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

The Sub-Fund will not enter in margin lending transactions, buy-sell back transactions and sell-buy back transactions.

5. Investor profile

The Sub-Fund is suitable for investors who are seeking capital appreciation over 8 years and are prepared to accept the risk of significant temporary losses and to afford to set aside the capital in the long timeframe. The Sub-Fund is suitable for both more experienced investors wishing to attain defined investment objectives, with experience with volatile products and less experienced investors including those who are interested in or informed about capital market topics but see investment fund as a convenient investment product. The Sub-Fund is designed for the investment objective of building up capital.

6. Specific risks

Investors should carefully read section 5 (General Risk Factors) of the Prospectus before investing in the Sub-Fund. Investors should in particular note the specific risk warnings contained in section 5.12.1 of the Prospectus regarding investing in derivatives and financial derivative instruments and in section 5.12.2 of the Prospectus regarding investing in securities lending transactions. In addition, investors should also consider the following additional risks which are specific to the Sub-Fund.

The Sub-Fund will be subject to the risks associated with equities, the values of which in general fluctuate in response to the activities of individual companies, the general market and economic conditions. In particular, investors should be aware that equity and equity related investments are subordinated in the right of payment to other corporate securities, including debt securities.

Corporate bonds are subject to the risk of the issuer's inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of corporate bonds can be expected to decline. Corporate bonds with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

By investing in UCITS and/or other UCIs indirectly through the Sub-Fund, the investor will bear not only his proportionate share of the Management Fee of the Sub-Fund, but also indirectly, the management and administration expenses of the underlying UCITS and/or other UCIs. The Sub-Fund may invest in units of UCITS and/or other UCIs that may be managed or sub-managed by the Investment Manager, an affiliated manager or by an unaffiliated manager. The ability of the Sub-Fund to invest in units of underlying UCITS and/or other UCIs to achieve its investment objective may be directly related to the ability of the underlying UCITS and/or other UCIs to meet their own investment objectives. The Sub-Fund will be exposed to the risks to which the underlying UCITS and/or other UCIs are exposed. These risks may include liquidity risk where the ability of the Sub-Fund to meet the liquidity requirements of its investment is directly linked to the ability of the underlying

UCITS and/or other UCIs to meet their liquidity requirements. Likely impacts of Sustainability Risks on the Sub-Fund's returns.

7. Likely impacts of Sustainability Risks on the Sub-Fund's returns

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value. As such, for a company in which a Sub-Fund invests, this may be because of damage to its reputation resulting in a consequential fall in demand for its products or services, loss of key personnel, exclusion from potential business opportunities, increased costs of doing business and/or increased cost of capital. A company may also suffer the impact of fines and other regulatory sanctions. The time and resources of the company's management team may be diverted from furthering its business into dealing with the Sustainability Risk event, including changes to business practices and dealing with investigations and litigation. Sustainability Risks events may also give rise to loss of assets and/or physical loss including damage to real estate and infrastructure. The utility and value of assets held by companies to which the respective Sub-Fund is exposed may also be adversely impacted by a Sustainability Risk event. A Sustainability Risk event may arise and impact a specific investment or may have a broader impact on an economic sector, geographical or political region or country. For instance, sector and geographic Sustainability Risk events may have an impact on the investment value of the sovereign fixed income exposure of a Sub-Fund.

8. Taxonomy

As the Sub-Fund is not identified as being subject to disclosures of articles 8 or 9 of SFDR, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

9. Global exposure and level of leverage

The global exposure of the Sub-Fund is calculated and monitored under the relative VaR approach. The global exposure of the Sub-Fund may not exceed twice the VaR of a reference portfolio, being the reference Benchmark (100% MSCI Europe TRN Index).

The level of leverage of the Sub-Fund, based on the delta-adjusted "sum of notionals" approach, is generally not expected to exceed 500% of the Net Asset Value. The leverage is resulting in particular from investments in derivatives as well as from investments in total return swaps. The Investment Manager will regularly monitor its leverage; the average level is not expected to be permanently close to the above mentioned threshold and it will generally fluctuate below that level. Nevertheless, the leverage of the Sub-Fund may occasionally exceed the level of 500%. Higher allocation to the satellite strategies is indeed associated with higher leverage levels. The leverage will in any event not reach or exceed 600% of the Net Asset Value.

10. Investment Manager

ARCA Fondi SGR S.p.A.

11. Valuation

Each Business Day is a Valuation Day. The Net Asset Value per Share will be calculated as of each Valuation Day. With respect to this Sub-Fund, a Business Day is any day which is defined as a Business Day in the Prospectus.

12. Subscriptions

Each Valuation Day is a Subscription Day. The Cut-Off Time for subscription applications is 1.00 pm CET of the Subscription Day. Subscription applications must be settled by the end of the Subscription Settlement Period, which is 1.00 pm CET two (2) Business Days following the Subscription Day.

13. Redemptions

Each Valuation Day is a Redemption Day. The Cut-Off Time for redemption applications is 1.00 pm CET of the Redemption Day. Redemption applications will normally be settled by the end of the Redemption Settlement Period, which is two (2) Business Days following the Redemption Day.

14. Share Classes

The table below lists all Share Classes established within the Sub-Fund. Certain Share Classes may currently not be active or may be unavailable to investors in certain jurisdictions. The list of active Share Classes currently available for subscription in each jurisdiction may be obtained from the UCI Administrator and the Global Distributor upon request or on www.siderafunds.com.

Share Class name	**Sidera Funds SICAV - Equity Europe Active Selection B Acc**	**Sidera Funds SICAV - Equity Europe Active Selection A Inc**	**Sidera Funds SICAV - Equity Europe Active Selection A Acc**
Reference Currency	EUR	EUR	EUR
Distribution (D) or Capitalisation (C)	C	D (semi-annual)	C
Minimum Subscription	EUR 50.000	EUR 1.000	EUR 1.000
Minimum Additional Subscription	EUR 500	EUR 250 EUR 100 in case of saving plans[3]	EUR 250 EUR 100 in case of saving plans

[3] Conditions and details of saving plans are reported in the offering materials available at local level.

Share Class name	**Sidera Funds SICAV - Equity Europe Active Selection B Acc**	**Sidera Funds SICAV - Equity Europe Active Selection A Inc**	**Sidera Funds SICAV - Equity Europe Active Selection A Acc**
Minimum Holding Amount	N.A.	N.A.	N.A.
Maximum Subscription Fee received by the sub-distributor	N.A.	Maximum 4% of the subscription amount	Maximum 4% of the subscription amount
Maximum Redemption Fee	N.A.	N.A.	N.A.
Management Fee	Max 0,7% p.a.	Max 1,95% p.a.	Max 1,95% p.a.
Performance Fee	N.A.	YES, according to the methodology set out in the Section 9.3.1 of the Prospectus	YES, according to the methodology set out in the Section 9.3.1 of the Prospectus
Taxe d'abonnement	0,01% p.a.	0,05% p.a.	0,05% p.a.

15. Distribution policy

Subject to the provisions of the Prospectus, Distribution Share Classes will normally distribute dividends in accordance with the following distribution policies:

Share Classes A Inc: semi-annual, based on figures of June and December, payable to shareholders in July and January

16. Eligible Investors

Classes of shares:

- Class A Inc and A Acc Shares are offered to individuals and legal entities, which are residents or established in Italy. Class A shares are issued only in registered form.
- Class B Acc: Shares are reserved for legal entities qualifying as Institutional Investors and for private entities qualifying as Professional Investors. Class B Shares are issued only in registered form.

16. SUPPLEMENT 3 – SIDERA FUNDS SICAV – GLOBAL HIGH YIELD

1. Launch date

16 November 2016 with initial offer period from 15 October 2016 to 15 November 2016 (Sidera Funds SICAV - Global High Yield B Acc).

6 February 2017 with initial offer period from 3 January 2017 to 3 February 2017 (Sidera Funds SICAV - Global High Yield A Acc and Sidera Funds SICAV - Global High Yield A Inc).

2. Reference Currency

The Reference Currency of the Sub-Fund is EURO.

3. Investment objective

The investment objective of the Sub-Fund is to achieve capital growth in the medium term by investing mainly in corporate bonds and to generate a total rate of return in excess of a composite Benchmark comprised of 50% ICE BofA Euro High Yield Index[4] (Bloomberg HE00) and 50% ICE BofA US High Yield Constrained Index hedged into Euro[5] (Bloomberg HUC0).

The Sub-Fund is actively managed in reference to these Benchmarks with significant degree of freedom.

4. Investment policy and specific restrictions

The Sub-Fund invests primarily in corporate bonds of any maturity and level of subordination, both 'investment grade' and 'high yield', denominated in Euro or USD, issued by any corporate from any country worldwide, under local or other country's law.

The Sub-Fund may also invest in corporate bonds denominated in other currencies, government bonds, government guaranteed bonds of any country worldwide and supranational and international agencies in any currency. The Sub-Fund may invest in convertible and hybrid bonds if their characteristics are in line with above until they are converted or repaid in stocks.

This investment policy may be conducted directly through single securities or indirectly through derivatives or other UCITS/UCIs.

The Sub-Fund may also invest in time deposits and other money market instruments. In principle, the Sub-Fund may hold on a temporarily basis ancillary liquid assets up to 20 % of the Sub-Fund's Net Asset Value as specified in section 4.1.4 of the Prospectus.

The Sub-Fund may invest up to 20% of its net assets in contingent convertible bonds, up to 20% of its net assets in asset-backed securities (ABS) and up to 20% of its net assets in mortgage-backed securities (MBS). Nonetheless, the total investment in contingent

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[4] formerly BofA Merrill Lynch Euro High Yield Index
[5] formerly BofA Merrill Lynch US High Yield Constrained Index hedged into Euro

convertible bonds, ABS and MBS cannot exceed 20% of the net assets. With respect to such instruments, the Sub-Fund will not invest more than 10% of its net assets in a single instrument of the same type and the same issuer.

The Sub-Fund may be indirectly exposed to equity due to the sensitivity of convertible bonds influenced by the price of underlying equities. The Sub-Fund may directly hold equities after exercising the conversion option attached to convertible bonds or following debt restructuring. Although such direct positions are not intended to be held over the long-term, the Sub-Fund is not required to sell them within a predefined period.

The Sub-Fund does not actively invest in defaulted and distressed bonds. Investment in defaulted and distressed bonds is however not expected to be meaningful and in any case it will not exceed 10% of the net assets of the Sub-Fund. Disposal or sale of defaulted or distressed instruments will be pursued in the interest of the investors.

The Sub-Fund may also invest in derivatives, both exchange traded and OTC on, for instance, credit indexes, single name and/or interest rates and FX. Such derivatives usage can be for investment, hedging or efficient portfolio management purposes.

The Investment Managers aim at delivering an extra performance versus the strategic asset allocation as described by the Benchmark in this Supplement. The Investment Managers will analyze macroeconomic trends, corporate balance sheets and market trends to take active exposures on rates, spreads, currency and issuers in compliance with pre-defined risk limits.

The Sub-Fund will on an ongoing basis enter into securities lending transactions as lender of securities. In circumstances where the agent for securities lending identifies opportunities based on the market developments to be in the interest of the Sub-Fund’s investors and given the securities lending scheme program developed to cover potentially a substantial portion of the portfolio of the Sub-Fund, a maximum of 50% of the assets held by the Sub-Fund can be subject to securities lending transactions. Notwithstanding the above, the lending of securities remains subject to the offer capacity and the terms of the offers provided by the agent for securities lending. For these reasons, under normal circumstances, the expected percentage of the assets subject to securities lending transactions is up to 35%. A percentage of minimum 80% of the gross revenues arising from securities lending transactions will be returned to the Sub-Fund; the remaining revenues are assigned to the agent for securities lending. All direct and indirect operational costs and fees in relation to securities lending programme activities are paid from the agent's portion of the gross revenues (being the remaining revenues mentioned above).

Furthermore, the Sub-Fund will also enter into repurchase transactions and reverse repurchase transactions as buyer or seller, occasionally. The securities subject to such repurchase transactions will be safe-kept with the Depositary. In circumstances where the Investment Manager identifies opportunities to be in the interest of the Sub-Fund’s investors and given the repurchase transactions and reverse repurchase transactions scheme program developed by the Investment Manager to cover potentially a substantial portion of the Sub-Fund, a maximum of 40% of the assets held by the Sub-Fund (i.e. bonds) can be subject to repurchase transactions and reverse repurchase transactions. Notwithstanding the above, the recourse to repurchase transactions and reverse repurchase transactions remains subject to the interest shown by market dealers to enter into such transactions. In addition, the Investment Manager is carefully considering the terms of the transactions in order to identify whether they are in the best possible interest of the Sub-Fund's investors. For these reasons, under normal circumstances, the expected percentage of the assets subject to repurchase transactions and reverse repurchase transactions is up to 20%. All revenues arising from repurchase transactions and reverse repurchase transactions, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

Finally, the Sub-Fund will on an ongoing basis enter into total return swaps on bond and credit indices for hedging, efficient portfolio management or investment. Notably for the purposes of portfolio construction as well as for implementing active investment positions, a maximum of 50% of the assets held by the Sub-Fund can be subject to total return swaps. The expected percentage of the assets subject to total return swaps is up to 25%. All revenues arising from total return swaps, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

The Sub-Fund will not enter in margin lending transactions, buy-sell back transactions and sell-buy back transactions.

5. Investor profile

The Sub-Fund is suitable for investors who are seeking capital appreciation over 5 years and are prepared to accept the risk of significant temporary losses and to afford to set aside the capital in the medium timeframe. The Sub-Fund is suitable for both more experienced investors wishing to attain defined investment objectives, with experience with volatile products and less experienced investors including those who are interested in or informed about capital market topics but see investment fund as a convenient investment product. The Sub-Fund is designed for the investment objective of building up capital.

6. Specific risks

Investors should carefully read section 5 (General Risk Factors) of the Prospectus before investing in the Sub-Fund. Investors should in particular note the specific risk warnings contained in section 5.12.1 of the Prospectus regarding investing in derivatives and financial derivative instruments, in section 5.12.2 of the Prospectus regarding investing in securities lending transactions and in section 5.12.6 of the Prospectus regarding investing in Distressed Debt Securities. In addition, investors should also consider the following additional risks which are specific to the Sub-Fund.

Debt securities are subject to the risk of the issuer's inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of corporate bonds can be expected to decline. Corporate bonds with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

High yield bonds are regarded as being predominately speculative as to the issuer's ability to make payments of principal and interest. Investment in such securities involves substantial risk. Issuers of high yield debt securities may be highly leveraged and may not have available to them more traditional methods of financing. An economic recession may adversely affect an issuer's financial condition and the market value of high yield debt securities issued by such entity. The issuer’s ability to service its debt obligations may be adversely affected by specific issuer developments, or the issuer’s inability to meet specific projected business forecasts, or the unavailability of additional financing. In the event of bankruptcy of an issuer, the Sub-Fund may experience losses and incur costs. Investments particularly those made in emerging markets may be adversely affected by the possibility of expropriation or confiscatory taxation, imposition of withholding taxes on dividend or interest payments, limitations on the removal of funds or other assets of a Portfolio, political or social instability or diplomatic developments. An issuer of securities may be domiciled in a country other than the country in whose currency the instrument is denominated. The values and relative yields of investments in the securities markets of different countries, and their associated risks, are expected to change independently of each other.

Many emerging markets are undergoing a period of rapid growth and are less regulated than the world’s leading stock markets and there may be less publicly available information about companies listed on such markets than is regularly published about companies listed on other stock markets. In addition, market practices in relation to settlement of securities transactions and custody assets in emerging markets can provide increased risk to emerging markets funds.

By investing in UCITS and/or other UCIs indirectly through the Sub-Fund, the investor will bear not only his proportionate share of the Management Fee of the Sub-Fund, but also indirectly, the management and administration expenses of the underlying UCITS and/or other UCIs. The Sub-Fund may invest in units of UCITS and/or other UCIs that may be managed or sub-managed by the Investment Manager, an affiliated manager or by an unaffiliated manager. The ability of the Sub-Fund to invest in units of underlying UCITS and/or other UCIs to achieve its investment objective may be directly related to the ability of the underlying UCITS and/or other UCIs to meet their own investment objectives. The Sub-Fund will be exposed to the risks to which the underlying UCITS and/or other UCIs are exposed. These risks may include liquidity risk where the ability of the Sub-Fund to meet the liquidity requirements of its investment is directly linked to the ability of the underlying UCITS and/or other UCIs to meet their liquidity requirements.

A contingent convertible bond is a debt instrument which may be converted into the issuer's equity or be partly or wholly written off if a predefined trigger event occurs. The terms of the bond will set out specific trigger events and conversion rates. Trigger events may be outside of the issuer’s control. A common trigger event is the decrease in the issuer’s capital ratio below a given threshold.

Conversion may cause the value of the investment to fall significantly and irreversibly, and in some cases even to zero.

Coupon payments on certain contingent convertible bonds may be entirely discretionary and may be cancelled by the issuer at any point, for any reason, and for any length of time.

Contrary to typical capital hierarchy, contingent convertible bond investors may suffer a loss of capital before equity holders.

Most contingent convertible bonds are issued as perpetual instruments which are callable at pre-determined dates. Perpetual contingent convertible bonds may not be called on the predefined call date and investors may not receive return of principal on the call date or at any date.

There are no widely accepted standards for valuing contingent convertible bonds. The price at which bonds are sold may therefore be higher or lower than the price at which they were valued immediately before their sale.

In certain circumstances finding a ready buyer for contingent convertible bonds may be difficult and the seller may have to accept a significant discount to the expected value of the bond in order to sell it.

7. Likely impacts of Sustainability Risks on the Sub-Fund's returns

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value. As such, for a company in which a Sub-Fund invests, this may be because of damage to its reputation resulting in a consequential fall in demand for its products or services, loss of key personnel, exclusion from potential business opportunities, increased costs of doing business and/or increased cost of capital. A company may also suffer the impact of fines and other regulatory sanctions. The time and resources of the company's management team may be diverted from furthering its business into dealing with the Sustainability Risk event, including changes to business practices and dealing with investigations and litigation. Sustainability Risks events may also give rise to loss of assets and/or physical loss including damage to real estate and infrastructure. The utility and value of assets held by companies to which the respective Sub-Fund is exposed may also be adversely impacted by a Sustainability Risk event. A Sustainability Risk event may arise and impact a specific investment or may have a broader impact on an economic sector, geographical or political region or country. For instance, sector and geographic Sustainability Risk events may have an impact on the investment value of the sovereign fixed income exposure of a Sub-Fund.

8. Taxonomy

As the Sub-Fund is not identified as being subject to disclosures of articles 8 or 9 of SFDR, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

9. Global exposure and level of leverage

The global exposure of the Sub-Fund is calculated and monitored under the relative VaR approach. The global exposure of the Sub-Fund may not exceed twice the VaR of a reference portfolio, being the reference Benchmarks (50% ICE BofA Euro High Yield Index (Bloomberg HE00) and 50% ICE BofA US High Yield Constrained Index hedged into Euro (Bloomberg HUC0).

The level of leverage of the Sub-Fund, based on the delta-adjusted "sum of notionals" approach, is generally not expected to exceed 250% of the Net Asset Value. The leverage is resulting in particular from investments in derivatives, both exchange traded and OTC on, for instance, credit indexes, single name and/or interest rates and FX as well as from investments in total return swaps. The Investment Manager will regularly monitor its leverage; the average level is not expected to be permanently close to the above mentioned threshold and it will generally fluctuate below that level. Nevertheless, the leverage of the Sub-Fund may occasionally exceed the level of 500% but will in any event not reach or exceed 600% of the Net Asset Value.

10. Investment Managers

The Board of Directors has opted for a multi-manager investment approach, having different investment managers appointed, each of which will be attributed a specific portion of the Sub-Fund's assets that will typically be linked to a specific asset class.

The investment management function of the assets of the Sub-Fund will be delegated to the following delegated Investment Managers as follows:

- The investment management of 50% of the assets of the Sub-Fund will be delegated to ARCA Fondi SGR S.p.A., who will focus on the EURO denominated investments of the portfolio (as well as in other denominated currencies investments except USD)

- The investment management of 50% of the assets of the Sub-Fund will be delegated to Goldman Sachs Asset Management International Ltd. who will focus on the USD denominated investments of the portfolio.

The above percentages reflect the portion of assets of the Sub Fund of the Fund, for which each Investment Manager is appointed as Investment Manager.

11. Valuation

Each Business Day is a Valuation Day. The Net Asset Value per Share will be calculated as of each Valuation Day. With respect to this Sub-Fund, a Business Day is any day which is defined as a Business Day in the Prospectus.

12. Subscriptions

Each Valuation Day is a Subscription Day. The Cut-Off Time for subscription applications is 1.00 pm CET of the Subscription Day. Subscription applications must be settled by the end of the Subscription Settlement Period, which is 1.00 pm CET two (2) Business Days following the Subscription Day.

13. Redemptions

Each Valuation Day is a Redemption Day. The Cut-Off Time for redemption applications is 1.00 pm CET of the Redemption Day. Redemption applications will normally be settled by the end of the Redemption Settlement Period, which is two (2) Business Days following the Redemption Day.

14. Share Classes

The table below lists all Share Classes established within the Sub-Fund. Certain Share Classes may currently not be active or may be unavailable to investors in certain jurisdictions. The list of active Share Classes currently available for subscription in each jurisdiction may be obtained from the UCI Administrator and the Global Distributor upon request or on www.siderafunds.com.

Share Class name	Sidera Funds SICAV - Global High Yield B Acc	Sidera Funds SICAV - Global High Yield A Inc	Sidera Funds SICAV - Global High Yield A Acc
Reference Currency	EUR	EUR	EUR
Distribution (D) or Capitalisation (C)	C	D (semi-annual)	C
Minimum Subscription	EUR 50.000	EUR 5.000	EUR 5.000
Minimum Additional Subscription	EUR 500	EUR 250 EUR 100 in case of saving plans[6]	EUR 250 EUR 100 in case of saving plans
Minimum Holding Amount	N.A.	N.A.	N.A.
Maximum Subscription Fee received by the sub-distributor	N.A.	Maximum 4% of the subscription amount	Maximum 4% of the subscription amount
Maximum Redemption Fee	N.A.	N.A.	N.A.
Management Fee	Max 0,65% p.a.	Max 1,50% p.a.	Max 1,50% p.a.
Taxe d'abonnement	0,01% p.a.	0,05% p.a.	0,05% p.a.

15. Distribution policy

Subject to the provisions of the Prospectus, Distribution Share Classes will normally distribute dividends in accordance with the following distribution policies:

Share Classes **A Inc:** semi-annual, based on figures of June and December, payable to shareholders in July and January.

[6] Conditions and details of saving plans are reported in the offering materials available at local level.

16. Eligible Investors

Classes of shares:

- Class A Inc and A Acc: Shares are offered to individuals and legal entities, which are residents or established in Italy. Class A shares are issued only in registered form.

- Class B Acc: Shares are reserved for legal entities qualifying as Institutional Investors and for private entities qualifying as Professional Investors. Class B Shares are issued only in registered form.

17. SUPPLEMENT 4 – SIDERA FUNDS SICAV – BALANCED GROWTH

1. Launch date

26 October 2016 (Sidera Funds SICAV – Balanced Growth B Acc).

3 August 2021 with initial offer period from 1 July 2021 to 2 August 2021 (Sidera Funds SICAV – Balanced Growth A Acc and Sidera Funds SICAV – Balanced Growth A Inc)

2. Reference Currency

The Reference Currency of the Sub-Fund is EURO.

3. Investment objective

The investment objective of the Sub-Fund is to achieve capital growth over 5 years via flexible allocation to fixed income and equity instruments. The Sub-Fund generally aims at achieving a gross return of 350 bps p.a. above the ICE BofA Euro Treasury Bill Index (EGB0).

The Sub-Fund is actively managed. The Sub-fund refers to the ICE BofA Euro Treasury Bill Index for the purpose of performance comparison only. The Sub-Fund does not aim to replicate this Benchmark and the investment selection process is not influenced, nor constrained in anyway by this Benchmark.

4. Investment policy and specific restrictions

The Sub-Fund has an investment policy based on a flexible asset allocation between fixed income and equity instruments, with the further possibility to enter into securities financing transactions and derivative instruments notably total return swaps.

The Sub-Fund invests mainly in the following geographical areas: European countries, United States, Japan and emerging countries.

As regards investments in fixed income, the Sub-Fund invests in corporate bonds, government bonds, government guaranteed bonds of any country worldwide and supranational and international agencies in any currency. The investment in bonds where the country risk is related to a single emerging market country will not exceed 10% of the Net Asset Value of the Sub-Fund. The Sub-Fund does not actively invest in defaulted and distressed bonds. Investment in defaulted and distressed bonds is not expected to be meaningful and in any case, it will not exceed 10% of the Net Asset Value of the Sub-Fund.

The Sub-Fund may invest up to 100% of its Net Asset Value in high yield bonds, up to 20% of its Net Asset Value in convertible bonds and up to 20% of its Net Asset Value in contingent convertible bonds (CoCos).

The Sub-Fund may be indirectly exposed to equity due to the sensitivity of convertible bonds or contingent convertible bonds influenced by the price of underlying equities. The Sub-Fund may directly hold equities after exercising the conversion option attached to convertible bonds or following debt restructuring. Although such direct positions are not intended to be held over the long-term, the Sub-Fund is not required to sell them within a predefined period.

Up to 100% of the Net Asset Value of the Sub-Fund may be invested in equity instruments.

Currency risk will be actively managed with a maximum exposure up to 100%. The Sub-Fund also invests in the following financial instruments: units of UCITS, currency and may also temporarily invest in money market instruments, time deposits and derivative instruments. These instruments are negotiated both in regulated markets and over the counter. In principle, the Sub-Fund may hold on a temporarily basis ancillary liquid assets up to 20 % of the Sub-Fund's Net Asset Value as further specified in section 4.1.4 of the Prospectus.

The Sub-Fund may also invest up to 10% of its Net Asset Value in units of UCITS, including, but not limited to, Shares of other Sub-Funds of the Fund (called Target Sub-Funds), and in other eligible UCIs with similar investment policies. As a part of the investment process, the Investment Manager will allocate risk (i.e. risk contribution to VaR or other equivalent measure) ensuring a sound portfolio diversification.

The Sub-Fund may also invest in other interest-bearing securities and liquidity.

The Sub-Fund may also invest in derivatives, both exchange traded and OTC on, for instance, equity and credit indexes, single name and/or interest rates and/or foreign currencies. Such derivatives usage can be for investment, hedging or efficient portfolio management purposes.

The Sub-Fund will furthermore on an ongoing basis enter into securities lending transactions including, but not limited to, the lending of securities being part of the Sub-Fund’s portfolio to third parties. In circumstances where the agent for securities lending identifies opportunities based on the market developments to be in the interest of the Sub-Fund’s investors and given the securities lending scheme program developed to cover potentially a substantial portion of the portfolio of the Sub-Fund, a maximum of 50% of the assets held by the Sub-Fund can be subject to securities lending transactions. Notwithstanding the above, the lending of securities remains subject to the offer capacity and the terms of the offers provided by the agent for securities lending. For these reasons, under normal circumstances, the expected percentage of the assets subject to securities lending transactions is up to 35%. A percentage of minimum 80% of the gross revenues arising from securities lending transactions will be returned to the Sub-Fund; the remaining revenues are assigned to the agent for securities lending. All direct and indirect operational costs and fees in relation to securities lending programme activities are paid from the agent's portion of the gross revenues (being the remaining revenues mentioned above.

Furthermore, the Sub-Fund will also enter into repurchase transactions and reverse repurchase transactions as buyer or seller, occasionally. The securities subject to such repurchase transactions will be safe-kept with the Depositary. In circumstances where the Investment Manager identifies opportunities to be in the interest of the Sub-Fund’s investors and given the repurchase transactions and reverse repurchase transactions scheme program developed by the Investment Manager to cover potentially a substantial portion of the Sub-Fund, a maximum of 50% of the assets held by the Sub-Fund (i.e. bonds) can be subject to repurchase transactions and reverse repurchase transactions. Notwithstanding the above, the recourse to repurchase transactions and reverse repurchase transactions remains subject to the interest shown by market dealers to enter into such transactions. In addition, the Investment Manager is carefully considering the terms of the transactions in order to identify whether they are in the best possible interest of the Sub-Fund's investors. For these reasons, under normal circumstances, the expected percentage of the assets subject to repurchase transactions and reverse repurchase transactions is up to 25%. All revenues arising from repurchase transactions and reverse repurchase transactions, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

Finally, the Sub-Fund will on an ongoing basis enter into total return swaps on bond, equity and credit indices, for hedging, efficient portfolio management or investment. Notably for the purposes of portfolio construction as well as for implementing active investment positions, a maximum of 50% of the assets held by the Sub-Fund can be subject to total return swaps. The expected percentage of the assets subject to total return swaps is up to 25%. All revenues arising from total return swaps, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

The Sub-Fund will not enter in margin lending transactions.

5. Investor profile

The Sub-Fund is suitable for investors who are seeking capital appreciation over 5 years and are prepared to accept the risk of significant temporary losses and to afford to set aside the capital in the long timeframe. The Sub-Fund is suitable for both more experienced investors wishing to attain defined investment objectives, with experience with volatile products and less experienced investors including those who are interested in or informed about capital market topics but see investment fund as a convenient investment product. The Sub-Fund is designed for the investment objective of building up capital.

6. Specific risks

Investors should carefully read section 5 (General Risk Factors) of the Prospectus before investing in the Sub-Fund. Investors should in particular note the specific risk warnings contained in section 5.12.1 of the Prospectus regarding investing in derivatives and financial derivative instruments, in section 5.12.2 of the Prospectus regarding investing in securities lending transactions, in section 5.12.4 of the Prospectus regarding investing in Asset-backed securities (ABS) and in section 5.12.6 of the Prospectus regarding investing in Distressed Debt Securities.

In addition, investors should also consider the following additional risks, which are specific to the Sub-Fund.

Corporate bonds are subject to the risk of the issuer's inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of corporate bonds can be expected to decline. Corporate bonds with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

High yield bonds are regarded as being predominately speculative as to the issuer's ability to make payments of principal and interest. Investment in such securities involves substantial risk. Issuers of high yield debt securities may be highly leveraged and may not have available to them more traditional methods of financing. An economic recession may adversely affect an issuer's financial condition and the market value of high yield debt securities issued by such entity. The issuer's ability to service its debt obligations may be adversely affected by specific issuer developments, or the issuer's inability to meet specific projected business forecasts, or the unavailability of additional financing. In the event of bankruptcy of an issuer, the Sub-Fund may experience losses and incur costs. Investments particularly those made in emerging markets may be adversely affected by the possibility of expropriation or confiscatory taxation, imposition of withholding taxes on dividend or interest payments, limitations on the removal of funds or other assets of a Portfolio, political or social instability or diplomatic developments. An issuer of securities may be domiciled in a country other than the country in whose currency the instrument is denominated. The values and relative yields of investments in the securities markets of different countries, and their associated risks, are expected to change independently of each other.

The Sub-Fund will be subject to the risks associated with equities, the values of which in general fluctuate in response to the activities of individual companies, the general market and economic conditions. In particular, investors should be aware that equity and equity related investments are subordinated in the right of payment to other corporate securities, including debt securities.

The Sub-Fund will be subject to the risks associated with third party absolute return strategies through eligible investment funds.

Debt securities are subject to the risk of the issuer's inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of debt securities can be expected to decline. Debt securities with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

Investments, particularly those made in emerging markets, may be adversely affected by the possibility of expropriation or confiscatory taxation, imposition of withholding taxes on dividend or interest payments, limitations on the removal of funds or other assets of a Portfolio, political or social instability or diplomatic developments. An issuer of securities may be domiciled in a country other than the country in whose currency the instrument is denominated. The values and relative yields of investments in the securities markets of different countries, and their associated risks, are expected to change independently of each other.

Many emerging markets are undergoing a period of rapid growth and are less regulated than the world's leading stock markets and there may be less publicly available information about companies listed on such markets than is regularly published about companies listed on other stock markets. In addition, market practices in relation to settlement of securities transactions and custody assets in emerging markets can provide increased risk to emerging markets funds.

By investing in UCITS and/or other UCIs indirectly through the Sub-Fund, the investor will bear not only his proportionate share of the Management Fee of the Sub-Fund, but also indirectly, the management and administration expenses of the underlying UCITS and/or other UCIs. The Sub-Fund may invest in units of UCITS and/or other UCIs that may be managed or sub-managed by the Investment Manager, an affiliated manager or by an unaffiliated manager. The ability of the Sub-Fund to invest in units of underlying UCITS and/or other UCIs to achieve its investment objective may be directly related to the ability of the underlying UCITS and/or other UCIs to meet their own investment objectives. The Sub-Fund will be exposed to the risks to which the underlying UCITS and/or other UCIs are exposed. These risks may include liquidity risk where the ability of the Sub-Fund to meet the liquidity requirements of its investment is directly linked to the ability of the underlying UCITS and/or other UCIs to meet their liquidity requirements.

A contingent convertible bond is a debt instrument which may be converted into the issuer's equity or be partly or wholly written off if a predefined trigger event occurs. The terms of the bond will set out specific trigger events and conversion rates. Trigger events may be outside of the issuer’s control. A common trigger event is the decrease in the issuer’s capital ratio below a given threshold.

Conversion may cause the value of the investment to fall significantly and irreversibly, and in some cases even to zero.

Coupon payments on certain contingent convertible bonds may be entirely discretionary and may be cancelled by the issuer at any point, for any reason, and for any length of time.

Contrary to typical capital hierarchy, contingent convertible bond investors may suffer a loss of capital before equity holders.

Most contingent convertible bonds are issued as perpetual instruments which are callable at pre-determined dates. Perpetual contingent convertible bonds may not be called on the predefined call date and investors may not receive return of principal on the call date or at any date.

There are no widely accepted standards for valuing contingent convertible bonds. The price at which bonds are sold may therefore be higher or lower than the price at which they were valued immediately before their sale.

In certain circumstances finding a ready buyer for contingent convertible bonds may be difficult and the seller may have to accept a significant discount to the expected value of the bond in order to sell it.

7. Likely impacts of Sustainability Risks on the Sub-Fund’s returns

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value. As such, for a company in which a Sub-Fund invests, this may be because of damage to its reputation resulting in a consequential fall in demand for its products or services, loss of key personnel, exclusion from potential business opportunities, increased costs of doing business and/or increased cost of capital. A company may also suffer the impact of fines and other regulatory sanctions. The time and resources of the company’s management team may be diverted from furthering its business into dealing with the Sustainability Risk event, including changes to business practices and dealing with investigations and litigation. Sustainability Risks events may also give rise to loss of assets and/or physical loss including damage to real estate and infrastructure. The utility and value of assets held by companies to which the respective Sub-Fund is exposed may also be adversely impacted by a

Sustainability Risk event. A Sustainability Risk event may arise and impact a specific investment or may have a broader impact on an economic sector, geographical or political region or country. For instance, sector and geographic Sustainability Risk events may have an impact on the investment value of the sovereign fixed income exposure of a Sub-Fund.

8. Taxonomy

As the Sub-Fund is not identified as being subject to disclosures of articles 8 or 9 of SFDR, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

9. Global exposure and level of leverage

The global exposure of the Sub-Fund is calculated and monitored under the absolute VaR approach.

The level of leverage of the Sub-Fund, based on the delta-adjusted "sum of notionals" approach, is generally not expected to exceed 500% of the Net Asset Value. The leverage is resulting in particular from investments in derivatives, both exchange traded and OTC on, for instance, equity and credit indexes, single name and/or interest rates and/or foreign currencies as well as from investments in total return swaps. The Investment Manager will regularly monitor its leverage; the average level is not expected to be permanently close to the above mentioned threshold and it will generally fluctuate below that level. Nevertheless, the leverage of the Sub-Fund may occasionally exceed the level of 500% but will in any event not reach or exceed 600% of the Net Asset Value.

10. Investment Manager

ARCA Fondi SGR S.p.A.

11. Valuation

Each Business Day is a Valuation Day. The Net Asset Value per Share will be calculated as of each Valuation Day. With respect to this Sub-Fund, a Business Day is any day which is defined as a Business Day in the Prospectus.

12. Subscriptions

Each Valuation Day is a Subscription Day. The Cut-Off Time for subscription applications is 1.00 pm CET of the Subscription Day. Subscription applications must be settled by the end of the Subscription Settlement Period, which is 1.00 pm CET two (2) Business Days following the Subscription Day.

13. Redemptions

Each Valuation Day is a Redemption Day. The Cut-Off Time for redemption applications is 1.00 pm CET of the Redemption Day. Redemption applications will normally be settled by the end of the Redemption Settlement Period, which is two (2) Business Days following the Redemption Day.

14. Share Classes

The table below lists all Share Classes established within the Sub-Fund. Certain Share Classes may currently not be active or may be unavailable to investors in certain jurisdictions. The list of active Share Classes currently available for subscription in each jurisdiction may be obtained from the UCI Administrator and the Global Distributor upon request or on www.siderafunds.com.

Share Class name	**Sidera Funds SICAV – Balanced Growth B Acc**	**Sidera Funds SICAV – Balanced Growth A Inc**	**Sidera Funds SICAV – Balanced Growth A Acc**
Reference Currency	EUR	EUR	EUR
Distribution (D) or Capitalisation (C)	C	D (semi-annual)	C
Minimum Subscription	EUR 50.000	EUR 1.000	EUR 1.000
Minimum Additional Subscription	EUR 500	EUR 250 EUR 100 in case of saving plans[7]	EUR 250 EUR 100 in case of saving plans
Minimum Holding Amount	N.A.	N.A.	N.A.
Maximum Subscription Fee received by the sub-distributor	N.A.	Maximum 4% of the subscription amount	Maximum 4% of the subscription amount
Maximum Redemption Fee	N.A.	N.A.	N.A.
Management Fee	Max 0,65% p.a.	Max 1,75% p.a.	Max 1,75% p.a.
Performance Fee	N.A.	YES, according to the methodology set out in the Section 9.3.2 of the Prospectus. Index: ICE BofA Euro Treasury Bill Index (EGB0) Spread: 3,5%	YES, according to the methodology set out in the Section 9.3.2 of the Prospectus. Index: ICE BofA Euro Treasury Bill Index (EGB0) Spread: 3,5%

[7] Conditions and details of saving plans are reported in the offering materials available at local level.

Share Class name	Sidera Funds SICAV – Balanced Growth B Acc	Sidera Funds SICAV – Balanced Growth A Inc	Sidera Funds SICAV – Balanced Growth A Acc
Taxe d'abonnement	0,01% p.a.	0,05% p.a.	0,05% p.a.

In case the Sub-Fund invests in units/shares of UCITS or other UCIs, the maximum level of the Management Fee that may be charged both to the Sub-Fund itself and to the UCITS or other UCIs in which it invests is 2% of the subscription amount p.a..

15. Distribution policy

Subject to the provisions of the Prospectus, Distribution Share Classes will normally distribute dividends in accordance with the following distribution policies:

Share Classes **A Inc:** semi-annual, based on figures of June and December, payable to shareholders in July and January.

16. Eligible Investors

Classes of shares:

- Class A Inc and A Acc: Shares are offered to individuals and legal entities, which are residents or established in Italy. Class A shares are issued only in registered form.

- Class B Acc: Shares are reserved for legal entities qualifying as Institutional Investors and for private entities qualifying as Professional Investors. Class B Shares are issued only in registered form.

18. SUPPLEMENT 5 – SIDERA FUNDS SICAV – GLOBAL CONSERVATIVE INCOME

1. Launch date

6 February 2017 with initial offering period from 3 January 2017 to 3 February 2017.

2. Reference Currency

The Reference Currency of the Sub-Fund is EURO.

3. Investment objective

The investment objective of the Sub Fund is to achieve capital growth in the medium term by investing in bonds and equities and to generate a total return in excess of the reference Benchmarks being:

- 15% MSCI Daily Net TR World Euro (Bloomberg MSDEWIN);
- 25% ICE BofA Global Corporate & High Yield Euro Hedged[8] (Bloomberg GI00);
- 20% ICE BofA Global Government Index Euro Hedged[9] (Bloomberg W0G1);
- 40% ICE BofA Euro Treasury Bill[10] (Bloomberg EGB0).

The Sub-Fund is actively managed in reference to these Benchmarks with significant degree of freedom.

4. Investment policy and specific restrictions

The investment process aims at constructing a well-diversified asset allocation mainly focused to fixed income but extending also to equities and to non-traditional asset classes like absolute return strategies.

The Sub-Fund may invest in the following asset classes: bonds issued by sovereign states, supranational institutions and private companies with rating above investment grade up to 90% of its Net Asset Value; bonds issued by private companies with non-investment grade rating up to 30% of its Net Asset Value; bonds issued by issuers in emerging countries including issuers with credit rating below investment grade up to 10% of its Net Asset Value; equities up to 30% of its Net Asset Value. The Sub-Fund may also invest up to 10% of its Net Asset Value in emerging market stocks. The Sub-Fund may also invest in financial instruments relating to commodities up to 5% of its Net Asset Value.

The Sub-Fund may also invest in units of UCITS, including, but not limited to, Shares of other Sub-Funds of the Fund (called Target Sub-Funds), up to 100% of its Net Asset Value and in other eligible UCIs with similar investment policies and in liquidity and time deposits. In principle, the Sub-Fund may hold on a temporarily basis ancillary liquid assets up to 20 % of the Sub-Fund's Net Asset Value as further specified in section 4.1.4 of the Prospectus.

The Sub-Fund will not directly invest in contingent convertible bonds, in Distressed Debt Securities, in asset-backed securities (ABS) or in mortgage-backed securities (MBS).

[8] formerly ICE BofAML Global Corporate & High Yield Euro Hedged.
[9] formerly ICE BofAML Global Government Index Euro Hedged.
[10] formerly ICE BofAML Euro Treasury Bill.

However, a residual exposure of up to 10% of its Net Asset Value to those instruments could be generated via the investment in units of UCITS or UCIs.

The Sub-Fund may be indirectly exposed to equity due to the sensitivity of convertible bonds influenced by the price of underlying equities. The Sub-Fund may directly hold equities after exercising the conversion option attached to convertible bonds or following debt restructuring. Although such direct positions are not intended to be held over the long-term, the Sub-Fund is not required to sell them within a predefined period.

The absolute return part will be spread among different liquid alternative strategies (e.g. long/short equity strategies, event driven strategies, fixed income strategies, momentum strategies) either directly or by investing in other UCITS in order to reduce specific fund and strategy risk and to maximize the diversification of the portfolio as a whole.

The Sub-Fund will on an ongoing basis enter into securities lending transactions as lender of securities. In circumstances where the agent for securities lending identifies investment opportunities based on the market developments to be in the interest of the Sub-Fund's investors and given the securities lending scheme program developed to cover potentially a substantial portion of the portfolio of the Sub-Fund, a maximum of 50% of the assets held by the Sub-Fund can be subject to securities lending transactions. Notwithstanding the above, the lending of securities remains subject to the offer capacity and the terms of the offers provided by the agent for securities lending. For these reasons, under normal circumstances, the expected percentage of the assets subject to securities lending transactions is up to 35%. A percentage of minimum 80% of the gross revenues arising from securities lending transactions will be returned to the Sub-Fund; the remaining revenues are assigned to the agent for securities lending. All direct and indirect operational costs and fees in relation to securities lending programme activities are paid from the agent's portion of the gross revenues (being the remaining revenues mentioned above).

Finally, the Sub-Fund will on an ongoing basis enter into total return swaps on equity indices for hedging, efficient portfolio management or investment. Notably for the purposes of portfolio construction as well as for implementing active investment positions, a maximum of 30% of the assets held by the Sub-Fund can be subject to total return swaps. The expected percentage of the assets subject to total return swaps is up to 10%. All revenues arising from total return swaps, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

The Sub-Fund will not enter in margin lending transactions, repurchase transactions and reverse repurchase transactions as well as buy-sell back transactions and sell-buy back transactions.

5. Investor profile

The Sub-Fund is suitable for investors who are seeking capital appreciation over 3 years and are prepared to accept risk to their capital and at least moderate volatility in the value of their investments. Given the investment objective and policies of the Sub-Fund, the Sub-Fund is suitable for conservative investors including those who are interested on or informed about capital market topics but see investment funds as convenient saving product. It is also suitable for more experienced investors wishing to attain defined investment objectives.

6. Specific risks

Investors should carefully read section 5 (General Risk Factors) of the Prospectus before investing in the Sub-Fund. Investors should in particular note the specific risk warnings contained in section 5.12.1 of the Prospectus regarding investing in derivatives and financial derivative instruments and in section 5.12.2 of the Prospectus regarding investing in securities lending transactions. In addition, investors should also consider the following additional risks which are specific to the Sub-Fund.

The Sub-Fund will be subject to the risks associated with equities, the values of which in general fluctuate in response to the activities of individual companies, the general market and economic conditions. In particular, investors should be aware that equity and equity related investments are subordinated in the right of payment to other corporate securities, including debt securities.

Corporate bonds are subject to the risk of the issuer's inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of corporate bonds can be expected to decline. Corporate bonds with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

The Sub-Fund will be subject to the risks associated with third party absolute return strategies through eligible investment funds.

By investing in UCITS and/or other UCIs indirectly through the Sub-Fund, the investor will bear not only his proportionate share of the Management Fee of the Sub-Fund, but also indirectly, the management and administration expenses of the underlying UCITS and/or other UCIs. The Sub-Fund may invest in units of UCITS and/or other UCIs that may be managed or sub-managed by the Investment Manager, an affiliated manager or by an unaffiliated manager. The ability of the Sub-Fund to invest in units of underlying UCITS and/or other UCIs to achieve its investment objective may be directly related to the ability of the underlying UCITS and/or other UCIs to meet their own investment objectives. The Sub-Fund will be exposed to the risks to which the underlying UCITS and/or other UCIs are exposed. These risks may include liquidity risk where the ability of the Sub-Fund to meet the liquidity requirements of its investment is directly linked to the ability of the underlying UCITS and/or other UCIs to meet their liquidity requirements.

A contingent convertible bond is a debt instrument which may be converted into the issuer's equity or be partly or wholly written off if a predefined trigger event occurs. The terms of the bond will set out specific trigger events and conversion rates. Trigger events may be outside of the issuer's control. A common trigger event is the decrease in the issuer's capital ratio below a given threshold.

Conversion may cause the value of the investment to fall significantly and irreversibly, and in some cases even to zero.

Coupon payments on certain contingent convertible bonds may be entirely discretionary and may be cancelled by the issuer at any point, for any reason, and for any length of time.

Contrary to typical capital hierarchy, contingent convertible bond investors may suffer a loss of capital before equity holders.

Most contingent convertible bonds are issued as perpetual instruments which are callable at pre-determined dates. Perpetual contingent convertible bonds may not be called on the predefined call date and investors may not receive return of principal on the call date or at any date.

There are no widely accepted standards for valuing contingent convertible bonds. The price at which bonds are sold may therefore be higher or lower than the price at which they were valued immediately before their sale.

In certain circumstances finding a ready buyer for contingent convertible bonds may be difficult and the seller may have to accept a significant discount to the expected value of the bond in order to sell it.

7. Likely impacts of Sustainability Risks on the Sub-Fund's returns

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value. As such, for a company in which a Sub-Fund invests, this may be because of damage to its reputation resulting in a consequential fall in demand for its products or services, loss of key personnel, exclusion from potential business opportunities, increased costs of doing business and/or increased cost of capital. A company may also suffer the impact of fines and other regulatory sanctions. The time and resources of the company's management team may be diverted from furthering its business into dealing with the Sustainability Risk event, including changes to business practices and dealing with investigations and litigation. Sustainability Risks events may also give rise to loss of assets and/or physical loss including damage to real estate and infrastructure. The utility and value of assets held by companies to which the respective Sub-Fund is exposed may also be adversely impacted by a Sustainability Risk event. A Sustainability Risk event may arise and impact a specific investment or may have a broader impact on an economic sector, geographical or political region or country. For instance, sector and geographic Sustainability Risk events may have an impact on the investment value of the sovereign fixed income exposure of a Sub-Fund.

8. Taxonomy

As the Sub-Fund is not identified as being subject to disclosures of articles 8 or 9 of SFDR, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

9. Global exposure and level of leverage

The global exposure of the Sub-Fund is calculated and monitored under the relative VaR approach. The global exposure of the Sub-Fund may not exceed twice the VaR of a reference portfolio, being the reference Benchmarks:

- 15% MSCI Daily Net TR World Euro (Bloomberg MSDEWIN);
- 25% ICE BofAGlobal Corporate & High Yield Euro Hedged (Bloomberg GI00);
- 20% ICE BofA Global Government Index Euro Hedged (Bloomberg W0G1);

- 40% ICE BofA Euro Treasury Bill (Bloomberg EGB0).

The level of leverage of the Sub-Fund, based on the delta-adjusted "sum of notionals" approach, is generally not expected to exceed 500% of the Net Asset Value. The leverage is resulting in particular from investments in total return swaps. The Investment Manager will regularly monitor its leverage; the average level is not expected to be permanently close to the above mentioned threshold and it will generally fluctuate below that level. Nevertheless, the leverage of the Sub-Fund may occasionally exceed the level of 500% but will in any event not reach or exceed 600% of the Net Asset Value.

10. Investment Manager

ARCA Fondi SGR S.p.A.

11. Valuation

Each Business Day is a Valuation Day. The Net Asset Value per Share will be calculated as of each Valuation Day. With respect to this Sub-Fund, a Business Day is any day which is defined as a Business Day in the Prospectus.

12. Subscriptions

Each Valuation Day is a Subscription Day. The Cut-Off Time for subscription applications is 1.00 pm CET of the Subscription Day. Subscription applications must be settled by the end of the Subscription Settlement Period, which is 1.00 pm CET two (2) Business Days following the Subscription Day.

13. Redemptions

Each Valuation Day is a Redemption Day. The Cut-Off Time for redemption applications is 1.00 pm CET of the Redemption Day. Redemption applications will normally be settled by the end of the Redemption Settlement Period, which is two (2) Business Days following the Redemption Day.

14. Share Classes

The table below lists all Share Classes established within the Sub-Fund. Certain Share Classes may currently not be active or may be unavailable to investors in certain jurisdictions. The list of active Share Classes currently available for subscription in each jurisdiction may be obtained from the UCI Administrator and the Global Distributor upon request or on www.siderafunds.com.

Share Class name	**Sidera Funds SICAV – Global Conservative Income A Inc**	**Sidera Funds SICAV – Global Conservative Income A Acc**
Reference Currency	EUR	EUR

Share Class name	Sidera Funds SICAV – Global Conservative Income A Inc	Sidera Funds SICAV – Global Conservative Income A Acc
Distribution (D) or Capitalisation (C)	D (semi-annual)	C
Minimum Subscription	EUR 1.000	EUR 1.000
Minimum Additional Subscription	EUR 250 EUR 100 in case of saving plans	EUR 250 EUR 100 in case of saving plans
Minimum Holding Amount	N.A.	N.A.
Maximum Subscription Fee	Maximum 4% of the subscription amount	Maximum 4% of the subscription amount
Maximum Redemption Fee	N.A.	N.A.
Management Fee	Max 1,15% p.a.	Max 1,15% p.a.
Taxe d'abonnement	0,05% p.a.	0,05% p.a.

In case the Sub-Fund invests in units/shares of UCITS or other UCIs, the maximum level of the Management Fee that may be charged both to the Sub-Fund itself and to the UCITS or other UCIs in which it invests is 2% of the subscription amount p.a..

15. Distribution policy

Subject to the provisions of the Prospectus, Distribution Share Classes will normally distribute dividends in accordance with the following distribution policies:

- Share Classes **A Inc:** semi-annual, based on figures of June and December, payable to shareholders in July and January.

16. Eligible Investors

Class A Inc and A Acc: Shares are offered to individuals and legal entities, which are residents or established in Italy. Class A shares are issued only in registered form.

19. SUPPLEMENT 6 – SIDERA FUNDS SICAV – GLOBAL INCOME OPPORTUNITIES

1. Launch date

19 November 2018

2. Reference Currency

The Reference Currency of the Sub-Fund is EURO.

3. Investment objective

The investment objective of the Sub-Fund is to achieve capital growth in the medium term by investing mainly in High Yield Global Bonds and Emerging Market bonds and to generate a total rate of return in excess of a composite Benchmark comprised of 50% MSCI EUR High Yield ESG Leaders Corporate Bond Index (Bloomberg MFLEHYEL) and 50% ICEBofA 1-5 Year BBB & Lower Sovereign External Debt Carbon Reduction Constrained Index hedged (Bloomberg IVCR) (each an "**ESG Index**" and, collectively, the "**ESG Indices**"). The Sub-Fund is actively managed in reference to this Benchmark with significant degree of freedom.

In accordance with Article 8 of SFDR, the Sub-Fund promotes environmental and social characteristics and investments which follow good governance practices. The environmental and social characteristics promoted by the Sub-Fund consist in favouring investment in issuers whose business activities and/or conduct take an appropriate and responsible approach to ESG. Further information on the environmental and social characteristics promoted by the Sub-Fund, and on European Taxonomy-related considerations, is available in the SFDR RTS Annex 2 of this Prospectus.

As part of the investment process and in order to fully comply with the ESG considerations of the Sub-Fund, the Investment Manager has full discretion over the composition of the Sub-Fund's portfolio and may take exposure to companies, countries or sectors not included in and/or that have different weightings than the ESG Indices. The Investment Manager may set discretionary internal risk thresholds which may reference deviations from the ESG Indices. While it is expected that the Sub-Fund's deviation from the ESG Indices will be moderate, there are no restrictions on the extent to which the Fund's performance may deviate from the one of the ESG Indices.

4. Investment policy and specific restrictions

The Sub-Fund invests primarily in corporate and government bonds, both investment grade and high yield, issued by companies domiciled in OECD countries and in emerging markets not limited to specific regions, denominated in G-10 country currencies, (i.e. USD, Canadian Dollar, EUR, GBP) with maturity shorter than five (5) years.

The Sub-Fund will be managed according to two sub strategies, one devoted to high yield bonds, the other concentrated on emerging markets bonds. The strategies investment process combines a top down approach with a bottom up selection model. Valuation criteria include fundamental, technical and risk indicators which are deemed to be statistically significant in explaining the cross section of returns. The allocation mix between high yield and emerging markets bonds may vary in the range 30% - 70%.

The investment in bonds whose country risk is related to a single emerging market country will not exceed 10% of the Net Asset Value.

The Sub-Fund may also invest in bonds with maturity exceeding five (5) years, in other interest-bearing securities, in units of UCITS and/or other eligible UCIs with similar investment policies, liquidity and in time deposits. In principle, the Sub-Fund may hold on a temporarily basis ancillary liquid assets up to 20 % of the Sub-Fund's Net Asset Value as further specified in section 4.1.4 of the Prospectus.

The Sub-Fund may also invest:

- up to 20% of the Net Asset Value in securitized products (e.g. asset-backed securities (ABS), collateralized loan obligations (CLOs));
- up to 20% of the Net Asset Value in convertible bonds;
- up to 20% of the Net Asset Value in contingent convertible bonds.

The Sub-Fund may be indirectly exposed to equity due to the sensitivity of convertible bonds or contingent convertible bonds influenced by the price of underlying equities. The Sub-Fund may directly hold equities after exercising the conversion option attached to convertible bonds or contingent convertible bonds or following debt restructuring. Although such direct positions are not intended to be held over the long-term, the Sub-Fund is not required to sell them within a predefined period.

The Sub-Fund does not actively invest in defaulted and distressed bonds. Investment in defaulted and distressed bonds is not expected to be meaningful and in any case it will not exceed 10% of the net assets of the Sub-Fund. Disposal or sale of defaulted or distressed instruments will be pursued in the interest of the investors. Currency risk will be mostly hedged, residual risk may remain. The interest rate duration of the Sub-Fund will be, on average, between one (1) and five (5) years.

The Sub-Fund may also invest in derivatives, both exchange traded and OTC on, for instance, credit indexes, single name and/or interest rates. Such derivatives usage can be for investment, hedging or efficient portfolio management purposes.

The Sub-Fund will enter into on an ongoing basis securities lending transactions as lender of securities. In circumstances where the agent for securities lending identifies investment opportunities based on the market developments to be in the interest of the Sub-Fund’s investors and given the securities lending scheme program developed to cover potentially a substantial portion of the portfolio of the Sub-Fund, a maximum of 50% of the assets held by the Sub-Fund can be subject to securities lending transactions. Notwithstanding the above, the lending of securities remains subject to the offer capacity and the terms of the offers provided by the agent for securities lending. For these reasons, under normal circumstances, the expected percentage of the assets subject to securities lending transactions is up to 35%. A percentage of minimum 80% of the gross revenues arising from securities lending transactions will be returned to the Sub-Fund; the remaining revenues are assigned to the agent for securities lending. All direct and indirect operational costs and fees in relation to securities lending programme activities are paid from the agent's portion of the gross revenues (being the remaining revenues mentioned above).

Furthermore, the Sub-Fund will also enter into repurchase transactions and reverse repurchase transactions as buyer or seller, occasionally. The securities subject to such repurchase transactions will be safe-kept with the Depositary. In circumstances where the Investment Manager identifies investment opportunities to be in the interest of the Sub-Fund's investors and given the repurchase transactions and reverse repurchase transactions scheme program developed by the Investment Manager to cover potentially a substantial portion of the Sub-Fund, a maximum of 40% of the assets held by the Sub-Fund (i.e. bonds) can be subject to repurchase transactions and reverse repurchase transactions. Notwithstanding the above, the recourse to repurchase transactions and reverse repurchase transactions remains subject to the interest shown by market dealers to enter into such transactions. In addition, the Investment Manager is carefully considering the terms of the transactions in order to identify whether they are in the best possible interest of the Sub-Fund's investors. For these reasons, under normal circumstances, the expected percentage of the assets subject to repurchase transactions and reverse repurchase transactions is up to 20%. All revenues arising from repurchase transactions and reverse repurchase transactions, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

Finally, the Sub-Fund will on an ongoing basis enter into total return swaps on bond and credit indices for hedging, efficient portfolio management or investment. Notably for the purposes of portfolio construction as well as for implementing active investment positions, a maximum of 50% of the assets held by the Sub-Fund can be subject to total return swaps. The expected percentage of the assets subject to total return swaps is up to 25%. All revenues arising from total return swaps, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

The Sub-Fund will not enter in margin lending transactions, buy-sell back transactions and sell-buy back transactions.

5. Investor profile

The Sub Fund is suitable for investors who have ESG preferences, who are seeking capital appreciation over five (5) years and are prepared to accept risk to their capital and at least moderate volatility in the value of their investments. Given the investment objective and policies of the Sub-Fund, the Sub-Fund is suitable for conservative investors including those who are interested in or informed about capital market topics but see investment fund as a convenient saving product. It is also suitable for more experienced investors wishing to attain defined investment objectives.

6. Specific risks

Investors should carefully read section 5 (General Risk Factors) of the Prospectus before investing in the Sub-Fund. Investors should in particular note the specific risk warnings contained in section 5.12.1 of the Prospectus regarding investing in derivatives and financial derivative instruments, in section 5.12.2 of the Prospectus regarding investing in securities lending transactions, in section 5.12.3 regarding collateral management, in section 5.12.4 of the Prospectus regarding investing in asset-backed securities (ABS) in section 5.12.5 of the Prospectus regarding collateralised loan obligations (CLOs) and in section 5.12.6 of the Prospectus regarding investing in Distressed Debt Securities.

In addition, investors should also consider the following additional risks which are specific to the Sub-Fund.

Debt securities are subject to the risk of the issuer's inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of debt securities can be expected to decline. Debt securities with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

High yield bonds are regarded as being predominately speculative as to the issuer's ability to make payments of principal and interest. Investment in such securities involves substantial risk. Issuers of high yield debt securities may be highly leveraged and may not have available to them more traditional methods of financing. An economic recession may adversely affect an issuer's financial condition and the market value of high yield debt securities issued by such entity. The issuer's ability to service its debt obligations may be adversely affected by specific issuer developments, or the issuer's inability to meet specific projected business forecasts, or the unavailability of additional financing. In the event of bankruptcy of an issuer, the Sub-Fund may experience losses and incur costs. Investments particularly those made in emerging markets may be adversely affected by the possibility of expropriation or confiscatory taxation, imposition of withholding taxes on dividend or interest payments, limitations on the removal of funds or other assets of a Portfolio, political or social instability or diplomatic developments. An issuer of securities may be domiciled in a country other than the country in whose currency the instrument is denominated. The values and relative yields of investments in the securities markets of different countries, and their associated risks, are expected to change independently of each other.

Many emerging markets are undergoing a period of rapid growth and are less regulated than the world's leading stock markets and there may be less publicly available information about companies listed on such markets than is regularly published about companies listed on other stock markets. In addition, market practices in relation to settlement of securities transactions and custody assets in emerging markets can provide increased risk to emerging markets funds.

By investing in UCITS and/or other UCIs indirectly through the Sub-Fund, the investor will bear not only his proportionate share of the Management Fee of the Sub-Fund, but also indirectly, the management and administration expenses of the underlying UCITS and/or other UCIs. The Sub-Fund may invest in units of UCITS and/or other UCIs that may be managed or sub-managed by the Investment Manager, an affiliated manager or by an unaffiliated manager. The ability of the Sub-Fund to invest in units of underlying UCITS and/or other UCIs to achieve its investment objective may be directly related to the ability of the underlying UCITS and/or other UCIs to meet their own investment objectives. The Sub-Fund will be exposed to the risks to which the underlying UCITS and/or other UCIs are exposed. These risks may include liquidity risk where the ability of the Sub-Fund to meet the liquidity requirements of its investment is directly linked to the ability of the underlying UCITS and/or other UCIs to meet their liquidity requirements.

A contingent convertible bond is a debt instrument which may be converted into the issuer's equity or be partly or wholly written off if a predefined trigger event occurs. The terms of the bond will set out specific trigger events and conversion rates. Trigger events may be outside of the issuer's control. A common trigger event is the decrease in the issuer's capital ratio below a given threshold.

Conversion may cause the value of the investment to fall significantly and irreversibly, and in some cases even to zero.

Coupon payments on certain contingent convertible bonds may be entirely discretionary and may be cancelled by the issuer at any point, for any reason, and for any length of time.

Contrary to typical capital hierarchy, contingent convertible bond investors may suffer a loss of capital before equity holders.

Most contingent convertible bonds are issued as perpetual instruments which are callable at pre-determined dates. Perpetual contingent convertible bonds may not be called on the predefined call date and investors may not receive return of principal on the call date or at any date.

There are no widely accepted standards for valuing contingent convertible bonds. The price at which bonds are sold may therefore be higher or lower than the price at which they were valued immediately before their sale.

In certain circumstances finding a ready buyer for contingent convertible bonds may be difficult and the seller may have to accept a significant discount to the expected value of the bond in order to sell it.

7. Likely impacts of Sustainability Risks on the Sub-Fund's returns

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value. As such, for a company in which a Sub-Fund invests, this may be because of damage to its reputation resulting in a consequential fall in demand for its products or services, loss of key personnel, exclusion from potential business opportunities, increased costs of doing business and/or increased cost of capital. A company may also suffer the impact of fines and other regulatory sanctions. The time and resources of the company's management team may be diverted from furthering its business into dealing with the Sustainability Risk event, including changes to business practices and dealing with investigations and litigation. Sustainability Risks events may also give rise to loss of assets and/or physical loss including damage to real estate and infrastructure. The utility and value of assets held by companies to which the respective Sub-Fund is exposed may also be adversely impacted by a Sustainability Risk event. A Sustainability Risk event may arise and impact a specific investment or may have a broader impact on an economic sector, geographical or political region or country. For instance, sector and geographic Sustainability Risk events may have an impact on the investment value of the sovereign fixed income exposure of a Sub-Fund.

8. Global exposure and level of leverage

The global exposure of the Sub-Fund is calculated and monitored under the relative VaR approach. The global exposure of the Sub-Fund may not exceed twice the VaR of a reference portfolio, being the reference Benchmarks 50% MSCI EUR High Yield ESG

Leaders Corporate Bond Index (Bloomberg MFLEHYEL) and 50% ICE BofA 1-5 Year BBB & Lower Sovereign External Debt Carbon Reduction Constrained Index hedged (Bloomberg IVCR).

The level of leverage of the Sub-Fund, based on the delta-adjusted "sum of notionals" approach, is generally not expected to exceed 500% of the Net Asset Value. The leverage is resulting in particular from investments in derivatives, both exchange traded and OTC on, for instance, credit indices, single name and/or interest rates as well as from investments in total return swaps. The Investment Manager will regularly monitor its leverage; the average level is not expected to be permanently close to the above mentioned threshold and it will generally fluctuate below that level. Nevertheless, the leverage of the Sub-Fund may occasionally exceed the level of 500% but will in any event not reach or exceed 600% of the Net Asset Value.

9. Investment Manager

ARCA Fondi SGR S.p.A.

10. Valuation

Each Business Day is a Valuation Day. The Net Asset Value per Share will be calculated as of each Valuation Day. With respect to this Sub-Fund, a Business Day is any day which is defined as a Business Day in the Prospectus.

11. Subscriptions

Each Valuation Day is a Subscription Day. The Cut-Off Time for subscription applications is 1.00 pm CET of the Subscription Day. Subscription applications must be settled by the end of the Subscription Settlement Period, which is two (2) Business Days following the Subscription Day.

12. Redemptions

Each Valuation Day is a Redemption Day. The Cut-Off Time for redemption applications is 1.00 pm CET of the Redemption Day. Redemption applications will normally be settled by the end of the Redemption Settlement Period, which is two (2) Business Days following the Redemption Day.

13. Share Classes

The table below lists all Share Classes established within the Sub-Fund. Certain Share Classes may currently not be active or may be unavailable to investors in certain jurisdictions. The list of active Share Classes currently available for subscription in each jurisdiction may be obtained from the UCI Administrator and the Global Distributor upon request or on www.siderafunds.com.

Share Class name	**Sidera Funds SICAV – Global Income Opportunities B Acc**
Reference Currency	EUR
Distribution (D) or Capitalisation (C)	C

Share Class name	Sidera Funds SICAV – Global Income Opportunities B Acc
Minimum Subscription	EUR 50.000
Minimum Additional Subscription	EUR 500
Minimum Holding Amount	N.A.
Maximum Subscription Fee received by the sub distributor	N.A.
Maximum Redemption Fee	N.A.
Management Fee	Max 0,55% p.a.
Performance Fee	N.A.
Taxe d'abonnement	0,01% p.a.

In case the Sub-Fund invests in units/shares of UCITS or other UCIs, the maximum level of the Management Fee that may be charged both to the Sub-Fund itself and to the UCITS or other UCIs in which it invests is 2% of the subscription amount p.a..

14. Distribution policy

The Sub-Fund has only one capitalisation share class, the shares of which, in accordance with the provisions of the Prospectus, do not confer the right to dividend distributions and capitalise their entire earnings.

15. Eligible Investors

Class(es) of shares:

- Class B Acc: Shares are reserved for legal entities qualifying as Institutional Investors and for private entities qualifying as Professional Investors. Class B Shares are issued only in registered form.

20. SUPPLEMENT 7 – SIDERA FUNDS SICAV – INCOME PLUS

1. Launch date

12 September 2019

2. Reference Currency

The Reference Currency of the Sub-Fund is EURO.

3. Investment objective

The investment objective of the Sub-Fund is to achieve capital growth over two (2) years by investing in fixed income and equity instruments. The Sub-Fund generally aims at achieving a gross return of 50 bps p.a. above the ICE BofA Euro Treasury Bill Index (EGB0).

The Sub-Fund is actively managed. The Sub-Fund refers to the ICE BofA Euro Treasury Bill Index for the purpose of performance comparison only. The Sub-Fund does not aim to replicate this Benchmark and the investment selection process is not influenced, nor constrained in anyway by this Benchmark.

4. Investment policy and specific restrictions

The Sub-Fund has an investment policy based on a flexible asset allocation between fixed income, equity instruments, furthermore investments in securities financing transactions and derivative instruments notably total return swaps. The Sub-Fund invests mainly in the following geographical areas: European countries, United States, Japan and emerging countries.

As regards investments in fixed income, the Sub-Fund invests in corporate bonds, government bonds, government guaranteed bonds of any country worldwide and supranational and international agencies in any currency. The investment in bonds where the country risk is related to a single emerging market country will not exceed 10% of the Net Asset Value of the Sub-Fund. The Sub-Fund does not actively invest in defaulted and distressed bonds. Investment in defaulted and distressed bonds is not expected to be meaningful and in any case it will not exceed 10% of the Net Asset Value of the Sub-Fund.

Up to 30% of the Net Asset Value of the Sub-Fund may be invested in equity instruments.

Currency risk will be mostly hedged, residual risk may remain.

The Sub-Fund also invests in the following financial instruments: units of UCITS, currency and money market instruments, time deposits and derivative instruments. These instruments are negotiated both in regulated markets and over the counter.

The Sub-Fund may also invest up to 10% of its Net Asset Value in units of UCITS, including, but not limited to, Shares of other Sub-Funds of the Fund (called Target Sub-Funds), and in other eligible UCIs with similar investment policies. As a part of the investment process, the Investment Manager will allocate risk (i.e. risk contribution to VaR or other equivalent measure) ensuring a sound portfolio diversification.

The Sub-Fund may also invest in other interest-bearing securities and liquidity. In principle, the Sub-Fund may hold on a temporarily basis ancillary liquid assets up to 20 % of the Sub-Fund's Net Asset Value as further specified in section 4.1.4 of the Prospectus.

The Sub-Fund may invest up to 40% of its Net Asset Value in high yield bonds, up to 20% of its Net Asset Value in convertible bonds and up to 20% of its Net Asset Value in contingent convertible bonds (CoCos).

The Sub-Fund may be indirectly exposed to equity due to the sensitivity of convertible bonds or contingent convertible bonds influenced by the price of underlying equities. The Sub-Fund may directly hold equities after exercising the conversion option attached to convertible bonds or contingent convertible bonds or following debt restructuring. Although such direct positions are not intended to be held over the long-term, the Sub-Fund is not required to sell them within a predefined period.

The Sub-Fund may also invest in derivatives, both exchange traded and OTC on, for instance, equity and credit indexes, single name and/or interest rates and/or foreign currencies. Such derivatives usage can be for investment, hedging or efficient portfolio management purposes.

The Sub-Fund will furthermore on an ongoing basis enter into securities lending transactions including, but not limited to, the lending of securities being part of the Sub-Fund’s portfolio to third parties. In circumstances where the agent for securities lending identifies opportunities based on the market developments to be in the interest of the Sub-Fund’s investors and given the securities lending scheme program developed to cover potentially a substantial portion of the portfolio of the Sub-Fund, a maximum of 50% of the assets held by the Sub-Fund can be subject to securities lending transactions. Notwithstanding the above, the lending of securities remains subject to the offer capacity and the terms of the offers provided by the agent for securities lending. For these reasons, under normal circumstances, the expected percentage of the assets subject to securities lending transactions is up to 35%. A percentage of minimum 80% of the gross revenues arising from securities lending transactions will be returned to the Sub-Fund; the remaining revenues are assigned to the agent for securities lending. All direct and indirect operational costs and fees in relation to securities lending programme activities are paid from the agent's portion of the gross revenues (being the remaining revenues mentioned above).

Furthermore, the Sub-Fund will also enter into repurchase transactions and reverse repurchase transactions as buyer or seller, occasionally. The securities subject to such repurchase transactions will be safe-kept with the Depositary. In circumstances where the Investment Manager identifies opportunities to be in the interest of the Sub-Fund’s investors and given the repurchase transactions and reverse repurchase transactions scheme program developed by the Investment Manager to cover potentially a substantial portion of the Sub-Fund, a maximum of 50% of the assets held by the Sub-Fund (i.e. bonds) can be subject to repurchase transactions and reverse repurchase transactions. Notwithstanding the above, the recourse to repurchase transactions and reverse repurchase transactions remains subject to the interest shown by market dealers to enter into such transactions. In addition, the Investment Manager is carefully considering the terms of the transactions in order to identify whether they are in the best possible interest of the Sub-Fund’s investors. For these reasons, under normal circumstances, the expected percentage of the assets subject to repurchase transactions and reverse repurchase transactions is up to 25%. All revenues arising from repurchase transactions and reverse repurchase transactions, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

Finally, the Sub-Fund will on an ongoing basis enter into total return swaps on bond, equity and credit indices for hedging, efficient portfolio management or investment. Notably for the purposes of portfolio construction as well as for implementing active investment positions, a maximum of 100% of the assets held by the Sub-Fund can be subject to total return swaps. The expected percentage of the assets subject to total return swaps is up to 50%. All revenues arising from total return swaps, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

The Sub-Fund will not enter in margin lending transactions, buy-sell back transactions and sell-buy back transactions.

5. Investor profile

The Sub-Fund is suitable for investors who are seeking capital appreciation over 2 years and are prepared to accept risk to their capital and at least moderate volatility in the value of their investments. Given the investment objective and policies of the Sub-Fund, the Sub-Fund is suitable for conservative investors including those who are interested in or informed about capital market topics but see investment fund as a convenient saving product. It is also suitable for more experienced investors wishing to attain defined investment objectives.

6. Specific risks

Investors should carefully read section 5 (General Risk Factors) of the Prospectus before investing in the Sub-Fund. Investors should in particular note the specific risk warnings contained in section 5.12.1 of the Prospectus regarding investing in derivatives and financial derivative instruments, in section 5.12.2 of the Prospectus regarding investing in securities lending transactions, in section 5.12.4 of the Prospectus regarding investing in Asset-backed securities (ABS) and in section 5.12.6 of the Prospectus regarding investing in Distressed Debt Securities.

In addition, investors should also consider the following additional risks which are specific to the Sub-Fund.

Corporate bonds are subject to the risk of the issuer's inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of corporate bonds can be expected to decline. Corporate bonds with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

High yield bonds are regarded as being predominately speculative as to the issuer's ability to make payments of principal and interest. Investment in such securities involves substantial risk. Issuers of high yield debt securities may be highly leveraged and may not have available to them more traditional methods of financing. An economic recession may adversely affect an issuer's financial condition and the market value of high yield debt securities issued by such entity. The issuer's ability to service its debt obligations may be adversely affected by specific issuer developments, or the issuer's inability to meet specific projected business forecasts, or the unavailability of additional financing. In the event of bankruptcy of an issuer, the Sub-Fund may experience losses and incur costs. Investments particularly those made in emerging markets may be adversely affected by the possibility of expropriation or confiscatory taxation, imposition of withholding taxes on dividend or interest payments, limitations on the removal of funds or other assets of a Portfolio, political or social instability or diplomatic developments. An issuer of securities may be domiciled in a country other than the country in whose currency the instrument is denominated. The values and relative yields of investments in the securities markets of different countries, and their associated risks, are expected to change independently of each other.

The Sub-Fund will be subject to the risks associated with equities, the values of which in general fluctuate in response to the activities of individual companies, the general market and economic conditions. In particular, investors should be aware that equity and equity related investments are subordinated in the right of payment to other corporate securities, including debt securities.

The Sub-Fund will be subject to the risks associated with third party absolute return strategies through eligible investment funds.

Debt securities are subject to the risk of the issuer's inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of debt securities can be expected to decline. Debt securities with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

Investments particularly those made in emerging markets may be adversely affected by the possibility of expropriation or confiscatory taxation, imposition of withholding taxes on dividend or interest payments, limitations on the removal of funds or other assets of a Portfolio, political or social instability or diplomatic developments. An issuer of securities may be domiciled in a country other than the country in whose currency the instrument is denominated. The values and relative yields of investments in the securities markets of different countries, and their associated risks, are expected to change independently of each other.

Many emerging markets are undergoing a period of rapid growth and are less regulated than the world's leading stock markets and there may be less publicly available information about companies listed on such markets than is regularly published about companies listed on other stock markets. In addition, market practices in relation to settlement of securities transactions and custody assets in emerging markets can provide increased risk to emerging markets funds.

By investing in UCITS and/or other UCIs indirectly through the Sub-Fund, the investor will bear not only his proportionate share of the Management Fee of the Sub-Fund, but also indirectly, the management and administration expenses of the underlying UCITS and/or other UCIs. The Sub-Fund may invest in units of UCITS and/or other UCIs that may be managed or sub-managed by the Investment Manager, an affiliated manager or by an unaffiliated manager. The ability of the Sub-Fund to invest in units of underlying UCITS and/or other UCIs to achieve its investment objective may be directly related to the ability of the underlying UCITS and/or other UCIs to meet their own investment objectives. The

Sub-Fund will be exposed to the risks to which the underlying UCITS and/or other UCIs are exposed. These risks may include liquidity risk where the ability of the Sub-Fund to meet the liquidity requirements of its investment is directly linked to the ability of the underlying UCITS and/or other UCIs to meet their liquidity requirements.

A contingent convertible bond is a debt instrument which may be converted into the issuer's equity or be partly or wholly written off if a predefined trigger event occurs. The terms of the bond will set out specific trigger events and conversion rates. Trigger events may be outside of the issuer’s control. A common trigger event is the decrease in the issuer’s capital ratio below a given threshold.

Conversion may cause the value of the investment to fall significantly and irreversibly, and in some cases even to zero.

Coupon payments on certain contingent convertible bonds may be entirely discretionary and may be cancelled by the issuer at any point, for any reason, and for any length of time.

Contrary to typical capital hierarchy, contingent convertible bond investors may suffer a loss of capital before equity holders.

Most contingent convertible bonds are issued as perpetual instruments which are callable at pre-determined dates. Perpetual contingent convertible bonds may not be called on the predefined call date and investors may not receive return of principal on the call date or at any date.

There are no widely accepted standards for valuing contingent convertible bonds. The price at which bonds are sold may therefore be higher or lower than the price at which they were valued immediately before their sale.

In certain circumstances finding a ready buyer for contingent convertible bonds may be difficult and the seller may have to accept a significant discount to the expected value of the bond in order to sell it.

7. Likely impacts of Sustainability Risks on the Sub-Fund’s returns

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value. As such, for a company in which a Sub-Fund invests, this may be because of damage to its reputation resulting in a consequential fall in demand for its products or services, loss of key personnel, exclusion from potential business opportunities, increased costs of doing business and/or increased cost of capital. A company may also suffer the impact of fines and other regulatory sanctions. The time and resources of the company’s management team may be diverted from furthering its business into dealing with the Sustainability Risk event, including changes to business practices and dealing with investigations and litigation. Sustainability Risks events may also give rise to loss of assets and/or physical loss including damage to real estate and infrastructure. The utility and value of assets held by companies to which the respective Sub-Fund is exposed may also be adversely impacted by a Sustainability Risk event. A Sustainability Risk event may arise and impact a specific investment or may have a broader impact on an economic sector, geographical or political region or country. For instance, sector and geographic Sustainability Risk events may have an impact on the investment value of the sovereign fixed income exposure of a Sub-Fund.

8. Taxonomy

As the Sub-Fund is not identified as being subject to disclosures of articles 8 or 9 of SFDR, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

9. Global exposure and level of leverage

The global exposure of the Sub-Fund is calculated and monitored under the absolute VaR approach. The level of leverage of the Sub-Fund, based on the delta-adjusted "sum of notionals" approach, is generally not expected to exceed 300% of the Net Asset Value. The leverage is resulting in particular from investments in derivatives, both exchange traded and OTC on, for instance, credit indices, single name and/or interest rates as well as from investments in total return swaps. The Investment Manager will regularly monitor its leverage; the average level is not expected to be permanently close to the above mentioned threshold and it will generally fluctuate below that level. Nevertheless, the leverage of the Sub-Fund may occasionally exceed the above level of 300% but will in any event not exceed 400% of the Net Asset Value.

10. Investment Manager

ARCA Fondi SGR S.p.A.

11. Valuation

Each Business Day is a Valuation Day. The Net Asset Value per Share will be calculated as of each Valuation Day. With respect to this Sub-Fund, a Business Day is any day which is defined as a Business Day in the Prospectus.

12. Subscriptions

Each Valuation Day is a Subscription Day. The Cut-Off Time for subscription applications is 1.00 pm CET of the Subscription Day. Subscription applications must be settled by the end of the Subscription Settlement Period, which is two (2) Business Days following the Subscription Day.

13. Redemptions

Each Valuation Day is a Redemption Day. The Cut-Off Time for redemption applications is 1.00 pm CET of the Redemption Day. Redemption applications will normally be settled by the end of the Redemption Settlement Period, which is two (2) Business Days following the Redemption Day.

14. Share Classes

The table below lists all Share Classes established within the Sub-Fund. Certain Share Classes may currently not be active or may be unavailable to investors in certain jurisdictions. The list of active Share Classes currently available for subscription in each jurisdiction may be obtained from the UCI Administrator and the Global Distributor upon request or on www.siderafunds.com.

Share Class name	**Sidera Funds SICAV – Income Plus B Acc**
Reference Currency	EUR
Distribution (D) or Capitalisation (C)	C
Minimum Subscription	EUR 50.000
Minimum Additional Subscription	EUR 500
Minimum Holding Amount	N.A.
Maximum Subscription Fee received by the sub distributor	N.A.
Maximum Redemption Fee	N.A.
Management Fee	Max 0,20% p.a.
Performance Fee	YES, according to the methodology set out in the Section 9.3.2 of the Prospectus. Index: ICE BOFA Euro Treasury Bill Index (EGB0)) Spread: 0,5%
Taxe d'abonnement	0,01% p.a.

15. Eligible Investors

Class(es) of shares:

- Class **B Acc**: Shares are reserved for legal entities qualifying as Institutional Investors and for private entities qualifying as Professional Investors. Class B Shares are issued only in registered form.

21. SUPPLEMENT 8 – SIDERA FUNDS SICAV – DIGITAL WORLDS

1. Launch date

17 October 2022 with initial offer period from 3 October 2022 until 14 October 2022 (included).

2. Reference Currency

The Reference Currency of the Sub-Fund is EURO.

3. Investment objective

The investment objective of the Sub-Fund is to achieve capital growth in the long term by investing mainly in equities and equity related instruments and to generate a total return in excess of the reference Benchmark being 100% MSCI AC World IMI Digital Economy ESG Filtered Net TR (Bloomberg NE727240) (an "**ESG Index**"). The Sub-Fund is actively managed in reference to this ESG Index with significant degree of freedom.

In accordance with Article 8 of SFDR, the Sub-Fund promotes environmental and social characteristics and investments which follow good governance practices. The environmental and social characteristics promoted by the Sub-Fund consist in favouring investment in issuers whose business activities and/or conduct take an appropriate and responsible approach to ESG. Further information on the environmental and social characteristics promoted by the Sub-Fund, and on European Taxonomy-related considerations, is available in the SFDR RTS Annex 3 of this Prospectus.

As part of the investment process and in order to fully comply with the ESG considerations of the Sub-Fund, the Investment Manager has full discretion over the composition of the Sub-Fund's portfolio and may take exposure to companies, countries or sectors not included in and/or that have different weightings than the ESG Index. The Investment Manager may set discretionary internal risk thresholds which may reference deviations from the ESG Index. While it is expected that the Sub-Fund's deviation from the ESG Index will be moderate, there are no restrictions on the extent to which the Fund's performance may deviate from the one of the ESG Index.

4. Investment policy and specific restrictions

The Sub-Fund invests mainly in equities or equity related instruments, listed mainly on developed markets and emerging markets. The Sub-Fund invests mainly in the following geographical areas: European countries, North America, Asia Pacific and emerging countries.

The Sub-Fund invests mainly in companies of any market capitalization (large, medium and small capitalization companies) that research, enable, develop or are associated to any part of the value chain of new technologies and digital innovations. Related technologies include, among others: artificial intelligence, computing, automation, robotics, virtual reality and metaverse, blockchain, technological analytics, e-commerce, payment systems, communications technology and platforms, gaming and generative design. For the avoidance of doubt, the Sub-Fund may not invest directly or indirectly in virtual assets (as defined in Article 1 (20) b) of the 2004 Law).

The Sub-Fund may also invest up to 49% of the Net Asset Value in corporate and government bonds or in other interest-bearing securities.

Currency risk will be actively managed with a maximum exposure up to 100%.

The Sub-Fund will be managed according to a strategy that combines a top-down fundamental approach based upon macroeconomic analysis with a bottom-up selection model which is quantitative in nature. The above-mentioned quantitative model identifies those stocks carrying the highest return potential while controlling risks. Valuation criteria employed include fundamental, technical and risk indicators which are deemed to be statistically significant in explaining the cross section of equity returns.

The Sub-Fund also invests in the following financial instruments: units of UCITS, currency and money market instruments, time deposits, depositary receipts (including American depositary receipts (ADR) and global depositary receipts (GDR) that do not embed derivatives). These instruments are negotiated both in regulated markets and over the counter.

The Sub-Fund may also invest up to 10% of its Net Asset Value in units of UCITS, including, but not limited to, Shares of other Sub-Funds of the Fund (called Target Sub-Funds), and in other eligible UCIs with similar investment policies. As a part of the investment process, the Investment Manager will allocate risk (i.e. risk contribution to VaR or other equivalent measure) ensuring a sound portfolio diversification.

The Sub-Fund may also invest in other interest-bearing securities, bank accounts, time deposits, T-bills and short-term bonds. In principle, the Sub-Fund may hold on a temporarily basis ancillary liquid assets up to 20% of the Sub-Fund's Net Asset Value as further specified in section 4.1.4 of the Prospectus.

The Sub-Fund may also invest in derivatives, both exchange traded and OTC on, for instance, equity and credit indexes, single name and/or interest rates and/or foreign currencies. Such derivatives usage can be for investment, hedging or efficient portfolio management purposes. Financial derivative instruments include forwards, futures, options, swaps (such as credit default swaps and total return swaps).

The Sub-Fund will on an ongoing basis enter into securities lending transactions as lender of securities. In circumstances where the agent for securities lending identifies investment opportunities based on the market developments to be in the interest of the Sub-Fund’s investors and given the securities lending scheme program developed to cover potentially a substantial portion of the portfolio of the Sub-Fund a maximum of 50% of the assets held by the Sub-Fund can be subject to securities lending transactions. Notwithstanding the above, the lending of securities remains subject to the offer capacity and the terms of the offers provided by the agent for securities lending. For these reasons, under normal circumstances, the expected percentage of the assets subject to securities lending transactions is up to 35%. A percentage of minimum 80% of the gross revenues arising from securities lending transactions will be returned to the Sub-Fund; the remaining revenues are assigned to the agent for securities lending. All direct and indirect operational costs and fees in relation to securities lending programme activities are paid from the agent's portion of the gross revenues (being the remaining revenues mentioned above).

Finally, the Sub-Fund will on an ongoing basis enter into total return swaps on equity indices for hedging, efficient portfolio management or investment purposes. Notably for the purposes of portfolio construction as well as for implementing active investment positions, a maximum of 20% of the assets held by the Sub-Fund can be subject to total return swaps. The expected percentage of the assets subject to total return swaps is up to 10%. All revenues arising from total return swaps, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

The Sub-Fund will not enter in repurchase transactions and reverse repurchase transactions, margin lending transactions, buy-sell back transactions and sell-buy back transactions.

5. Investor profile

The Sub-Fund is suitable for investors who have ESG preferences, who are seeking capital appreciation over eight (8) years and are prepared to accept the risk of significant temporary losses and to afford to set aside the capital in the long timeframe. The Sub-Fund is suitable for both more experienced investors wishing to attain defined investment objectives, with experience with volatile products and less experienced investors including those who are interested in or informed about capital market topics but see the investment fund as a convenient investment product. The Sub-Fund is designed for the investment objective of building up capital.

6. Specific risks

Investors should carefully read section 5 (General Risk Factors) of the Prospectus before investing in the Sub-Fund. Investors should in particular note the specific risk warnings contained in section 5.12.1 of the Prospectus regarding investing in derivatives and financial derivative instruments and in section 5.12.2 of the Prospectus regarding investing in securities lending transactions. In addition, investors should also consider the following additional risks which are specific to the Sub-Fund.

The Sub-Fund will be subject to the risks associated with equities, the values of which in general fluctuate in response to the activities of individual companies, the general market and economic conditions. In particular, investors should be aware that equity and equity-related investments are subordinated in the right of payment to other corporate securities, including debt securities.

Smaller companies’ securities may be subject to fluctuation larger or more abrupt than larger, more established companies. Smaller companies’ securities tend to trade less frequently and with lower volume than large companies related instruments and may also be more sensitive to market changes. Smaller companies may also present lesser diversified business.

Corporate bonds are subject to the risk of the issuer’s inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of corporate bonds can be expected to decline. Corporate bonds with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

Investments made in one or in a limited number of market sectors, or securities related to some specific business activities, may be more volatile and more exposed to cyclical changes in the economic activity in the relevant sector or sectors, as well as the supply and demand of specific products and services.

Investments particularly those made in emerging markets may be adversely affected by the possibility of expropriation or confiscatory taxation, imposition of withholding taxes on dividend or interest payments, limitations on the removal of funds or other assets of a Portfolio, political or social instability or diplomatic developments. An issuer of securities may be domiciled in a country other than the country in whose currency the instrument is denominated. The values and relative yields of investments in the securities markets of different countries, and their associated risks, are expected to change independently of each other.

Many emerging markets are undergoing a period of rapid growth and are less regulated than the world's leading stock markets and there may be less publicly available information about companies listed on such markets than is regularly published about companies listed on other stock markets. In addition, market practices in relation to settlement of securities transactions and custody assets in emerging markets can provide increased risk to emerging markets funds.

By investing in UCITS and/or other UCIs indirectly through the Sub-Fund, the investor will bear not only his proportionate share of the Management Fee of the Sub-Fund, but also indirectly, the management and administration expenses of the underlying UCITS and/or other UCIs. The Sub-Fund may invest in units of UCITS and/or other UCIs that may be managed or sub-managed by the Investment Manager, an affiliated manager or by an unaffiliated manager. The ability of the Sub-Fund to invest in units of underlying UCITS and/or other UCIs to achieve its investment objective may be directly related to the ability of the underlying UCITS and/or other UCIs to meet their own investment objectives. The Sub-Fund will be exposed to the risks to which the underlying UCITS and/or other UCIs are exposed. These risks may include liquidity risk where the ability of the Sub-Fund to meet the liquidity requirements of its investment is directly linked to the ability of the underlying UCITS and/or other UCIs to meet their liquidity requirements.

Different types of risk may apply to structured products since the term encompasses a broad scope of different structuring possibilities. Given that structured products are often unsecured and are only backed by the credit of the issuer, they are subject to credit risk of the issuer. In addition, the structured products may be highly customised. Accordingly, particular attention shall be paid to whether the envisaged structured product is eligible for an investment and suits the Sub-Fund's investment objective and investment policy appropriately.

Investment in depositary receipts may be less liquid and more volatile than the underlying securities in their primary trading market. If a depositary receipt is denominated in a different currency than its underlying securities, the Sub-Fund will be subject to the currency risk of both the investment in the depositary receipt and the underlying security. There may be less publicly available information regarding the issuer of the securities underlying a depositary receipt than if those securities were traded directly. Depositary receipts may or may not be sponsored by the issuers of the underlying securities, and information regarding issuers of securities underlying unsponsored depositary receipts may be more limited than for sponsored depositary receipts. The values of depository receipts may decline for a number of reasons relating to the issuers or sponsors of the depository receipts, including, but not limited to, insolvency of the issuer or sponsor. Holders of depositary receipts may have limited or no rights to take action with respect to the underlying securities or to compel the issuer of the receipts to take action.

7. Likely impacts of Sustainability Risks on the Sub-Fund’s returns

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value. As such, for a company in which a Sub-Fund invests, this may be because of damage to its reputation resulting in a consequential fall in demand for its products or services, loss of key personnel, exclusion from potential business opportunities, increased costs of doing business and/or increased cost of capital. A company may also suffer the impact of fines and other regulatory sanctions. The time and resources of the company’s management team may be diverted from furthering its business into dealing with the Sustainability Risk event, including changes to business practices and dealing with investigations and litigation. Sustainability Risks events may also give rise to loss of assets and/or physical loss including damage to real estate and infrastructure. The utility and value of assets held by companies to which the respective Sub-Fund is exposed may also be adversely impacted by a Sustainability Risk event. A Sustainability Risk event may arise and impact a specific investment or may have a broader impact on an economic sector, geographical or political region or country. For instance, sector and geographic Sustainability Risk events may have an impact on the investment value of the sovereign fixed income exposure of a Sub-Fund.

8. Global exposure and level of leverage

The global exposure of the Sub-Fund is calculated and monitored under the relative VaR approach. The global exposure of the Sub-Fund may not exceed twice the VaR of a reference portfolio, being the reference Benchmark (100% MSCI AC World IMI Digital Economy ESG Filtered Net TR).

The level of leverage of the Sub-Fund, based on the delta-adjusted “sum of notionals” approach, is generally not expected to exceed 500% of the Net Asset Value. The Investment Manager will regularly monitor its leverage; the average level is not expected to be permanently close to the above-mentioned threshold and it will generally fluctuate below that level. Nevertheless, the leverage of the Sub-Fund may occasionally exceed the level of 500% but will in any event not reach or exceed 600% of the Net Asset Value.

9. Investment Manager

ARCA Fondi SGR S.p.A.

10. Valuation

Each Business Day is a Valuation Day. The Net Asset Value per Share will be calculated as of each Valuation Day. With respect to this Sub-Fund, a Business Day is any day which is defined as a Business Day in the Prospectus.

11. Subscriptions

Each Valuation Day is a Subscription Day. The Cut-Off Time for subscription applications is 1.00 pm CET of the Subscription Day. Subscription applications must be settled by the end of the Subscription Settlement Period, which is two (2) Business Days following the Subscription Day.

12. Redemptions

Each Valuation Day is a Redemption Day. The Cut-Off Time for redemption applications is 1.00 pm CET of the Redemption Day. Redemption applications will normally be settled by the end of the Redemption Settlement Period, which is two (2) Business Days following the Redemption Day.

13. Share Classes

The table below lists all Share Classes established within the Sub-Fund. Certain Share Classes may currently not be active or may be unavailable to investors in certain jurisdictions. The list of active Share Classes currently available for subscription in each jurisdiction may be obtained from the UCI Administrator and the Global Distributor upon request or on www.siderafunds.com.

Share Class name	**Sidera Funds SICAV – Digital Worlds B Acc**
Reference Currency	EUR
Distribution (D) or Capitalisation (C)	C
Minimum Subscription	EUR 50.000
Minimum Additional Subscription	EUR 500
Minimum Holding Amount	N.A.
Maximum Subscription Fee received by the sub distributor	N.A.
Maximum Redemption Fee	N.A.
Management Fee	Max 0,70% p.a.
Performance Fee	N.A.
Taxe d'abonnement	0,01% p.a.

In case the Sub-Fund invests in units/shares of UCITS or other UCIs, the maximum level of the Management Fee that may be charged both to the Sub-Fund itself and to the UCITS or other UCIs in which it invests is 2% of the subscription amount p.a..

14. Distribution policy

Distribution policy

The Sub-Fund has only one capitalisation Share Class, the shares of which, in accordance with the provisions of the Prospectus, do not confer the right to dividend distributions and capitalise their entire earnings.

15. Eligible Investors

Class(es) of shares:

- Class B Acc: Shares are reserved for legal entities qualifying as Institutional Investors and for private entities qualifying as Professional Investors. Class B Shares are issued only in registered form.

22. SUPPLEMENT 9 – SIDERA FUNDS SICAV – FINANCIAL BOND

1. Launch date

7 July 2023 with initial offer period from 3 July 2023 to 6 July 2023.

2. Reference Currency

The Reference Currency of the Sub-Fund is EURO.

3. Investment objective

The investment objective of the Sub-Fund is to achieve income and moderate capital growth over five (5) years, by investing in fixed income instruments. The Sub-Fund generally aims at outperforming the reference index on a consistent basis. The Sub-Fund is actively managed in reference to its benchmark 40% ICE BofA Euro Subordinated Financial Index (EBSU), 20% ICE BofA Large Cap Contingent Capital Index hedged (COCL), 40% ICE BofA Euro Financial High Yield Index (HEB0) with significant degree of freedom.

4. Investment policy and specific restrictions

The Sub-Fund invests primarily in corporate bonds issued by financial institutions, both investment grade and high yield up to 100% and 70% respectively, senior and subordinated, issued by companies domiciled in OECD countries, denominated in USD, EUR, GBP currencies. Currency risk is mostly hedged.

The Sub-Fund invests mainly in the following geographical areas: European countries, United States, Japan.

The Sub-Fund may also invest in derivatives, both exchange traded and OTC on, for instance, credit indexes, single name and/or interest rates and FX. Such derivatives usage can be for investment, hedging or efficient portfolio management purposes.

The Sub-Fund may also invest in government bonds issued by a member State of the OECD such as the Group of Ten (G10), in other interest-bearing securities, in units of UCITS and/or other eligible UCIs with similar investment policies, liquidity and in time deposits. In principle, the Sub-Fund may hold on a temporarily basis ancillary liquid assets up to 20 % of the Sub-Fund's Net Asset Value as further specified in section 4.1.4 of the Prospectus.

When the Sub-Fund invests in securities, these must be rated at least B-/B3/B low by at least one (1) rating agency among S&P, Moody's, Fitch or DBRS. The Sub-Fund may also, and up to 10% of its assets, hold securities which would have become non-rated securities or distressed and defaulted securities as a result of holding securities whose rating would have been downgraded to be defaulting or distressing. Should a security become a non-rated security or following a downgrade below the above-mentioned ratings, the Investment Manager will judge the most appropriate moment, in the interest of shareholders, to redeem the investment position within maximum nine (9) months as of when the Investment Manager is aware of such non-rating or downgrade.

The Sub-Fund may also invest:

- up to 3% of the Net Asset Value in securitized products (e.g., ABS, CLOs); and

- up to 20% of the Net Asset Value in contingent convertible bonds (CoCos).

Contingent convertible bonds, also called Cocos or CoCo bonds, are unlimited, principally fixed-income bonds with a hybrid character which are issued as bonds with fixed coupon payments, but which upon a trigger event are mandatorily converted into company shares or written down, provided that respective trigger events are set out in the issuing terms of the CoCo bonds. The interest rate duration of the Sub-Fund will be, on average, between 0 and 10 years.

The Sub-Fund may be indirectly exposed to equity due to the sensitivity of contingent convertible bonds influenced by the price of underlying equities. The Sub-Fund may directly hold equities after exercising the conversion option attached to convertible bonds or contingent convertible bonds or following debt restructuring. Although such direct positions are not intended to be held over the long-term, the Sub-Fund is not required to sell them within a predefined period.

The Sub-Fund will be managed according to a core strategy which will generate the net market exposure. The core strategy's investment process combines a top-down approach with a bottom-up selection model. Valuation criteria include fundamental, technical and risk indicators which are deemed to be statistically significant in explaining the cross section of returns.

Currency exposure is mainly hedged with residual risk remaining.

The core strategy may absorb up to 100% of the investments. Satellite strategies may also be implemented. These strategies will usually have low correlation with the core strategy and will therefore improve on average the risk-return profile of the Sub-Fund. Satellite strategies will encompass both long only and long short positions on single issuers, sectors and indices. The above-mentioned positions will be mainly implemented via eligible futures, options and swaps, short positions always being implemented via derivatives.

Satellite strategies include:

- credit 'long-short' where a long position in a certain issuer (via corporate bond or credit default swap) is spread duration matched by a short position in an another corporate issuer;
- rate curve relative value strategies where long positions in certain curve segments are duration-matched by corresponding short positions in other segments via government bonds,
- future or swaps;
- basis trade strategies where long and short positions are built for a given issuer using different financial instruments (for example bond versus credit default swap).

As a part of the investment process, the Investment Manager will allocate risk (i.e. risk contribution to VaR or other equivalent measure) to the satellite strategies while ensuring a sound balance of core and non-core strategies.

The Sub-Fund may on an ongoing basis enter into securities lending transactions as lender of securities. In circumstances where the agent for securities lending identifies opportunities based on the market developments to be in the interest of the Sub-Fund's investors and given the securities lending scheme program developed to cover potentially a substantial portion of the portfolio of the Sub-Fund, a maximum of 50% of the assets held by the Sub-Fund can be subject to securities lending transactions. Notwithstanding the above, the lending of securities remains subject to the offer capacity and the terms of the offers provided by the agent for securities lending. For these reasons, under normal circumstances, the expected percentage of the assets subject to securities lending transactions is up to 35%. A percentage of minimum 80% of the gross revenues arising from securities lending transactions will be returned to the Sub-Fund; the remaining revenues are assigned to the agent for securities lending. All direct and indirect operational costs and fees in relation to securities lending programme activities are paid from the agent's portion of the gross revenues (being the remaining revenues mentioned above).

Furthermore, the Sub-Fund will also enter into repurchase transactions and reverse repurchase transactions as buyer or seller, occasionally. The securities subject to such repurchase transactions will be safe-kept with the Depositary. In circumstances where the Investment Manager identifies opportunities to be in the interest of the Sub-Fund’s investors and given the repurchase transactions and reverse repurchase transactions scheme program developed by the Investment Manager to cover potentially a substantial portion of the Sub-Fund, a maximum of 40% of the assets held by the Sub-Fund (i.e. bonds) can be subject to repurchase transactions and reverse repurchase transactions. Notwithstanding the above, the recourse to repurchase transactions and reverse repurchase transactions remains subject to the interest shown by market dealers to enter into such transactions. In addition, the Investment Manager is carefully considering the terms of the transactions in order to identify whether they are in the best possible interest of the Sub-Fund’s investors. For these reasons, under normal circumstances, the expected percentage of the assets subject to repurchase transactions and reverse repurchase transactions is up to 25%. All revenues arising from repurchase transactions and reverse repurchase transactions, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

Finally, the Sub-Fund will on an ongoing basis enter into total return swaps on bond and credit indices for hedging, efficient portfolio management or investment. Notably for the purposes of portfolio construction as well as for implementing active investment positions, a maximum of 40% of the assets held by the Sub-Fund can be subject to total return swaps. The expected percentage of the assets subject to total return swaps is up to 25%. All revenues arising from total return swaps, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

The Sub-Fund will not enter in margin lending transactions, buy-sell back transactions and sell-buy back transactions.

5. Investor profile

The Sub-Fund is suitable for investors who are seeking income and capital appreciation over five (5) years and are prepared to accept the risk of significant temporary losses and to afford to set aside the capital in the medium timeframe. The Sub-Fund is suitable for both more experienced investors wishing to attain defined investment objectives, with experience with volatile products and less experienced investors including those who are interested in or informed about capital market topics but see investment fund as a convenient investment product. The Sub-Fund is designed for the investment objective of building up capital.

Specific risks

Investors should carefully read section 5 (General Risk Factors) of the Prospectus before investing in the Sub-Fund. Investors should in particular note the specific risk warnings contained in section 5.12.1 of the Prospectus regarding investing in derivatives and financial derivative instruments, in section 5.12.2 of the Prospectus regarding investing in securities lending transactions and in repurchase and reverse repurchase transactions, in section 5.12.3 regarding collateral management, in section 5.12.4 of the Prospectus regarding investing in Asset-backed securities (ABS) in section 5.12.5 of the Prospectus regarding collateralised loan obligations (CLOs) and in section 5.12.6 of the Prospectus regarding investing in Distressed Debt Securities. In addition, investors should also consider the following additional risks which are specific to the Sub-Fund.

Corporate bonds are subject to the risk of the issuer's inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of corporate bonds can be expected to decline. Corporate bonds with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

Debt securities are subject to the risk of the issuer's inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of debt securities can be expected to decline. Debt securities with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

High yield bonds are regarded as being predominately speculative as to the issuer's ability to make payments of principal and interest. Investment in such securities involves substantial risk. Issuers of high yield debt securities may be highly leveraged and may not have available to them more traditional methods of financing. An economic recession may adversely affect an issuer's financial condition and the market value of high yield debt securities issued by such entity. The issuer's ability to service its debt obligations may be adversely affected by specific issuer developments, or the issuer's inability to meet specific projected business forecasts, or the unavailability of additional financing. In the event of bankruptcy of an issuer, the Sub-Fund may experience losses and incur costs. Investments particularly those made in emerging markets may be adversely affected by the possibility of expropriation or confiscatory taxation, imposition of withholding taxes on dividend or interest payments, limitations on the removal of funds or other assets of a Portfolio, political or social instability or diplomatic developments. An issuer of securities may be domiciled in a country other than the country in whose currency the instrument is denominated. The values and relative yields of investments in the securities markets of different countries, and their associated risks, are expected to change independently of each other.

By investing in UCITS and/or other UCIs indirectly through the Sub-Fund, the investor will bear not only his proportionate share of the Management Fee of the Sub-Fund, but also indirectly, the management and administration expenses of the underlying UCITS and/or other UCIs. The Sub-Fund may invest in units of UCITS and/or other UCIs that may be managed or sub-managed by the Investment Manager, an affiliated manager or by an unaffiliated manager. The ability of the Sub-Fund to invest in units of underlying UCITS and/or other UCIs to achieve its investment objective may be directly related to the ability of the underlying UCITS and/or other UCIs to meet their own investment objectives. The Sub-Fund will be exposed to the risks to which the underlying UCITS and/or other UCIs are exposed. These risks may include liquidity risk where the ability of the Sub-Fund to meet the liquidity requirements of its investment is directly linked to the ability of the underlying UCITS and/or other UCIs to meet their liquidity requirements.

Subordinated debt (also known as a subordinated debenture) is riskier than unsubordinated debt: it is an unsecured loan or bond that ranks below other, more senior loans or securities with respect to claims on assets or earnings. Subordinated debentures are thus also known as junior securities. In the case of borrower default, creditors who own subordinated debt will not be paid out until after senior bondholders are paid in full. Subordinated debt is also subject to regulatory risk in so far as the regulatory authority may change ex abrupto the requisites of these securities in order to be compliant with regulation and the issuer may be authorized to call the security at investor's disadvantage ('regulatory call').

A contingent convertible bond (CoCos) is a subordinated debt instrument which may be converted into the issuer's equity or be partly or wholly written off if a predefined trigger event occurs. The terms of the bond will set out specific trigger events and conversion rates. Trigger events may be outside of the issuer's control. A common trigger event is the decrease in the issuer's capital ratio below a given threshold.

The Sub-Fund will be subject to the risks associated with third party absolute return strategies through eligible investment funds.

Conversion may cause the value of the investment to fall significantly and irreversibly, and in some cases even to zero.

Coupon payments on certain contingent convertible bonds may be entirely discretionary and may be cancelled by the issuer at any point, for any reason, and for any length of time.

Contrary to typical capital hierarchy, contingent convertible bond investors may suffer a loss of capital before equity holders.

Most contingent convertible bonds are issued as perpetual instruments which are callable at pre-determined dates. Perpetual contingent convertible bonds may not be called on the predefined call date and investors may not receive return of principal on the call date or at any date.

There are no widely accepted standards for valuing contingent convertible bonds. The price at which bonds are sold may therefore be higher or lower than the price at which they were valued immediately before their sale.

In certain circumstances finding a ready buyer for contingent convertible bonds may be difficult and the seller may have to accept a significant discount to the expected value of the bond in order to sell it.

6. Likely impacts of Sustainability Risks on the Sub-Fund's returns

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value. As such, for a company in which a Sub-Fund invests, this may be because of damage to its reputation resulting in a consequential fall in demand for its products or services, loss of key personnel, exclusion from potential business opportunities, increased costs of doing business and/or increased cost of capital. A company may also suffer the impact of fines and other regulatory sanctions. The time and resources of the company's management team may be diverted from furthering its business into dealing with the Sustainability Risk event, including changes to business practices and dealing with investigations and litigation. Sustainability Risks events may also give rise to loss of assets and/or physical loss including damage to real estate and infrastructure. The utility and value of assets held by companies to which the respective Sub-Fund is exposed may also be adversely impacted by a Sustainability Risk event. A Sustainability Risk event may arise and impact a specific investment or may have a broader impact on an economic sector, geographical or political region or country. For instance, sector and geographic Sustainability Risk events may have an impact on the investment value of the sovereign fixed income exposure of a Sub-Fund.

7. Taxonomy

As the Sub-Fund is not identified as being subject to disclosures of articles 8 or 9 of SFDR, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

8. Global exposure and level of leverage

The global exposure of the Sub-Fund is calculated and monitored under the relative VaR approach. The global exposure of the Sub-Fund may not exceed twice the VaR of a reference portfolio, being the reference Benchmark (40% ICE BofA Euro Subordinated Financial Index, 20% ICE BofA Large Cap Contingent Capital Index hedged, 40% ICE BofA Euro Financial High Yield Index).

The level of leverage of the Sub-Fund, based on the delta-adjusted "sum of notionals" approach, is generally not expected to exceed 500% of the Net Asset Value. The leverage is resulting in particular from investments in derivatives, both exchange traded and OTC on, for instance, credit indexes, single name and/or interest rates and FX as well as from investments in total return swaps. The Investment Manager will regularly monitor its leverage; the average level is not expected to be permanently close to the above-mentioned threshold and it will generally fluctuate below that level. Nevertheless, the leverage of the Sub-Fund may occasionally exceed the level of 500%. Higher allocation to the satellite strategies is indeed associated with higher leverage levels. The leverage will in any event not reach or exceed 600% of the Net Asset Value.

9. Investment Manager

ARCA Fondi SGR S.p.A.

10. Valuation

Each Business Day is a Valuation Day. The Net Asset Value per Share will be calculated as of each Valuation Day. With respect to this Sub-Fund, a Business Day is any day which is defined as a Business Day in the Prospectus.

11. Subscriptions

Each Valuation Day is a Subscription Day. The Cut-Off Time for subscription applications is 1.00 pm CET of the Subscription Day. Subscription applications must be settled by the end of the Subscription Settlement Period, which is two (2) Business Days following the Subscription Day.

12. Redemptions

Each Valuation Day is a Redemption Day. The Cut-Off Time for redemption applications is 1.00 pm CET of the Redemption Day. Redemption applications will normally be settled by the end of the Redemption Settlement Period, which is two (2) Business Days following the Redemption Day.

13. Share Classes

The table below lists all Share Classes established within the Sub-Fund. Certain Share Classes may currently not be active or may be unavailable to investors in certain jurisdictions. The list of active Share Classes currently available for subscription in each jurisdiction may be obtained from the UCI Administrator and the Global Distributor upon request or on www.siderafunds.com.

Share Class name	**Sidera Funds SICAV – Financial Bond B Acc**
Reference Currency	EUR
Distribution (D) or Capitalisation (C)	C
Minimum Subscription	EUR 50.000
Minimum Additional Subscription	EUR 500
Minimum Holding Amount	N.A.
Maximum Subscription Fee received by the sub distributor	N.A.
Maximum Redemption Fee	N.A.

Share Class name	Sidera Funds SICAV – Financial Bond B Acc
Management Fee	Max 0,45% p.a.
Performance Fee	N.A.
Taxe d’abonnement	0,01% p.a.

In case the Sub-Fund invests in units/shares of UCITS or other UCIs, the maximum level of the Management Fee that may be charged both to the Sub-Fund itself and to the UCITS or other UCIs in which it invests is 2% of the subscription amount p.a.

14. Distribution policy

The Sub-Fund has only one capitalisation Share Class, the shares of which, in accordance with the provisions of the Prospectus, do not confer the right to dividend distributions and capitalise their entire earnings.

15. Eligible Investors

Class(es) of shares:

- Class B Acc: Shares are reserved for legal entities qualifying as Institutional Investors and for private entities qualifying as Professional Investors. Class B Shares are issued only in registered form.

23. SUPPLEMENT 10 – SIDERA FUNDS SICAV – CHRISTIAN EQUITY

1. Launch date

On or around 25 October 2023 with initial offer period from 12 October 2023 until 24 October 2023 (included). The Board of Directors may postpone the launch date and initial offer period at its sole discretion.

2. Reference Currency

The Reference Currency of the Sub-Fund is EURO.

3. Investment objective

The investment objective of the Sub-Fund is to achieve capital growth in the long term by investing mainly in equities and equity related instruments and to generate a total return in excess of the reference benchmark being MSCI ACWI ESG Leaders Net Return EUR (Bloomberg NE703303) (the "**ESG Index**"). The Sub-Fund is actively managed in reference to this ESG Index with significant degree of freedom.

In accordance with Article 8 of SFDR, the Sub-Fund promotes environmental and social characteristics and investments which follow good governance practices. The environmental and social characteristics promoted by the Sub-Fund consist in favoring investment in issuers whose business activities and/or conduct take an appropriate and responsible approach to ESG. Further information on the environmental and social characteristics promoted by the Sub-Fund, and on European Taxonomy-related considerations, is available in the SFDR RTS Annex 4 of this Prospectus.

To ensure that ESG characteristics of the Sub-Fund are met, the Investment Manager relies on a proprietary model.

As part of the investment process and in order to fully comply with the ESG considerations of the Sub-Fund, the Investment Manager has full discretion over the composition of the Sub-Fund's portfolio and may take exposure to companies, countries or sectors not included in and/or that have different weightings than the ESG Index. The Investment Manager may set discretionary internal risk thresholds which may reference deviations from the ESG Index. While it is expected that the Sub-Fund's deviation from the ESG Index will be moderate, there are no restrictions on the extent to which the Fund's performance may deviate from the one of the ESG Index.

In parallel to the promotion of environmental and social characteristics, the Sub-Fund will follow Christian investment guidelines with the objective of promoting fundamental values of the Catholic Church such as protection of life and families with children, support for human dignity and care of environment and animals based on the main principles defined by the Italian Episcopal Conference, being the official assembly of the Catholic Church's bishops in Italy (the "**Christian Investment Guidelines**").

4. Investment policy and specific restrictions

The Sub-Fund invests mainly in equities or equity related instruments, listed mainly on developed markets and emerging markets. The Sub-Fund invests mainly in the following geographical areas: European countries, North America, Asia Pacific and emerging countries.

The Sub-Fund may be exposed to Chinese instruments either indirectly via derivatives, units of UCITS and/or other eligible UCIs, American depositary receipts (ADR) and global depositary receipts (GDR) or via investments in H-shares on the Hong Kong Stock Exchange.

The Sub-Fund invests mainly in large and medium market capitalization companies.

Currency risk will be actively managed with a maximum exposure of up to 100%.

The Sub-Fund will be managed according to a strategy that combines a top-down fundamental approach based upon macroeconomic analysis with a bottom-up selection model which is quantitative in nature. The above-mentioned quantitative model identifies those stocks carrying the highest return potential while controlling risks. Valuation criteria employed include fundamental, technical and risk indicators which are deemed to be statistically significant in explaining the cross section of equity returns.

Moreover, the Investment Manager will also exclude from the Sub-Fund's portfolio certain equity and equity-related instruments that do not respect the fundamental values of the Catholic Church as per the Christian Investment Guidelines and that are not already comprised in the promotion of the environmental and/or social characteristics. These include the exclusion of companies that derive any revenues from abortion and birth control, adult entertainment and research on stem cells. The full list of exclusions can be found on the Fund's website (www.sidera.com).

For the purposes of building up the Sub-Fund's portfolio or of mitigating volatility risk (where deemed in the best interests of the Sub-Fund's investors), the Sub-Fund may also invest up to 30% of the Net Asset Value in corporate and government bonds or in other interest-bearing securities. The Investment Manager, when investing in government bonds or in other government interest-bearing securities, will exclude countries that apply controls on death penalty in addition to the exclusions applied as part of the ESG model. The exclusions applied to equity and equity-related instruments also apply to investments in corporate bonds.

Despite the above-mentioned exclusions, the Investment Manager may invest up to 5% of the Sub-Fund's Net Asset Value in equity and equity-related instruments as well as government bonds or government in other interest-bearing that are involved in activities excluded by the Christian Investment Guidelines (tolerance threshold).

For the purpose of applying the Christian Investment Guidelines, the Investment Manager can rely on data provided by a Data Service Provider.

The Sub-Fund may invest in derivatives, both exchange traded and OTC on, for instance, stock indexes and/or single stock and/or equity related indexes (options on volatility, dividends, etc), in liquidity, currencies and in time deposits. In addition, the Sub-Fund may invest up to 10% of its Net Asset Value in units of UCITS and/or other eligible UCIs with analogous investment policies. In principle, the Sub-Fund may hold on a temporarily basis ancillary liquid assets up to 20% of the Sub-Fund's Net Asset Value as specified in section 4.1.4 of the Prospectus.

The Sub-Fund will on an ongoing basis enter into total return swaps on equity indices for hedging, efficient portfolio management or investment purposes. Notably for the purposes of portfolio construction as well as for implementing active investment positions, a maximum of 50% of the assets held by the Sub-Fund can be subject to total return swaps. The expected percentage of the assets subject to total return swaps is up to 25%. All revenues arising from total return swaps, net of direct and indirect operational costs and fees, will be returned to the Sub-Fund.

The Sub-Fund will not enter in margin lending transactions, buy-sell back transactions and sell-buy back transactions.

5. Investor profile

The Sub-Fund is suitable for investors who have ESG preferences with an additional focus on investments guided by the fundamental values of the Catholic Church based on the main principles defined by the Italian Episcopal Conference, being the official assembly of the Catholic Church’s bishops in Italy and who are seeking capital appreciation over seven (7) years and are prepared to accept the risk of significant temporary losses and to afford to set aside the capital in the long timeframe. The Sub-Fund is suitable for both more experienced investors wishing to attain defined investment objectives, with experience with volatile products and less experienced investors including those who are interested in or informed about capital market topics but see the investment fund as a convenient investment product. The Sub-Fund is designed for the investment objective of building up capital.

6. Specific risks

Investors should carefully read section 5 (General Risk Factors) of the Prospectus before investing in the Sub-Fund. Investors should in particular note the specific risk warnings contained in section 5.14.1 of the Prospectus regarding investing in derivatives and financial derivative instruments and in section 5.14.7 of the Prospectus regarding investing in PRC. In addition, investors should also consider the following additional risks which are specific to the Sub-Fund.

The Sub-Fund will be subject to the risks associated with equities, the values of which in general fluctuate in response to the activities of individual companies, the general market and economic conditions. In particular, investors should be aware that equity and equity-related investments are subordinated in the right of payment to other corporate securities, including debt securities.

Corporate bonds are subject to the risk of the issuer’s inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of corporate bonds can be expected to decline. Corporate bonds with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

Investments particularly those made in emerging markets may be adversely affected by the possibility of expropriation or confiscatory taxation, imposition of withholding taxes on dividend or interest payments, limitations on the removal of funds or other assets of a Portfolio, political or social instability or diplomatic developments. An issuer of securities may be domiciled in a country other than the country in whose currency the instrument is denominated. The values and relative yields of investments in the securities markets of different countries, and their associated risks, are expected to change independently of each other.

Many emerging markets are undergoing a period of rapid growth and are less regulated than the world’s leading stock markets and there may be less publicly available information about companies listed on such markets than is regularly published about companies listed on other stock markets. In addition, market practices in relation to settlement of securities transactions and custody assets in emerging markets can provide increased risk to emerging markets funds.

By investing in UCITS and/or other UCIs indirectly through the Sub-Fund, the investor will bear not only his proportionate share of the Management Fee of the Sub-Fund, but also indirectly, the management and administration expenses of the underlying UCITS and/or other UCIs. The Sub-Fund may invest in units of UCITS and/or other UCIs that may be managed or sub-managed by the Investment Manager, an affiliated manager or by an unaffiliated manager. The ability of the Sub-Fund to invest in units of underlying UCITS and/or other UCIs to achieve its investment objective may be directly related to the ability of the underlying UCITS and/or other UCIs to meet their own investment objectives. The Sub-Fund will be exposed to the risks to which the underlying UCITS and/or other UCIs are exposed. These risks may include liquidity risk where the ability of the Sub-Fund to meet the liquidity requirements of its investment is directly linked to the ability of the underlying UCITS and/or other UCIs to meet their liquidity requirements.

7. Likely impacts of Sustainability Risks on the Sub-Fund's returns

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value. As such, for a company in which a Sub-Fund invests, this may be because of damage to its reputation resulting in a consequential fall in demand for its products or services, loss of key personnel, exclusion from potential business opportunities, increased costs of doing business and/or increased cost of capital. A company may also suffer the impact of fines and other regulatory sanctions. The time and resources of the company's management team may be diverted from furthering its business into dealing with the Sustainability Risk event, including changes to business practices and dealing with investigations and litigation. Sustainability Risks events may also give rise to loss of assets and/or physical loss including damage to real estate and infrastructure. The utility and value of assets held by companies to which the respective Sub-Fund is exposed may also be adversely impacted by a Sustainability Risk event. A Sustainability Risk event may arise and impact a specific investment or may have a broader impact on an economic sector, geographical or political region or country. For instance, sector and geographic Sustainability Risk events may have an impact on the investment value of the sovereign fixed income exposure of a Sub-Fund.

8. Global exposure and level of leverage

The global exposure of the Sub-Fund is calculated and monitored under the relative VaR approach. The global exposure of the Sub-Fund may not exceed twice the VaR of a reference portfolio, being the reference Benchmark (MSCI ACWI ESG Leaders Net Return EUR (Bloomberg NE703303)).

The level of leverage of the Sub-Fund, based on the delta-adjusted "sum of notionals" approach, is generally not expected to exceed 200% of the Net Asset Value. The Investment Manager will regularly monitor its leverage; the average level is not expected to be permanently close to the above-mentioned threshold and it will generally fluctuate below that level.

Nevertheless, the leverage of the Sub-Fund may occasionally exceed the level of 200% but will in any event not reach or exceed 250% of the Net Asset Value.

9. Investment Manager

ARCA Fondi SGR S.p.A.

10. Valuation

Each Business Day is a Valuation Day. The Net Asset Value per Share will be calculated as of each Valuation Day. With respect to this Sub-Fund, a Business Day is any day which is defined as a Business Day in the Prospectus.

11. Subscriptions

Each Valuation Day is a Subscription Day. The Cut-Off Time for subscription applications is 1.00 pm CET of the Subscription Day. Subscription applications must be settled by the end of the Subscription Settlement Period, which is two (2) Business Days following the Subscription Day.

12. Redemptions

Each Valuation Day is a Redemption Day. The Cut-Off Time for redemption applications is 1.00 pm CET of the Redemption Day. Redemption applications will normally be settled by the end of the Redemption Settlement Period, which is two (2) Business Days following the Redemption Day.

13. Share Classes

The table below lists all Share Classes established within the Sub-Fund. Certain Share Classes may currently not be active or may be unavailable to investors in certain jurisdictions. The list of active Share Classes currently available for subscription in each jurisdiction may be obtained from the UCI Administrator and the Global Distributor upon request or on www.siderafunds.com.

Share Class name	**Sidera Funds SICAV – Christian Equity A Acc**	**Sidera Funds SICAV – Christian Equity C Acc**
Reference Currency	EUR	EUR
Distribution (D) or Capitalisation (C)	C	C
Minimum Initial Subscription Amount	EUR 1.000	EUR 500.000
Minimum Additional Subscription Amount	EUR 500 EUR 100 in case of saving plans[11]	EUR 50.000 EUR 10.000 in case of saving plans[12]

[11] Conditions and details of saving plans are reported in the offering materials available at local level.
[12] Conditions and details of saving plans are reported in the offering materials available at local level.

Share Class name	Sidera Funds SICAV – Christian Equity A Acc	Sidera Funds SICAV – Christian Equity C Acc
Minimum Holding Amount	N.A.	N.A.
Maximum Subscription Fee received by the sub-distributor	N.A.	N.A.
Maximum Redemption Fee	N.A.	N.A.
Maximum Conversion Fee	N.A.	N.A.
Management Fee	Max 1,85% p.a.	Max 0,95% p.a.
Performance Fee	N.A.	N.A.
Data Service Provider Fee[13]	Max 0,04% p.a.	Max 0,04% p.a.
Taxe d'abonnement	0,05% p.a.	0,05% p.a.

In case the Sub-Fund invests in units/shares of UCITS or other UCIs, the maximum level of the Management Fee that may be charged both to the Sub-Fund itself and to the UCITS or other UCIs in which it invests is 2% of the subscription amount p.a..

14. Distribution policy

The Sub-Fund has only two (2) capitalisation Share Classes, the shares of which, in accordance with the provisions of the Prospectus, do not confer the right to dividend distributions and capitalise their entire earnings.

15. Eligible Investors

Classes of shares:

- Class A Acc: Shares are offered to individuals and legal entities. Class A shares are issued only in registered form.
- Class C Acc: Shares are offered to individuals and legal entities with high minimum investment. Class C shares are issued only in registered form.

[13] Subject to a minimum amount of 3.000,00 EUR p.a.

SFDR RTS ANNEX 1 – PRE-CONTRACTUAL DISCLOSURE FOR THE FINANCIAL PRODUCTS REFERRED TO IN ARTICLE 8, PARAGRAPHS 1, 2 AND 2A, OF REGULATION (EU) 2019/2088 AND ARTICLE 6, FIRST PARAGRAPH, OF REGULATION (EU) 2020/852

Product name: Sidera Funds – Euro ESG Credit (the "**Sub-Fund**")

Legal entity identifier: 5493002RLYEJJ6YVQF80

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

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

The Sub-Fund promotes the environmental and social characteristics of reducing the negative impacts of its investments on the environment and society. Such characteristics are promoted via a proprietary model developed by the Investment Manager through which investments are made in issuers whose business activities and/or conduct take an appropriate and responsible approach to ESG.

In its ESG evaluation, the Investment Manager takes into account the following environmental and social factors: climate change, resource depletion, waste and pollution, deforestation, worker conditions, gender policies, respect for human rights, health and safety, labour standards, corporate governance practices and control procedures behaviour of top management in compliance with laws and professional ethics.

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

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

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

In order to measure the attainment of the environmental and social characteristics promoted by the Sub-Fund, the Investment Manager takes into account the following sustainability indicators:

• The ESG rating of the Sub-Fund's portfolio against the ESG Index, as defined in the investment strategy section below;
• Percentage of issuers non-compliant with the Sub-Fund's exclusion criteria, as detailed in the investment strategy section below.

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

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.

The sustainable investment objectives that the financial product aims to partially achieve include climate change mitigation and adaptation.

To contribute to the above objectives, the issuer of an investment should belong to at least one index designed to exceed the minimum standards of the PAB. Among the possible investable PABs are:

- MSCI World AC Climate Paris Aligned;
- MSCI Europe Climate Paris Aligned;
- MSCI USA Climate Paris Aligned;
- MSCI EUR IG Climate Paris Aligned Corp Bond;
- MSCI USD IG Climate Paris Aligned Corp Bond;
- MSCI EUR HY Climate Paris Aligned Corp Bond; and
- MSCI USD HY Climate Paris Aligned Corp Bond.

Can also contribute to the above objectives, issuers that belong to the investable universes "Social" or "Blue" based on the internal ESG methodology.

With reference to the Social' investable universe, to enable the selection of the best issuers, a synthetic indicator is constructed using key data on social issues (e.g. gender diversity in the board of directors, gender pay gap, accident rate at work, respect for human rights, "S" rating, etc.). The universe is then made of the best 60% ranked companies.

With reference to the Blue' investable universe, in order to allow the selection of the best issuers, a synthetic indicator is constructed using key data on water and blue economy issues (e.g.: turnover generated by water and marine-related sectors, emissions and recycling policies, presence of specific targets and absence of environmental controversies, sustainability in water use, etc.). The universe is then made approximately of the best 250 ranked companies.

For investments classified as “Green Bond” and/or “Social Bond”, the contribution to the sustainable investment objectives is assessed by their belonging to the ICE BofA Green Bond Index or the ICE Social Bond Index.

The sustainable nature of an issuer is also assessed using the internal ESG rating which should be higher than BBB- on a scale from AAA (the best rating) to CCC (the worst score). In addition, to qualify as sustainable investment, the issuer must demonstrate having a stronger governance than issuers contributing to the promoted environmental and social characteristics by having an internal governance (“G”) rating of at least B-.

For details on the metrics used, please refer to the section *“What investment strategy does this financial product follow?”* of this document.

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

The Sub-Fund applies an internally developed model to ensure that sustainable investments in the portfolio do not cause significant harm to any environmental or social objectives as defined in Article 2(17) of SFDR. Specifically, the "do no significant harm" (DNSH) principle is assessed by the Investment Manager through a specific approach that involves evaluating the ESG rating, calculated using an internal model based on data from the info provider MSCI, for all sustainable investments in the portfolio. For details on this internal model for ESG rating attribution, please refer to the below investment strategy section. Each sustainable investment must have an ESG rating of at least BBB-.

In addition, to ensure that sustainable investments in the portfolio do not cause significant harm to any environmental or social objectives, the Investment Manager takes into consideration the principal adverse impacts (PAIs) on sustainability factors, as further described below.

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

Indeed, to assess the DNSH principle for sustainable investments, the Sub-Fund also considers all the mandatory PAIs listed in Table 1 of Annex 1 of the SFDR RTS, supplemented with elements from Tables 2 and 3 of Annex 1 of the SFDR RTS (specifically, PAI 13 "Non-recycled waste ratio" and PAI 2 "Rate of accidents").

The application of exclusionary screening addresses the PAI 10 on violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises, PAI 11 on the lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises and PAI 14 on contriversial weapons.

The consideration of all other PAIs is ensured by calculating the value of each PAI for the investable universe of the MSCI data provider and comparing these values with the PAI of each investment. The DNSH principle will be deemed satisfied if the sustainable investment in question does not have more than four PAIs in the bottom decile of its MSCI investable universe.

It is indeed possible that some PAIs for certain investments have a low data coverage or are not available, in which case they should fall in the bottom decile. In this case, to ensure that the

DNSH principle is respected, the investment must have a minimum ESG rating of BBB- or be subject to engagment actions. If the engagment actions do not lead to the desired outcomes within the set timeframe, the investment will not qualify as sustainable anymore.

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

The alignment of the portfolio with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights applies to all instruments in the portfolio and is ensured using the values of PAI 10, "Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises," and PAI 11, "Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises," as specified in Table 1 of Annex 1 of the SFDR RTS.

An issuer is considered aligned if it is not in violation of the UN Global Compact principles and OECD Guidelines for Multinational Enterprises or if it has in place processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises.

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

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

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

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

☒ Yes, the Sub-Fund considers the PAIs listed in Table 1 of Annex 1 of the SFDR RTS, supplemented with elements from Tables 2 and 3 of Annex 1 of the SFDR RTS (specifically, PAI 13 "Non-recycled waste ratio" and PAI 2 "Rate of accidents"). Information on the principal adverse impacts on sustainability factors will be made available in the annual report to be disclosed pursuant to Article 11(2) of SFDR.

☐ No

What investment strategy does this financial product follow?

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

The Investment Manager conducts an ESG analysis on the securities issued by the issuers by relying on its proprietary model as hereby described. For that purpose, the Investment Manager selects securities that are part of the ICE BofA Euro Large Cap Corporate Duration-Matched ESG Tilt Index (Bloomberg ELSE) (the "**ESG Index**"). The Sub-Fund is actively managed in reference to the ESG Index with significant degree of freedom.

The ESG Index is tilted toward those companies with better ESG scores with additional weighting adjustments to match its parent index interest rate exposure across rating and sector segments as closely as possible. The information used by the ESG Index provider to compile the ESG Index is based in part on proprietary information published on Sustainalytics' website. The ESG Index is continuously reviewed and rebalanced on a monthly basis by the ESG Index provider.

As part of the investment process, the Investment Manager may take exposure to companies, countries or sectors not included in and/or that have different weightings than the ESG Index. The Investment Manager may set discretionary internal risk thresholds which may reference deviations from the ESG Index. While it is expected that the Sub-Fund's financial performance deviation from the ESG Index will be moderate, there are no restrictions on the extent to which the Sub-Fund's financial performance may deviate from the one of the ESG Index.

The proprietary model underlying the investment strategy of the Sub-Fund relies on:

- **ESG rating of investments**

The Investment Manager has developed a proprietary model that, based on data from the info provider MSCI, assigns an ESG score/rating to all financial instruments in the portfolio (excluding unrated instruments, liquidity management instruments, derivatives used for hedging purposes, etc.). In addition to the aggregate ESG score, data is also available for each of the three "pillars": E (Environmental), S (Social), and G (Governance).

The calculation of the ESG rating for a Sub-Fund, portfolio, or index (or benchmark) is based on the determination of the weighted sum of the ratings of the securities in the portfolio and can range from 0 to 10, according to the following pillar weights: 50%E + 25%S + 25%G. This score is then translated into a rating ranging from CCC (the lowest grade) to AAA (the highest grade).

The Investment Manager adopts a rigorous approach, requiring that the Sub-Fund's portfolio must have an overall ESG rating higher than or equal to that of the ESG Index.

The Investment Manager's Compliance Department is responsible for verifying adherence to the ratings and criteria established by the Investment Manager's ESG Policy and for evaluating the need to update the blacklist (i.e. the list of companies excluded from the investment universe), involving the ESG Committee as necessary. The results of these checks are promptly communicated to the relevant departments and reported monthly to the risk and regulatory compliance committee, as well as the Board of Directors. Quarterly updates are also provided to the internal control committee.

The consistency of portfolio adherence to ESG principles is automatically monitored through specific algorithms embedded in Investment Manager's control systems. In fact, the Investment Manager's control systems, supported by specific algorithms, automatically monitor portfolio adherence to ESG principles. In cases where an investment no longer qualifies as aligned with

E/S characteristics or as a sustainable investment, divestment is considered as the primary course of action.

- **Exclusion criteria**

  - Securities from issuers evaluated as “not aligned with environmental, social, and governance themes” cannot be directly invested in the Sub-Fund portfolio (blacklist of government issuers/"controversial weapons" sector, exclusion of sectors such as “aerospace & defence, casino & gaming, and tobacco,” exclusion of all financial instruments associated with a “red flag” indicating involvement in a severe ESG dispute regarding operations and/or products).
  - Penalisation of the score of securities involved in the following corporate sectors, Aerospace & Defence due to their involvement in the weapons industry and military contracting, Casinos & Gaming due to their socially harmful activities in the rating model by attributing to these sectors a score equal to the minimum between the score provided by MSCI and the upper bound of the CCC rating band.
  - Application of two blacklists maintained by the Investment Manager which exclude:
    - Government bonds issued by countries and corporate sectors that are deemed not eligible for investments. Countries will enter this blacklist upon decision of an ESG Committee, based on the assessment of their respect of social and civil rights or if subject to international sanctions.
    - Companies active in the non-conventional weapons production (landmines, cluster munitions, chemical weapons and biological weapons).
  - Exclusion of issuers in violation of the UN Global Compact principles and OECD Guidelines for Multinational Enterprises and/or issuers that do not have in place processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises.

In addition to the above-described exclusions, the Sub-Fund applies the PAB Exclusions in line with the regulatory requirements set out by the ESMA in the Guidelines on funds’ names using ESG or sustainability-related terms.

- **Selection of investments**

- A security is deemed to promote environmental and/or social characteristics when:
  - The issuer belongs to at least one index that applies specific inclusion/exclusion policies regarding ESG factors. The identified indices, which belong to the “Best-in-Class” family (securities from companies with high environmental, social, and governance performance compared to their sector peers) or are designed to exceed the minimum standards of the PAB, are as follows: MSCI World AC ESG Leaders, MSCI World AC Climate Paris Aligned, MSCI Europe Climate Paris Aligned, MSCI USA Climate Paris Aligned, MSCI EUR IG Climate Paris Aligned Corp Bond, MSCI USD IG Climate Paris Aligned Corp Bond, MSCI EUR HY Climate Paris Aligned Corp Bond, MSCI USD HY Climate Paris Aligned Corp Bond. The issuer must also have an ESG rating of at least BBB-.
  - The issuer belongs to the investable universe (proprietary methodology) “Social,” “Blue,” or other internally created ESG investable universes. The issuer must also have an ESG rating of at least BBB-.
  - It is classified as a “Green Bond” and/or “Social Bond” or belongs to an index among those identified (ICE BofA Green Bond Index, ICE Social Bond Index).

- A security is considered a sustainable investment within the meaning of SFDR when, in addition to passing the DNSH test as referred to above:

- The issuer belongs to at least one index designed to exceed the minimum standards of the PAB (MSCI World AC Climate Paris Aligned, MSCI Europe Climate Paris Aligned, MSCI USA Climate Paris Aligned, MSCI EUR IG Climate Paris Aligned Corp Bond, MSCI USD IG Climate Paris Aligned Corp Bond, MSCI EUR HY Climate Paris Aligned Corp Bond, MSCI USD HY Climate Paris Aligned Corp Bond). The issuer must also have an ESG rating of at least BBB-, an internal "G" rating of at least B- (details in other sections of this document) and must account for the PAIs (for details, refer to other sections of this document);
- The issuer belongs to the investable universe (proprietary methodology) "Social," "Blue," or other internally created ESG investable universes. The issuer must also have an ESG rating of at least BBB an internal "G" rating of at least B- (details in other sections of this document), and must account for the PAIs (for details, refer to other sections of this document);
- It is classified as a "Green Bond" and/or "Social Bond" or belongs to an index among those identified (ICE BofA Green Bond Index, ICE Social Bond Index).

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

The binding criteria used by the Investment Manager to select the investments are the following:

- The Sub-Fund's portfolio must have an overall ESG rating higher than or equal to that of the ESG Index.
- The Sub-Fund will not make any investments in companies not complying with the exclusion criteria as referred in the section above.
- The Sub-Fund will only invest in companies having an ESG rating above BBB- for the purpose of promoting environmental and/or social characteristics as per the above-mentioned performed assessment.
- The Sub-Fund will only make sustainable investments in issuers belonging to at least one index designed to exceed the minimum standards of the PAB and rated at least BBB.

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

The Sub-Fund currently does not set a minimum rate to reduce the scope of investments considered before applying this investment strategy.

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

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

To evaluate the governance practices of the investee companies, the Investment Manager relies on governance information provided by the MSCI info provider and assesses it appropriately. Compliance with good governance practices is verified through the exclusion of the "red flag on governance," which indicates involvement in a serious governance-related controversy, through careful monitoring of issuers within the investable universe of the Sub-Fund, and through integration into the Investment Manager's evaluation model (ESG rating), which includes the "G" pillar that accounts for governance factors (such as corporate governance practices, any governance-related controversies, procedures for monitoring top management's behavior in compliance with laws and professional ethics, etc.). In addition to the above, the Investment Manager has defined a further criterion for sustainable investments: the issuer must present a "G" rating, calculated through the internal model, of at least B-.

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

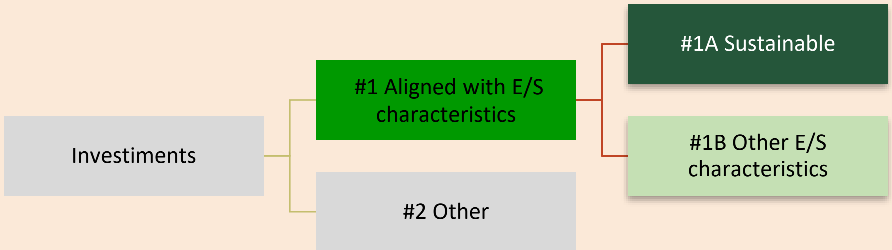
What is the asset allocation planned for this financial product?

At least 80% of the Sub-Fund's Net Asset Value will be invested in securities which are aligned with the environmental and social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics).

In addition, the share of sustainable investments is set at a minimum of 50% of the Sub-Fund's Net Asset Value.

The Sub-Fund is allowed to invest a maximum of 20% of the Net Asset Value in investments that are not aligned with the E/S characteristics promoted and that may include investments in liquid assets held mainly for cash management purposes, investments in securities held mainly for efficient portfolio management purposes, and/or for which there is insufficient data to be considered an ESG-related investment (#2 Other).

The Sub-Fund intends to increase the allocation to "#1 Aligned with E/S characteristics" should the investible universe evolve to allow a higher level of investment.



#1 Aligned with E/S characteristics includes the investments of the financial product used to meet the environmental or social characteristics promoted by the financial product.
#2 Others includes the remaining investments of the financial product that are neither aligned with environmental or social characteristics, nor considered sustainable investments.
The category #1 Aligned with E/S characteristics includes:
- Subcategory #1A Sustainable, which includes sustainable investments with environmental or social objectives;
- Subcategory #1B Other E/S characteristics, which includes investments aligned with environmental or social characteristics but not considered sustainable investments.

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

Derivatives used for investment purposes are subject to compliance with the above-described ESG analysis. In case of index derivatives, a look through is applied.

The Sub-Fund may also hold derivatives for hedging purposes. In this case, net short positions on single name derivatives or net short positions on index derivatives are excluded from the ESG analysis.

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

The Sub-Fund does not currently commit to invest a minimum proportion of "sustainable investments" with an environmental objective aligned with the EU Taxonomy. However, the position is kept under review as the underlying rules are finalized and the availability of reliable data increases over time. Consequently, the Sub-Fund's commitment to make "environmentally sustainable investments" within the meaning of the EU Taxonomy Regulation is set at 0%.

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

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

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

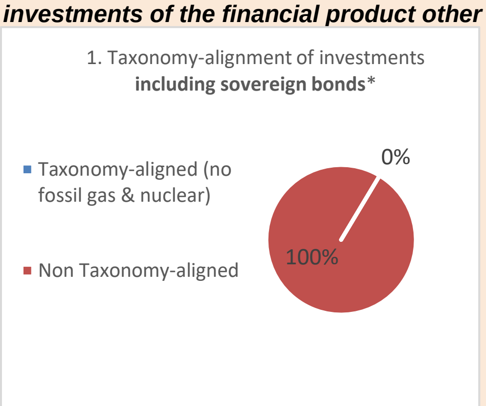
- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[14]?***

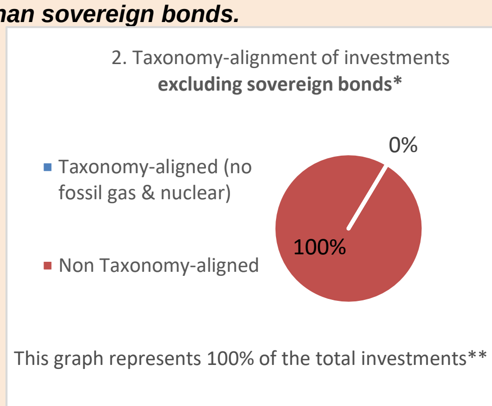
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

The two graphs below show in blue 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 proportion of total investments shown in this graph is purely indicative and may vary.*

At the moment, detailed data related to taxonomy in activities connected to fossil gas and nuclear are not available, therefore only the aggregated value is provided.

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

As the Sub-Fund does not commit to invest any "sustainable investment" within the meaning of the Taxonomy Regulation, the minimum share of investments in transitional and enabling activities within the meaning of the Taxonomy Regulation is therefore also set at 0%.

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

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

The Sub-Fund commits to a minimum proportion of 50% of sustainable investments with an environmental objective aligned with SFDR in economic activities that are not aligned with the EU Taxonomy and/or with a social objective. These investments could be aligned with the EU Taxonomy but the Investment Manager is not currently in a position to specify the exact proportion of the Sub-Fund's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

[14] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left-hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in the SFDR RTS.

What is the minimum share of socially sustainable investments?

Not applicable.

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

#2 "Other" investments may include investments in:

- Liquid assets (cash and cash equivalents, time and term deposits) held for the purposes of servicing the day-to-day requirements of the Sub-Fund,
- Currency derivatives, repurchase agreement, interest rate swaps, government bonds with IR Duration lower than one (1) year held for the purposes of efficient portfolio management,
- Own or third party funds with an ESG rating coverage lower than 65% or investments for which there is insufficient data to be considered investments aligned with E/S characteristics or sustainable investments,
- Sovereign bond instruments not classified as green bonds and/or social bonds.

#2 "Other" investments do not follow any minimum environmental or social safeguards.

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

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

Not applicable.

Where can I find more product specific information online?

More product-specific information can be found on the website: https://www.siderafunds.com/en/sustainability.html

SFDR RTS ANNEX 2 – PRE-CONTRACTUAL DISCLOSURE FOR THE FINANCIAL PRODUCTS REFERRED TO IN ARTICLE 8, PARAGRAPHS 1, 2 AND 2A, OF REGULATION (EU) 2019/2088 AND ARTICLE 6, FIRST PARAGRAPH, OF REGULATION (EU) 2020/852

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Product name: Sidera Funds – Global Income Opportunities (the "**Sub-Fund**")

Legal entity identifier: 5493002LW6FLGWJ4U062

Environmental and/or social characteristics

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

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

The Sub-Fund promotes the environmental and social characteristics of reducing the negative impacts of its investments on the environment and society. Such characteristics are promoted via a proprietary model developed by the Investment Manager through which investments are made in issuers whose business activities and/or conduct take an appropriate and responsible approach to ESG.

In its ESG evaluation, the Investment Manager takes into account the following environmental and social factors: climate change, resource depletion, waste and pollution, deforestation, worker conditions, gender policies, respect for human rights, health and safety, labor standards, corporate governance practices and control procedures behaviour of top management in compliance with laws and professional ethics.

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

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

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

In order to measure the attainment of the environmental and social characteristics promoted by the Sub-Fund, the Investment Manager takes into account the following sustainability indicators:

• The ESG rating of the Sub-Fund's portfolio against the ESG Indices, as defined in the investment strategy section below;
• Petrcentage of issuers non-compliant with the Sub-Fund's exclusion criteria, as detailed in the investment strategy section below.

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

  Not applicable.

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

  Not applicable.

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

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

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

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

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

☐ Yes

☒ No

What investment strategy does this financial product follow?

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

The Investment Manager conducts an ESG analysis on the securities issued by the issuers by relying on its proprietary model as hereby described. For that purpose, the Investment Manager selects securities that are part of the composite Benchmark comprised of 50% MSCI EUR High Yield ESG Leaders Corporate Bond Index (Bloomberg MFLEHYEL) and 50% ICE BofA 1-5 Year BBB & Lower Sovereign External Debt Carbon Reduction Constrained Index hedged (Bloomberg IVCR) (the "**ESG Indices**"). The Sub-Fund is actively managed in reference to the ESG Indices with significant degree of freedom.

50% MSCI EUR High Yield ESG Leaders Corporate Bond Index is a market value-weighted index designed to represent the performance of fixed income securities from issuers that are selected from an underlying index based on ESG criteria. The information used by the ESG Indices provider to compile the ESG Indices is based in part on proprietary information published on Sustainalytics' website.

ICE BofA 1-5 Year BBB & Lower Sovereign External Debt Carbon Reduction Constrained Index hedged tilts country weights in order to lower the weighted average carbon footprint of the overall index while minimizing the tracking error versus the starting capitalization-weighted Parent Index. The information used is based, in part, on CO2 per capita data published by Emissions Database for Global Atmospheric Research (EDGAR Carbon Data Report).

The ESG Indices are continuously reviewed and rebalanced on a monthly basis by the ESG Indices provider.

As part of the investment process, the Investment Manager may take exposure to companies, countries or sectors not included in and/or that have different weightings than the ESG Indices. The Investment Manager may set discretionary internal risk thresholds which may reference deviations from the ESG Indices. While it is expected that the Sub-Fund's financial performance deviation from the ESG Indices will be moderate, there are no restrictions on the extent to which the Sub-Fund's financial performance may deviate from the one of the ESG Indices.

The proprietary model underlying the investment strategy of the Sub-Fund relies on:

- **ESG rating of investments**

The Investment Manager has developed a proprietary model that, based on data from the info provider MSCI, assigns an ESG score/rating to all financial instruments in the portfolio (excluding unrated instruments, liquidity management instruments, derivatives used for hedging purposes, etc.). In addition to the aggregate ESG score, data is also available for each of the three "pillars": E (Environmental), S (Social), and G (Governance).

The calculation of the ESG rating for a Sub-Fund, portfolio, or index (or benchmark) is based on the determination of the weighted sum of the ratings of the securities in the portfolio and can range from 0 to 10, according to the following pillar weights: 50%E + 25%S + 25%G. This score is then translated into a rating ranging from CCC (the lowest grade) to AAA (the highest grade).

The Investment Manager adopts a rigorous approach, requiring that the Sub-Fund's portfolio must have an overall ESG rating higher than or equal to that of the ESG Indices.

The Investment Manager's Compliance Department is responsible for verifying adherence to the ratings and criteria established by the Investment Manager's ESG Policy and for evaluating the need to update the blacklist (i.e. the list of companies excluded from the investment universe), involving the ESG Committee as necessary. The results of these checks are promptly communicated to the relevant departments and reported monthly to the risk and regulatory compliance committee, as well as the Board of Directors. Quarterly updates are also provided to the internal control committee.

The consistency of portfolio adherence to ESG principles is automatically monitored through specific algorithms embedded in Investment Manager's control systems. In fact, the Investment Manager's control systems, supported by specific algorithms, automatically monitor portfolio adherence to ESG principles. In cases where an investment no longer qualifies as aligned with E/S characteristics, divestment is considered as the primary course of action.

- **<u>Exclusion criteria</u>**

- Securities from issuers evaluated as "not aligned with environmental, social, and governance themes" cannot be directly invested in the Sub-Fund portfolio (blacklist of government issuers/"controversial weapons" sector, exclusion of sectors such as "aerospace & defence, casino & gaming, and tobacco," exclusion of all financial instruments associated with a "red flag" indicating involvement in a severe ESG dispute regarding operations and/or products).
- Penalisation of the score of securities involved in the following corporate sectors, Aerospace & Defence due to their involvement in the weapons industry and military contracting, Casinos & Gaming due to their socially harmful activities in the rating model by attributing to these sectors a score equal to the minimum between the score provided by MSCI and the upper bound of the CCC rating band.
- Application of two blacklists maintained by the Investment Manager which exclude:
    - Government bonds issued by countries and corporate sectors that are deemed not eligible for investments. Countries will enter this blacklist upon decision of an ESG Committee, based on the assessment of their respect of social and civil rights or if subject to international sanctions.
    - Companies active in the non-conventional weapons production (landmines, cluster munitions, chemical weapons and biological weapons).
- Exclusion of issuers in violation of the UN Global Compact principles and OECD Guidelines for Multinational Enterprises and/or issuers that do not have in place processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises.

- **<u>Selection of investments</u>**

A security is deemed to promote environmental and/or social characteristics when:

- The issuer belongs to at least one index that applies specific inclusion/exclusion policies regarding ESG factors. The identified indices, which belong to the "Best-in-Class" family (securities from companies with high environmental, social, and governance performance compared to their sector peers) or are designed to exceed the minimum standards of the PAB, are as follows: MSCI World AC ESG Leaders, MSCI World AC Climate Paris Aligned, MSCI Europe Climate Paris Aligned, MSCI

USA Climate Paris Aligned, MSCI EUR IG Climate Paris Aligned Corp Bond, MSCI USD IG Climate Paris Aligned Corp Bond, MSCI EUR HY Climate Paris Aligned Corp Bond, MSCI USD HY Climate Paris Aligned Corp Bond. The issuer must also have an ESG rating of at least BBB-.
  - The issuer belongs to the investable universe (proprietary methodology) “Social,” “Blue,” or other internally created ESG investable universes. The issuer must also have an ESG rating of at least BBB-.
  - It is classified as a “Green Bond” and/or “Social Bond” or belongs to an index among those identified (ICE BofA Green Bond Index, ICE Social Bond Index).

With reference to the Social’ investable universe, to enable the selection of the best issuers, a synthetic indicator is constructed using key data on social issues (e.g. gender diversity in the board of directors, gender pay gap, accident rate at work, respect for human rights, “S” rating, etc.). The universe is then made of the best 60% ranked companies.

With reference to the Blue' investable universe, in order to allow the selection of the best issuers, a synthetic indicator is constructed using key data on water and blue economy issues (e.g.: turnover generated by water and marine-related sectors, emissions and recycling policies, presence of specific targets and absence of environmental controversies, sustainability in water use, etc.). The universe is then made approximately of the best 250 ranked companies.

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

The binding criteria used by the Investment Manager to select the investments are the following:

- The Sub-Fund’s portfolio must have an overall ESG rating higher than or equal to that of the ESG Indices.
- The Sub-Fund will not make any investments in companies not complying with the exclusion criteria as referred in the section above.
- The Sub-Fund will only invest in companies having an ESG rating above BBB- for the purpose of promoting environmental and/or social characteristics as per the above-mentioned performed assessment.

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

  The Sub-Fund currently does not set a minimum rate to reduce the scope of investments considered before applying this investment strategy.

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

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

To evaluate the governance practices of the investee companies, the Investment Manager relies on governance information provided by the MSCI info provider and assesses it appropriately. Compliance with good governance practices is verified through the exclusion of the "red flag on governance," which indicates involvement in a serious governance-related controversy, through careful monitoring of issuers within the investable universe of the Sub-Fund, and through integration into the Investment Manager’s evaluation model (ESG rating), which includes the "G" pillar that accounts for governance factors (such as corporate governance practices, any governance-related controversies, procedures for monitoring top management's behavior in compliance with laws and professional ethics, etc.).

Asset allocation describes the share of investments in specific assets.

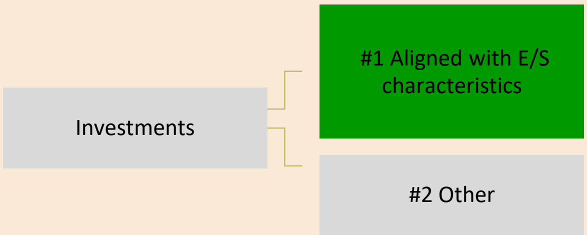
Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure**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

What is the asset allocation planned for this financial product?

At least 50% of the Sub-Fund's Net Asset Value will be invested in securities which are aligned with the environmental and social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics).

The Sub-Fund is allowed to invest a maximum of 50% of the Net Asset Value in investments that are not aligned with the E/S characteristics promoted and that may include investments in liquid assets held mainly for cash management purposes, investments in securities held mainly for efficient portfolio management purposes, and/or for which there is insufficient data to be considered an ESG-related investment (#2 Other).

The Sub-Fund intends to increase the allocation to "#1 Aligned with E/S characteristics" should the investible universe evolve to allow a higher level of investment.



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

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

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

Derivatives used for investment purposes are subject to compliance with the above-described ESG analysis. In case of index derivatives, a look through is applied.

The Sub-Fund may also hold derivatives for hedging purposes. In this case, net short positions on single name derivatives or net short positions on index derivatives are excluded from the ESG analysis.

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

The Sub-Fund promotes environmental and social characteristics but does not currently commit to making any sustainable investments within the meaning of the SFDR or the Taxonomy Regulation.

As a consequence, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation and the proportion of the Sub-Fund's assets invested in such environmentally sustainable economic activities is currently estimated to be 0%.

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

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

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

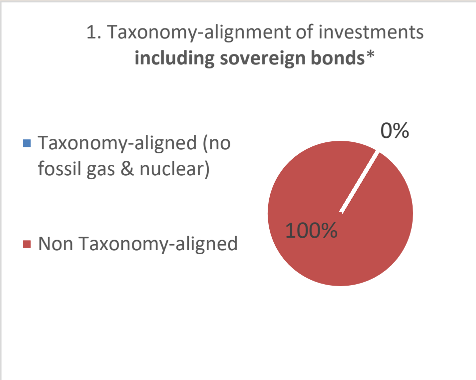
- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[15]?***

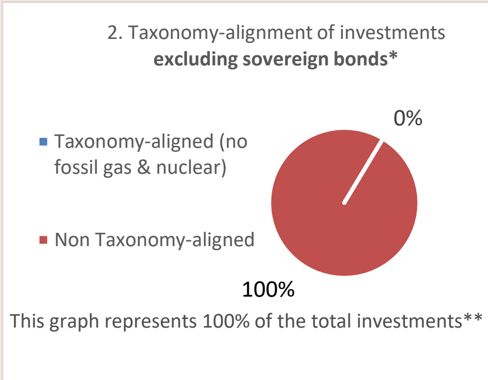
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

The two graphs below show in blue 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 proportion of total investments shown in this graph is purely indicative and may vary.*

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

As the Sub-Fund does not commit to invest any "sustainable investment" within the meaning of the Taxonomy Regulation, the minimum share of investments in transitional and enabling activities within the meaning of the Taxonomy Regulation is therefore also set at 0%.

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

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

The Sub-Fund promotes environmental and social characteristics, but does not commit to making any sustainable investments. As a consequence, the Sub-Fund does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

[15] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left-hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in the SFDR RTS.

What is the minimum share of socially sustainable investments?

Not applicable.

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

#2 "Other" Investments may include investments in:

- liquid assets (cash and cash equivalents and time and term deposits) held for the purposes of servicing the day-to-day requirements of the Sub-Fund,
- currency derivatives, repurchase agreements, interest rate swaps, government bonds with IR Duration lower than one (1) year held for the purposes of efficient portfolio management,
- own or third party funds with an ESG rating coverage lower than 65% or investments for which there is insufficient data to be considered ESG-related Investment,
- Sovereign bond instruments not classified as green bonds and/or social bonds.

#2 "Other" investments do not follow any minimum environmental or social safeguards.

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

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

Not applicable.

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.siderafunds.com/en/sustainability.html

SFDR RTS ANNEX 3 – PRE-CONTRACTUAL DISCLOSURE FOR THE FINANCIAL PRODUCTS REFERRED TO IN ARTICLE 8, PARAGRAPHS 1, 2 AND 2A, OF REGULATION (EU) 2019/2088 AND ARTICLE 6, FIRST PARAGRAPH, OF REGULATION (EU) 2020/852

Product name: Sidera Funds – Digital Worlds (the "**Sub-Fund**")

Legal entity identifier: 635400U8NRYRYVJIJO87

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

●● Yes	●○ ☒ No
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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

The Sub-Fund promotes the environmental and social characteristics of reducing the negative impacts of its investments on the environment and society. Such characteristics are promoted via a proprietary model developed by the Investment Manager through which investments are made in issuers whose business activities and/or conduct take an appropriate and responsible approach to ESG.

In its ESG evaluation, the Investment Manager takes into account the following environmental and social factors: climate change, resource depletion, waste and pollution, deforestation, worker conditions, gender policies, respect for human rights, health and safety, labor standards, corporate governance practices and control procedures behavior of top management in compliance with laws and professional ethics.

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

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

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

In order to measure the attainment of the environmental and social characteristics promoted by the Sub-Fund, the Investment Manager takes into account the following sustainability indicators:

- The ESG rating of the Sub-Fund's portfolio against the ESG Indices, as defined in the investment strategy section below;
- Percentage of issuers non-compliant with the Sub-Fund's exclusion criteria, as detailed in the investment strategy section below.

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

  Not applicable.

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

  Not applicable.

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

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

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

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

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

☐ Yes

☒ No

What investment strategy does this financial product follow?

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

The Investment Manager conducts an ESG analysis on the securities issued by these issuers by relying on its propriety model as hereby described. For that purpose, the Investment Manager selects securities that are part of the MSCI AC World IMI Digital Economy ESG Filtered Net TR (Bloomberg NE727240) (the "**ESG Index**") and to which the Sub-Fund refers.

The ESG Index excludes securities of companies with certain business involvement such as nuclear weapons, controversial weapons, civilian firearms, tobacco, thermal coal, oil sands and UN Global Compact Violators. In addition, companies with MSCI ESG rating of 'CCC' and MSCI ESG Controversy score of '0' are excluded from the ESG Index.

As part of the investment process, the Investment Manager may take exposure to companies, countries or sectors not included in and/or that have different weightings than the ESG Index. The Investment Manager may set discretionary internal risk thresholds which may deviate from the ESG Index. While it is expected that the Sub-Fund's financial performance deviation from the ESG Index will be moderate, there are no restrictions on the extent to which the Sub-Fund's financial performance may deviate from the one of the ESG Index.

The proprietary model underlying the investment strategy of the Sub-Fund relies on:

- **ESG rating of investments**

The Investment Manager has developed a proprietary model that, based on data from the info provider MSCI, assigns an ESG score/rating to all financial instruments in the portfolio (excluding unrated instruments, liquidity management instruments, derivatives used for hedging purposes, etc.). In addition to the aggregate ESG score, data is also available for each of the three "pillars": E (Environmental), S (Social), and G (Governance).

The calculation of the ESG rating for a Sub-Fund, portfolio, or index (or benchmark) is based on the determination of the weighted sum of the ratings of the securities in the portfolio and can range from 0 to 10, according to the following pillar weights: 50%E + 25%S + 25%G. This score is then translated into a rating ranging from CCC (the lowest grade) to AAA (the highest grade).

The Investment Manager adopts a rigorous approach, requiring that the Sub-Fund's portfolio must have an overall ESG rating higher than or equal to that of the ESG Indices.

The Investment Manager's Compliance Department is responsible for verifying adherence to the ratings and criteria established by the Investment Manager's ESG Policy and for evaluating the need to update the blacklist (i.e. the list of companies excluded from the investment universe), involving the ESG Committee as necessary. The results of these checks are promptly communicated to the relevant departments and reported monthly to the risk and regulatory compliance committee, as well as the Board of Directors. Quarterly updates are also provided to the internal control committee.

The consistency of portfolio adherence to ESG principles is automatically monitored through specific algorithms embedded in Investment Manager's control systems. In fact, the Investment Manager's control systems, supported by specific algorithms, automatically monitor portfolio adherence to ESG principles. In cases where an investment no longer qualifies as aligned with E/S characteristics, divestment is considered as the primary course of action.

- **Exclusion criteria**

- Securities from issuers evaluated as "not aligned with environmental, social, and governance themes" cannot be directly invested in the Sub-Fund portfolio (blacklist of government issuers/"controversial weapons" sector, exclusion of sectors such as "aerospace & defence, casino & gaming, and tobacco," exclusion of all financial instruments associated with a "red flag" indicating involvement in a severe ESG dispute regarding operations and/or products).
- Penalisation of the score of securities involved in the following corporate sectors, Aerospace & Defence due to their involvement in the weapons industry and military contracting, Casinos & Gaming due to their socially harmful activities in the rating model by attributing to these sectors a score equal to the minimum between the score provided by MSCI and the upper bound of the CCC rating band.
- Application of two blacklists maintained by the Investment Manager which exclude:
  - Government bonds issued by countries and corporate sectors that are deemed not eligible for investments. Countries will enter this blacklist upon decision of an ESG Committee, based on the assessment of their respect of social and civil rights or if subject to international sanctions.
  - Companies active in the non-conventional weapons production (landmines, cluster munitions, chemical weapons and biological weapons).
- Exclusion of issuers in violation of the UN Global Compact principles and OECD Guidelines for Multinational Enterprises and/or issuers that do not have in place processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises.

- **Selection of investments**

A security is deemed to promote environmental and/or social characteristics when:

- The issuer belongs to at least one index that applies specific inclusion/exclusion policies regarding ESG factors. The identified indices, which belong to the "Best-in-Class" family (securities from companies with high environmental, social, and governance performance compared to their sector peers) or are designed to exceed the minimum standards of the PAB, are as follows: MSCI World AC ESG Leaders, MSCI World AC Climate Paris Aligned, MSCI Europe Climate Paris Aligned, MSCI USA Climate Paris Aligned, MSCI EUR IG Climate Paris Aligned Corp Bond, MSCI USD IG Climate Paris Aligned Corp Bond, MSCI EUR HY Climate Paris Aligned Corp Bond, MSCI USD HY Climate Paris Aligned Corp Bond. The issuer must also have an ESG rating of at least BBB-.
- The issuer belongs to the investable universe (proprietary methodology) "Social," "Blue," or other internally created ESG investable universes. The issuer must also have an ESG rating of at least BBB-.
- It is classified as a "Green Bond" and/or "Social Bond" or belongs to an index among those identified (ICE BofA Green Bond Index, ICE Social Bond Index).

With reference to the Social' investable universe, to enable the selection of the best issuers, a synthetic indicator is constructed using key data on social issues (e.g. gender diversity in the board of directors, gender pay gap, accident rate at work, respect for human rights, "S" rating, etc.). The universe is then made of the best 60% ranked companies.

With reference to the Blue' investable universe, in order to allow the selection of the best issuers, a synthetic indicator is constructed using key data on water and blue economy issues (e.g.: turnover generated by water and marine-related sectors, emissions and recycling policies, presence of specific targets and absence of environmental controversies, sustainability in water use, etc.). The universe is then made approximately of the best 250 ranked companies.

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

The binding criteria used by the Investment Manager to select the investments are the following:

- The Sub-Fund's portfolio must have an overall ESG rating higher than or equal to that of the ESG Index.
- The Sub-Fund will not make any investments in companies not complying with the exclusion criteria as referred in the section above.
- The Sub-Fund will only invest in companies having an ESG rating above BBB- for the purpose of promoting environmental and/or social characteristics as per the above-mentioned performed assessment.

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

The Sub-Fund currently does not set a minimum rate to reduce the scope of investments considered before applying this investment strategy.

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

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

To evaluate the governance practices of the investee companies, the Investment Manager relies on governance information provided by the MSCI info provider and assesses it appropriately. Compliance with good governance practices is verified through the exclusion of the "red flag on governance," which indicates involvement in a serious governance-related controversy, through careful monitoring of issuers within the investable universe of the Sub-Fund, and through integration into the Investment Manager's evaluation model (ESG rating), which includes the "G" pillar that accounts for governance factors (such as corporate governance practices, any governance-related controversies, procedures for monitoring top management's behavior in compliance with laws and professional ethics, etc.).

Asset allocation describes the share of investments in specific assets.

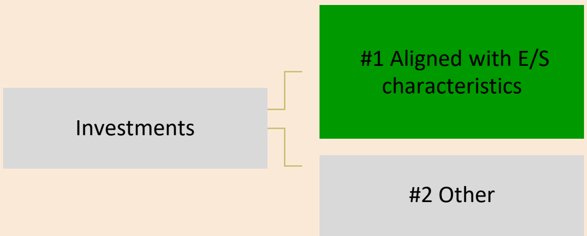
What is the asset allocation planned for this financial product?

At least 50% of the Sub-Fund's Net Asset Value will be invested in securities which are aligned with the environmental and social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics)

The Sub-Fund is allowed to invest a maximum of 50% of the Net Asset Value in investments that are not aligned with the E/S characteristics promoted and that may include investments in liquid assets held mainly for cash management purposes, investments in securities held mainly for efficient portfolio management purposes, and/or for which there is insufficient data to be considered an ESG-related investment (#2 Other).

The Sub-Fund intends to increase the allocation to "#1 Aligned with E/S characteristics" should the investible universe evolve to allow a higher level of investment.

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



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.
#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

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

Derivatives used for investment purposes are subject to compliance with the above-described ESG analysis. In case of index derivatives, a look through is applied.

The Sub-Fund may also hold derivatives for hedging purposes. In this case, net short positions on single name derivatives or net short positions on index derivatives are excluded from the ESG analysis.

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

The Sub-Fund promotes environmental and social characteristics but does not currently commit to making any sustainable investments within the meaning of the SFDR or the Taxonomy Regulation.

As a consequence, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation and the proportion of the Sub-Fund's assets invested in such environmentally sustainable economic activities is 0%.

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

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

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

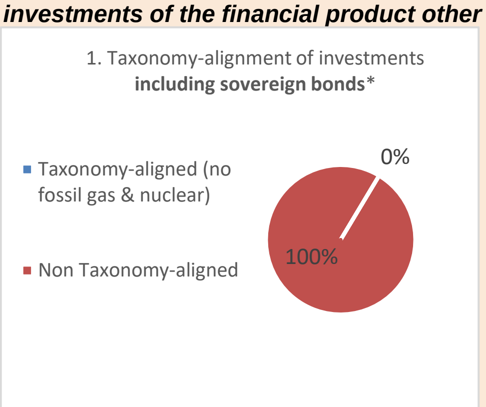
- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that Taxonomy[16]?***

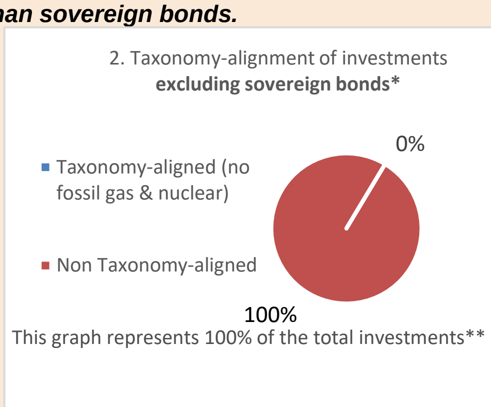
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

The two graphs below show in blue 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 proportion of total investments shown in this graph is purely indicative and may vary.*

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

As the Sub-Fund does not commit to invest any "sustainable investment" within the meaning of the Taxonomy Regulation, the minimum share of investments in transitional and enabling activities within the meaning of the Taxonomy Regulation is therefore also set at 0%.

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

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

The Sub-Fund promotes environmental and social characteristics, but does not commit to making any sustainable investments. As a consequence, the Sub-Fund does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

[16] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left-hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in the SFDR RTS.

What is the minimum share of socially sustainable investments?

Not applicable.

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

#2 “Other” Investments may include:

- investments in liquid assets (cash and cash equivalents, time and term deposits) held for the purposes of servicing the day-to-day requirements of the Sub-fund,
- currency derivatives, repurchase agreements, interest ratesSwaps, government bonds with IR Duration lower than 1 year held for the purposes of efficient portfolio management,
- own or third party funds with an ESG rating coverage lower than 65% or investments for which there is insufficient data to be considered ESG-related investment,
- Sovereign bond instruments not classified as green bonds and/or social bonds.

#2 “Other” investments do not follow any minimum environmental or social safeguards.

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

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

Not applicable.

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.siderafunds.com/en/sustainability.html

SFDR RTS ANNEX 4 – PRE-CONTRACTUAL DISCLOSURE FOR THE FINANCIAL PRODUCTS REFERRED TO IN ARTICLE 8, PARAGRAPHS 1, 2 AND 2A, OF REGULATION (EU) 2019/2088 AND ARTICLE 6, FIRST PARAGRAPH, OF REGULATION (EU) 2020/852

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Product name: Sidera Funds SICAV – Christian Equity (the "**Sub-Fund**")

Legal entity identifier: 635400WUUOOVIBTSF238

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

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

The Sub-Fund promotes the environmental and social characteristics of reducing the negative impacts of its investments on the environment and society. Such characteristics are promoted via a proprietary model developed by the Investment Manager through which investments are made in issuers whose business activities and/or conduct take an appropriate and responsible approach to ESG.

In its ESG evaluation, the Investment Manager takes into account the following environmental and social factors: climate change, resource depletion, waste and pollution, deforestation, worker conditions, gender policies, respect for human rights, health and safety, labor standards, corporate governance practices and control procedures behavior of top management in compliance with laws and professional ethics.

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

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

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

In order to measure the attainment of the environmental and social characteristics promoted by the Sub-Fund, the Investment Manager takes into account the following sustainability indicators:

- The ESG rating of the Sub-Fund's portfolio against the ESG Index, as defined in the investment strategy section below;
- Percentage of issuers non-compliant with the Sub-Fund's exclusion criteria, as detailed in the investment strategy section below.

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

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

The sustainable investment objectives that the financial product aims to partially achieve include climate change mitigation and adaptation.

To contribute to the above objectives, the issuer of an investment should belong to at least one index designed to exceed the minimum standards of the PAB. Among the possible investable PABs are:

- MSCI World AC Climate Paris Aligned;
- MSCI Europe Climate Paris Aligned;
- MSCI USA Climate Paris Aligned;
- MSCI EUR IG Climate Paris Aligned Corp Bond;
- MSCI USD IG Climate Paris Aligned Corp Bond;
- MSCI EUR HY Climate Paris Aligned Corp Bond; and
- MSCI USD HY Climate Paris Aligned Corp Bond.

Can also contribute to the above objectives, issuers that belong to the investable universes "Social" or "Blue" based on the internal ESG methodology.

With reference to the Social' investable universe, to enable the selection of the best issuers, a synthetic indicator is constructed using key data on social issues (e.g. gender diversity in the board of directors, gender pay gap, accident rate at work, respect for human rights, "S" rating, etc.). The universe is then made of the best 60% ranked companies.

With reference to the Blue' investable universe, in order to allow the selection of the best issuers, a synthetic indicator is constructed using key data on water and blue economy issues (e.g.: turnover generated by water and marine-related sectors, emissions and recycling policies, presence of specific targets and absence of environmental controversies, sustainability in water use, etc.). The universe is then made approximately of the best 250 ranked companies.

For investments classified as “Green Bond” and/or “Social Bond”, the contribution to the sustainable investment objectives is assessed by their belonging to the ICE BofA Green Bond Index or the ICE Social Bond Index.

The sustainable nature of an issuer is also assessed using the internal ESG rating which should be higher than BBB- on a scale from AAA (the best rating) to CCC (the worst score). In addition, to qualify as sustainable investment, the issuer must demonstrate having a stronger governance than issuers contributing to the promoted environmental and social characteristics by having an internal governance (“G”) rating of at least B-.

For details on the metrics used, please refer to the section *“What investment strategy does this financial product follow?”* of this document.

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

The Sub-Fund applies an internally developed model to ensure that sustainable investments in the portfolio do not cause significant harm to any environmental or social objectives as defined in Article 2(17) of SFDR. Specifically, the "do no significant harm" (DNSH) principle is assessed by the Investment Manager through a specific approach that involves evaluating the ESG rating, calculated using an internal model based on data from the info provider MSCI, for all sustainable investments in the portfolio. For details on this internal model for ESG rating attribution, please refer to the below investment strategy section. Each sustainable investment must have an ESG rating of at least BBB-.

In addition, to ensure that sustainable investments in the portfolio do not cause significant harm to any environmental or social objectives, the Investment Manager takes into consideration the principal adverse impacts (PAIs) on sustainability factors, as further described below.

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

To assess the DNSH principle for sustainable investments, the Sub-Fund also considers all the mandatory PAIs listed in Table 1 of Annex 1 of the SFDR RTS, supplemented with elements from Tables 2 and 3 of Annex 1 of the SFDR RTS (specifically, PAI 13 "Non-recycled waste ratio" and PAI 2 "Rate of accidents").

The application of exclusionary screening addresses the PAI 10 on violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises, PAI 11 on the lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises and PAI 14 on contriversial weapons.

The consideration of all other PAIs is ensured by calculating the value of each PAI for the investable universe of the MSCI data provider and comparing these values with the PAI of each investment. The DNSH principle will be deemed satisfied if the sustainable investment in question does not have more than four PAIs in the bottom decile of its MSCI investable universe.

It is indeed possible that some PAIs for certain investments have a low data coverage or are not available, in which case they should fall in the bottom decile. In this case, to ensure that the DNSH principle is respected, the investment must have a minimum ESG rating of BBB- or be subject to engagment actions. If the engagment actions do not lead to the desired outcomes within the set timeframe, the investment will not qualify as sustainable anymore.

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

The alignment of the portfolio with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights applies to all instruments in the portfolio and is ensured using the values of PAI 10, "Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises," and PAI 11, "Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises," as specified in Table 1 of Annex 1 of the SFDR RTS.

An issuer is considered aligned if it is not in violation of the UN Global Compact principles and OECD Guidelines for Multinational Enterprises or if it has in place processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises.

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

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

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

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

☒ Yes, the Sub-Fund considers the PAIs listed in Table 1 of Annex 1 of the SFDR RTS, supplemented with elements from Tables 2 and 3 of Annex 1 of the SFDR RTS (specifically, PAI 13 "Non-recycled waste ratio" and PAI 2 "Rate of accidents"). Information on the principal adverse impacts on sustainability factors will be made available in the annual report to be disclosed pursuant to Article 11(2) of SFDR.

☐ No

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

What investment strategy does this financial product follow?

The Investment Manager conducts an ESG analysis on the securities issued by these issuers by relying on its proprietary model. For that purpose, the Investment Manager selects securities that are part of the MSCI ACWI ESG Leaders Net Return EUR (Bloomberg NE703303) (an "**ESG Index**"). The Sub-Fund is actively managed in reference to this ESG Index with significant degree of freedom.

As part of the investment process, the Investment Manager may take exposure to companies, countries or sectors not included in and/or that have different weightings than the ESG Index. The Investment Manager may set discretionary internal risk thresholds which may reference deviations from the ESG Index. While it is expected that the Sub-Fund's deviation from the ESG Index will be moderate, there are no restrictions on the extent to which the Sub-fund's performance may deviate from the one of the ESG Index.

The proprietary model underlying the investment strategy of the Sub-Fund relies on:

- **<u>ESG rating of investments</u>**

The Investment Manager has developed a proprietary model that, based on data from the info provider MSCI, assigns an ESG score/rating to all financial instruments in the portfolio (excluding unrated instruments, liquidity management instruments, derivatives used for hedging purposes, etc.). In addition to the aggregate ESG score, data is also available for each of the three "pillars": E (Environmental), S (Social), and G (Governance).

The calculation of the ESG rating for a Sub-Fund, portfolio, or index (or benchmark) is based on the determination of the weighted sum of the ratings of the securities in the portfolio and can range from 0 to 10, according to the following pillar weights: 50%E + 25%S + 25%G. This score is then translated into a rating ranging from CCC (the lowest grade) to AAA (the highest grade).

The Investment Manager adopts a rigorous approach, requiring that the Sub-Fund's portfolio must have an overall ESG rating higher than or equal to that of the ESG Index.

The Investment Manager's Compliance Department is responsible for verifying adherence to the ratings and criteria established by the Investment Manager's ESG Policy and for evaluating the need to update the blacklist (i.e. the list of companies excluded from the investment universe), involving the ESG Committee as necessary. The results of these checks are promptly communicated to the relevant departments and reported monthly to the risk and regulatory compliance committee, as well as the Board of Directors. Quarterly updates are also provided to the internal control committee.

The consistency of portfolio adherence to ESG principles is automatically monitored through specific algorithms embedded in Investment Manager's control systems. In fact, the Investment Manager's control systems, supported by specific algorithms, automatically monitor portfolio adherence to ESG principles. In cases where an investment no longer qualifies as aligned with E/S characteristics or as a sustainable investment, divestment is considered as the primary course of action.

- **<u>Exclusion criteria</u>**

- Securities from issuers evaluated as "not aligned with environmental, social, and governance themes" cannot be directly invested in the Sub-Fund portfolio (blacklist of government issuers/"controversial weapons" sector, exclusion of sectors such as "aerospace & defence, casino & gaming, and tobacco," exclusion of all financial instruments associated with a "red flag" indicating involvement in a severe ESG dispute regarding operations and/or products).

- Penalisation of the score of securities involved in the following corporate sectors, Aerospace & Defence due to their involvement in the weapons industry and military contracting, Casinos & Gaming due to their socially harmful activities in the rating model by attributing to these sectors a score equal to the minimum between the score provided by MSCI and the upper bound of the CCC rating band.
- Application of two blacklists maintained by the Investment Manager which exclude:
  - Government bonds issued by countries and corporate sectors that are deemed not eligible for investments. Countries will enter this blacklist upon decision of an ESG Committee, based on the assessment of their respect of social and civil rights or if subject to international sanctions.
  - Companies active in the non-conventional weapons production (landmines, cluster munitions, chemical weapons and biological weapons).
- Exclusion of issuers in violation of the UN Global Compact principles and OECD Guidelines for Multinational Enterprises and/or issuers that do not have in place processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises.
- Exclusion of issuers that do not comply with the Christian Investment Guidelines.

In addition to the above-listed exclusions, the Sub-Fund always ensures compliance with the CTB Exclusions, in line with the regulatory requirements set out by the ESMA in the Guidelines on funds' names using social-related terms.

- **Selection of investments**

- A security is deemed to promote environmental and/or social characteristics when:

  - The issuer belongs to at least one index that applies specific inclusion/exclusion policies regarding ESG factors. The identified indices, which belong to the "Best-in-Class" family (securities from companies with high environmental, social, and governance performance compared to their sector peers) or are designed to exceed the minimum standards of the PAB, are as follows: MSCI World AC ESG Leaders, MSCI World AC Climate Paris Aligned, MSCI Europe Climate Paris Aligned, MSCI USA Climate Paris Aligned, MSCI EUR IG Climate Paris Aligned Corp Bond, MSCI USD IG Climate Paris Aligned Corp Bond, MSCI EUR HY Climate Paris Aligned Corp Bond, MSCI USD HY Climate Paris Aligned Corp Bond. The issuer must also have an ESG rating of at least BBB-.
  - The issuer belongs to the investable universe (proprietary methodology) "Social," "Blue," or other internally created ESG investable universes. The issuer must also have an ESG rating of at least BBB-.
  - It is classified as a "Green Bond" and/or "Social Bond" or belongs to an index among those identified (ICE BofA Green Bond Index, ICE Social Bond Index).

- A security is considered a sustainable investment within the meaning of SFDR when, in addition to passing the DNSH test as referred to above:

  - The issuer belongs to at least one index designed to exceed the minimum standards of the PAB (MSCI World AC Climate Paris Aligned, MSCI Europe Climate Paris Aligned, MSCI USA Climate Paris Aligned, MSCI EUR IG Climate Paris Aligned Corp Bond, MSCI USD IG Climate Paris Aligned Corp Bond, MSCI EUR HY Climate Paris Aligned Corp Bond, MSCI USD HY Climate Paris Aligned Corp Bond). The issuer must also have an ESG rating of at least BBB-, an internal "G" rating of at least B- (details

in other sections of this document) and must account for the PAIs (for details, refer to other sections of this document);
- The issuer belongs to the investable universe (proprietary methodology) “Social,” “Blue,” or other internally created ESG investable universes. The issuer must also have an ESG rating of at least BBB an internal “G” rating of at least B- (details in other sections of this document), and must account for the PAIs (for details, refer to other sections of this document);
- It is classified as a “Green Bond” and/or “Social Bond” or belongs to an index among those identified (ICE BofA Green Bond Index, ICE Social Bond Index).

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

The binding criteria used by the Investment Manager to select the investments are the following:

- The Sub-Fund’s portfolio must have an overall ESG rating higher than or equal to that of the ESG Index.
- The Sub-Fund will not make any investments in companies not complying with the exclusion criteria as referred in the section above.
- The Sub-Fund will only invest in companies having an ESG rating above BBB- for the purpose of promoting environmental and/or social characteristics as per the above-mentioned performed assessment.
- The Sub-Fund will only make sustainable investments in issuers belonging to at least one index designed to exceed the minimum standards of PAB and rated at least BBB.

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

The Sub-Fund currently does not set a minimum rate to reduce the scope of investments considered before applying this investment strategy.

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

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

To evaluate the governance practices of the investee companies, the Investment Manager relies on governance information provided by the MSCI info provider and assesses it appropriately. Compliance with good governance practices is verified through the exclusion of the "red flag on governance," which indicates involvement in a serious governance-related controversy, through careful monitoring of issuers within the investable universe of the Sub-Fund, and through integration into the Investment Manager’s evaluation model (ESG rating), which includes the "G" pillar that accounts for governance factors (such as corporate governance practices, any governance-related controversies, procedures for monitoring top management's behavior in compliance with laws and professional ethics, etc.). In addition to the above, the Investment Manager has defined a further criterion for sustainable investments: the issuer must present a "G" rating, calculated through the internal model, of at least B-.

Asset allocation describes the share of investments in specific assets.

What is the asset allocation planned for this financial product?

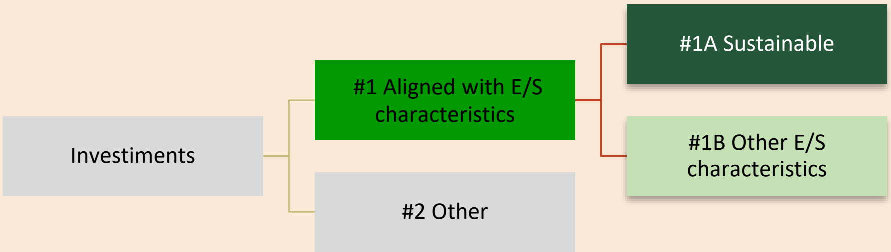
At least 80% of the Sub-Fund's Net Asset Value will be invested in securities which are aligned with the environmental and social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics).

In addition, the share of sustainable investments is set at a minimum of 50% of the Sub-Fund's Net Asset Value.

The Sub-Fund is allowed to invest a maximum of 20% of the Net Asset Value in investments that are not aligned with the E/S characteristics promoted and that may include investments in liquid assets held mainly for cash management purposes, investments in securities held mainly for efficient portfolio management purposes, and/or for which there is insufficient data to be considered an ESG-related investment (#2 Other).

The Sub-Fund intends to increase the allocation to "#1 Aligned with E/S characteristics" should the investible universe evolve to allow a higher level of investment.

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



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.
#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.
The category #1 Aligned with E/S characteristics includes:
- Subcategory #1A Sustainable, which includes sustainable investments with environmental or social objectives;
- Subcategory #1B Other E/S characteristics, which includes investments aligned with environmental or social characteristics but not considered sustainable investments.

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

Derivatives used for investment purposes are subject to compliance with the above-described ESG analysis. In case of index derivatives, a look through is applied.

The Sub-Fund may also hold derivatives for hedging purposes. In this case, net short positions on single name derivatives or net short positions on index derivatives are excluded from the ESG analysis.

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

The Sub-Fund does not currently commit to invest a minimum proportion of "sustainable investments" with an environmental objective aligned with the EU Taxonomy. However, the position is kept under review as the underlying rules are finalized and the availability of reliable data increases over time. Consequently, the Sub-Fund's commitment to make "environmentally sustainable investments" within the meaning of the EU Taxonomy Regulation is set at 0%.

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

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

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

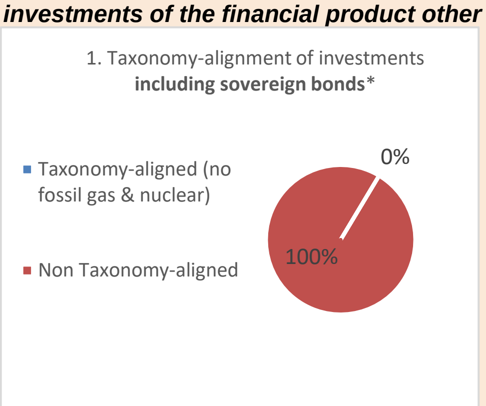
- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[17]?***

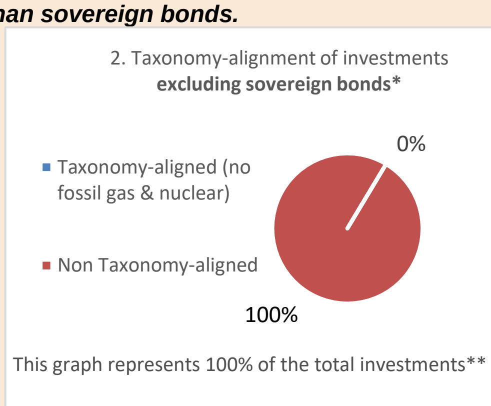
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

The two graphs below show in blue 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 proportion of total investments shown in this graph is purely indicative and may vary.*

At the moment, detailed data related to taxonomy in activities connected to fossil gas and nuclear are not available, therefore only the aggregated value is provided.

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

As the Sub-Fund does not commit to invest any "sustainable investment" within the meaning of the Taxonomy Regulation, the minimum share of investments in transitional and enabling activities within the meaning of the Taxonomy Regulation is therefore also set at 0%.

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

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

The Sub-Fund commits to a minimum proportion of 50% of sustainable investments with an environmental objective aligned with SFDR in economic activities that are not aligned with the EU Taxonomy and/or with a social objective. These investments could be aligned with the EU Taxonomy but the Investment Manager is not currently in a position to specify the exact proportion of the Sub-Fund's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

[17] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left-hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in the SFDR RTS.

What is the minimum share of socially sustainable investments?

Not applicable.

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

#2 "Other" Investments may include:

- Liquid assets (cash and cash equivalents, time and term deposits) held for the purposes of servicing the day-to-day requirements of the Sub-Fund,
- Currency derivatives, repurchase agreements, interest rates swaps, government bonds with IR Duration lower than one (1) year held for the purposes of efficient portfolio management,
- Own or third party funds without a benchmark or not clearly identifiable with a market index/benchmark,
- Alternative investment funds,
- Sovereign bond instruments not classified as green bonds and/or social bonds.

#2 "Other" investments do not follow any minimum environmental or social safeguards.

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

Not applicable.

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

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.siderafunds.com/en/sustainability.html

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