NEW MILLENNIUM

SOCIÉTÉ D'INVESTISSEMENT À CAPITAL VARIABLE

PROSPECTUS

1ST OF DECEMBER 2020

The latest annual report available and the latest semi-annual report if published after the latest annual report represent an integral part of the present Prospectus.

INTRODUCTION

NEW MILLENNIUM (the **Fund**), has been launched at the initiative of Banca Finnat Euramerica S.p.A., Rome (the **Sponsor**).

NEW MILLENNIUM has been registered on the official list of undertakings for collective investment in accordance with the Law of 17 December 2010.

This registration cannot be interpreted as a positive judgement either of the quality of the instrument or the quality of the securities held by the Fund and any assertion of the contrary would be unauthorised and unlawful.

This prospectus (the **Prospectus**) may not be used for the purpose of offering and promoting sales in any country or under any circumstances where such offers or promotions are not authorised.

In particular, the shares of the Fund have not been registered in accordance with any legal provisions pertaining to securities applicable in the United States of America, and may not be offered in the United States or any of its territories or in any possession or area subject to its jurisdiction.

No person is authorised to give any information or make any representations other than those contained in this Prospectus or in the documents indicated herein, which are available for public inspection.

The Board of Directors of the Fund accepts responsibility for the accuracy of the information contained in this Prospectus on the date of publication.

This Prospectus may be updated from time to time with significant amendments. Consequently, subscribers are advised to inquire with the Fund as to the publication of a more recent Prospectus.

It is recommended to subscribers to seek professional advice on the laws and regulations (such as those on taxation and foreign exchange control) applicable to the subscription, purchase, holding and selling of shares in their place of origin, residence or domicile.

The valuation currency varies according to the different Sub-Funds in the Fund and the consolidation currency is the Euro.

This Prospectus is valid only if accompanied by the latest available annual report and by the latest available semi-annual report, if published after the annual report. These documents are an integral part of this Prospectus.

Potential subscribers should note that the structure of the Prospectus is made up of Section I which contains the regulations to which the Fund is subject as a whole and of Section II which contains the regulations applicable to each individual Sub-Fund.

SECTION I - GENERAL PROVISIONS

1. MANAGEMENT AND ADMINISTRATION OF THE FUND

Board of Directors

Chairman

Mr. Sante JANNONI
General Manager
Natam Management Company S.A.
11, rue Béatrix de Bourbon,
L-1225 Luxembourg

Directors

Mr. Emanuele BONABELLO
Head of Asset Management and Institutional Investors
Banca Finnat Euramerica S.p.A
Piazza del Gesù, 49
I–00186 Rome

Mr. Antonio MAUCERI
Partner
AZ Swiss & Partners S.A.
Via Marina, 6
I - 20121 Milan

Management Company

NATAM MANAGEMENT COMPANY S.A.
11, rue Béatrix de Bourbon,
L-1225 Luxembourg

Board of Directors of the Management Company

Mr. Alberto ALFIERO (Chairman)
Deputy General Manager
Banca Finnat Euramerica S.p.A.
Piazza del Gesù, 49
I–00186 Rome

Mr. Gianluca COSTANTINI (Director)
Chief Administrative Officer
Banca Finnat Euramerica S.p.A
Piazza del Gesù, 49
I–00186 Rome

Mr. Alex SCHMITT (Director)
Partner
Bonn&Schmitt
148, Avenue de la Faïencerie
L-1511 Luxembourg

Conducting Persons of the Management Company	**Mr. Alberto ALFIERO** Deputy General Manager Banca Finnat Euramerica S.p.A. Piazza del Gesù, 49 I–00186 Rome **Mr. Sante JANNONI** General Manager Natam Management Company S.A. 11, rue Béatrix de Bourbon, L-1225 Luxembourg **Mr. Lorenzo PERELLI** Chief Risk Officer Natam Management Company S.A. 11, rue Béatrix de Bourbon, L-1225 Luxembourg **Mr. Marco Ricci** Chief Compliance Officer Independent Conducting Person
Head Office	49, avenue J.F. Kennedy L-1855 Luxembourg
Global Distributor	**Banca Finnat Euramerica S.p.A** Piazza del Gesù, 49 I- 00186 Rome
Depositary	**State Street Bank International GmbH, Luxembourg Branch** 49, Avenue J.F. Kennedy L - 1855 Luxembourg Grand Duchy of Luxembourg
Central Administration	**State Street Bank International GmbH, Luxembourg Branch** 49, Avenue J.F. Kennedy L - 1855 Luxembourg Grand Duchy of Luxembourg
Auditor	**PricewaterhouseCoopers Société Coopérative** 2, rue Gerhard MercatorL-2182 Luxembourg

2. MAIN FEATURES OF THE FUND

NEW MILLENNIUM, referred to hereafter as the Fund**,** is a Luxembourg investment company (Société d'investissement à capital variable) incorporated for an unlimited duration in Luxembourg on 11 August 1999 and organized under the Luxembourg Law of 17 December 2010 on undertakings for collective investment (the " Law of 17 December 2010") and the Law of 10 August 1915 on commercial companies, as further amended and supplemented.
In particular, it is subject to the provisions of Part I of the Law of 17 December 2010, relating to undertakings for collective investment in transferable securities (UCITS) as defined in the Directive 2014/91/EU of the European Parliament and of the Council of 23 July 2014 for all matters relating to the depositary functions, remuneration policies and sanctions amending the Directive 2009/65/EC on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities (the "**UCITS Directive**").

The Fund was initially qualified as a self-managed investment company within the meaning of art. 27 of the Law of 17 December 2010; effective from 1 January 2017 the Fund has designated **Natam Management Company S.A.**, referred to hereafter as the Management Company, a management company governed by Chapter 15 of the Law of 17 December 2010 and authorised pursuant to the UCITS Directive. The Fund has been structured as an umbrella-fund, which means that it comprises several sub-funds, referred to hereafter as the Sub-Funds**,** having each its specific assets and liabilities and an own distinct investment policy. Such a structure gives the investor the advantage of a choice between different Sub-Funds with the possibility to switch from one Sub-Fund into another free of charge and at his request.

At present, the shares – hereinafter referred to as Shares - of the following Sub-Funds are offered to investors:

1. NEW MILLENNIUM - Euro Equities
2. NEW MILLENNIUM - Global Equities (Eur Hedged)
3. NEW MILLENNIUM - Euro Bonds Short Term
4. NEW MILLENNIUM - Large Europe Corporate
5. NEW MILLENNIUM - Balanced World Conservative
6. NEW MILLENNIUM - Total Return Flexible
7. NEW MILLENNIUM - Inflation Linked Bond Europe
8. NEW MILLENNIUM - Augustum Italian Diversified Bond
9. NEW MILLENNIUM - Augustum High Quality Bond
10. NEW MILLENNIUM - Augustum Corporate Bond
11. NEW MILLENNIUM - Augustum Market Timing
12. NEW MILLENNIUM - Augustum Extra Euro High Quality Bond
13. NEW MILLENNIUM - VolActive
14. NEW MILLENNIUM – Evergreen Global High Yield Bond
15. NEW MILLENNIUM – Multi Asset Opportunity
16. NEW MILLENNIUM – PIR Bilanciato Sistema Italia

The Board of Directors may subsequently launch other Sub-Funds, the investment policy and the subscription procedures of which will be conveyed as the occasion arises by the updating of this Prospectus and the publication of a notice in the newspapers at the Board of Directors' discretion. The Board may as well decide upon the liquidation of one or several Sub-Funds, in which case investors will be informed by news release and the Prospectus will be updated.

The Shares are available through the Global Distributor which in turn might enter into agreements with other distributors, intermediaries, operators and/or professional investors for the placement of the Shares.

The Articles of Incorporation of the Fund were published in the Mémorial C, Recueil des Sociétés et Associations (the Mémorial) on September 17, 1999 (the "Articles of Incorporation"). These Articles of Incorporation, as well as the legal notice relating to the issue of the Fund's Shares have been filed with the Registre de Commerce et des Sociétés of Luxembourg. These documents are kept available at the *Registre de Commerce et des Sociétés* of Luxembourg for inspection and copies may be obtained upon request and against payment of the registry dues. The Articles of Incorporation have been amended on 17 April 2013 by a deed published in the *Mémorial* on 6 June 2013 and on 10 July 2014 by a deed published in the *Mémorial* on 25 October 2014.

The Fund is registered in the Luxembourg *Registre de Commerce et des Sociétés* under the number B 71.256. The registered office of the Fund is at 49, avenue J.F. Kennedy, L-1855 Luxembourg.

The capital of the Fund is at all times equal to the net assets and is represented by fully paid-up Shares with no par value. Variations in the capital shall be effected ipso jure and without compliance with measures regarding publication and entry of such in the *Registre de Commerce et des Sociétés* of Luxembourg as prescribed for increases and decreases of capital of public limited companies. Its minimum capital is 1,250,000 EUR (one million two hundred and fifty thousand Euros).

The Shares have not been registered under the United States Securities Act of 1933, as amended (the "1933 Act"); they may therefore not be publicly offered or sold in the USA, or in any of its territories subject to its jurisdiction or to or for the benefit of a U.S. person. A U.S. person (a "U.S. Person") means a citizen or resident of, or a company or partnership organized under the laws of or existing in any state, commonwealth, territory or possession of the United States of America, or on estate or trust other than an estate or trust the income of which from sources outside the United States of America is not includible in gross income for purpose of computing United States income tax payable by it, or any firm, company or other entity, regardless of citizenship, domicile, situs or residence if under the income tax laws of the United States of America from time to time in effect, the ownership thereof would be attributed to one or more U.S. persons or any such other person or persons defined as a "U.S. person" under Regulation S promulgated under the United States Securities Act of 1933 or in the United States Internal Revenue Code of 1986, as amended from time to time.

U.S. person as used herein does neither include any subscriber to Shares of the Company issued in connection with the incorporation of the Company while such subscriber holds such Shares nor any securities dealer who acquires shares with a view to their distribution in connection with an issue of Shares by the Company.

The Shares are not being offered in the USA, and may be so offered only pursuant to an exemption from registration under the 1933 Act, and have not been registered with the Securities and Exchange Commission or any state securities commission nor has the Fund been registered under the Investment Company Act of 1940, as amended (the "1940 Act").

No transfer or sale of the Shares shall be made unless, among other things, such transfer or sale is exempt from the registration requirement of the 1933 Act and any applicable state securities laws or is made pursuant to an effective registration statement under the 1933 Act and such state securities laws and would not result in the Fund becoming subject to registration or regulation under the 1940 Act.

Data Protection

The Fund and/or the Management Company may collect information from a shareholder or prospective shareholder of the Fund from time to time in order to develop and process the business relationship between the shareholder or prospective shareholder of the Fund and the Fund, and for other related activities. If a shareholder or prospective shareholder fails to provide such information in a form which is satisfactory to the Fund, the Fund may restrict or prevent the ownership of Shares in the Fund and the Fund, the Management Company, the Registrar and Transfer Agent and/or any Placing Agent (as the case may be) shall be held harmless and indemnified against any loss arising as a result of the restriction or prevention of the ownership of Shares.

By completing and returning an application form, shareholder consent to the use of personal data by the Fund. The Fund and/or the Management Company may disclose personal data to its agents, service providers or if required to do so by force of law or regulatory authority. Shareholders will upon written request be given access to personal data provided to the Fund and/or the Management Company. Shareholders may request in writing the rectification of, and the Fund and/or the Management Company will upon written request rectify, personal data. All personal data shall not be held by the Fund and/or the Management Company for longer than necessary with regard to the purpose of the data processing.

By subscribing shares of the Fund, shareholders consent to the aforementioned processing of their personal data and in particular, the disclosure of their personal data to, and the processing of their personal data by the parties referred to above including parties situated in countries outside of the European Union which may not offer a similar level of protection as the one deriving from Luxembourg data protection law. Shareholders acknowledge that the transfer of their personal data to these parties may transit via and/or their personal data may be processed by parties in countries which may not have data protection requirements deemed equivalent to those prevailing in the European Union

The Placing Agents may use personal data to regularly inform shareholder about other products and services that the placing agents believe may be of interest to shareholder, unless the shareholder indicates to the Placing Agent on the application form or in writing that it does not wish to receive such information.

Investors Information

The Fund draws the investors' attention to the fact that any investor will be only able to fully exercise his investor rights directly against the Fund if the investor is registered himself and in his own name in the shareholders' register. In case where an investor invests in the Fund through an intermediary investing into the Fund in his own name but on behalf of the investor, it may not always be possible for the investor to exercise certain shareholder rights directly against the Fund. Investors are advised to take advice on their rights.

Foreign Account Tax Compliance Act ("FATCA") Requirements - FATCA provisions generally impose a reporting to the U.S. Internal Revenue Service of 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.

The basic terms of FATCA currently classify the Fund as a “Foreign Financial Institution” (“FFI”), such that in order to comply, 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 legislation.

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, whether by law or otherwise, 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 or its agents, in their discretion in order to comply with any law and/or to promptly determine the amount of withholding to be retained;
- Divulge any such personal information to any tax or regulatory authority, as may be required by law or such authority,
- Withhold the payment of any dividend or redemption proceeds to a Shareholder until the Fund or its agents hold sufficient information to enable them to determine the correct amount to be withheld.

The Fund hereby confirms that it is classified as Reporting Financial Institution, in compliance with the FATCA rules and that it is registered at the IRS with the following Global Intermediary Identification Number (GIIN): EFXEJI.99999.SL.442.

3. INVESTMENT POLICY AND OBJECTIVES

The objective of the Fund is to offer the Shareholders an easy access to the different markets of transferable securities while ensuring observance of the principle of risk spreading. Pursuant to the legal provisions, the transferable securities purchased may be quoted on an official stock exchange or dealt in on a regulated market, which operates regularly, is recognised and is open to the public. Besides, the Fund may use on a regular basis derivatives for investment purposes and/or to hedge main risks. Please refer to paragraph 8 for more details on the eligible assets and the relative investment restrictions.

The investment policies of the Sub-Funds are described in the Section II “Description of the Sub-Funds".

4. TYPE OF SHARES

Shares of each Sub-Fund are issued in registered form only and dematerialized.

The Fund may also issue fractional Shares (thousandths).

The Shareholders' register is kept at the registered office of the Fund. The Central Administration performs the registration and the necessary alterations or deletions of all registered Shares in the company register in order to ensure the regular update thereof.

Shares must be fully paid-up and are issued with no par value. There is no restriction with regard to the number of Shares which may be issued.

The rights attached to the Shares are those provided for in the Luxembourg Law of 10 August 1915 on commercial companies, as amended, unless superseded by the Law of 17 December 2010. All Shares of the Fund have an equal voting right, whatever their value (except fractional Shares). The Shares have an equal right to the liquidation proceeds of their relevant Sub-Fund.

Any amendments to the Articles of Incorporation changing the rights of one specific Sub-Fund have to be approved by a decision of the General Meeting of the Fund as well as a General Meeting of the Shareholders of the specific Sub-Fund.

5. CLASSES OF SHARES

In order to best meet the specific needs of Shareholders, the Board of Directors may decide to create within each Sub-Fund different classes of Shares whose assets will be commonly invested pursuant to the specific investment policy of the relevant Sub-Fund. A specific fee structure, currency of denomination, minimum investment amount, dividend policy, target investor group or other specific feature may apply to each class of Shares.

A separate net asset value per Share, which may differ as a consequence of these variable factors, will be calculated for each class of Shares.

The Board of Directors will have the faculty to create further classes of Shares, notice of which will be given by updating the present Prospectus and by informing Shareholders through the press, in the most appropriate way the Board of Directors will deem it. Furthermore the Board can decide the elimination of one or more classes, communicating this to the Shareholders via the press and by updating the present Prospectus.

Further information on each class of Shares available for each Sub-Fund can be found under the Section II – "Description of the Sub-Funds". "Class I" and "Class Y" are reserved for institutional investors only and Class "I" capitalizes income while Class "Y" distributes income, "Class A" can be subscribed by any investor and it capitalizes income, "Class D" can be subscribed by any investor and it distributes income, "Class L" (listed on the London Stock Exchange Group/ Italian Stock Exchange Multilateral Trading Facility ("MTF") ATFund (as described below) the market for open-end UCIs. Banca Finnat Euramerica S.p.A. has been designated as the appointed intermediary for the class L shares. "Class Z" is reserved for insurance company investing through their proprietary accounts and Italian Social Security institutions ("Enti Previdenziali) only and it distributes income.

The fund may offer other shares denominated in a currency other than the sub fund reference currency; such share classes may be hedged ("Hedged Share Class) or not. The Fund may engage in currency hedging transactions with regard to a certain share class (the "Hedged Share Class"). The hedging will be undertaken to reduce exchange rate fluctuations in case the base currency of the Fund is declining or increasing in value relative to the hedged currency. The hedging strategy employed will seek to reduce as far as possible the exposure of the Hedged Share Classes so that the performance of the Hedged Share Classes closely tracks the performance of the Share Classes in base currency. No assurance can be given that the hedging objective will be achieved. Investors should be aware that the hedging strategy may substantially limit Investors of the relevant Hedged Share Class from benefiting from any potential increase in value of the Share Class expressed in the reference currency, if the Hedged Share Class currency falls against the reference currency. Additionally, Investors of the Hedged Share Class may be exposed to fluctuations in the Net Asset Value per Share reflecting the gains/losses on and the associated transactions costs of the relevant financial instruments used to implement the hedging strategy. The gains/losses on and the transactions costs of the relevant financial instruments will accrue solely to the relevant Hedged Share Class.

In this sense, the costs related to the hedging will be borne by the relevant Share Class.

The share class denomination will specify if the class is hedged or not. (i.e. A-CHF-Hedged: class suitable for all investors, with CHF base currency hedged against the sub-fund base currency; A-CHF: class suitable for all investors, with CHF base currency without hedging against the sub-fund base currency).

DESCRIPTION OF ATFund

ATFund Market - ATFund is the Multilateral Trading Facility managed and organised by London Stock Exchange Group/Italian Stock Exchange ("Borsa Italiana"), fully dedicated to the trading of open-end Cius. It has been launched on October 1st 2018, when the open-end CIUs previously listed on the ETF Plus market have been transferred to ATFund.

The unit/shares of open-end CIUs may be admitted to listing, under the conditions that they are compliant with Directive 2009/65/EC and for which the Prospectus indicates the trading on the ATFund market as offer method. In addition, the listing of open-end CIUs requires the presence of an Appointed Intermediary. The listed CIUs are accessible to all intermediaries (banks, investment firms) that adhere to ATFund. They are allowed to buy or sell CIUs daily at a price equal to the Net Asset Value ("NAV") of the trading day. Trading does not take place on days when the NAV is not calculated.

6. RISK FACTORS

Investors are advised to read the following information about the various risk factors before investing in any of the Fund's Sub-Funds.

Potential investors should be aware that, as for any kind of financial investment, the value of the Sub-Funds' assets may be subject to significant volatility. Therefore, no assurance can be given that the investors will get back the full amount invested.

Equity risk

The value of all Sub-Funds that invest in equity and equity-related securities will be affected by economic, political, market, and issuer specific changes. Such changes may adversely affect securities, regardless of company specific performance. The risk that the value of one or more companies in a Sub-Fund's portfolio will fall, or fail to rise, can adversely affect the overall portfolio performance in any given period.

Issuer risk

Issuer risk (or credit risk), a fundamental risk relating to all fixed income securities as well as money market instruments, is the possibility that an issuer will fail to make principal and interest payments when due. Issuers with higher credit risk typically offer higher yields for this added risk. Conversely, issuers with lower credit risk typically offer lower yields. Generally, government bonds are considered to be the safest in terms of credit risk, while corporate debt, especially those with poorer credit ratings (e.g. non-investment grade which refer to securities or issuers rated below BBB- by Standard & Poors or Fitch, below Baa3 by Moodys, or below BBB by DBRS) or those without a credit rating (not-rated), have the highest credit risk. Changes in the financial condition of an issuer, changes in economic and political conditions in general, or changes in economic and political conditions specific to an issuer, are all factors that may have an adverse impact on an issuer's credit quality and security values.

Interest rate risk

The value of the assets can change as a function of the change in interest rates. In particular, the value of fixed income securities held by the Sub-Funds move, in general, in the opposite direction to that of the change in the interest rates, and the longer the maturity of the securities, the larger the fluctuation. As a result, such variations can affect the value of the Sub-Funds that invest in such securities.

Liquidity risk

Some markets in which a Sub-Fund may invest could, in some circumstances, turn out to be illiquid, not sufficiently liquid or extremely volatile. This could influence the price at which a Sub-Fund can liquidate positions in order to meet redemption requests or other cash needs.

Foreign currency risk

Since the securities held by a Sub-Fund may be denominated in currencies different from its base currency, the value of the Shares of such Sub-Funds will be affected by changes in the exchange rates between the base currency and other currencies.

It should be pointed out that the exchange rates with the currencies of several countries, and in particular of emerging countries, are highly volatile, and in any case the evolution of exchange rates can influence the total return on the investment.

To the extent that a Sub-Fund seeks to use any strategies or instruments to hedge or to protect against currency exchange risk, there is no guarantee that hedging or protection will be achieved.

Risks inherent in investing in emerging European markets

In the emerging and less developed markets of the above area, the legal, judiciary and regulatory apparatus is in the development phase, and the uncertainties inherent in the legal system are numerous, both for local market operators and for their foreign counterparties. Some markets can present a higher level of risk to investors, who thus should make sure, before investing, to have understood well the associated risks and that such an investment is suitable for their portfolio. Investment in emerging and less developed countries should only be carried out by professional investors or in any case investors with a good knowledge of the markets in question, who are capable of considering and evaluating the various risks inherent in such investment and who have the necessary financial resources to withstand the considerable risk of loss of capital invested in such financial instruments.

Risks inherent in investing in emerging markets

Potential investors should be aware the some Sub-Funds can invest in companies or issues of companies in emerging countries such as, but not limited to India, Russia and China and thus be exposed to higher risk levels than those associated with investments in developed countries. Investors should realize that the eventual social, political or economic instability of some emerging countries in which a Sub-Fund can invest could affect the value and the liquidity of the investments. In addition to the risks inherent in any type of investment in securities, there could also be political risks, risks associated with a change in exchange controls and in the tax regime, which could directly affect the value and liquidity of the Sub-Fund's portfolio.

Furthermore, investments in some countries could be exposed to significant exchange rate risk, given that such currencies are considerably volatile.

Russian Market Risk

Investments in Russia are currently subject to certain heightened risks with regard to the ownership and custody of securities. In Russia shareholdings are evidenced by entries in the books of a company or its registrar (which is neither an agent nor responsible to the Depositary bank). No certificates representing shareholdings in Russian companies will be held by the Depositary bank or any of its local correspondents or in an effective central depository system. As a result of this system and the lack of effective state regulation and enforcement, the Sub-Fund could lose its registration and ownership of Russian securities through fraud, negligence or even mere oversight. In addition, Russian debt securities have an increased custodial risk associated with them as such securities are, in accordance with market practice, held in custody with Russian institutions which may not have adequate insurance coverage to cover loss due to theft, destruction or default.

China Market Risk

Investment in China is subject to legal, regulatory, monetary and economic risks. China is dominated by the one-party rule of the Communist Party. Investments in China involve greater control over the economy, political and legal uncertainties and currency fluctuations or blockage, the risk that the Chinese government may decide not to continue to support the economic reform programs implemented in 1978 and possibly return to the completely centrally planned economy that existed prior to 1978, and the risk of confiscatory taxation, and nationalization or expropriation of assets. The Chinese government exercises significant control over China's economic growth through the allocation of resources, controlling payment of foreign currency denominated obligations, setting monetary policy and providing preferential treatment to particular industries or companies.

The willingness and ability of the Chinese government to support the Chinese and Hong Kong economies is uncertain. The growing interconnectivity of global economies and financial markets has increased the possibility that conditions in one country or region might adversely impact the issuers of securities in a different country or region. In particular, the adoption or continuation of protectionist trade policies by one or more countries could lead to a decrease in demand for Chinese products and reduced flows of private capital to these economies. Government supervision and regulation of Chinese stock exchanges, currency markets, trading systems and brokers may be less than in developed countries. Companies in China may not be subject to the same disclosure, accounting, auditing and financial reporting standards and practices as in developed countries.

Thus, there may be less information publicly available about Chinese companies than about other companies. Political, social or economic disruptions in the region, including conflicts and currency devaluations, even in countries in which the Fund is not invested, may adversely affect security values in other countries in the region and thus the Fund's holdings.

Risks inherent in investing in UCITS and/or OIC

Investments in a UCITS and / or UCIs might lead for the investor an increasing of some expenses such as subscription, redemption, depositary, administration and management fees.

Warrants risk

Investment in and holding of warrants may result in an increased volatility of the net asset value of the Sub-Funds which may make use of warrants, and accordingly is accompanied by a higher degree of risk.

Risks associated with derivatives transactions

Each Sub-Fund can carry out various portfolio strategies aimed at containing some of the risks of its investments and/or increasing return. These strategies include at present the use of options, currency forwards, futures, credit derivatives and derivatives in general. The ability to use these strategies can be influenced by market trends and by regulatory limits, and no guarantee can be given that such strategies will obtain the expected goals.

The risk factors associated with the use of derivatives include, but are not limited to, the following:

a. a possible incorrect forecast, by the subjects to whom the investment management has been delegated, of the changing dynamics of interest rates, security prices and currency markets;
b. an insufficient correlation between the price of options, futures contracts, and options on the aforementioned, and the price movements of the underlying securities or currencies;
c. the possible lack of a liquid secondary market for a given instrument in a given moment (e.g. for the closing of a futures or forward position);
d. in case of OTC contracts the risk of counterparty default may be higher, depending on the lack of regulation and non-fulfilment of the counterparty. In general, the regulation and the supervision of the governmental authorities on OTC markets (e.g. markets in which forwards, spot contracts and options, credit default swaps, total return swaps, and some currency options are traded) is lower than the one carried out on the regulated market transactions. Besides, many of the protections towards regulated market participants, as the guarantee on the transactions' execution by the clearing houses, may not be available when OTC transactions occur.

Consequently, the Sub-Funds investing in OTC derivatives will be exposed to the risk that counterparties may not fulfil the transactions' expected obligations and that the Sub-Fund may meet the relative losses. Apart from the actions the Fund may undertake in order to lower the counterparty credit risk, it is not possible to assure that counterparty will neither default nor the Fund will meet the consequent losses.

Each Sub-Fund, where it is clearly indicated in its investment policy, can invest in credit derivatives (including credit default swaps and credit spread derivatives). The use of credit default swaps normally carries a higher risk than investing in bonds directly. A credit default swap allows the transfer of default risk. This allows investors to effectively buy insurance on a bond they hold (hedging the investment) or buy protection on a bond they do not physically own in the expectation that the credit will decline in quality. One party, the protection buyer, makes a stream of payments to the seller of protection, and a payment is due to the buyer in the event that there is a "credit event" (a decline in credit quality, which will be pre-defined in the agreement). If the credit event does not occur the buyer pays all the required premiums and the swap terminates on maturity with no further payments. The risk of the buyer is therefore limited to the value of the premiums paid. The market for credit default swaps may sometimes be more illiquid than bond markets. A Sub-Fund entering into credit default swaps must at all times be able to meet the redemption requests. Credit default swaps are valued on a regular basis according to verifiable and transparent valuation methods reviewed by the Fund's auditor.

Also in compliance with the CSSF circular 14/592, as further amended and supplemented:

a) Swaps may be used in both hedging and speculative strategies; details regarding the underlying and the max exposure allowed are provided in the relevant Sub-Fund section of the Prospectus.

b) The Fund may enter into OTC derivatives contracts with counterparties that are financial institutions subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by Community law and specialized in this type of transactions.

c) Financial institutions involved in OTC transactions are carefully selected and the resulting counterparty risk is subject to appropriate monitoring and control in the context of the risk management process.

d) The fund managers will never enter into a swap contract with a counterparty that may assume discretion over the composition or management of the UCITS' investment portfolio or over the underlying of the financial derivative instruments.

The negative consequences of the use of derivative instruments can cause the Sub-Funds a loss that is larger than the amount invested in such instruments.

The risk associated with the use of the above-mentioned instruments cannot exceed 100% of the Net Asset Value of the relevant Sub-Fund. As a consequence, the global risk related to the investments of a Sub-Fund can reach a maximum of 200% of the Sub-Fund's Net Asset Value. The Fund can borrow for the account of any Sub-Fund, as a temporary measure only, up to 10% of the value of net assets, therefore global risk can never exceed 210% of the Net Asset Value of the relevant Sub-Fund.

Commodity-linked risk

Potential investors should be aware the some Sub-Funds can invest in commodity-linked instruments. Investments in commodity-linked instruments may subject the portfolio to greater volatility than instruments in traditional securities. The value of commodity-linked instruments may be affected, favourably or unfavourably, by changes in overall market movements, commodity index volatility, changes in interest rates, or factors affecting a particular industry or commodity, such as drought, floods, weather, livestock disease, embargoes, tariffs and international economic, political and regulatory developments.

Management risk

This risk covers the possibility that the investment technique employed for a given Sub-Fund proves to be unsuccessful and leads to losses.

Investment in specific sectors

The Sub-Funds can invest in securities of new companies or companies in rapidly developing sectors that are characterized by a higher volatility.

Investment in Non-investment grade securities

For Sub-Funds whose policy allows for the investment in securities rated lower than BBB- (Standard & Poors), investors are warned that these securities are below investment grade and carry more risk, including greater price volatility and a higher default risk on the repayment of principal and the payment of interest than for higher grade securities. Moreover, certain unlisted or undervalued fixed income securities are highly speculative and entail considerable risk, and may be disputed when principal and interest payments fall due. Securities with a rating below BBB- (Standard & Poors), or comparable unlisted securities, are considered speculative and may be disputed when principal and interest payments fall due and incorporate a high risk as to the ability of the debtor to honour their obligations in full.

Such securities involve higher credit or liquidity risk. High Credit Risk: Lower rated debt securities, commonly referred to as "junk bonds" are subject to a substantially higher degree of risk than investment grade debt securities. During recessions, a high percentage of issuers of lower rated debt securities may default on payments of principal and interest. The price of a lower rated debt security may therefore fluctuate drastically due to unfavourable news about the issuer or the economy in general. High Liquidity Risk: During recessions and periods of broad market declines, lower rated debt securities could become less liquid, meaning that they will be harder to value or sell at a fair price.

Due to the volatile nature of the above assets and the corresponding risk of default, investors must be able to accept significant temporary losses to their capital and the possibility of fluctuations in the income return level of the relevant Sub-Fund. The Manager of the relevant Sub-Fund will endeavour to mitigate the risks associated with the investment in securities rated lower than BBB-, by diversifying its holdings by issuer, industry and credit quality.

Downgrading risk

Debt securities can be rated investment grade or below investment grade. Such ratings are assigned by independent rating agencies (e.g. Fitch, Moody's, Standard & Poor's, DBRS) on the basis of the creditworthiness of the issuer or of a bond issue. The general assessment of an issuer's creditworthiness may affect the value of the fixed income securities issued by the issuer. Rating agencies review, from time to time, such assigned ratings and debt securities may therefore be downgraded in rating if economic circumstances impact the relevant bond issues. A reassessment of the creditworthiness that results in a downgrading of the rating assigned to an issuer may negatively affect the value of the fixed income securities issued by this issuer.

Shareholders should understand that all investments involve risk and there can be no guarantee against loss resulting from an investment in a Sub-Fund, nor can be any assurance that the investment objectives will be attained.

7. DISTRIBUTION POLICY

Each year, the General Meeting of Shareholders shall decide upon the proposal made by the Board of Directors on this matter. Should the Board of Directors decide to propose the payment of a dividend to the

General Meeting, such dividend shall be calculated in accordance with the legal and statutory limits provided for this purpose.

Except for the D, Y and Z share classes, in its distribution policy, the Board of Directors has determined to propose the capitalisation of the income. Nevertheless, if in its opinion, the payment of a dividend could be more profitable to the Shareholders, the Board shall not refrain from proposing such a dividend to the General Meeting. This dividend may include, beside the net investment income, the realised and unrealised capital gains, after deduction of realised and unrealised capital losses.

For the D, Y and Z classes, which distribute income, the terms of the distribution are set in the relevant boxes of the Section II – “Description of the sub funds”, In case a maximum threshold is specified, the Board of Directors reserves the right to increase the threshold at its own discretion in case of extraordinary positive performance.

All dividend payment notices are published on the company’s website (www.newmillenniumsicav.com) and notified by any other means the Board of Directors deems appropriate.

Registered Shareholders are paid by bank transfer according to their instructions.

Each Shareholder is offered the possibility to reinvest his/her dividend free of charge up to the available share unit.

Dividends not claimed within five years after their payment date shall no longer be payable to the beneficiaries and shall revert to the Sub-Fund.

8. INVESTMENT RESTRICTIONS

The Board of Directors has adopted the following restrictions relating to the investment of the Fund's assets and its activities. These restrictions and policies may be amended from time to time by the Board of Directors if and as they shall deem it to be in the best interests of the Fund in which case this Prospectus will be updated.

The investment restrictions imposed by Luxembourg law must be complied with by each Sub-Fund. Those restrictions in paragraph 1.(D) below are applicable to the Fund as a whole.

1. Investment in transferable securities and liquid asset

A. (1) The Fund will invest in:

i. transferable securities and money market instruments admitted to an official listing on a stock exchange in any Member State of the European Union (EU), any Member State of the Organisation for the Economic Cooperation and Development (OECD), and any other State which the Board of Directors deems appropriate with regard to the investment objective of each Sub-Fund (each an "Eligible State"); and/or

ii. transferable securities and money market instruments dealt in on another regulated market in a Member State of the European Union which, operates regularly and is recognised and open to the public in an Eligible State (a "Regulated Market"); and/or

iii. 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 Regulated Market (an "Eligible Market") or stock exchange and that such admission be secured within one year of issue; and/or

iv. units of undertakings for collective investment in transferable securities (a "UCITS") and/or of other undertakings for collective investment within the meaning of Article 1, paragraph (2) points a) and b) of Directive 2009/65/EC, as amended ("other UCIs"), whether situated in an EU member state or not, provided that:

- such other UCIs have been authorised under laws which provide that they are subject to supervision considered by the Luxembourg supervisory authority to be equivalent to that laid down in Community law and that a cooperation between authorities is sufficiently ensured,
- the level of protection for unitholders in such other UCIs is equivalent to that provided for unitholders in a UCITS, and in particular that the rules on assets segregation, borrowing, lending, and uncovered sales of transferable securities and money market instruments are equivalent to the requirements of directive 2009/65/EC,
- the business of such other UCIs is reported in half-yearly and annual reports to enable an assessment of the assets and liabilities, income and operations over the reporting period,
- no more than 10% of the assets of the UCITS or of the other UCIs, whose acquisition is contemplated, can, according to their constitutional documents, in aggregate be invested in units of other UCITS or other UCIs; and/or

v. deposits with credit institutions which are repayable on demand or have the right to be withdrawn, and maturing in no more than 12 months, provided that the credit institution has its registered office in a Member State of the European Union, or if the registered office of the credit institution is situated in a non-Member State, provided that it is subject to prudential rules considered by the CSSF as equivalent to those laid down in Community law; and/or

vi. financial derivative instruments, including equivalent cash-settled instruments, dealt in on a regulated market referred to in subparagraphs i. and ii. above, and/or financial derivative instruments dealt in over-the-counter ("OTC derivatives"), provided that:

- the underlying consists of securities covered by this section 1. A. (1), financial indices, interest rates, foreign exchange rates or currencies, in which the Sub-Funds may invest according to their investment objective;
- the counterparties to OTC derivative transactions are institutions subject to prudential supervision, and belonging to the categories approved by the Luxembourg supervisory authority;
- the OTC derivatives are subject to reliable and verifiable valuation on a daily basis and can be sold, liquidated or closed by an offsetting transaction at any time at their fair value at the Fund's initiative.

Unless specifically provided otherwise in the Section II for any specific Sub-Fund, the Fund will invest in financial derivative instruments for hedging purposes and for efficient portfolio management purposes, as more fully described in the section "3. Derivatives, Techniques and Other Instruments " below; and/or

vii. money market instruments other than those dealt in on a Regulated Market, if the issue or the issuer of such instruments are themselves regulated for the purpose of protecting investors and savings, and provided that such instruments are:

- issued or guaranteed by a central, regional or local authority or by a central bank of an EU member state, the European Central Bank, the European Union or the European Investment Bank, a non-EU 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 EU member states belong, or
- issued by an undertaking any securities of which are dealt in on Regulated Markets, or
- issued or guaranteed by an establishment subject to prudential supervision, in accordance with criteria defined by Community 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 Community law, or
- issued by other bodies belonging to categories approved by Luxembourg supervisory authority provided that investments in such instruments are subject to investor protection equivalent to that laid down in the first, the second or the third indent and provided that the issuer is a company whose capital and reserves amount to at least ten million Euro (EUR 10.000.000) and which presents and publishes its annual accounts in accordance with the fourth Directive 78/660/EEC, is an entity which, within a group of companies which includes one or several listed companies, is dedicated to the financing of the group or is an entity which is dedicated to the financing of securitisation vehicles which benefit from a banking liquidity line.

(2) In addition, the Fund may invest a maximum of 10% of the net asset value of any Sub-Fund in transferable securities and money market instruments other than those referred to under (1) above.

B. Each Sub-Fund may hold ancillary liquid assets.

C. i. Each Sub-Fund may invest no more than 10% of its net asset value in transferable securities or money market instruments issued by the same issuing body (and in the case of credit-linked securities both the issuer of the credit-linked securities and the issuer of the underlying securities).

Each Sub-Fund may not invest more than 20% of its net assets in deposits made with the same body. The risk exposure to a counterparty of a Sub-Fund in an OTC derivative transaction may not exceed 10% of its net assets when the counterparty is a credit institution referred to in 1.A.V. above or 5% of its net assets in other cases.

ii. Furthermore, where any Sub-Fund holds investments in transferable securities and money market instruments of any issuing body which individually exceed 5% of the net asset value of such Sub-Fund, the total value of all such investments must not account for more than 40% of the net asset value of such Sub-Fund.

This limitation does not apply to deposits and OTC derivative transactions made with financial institutions subject to prudential supervision.

Notwithstanding the individual limits laid down in paragraph C. i., a Sub-Fund may not combine:

- investments in transferable securities or money market instruments issued by a single body,
- deposits made with, and/or
- exposures arising from OTC derivative transactions undertaken with a single body

in excess of 20% of its net assets.

iii. The limit of 10% laid down in paragraph C. i. above shall be 35% in respect of transferable securities or money market instruments which are issued or guaranteed by an EU member state, its local authorities or by an Eligible State or by public international bodies of which one or more EU member states are members.

iv. The limit of 10% laid down in paragraph C. i. above shall be 25% in respect of debt securities which are issued by credit institutions having their registered office in an EU member state and which are subject by law to a special public supervision for the purpose of protecting the holders of such debt securities, provided that the amount resulting from the issue of such debt securities are invested, pursuant to applicable provisions of the law, in assets which are sufficient to cover the liabilities arising from such debt securities during the whole period of validity thereof and which are assigned to the preferential repayment of capital and accrued interest in the case of a default by such issuer.

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

v. The transferable securities and money market instruments referred to in paragraphs C. iii. and C. iv. are not included in the calculation of the limit of 40% referred to in paragraph C. ii..

The limits set out in paragraphs C. i., C.ii., C. iii. and C. iv. above may not be aggregated and, accordingly, the value of investments in transferable securities and money market instruments issued by the same body, in deposits or derivative instruments made with this body, effected in accordance with paragraphs C. i., C. ii., C. iii. and C. iv. may not, in any event, exceed a total of 35% of each Sub-Fund’s net asset value.

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

A Sub-Fund may cumulatively invest up to 20% of its net assets in transferable securities and money market instruments within the same group.

vi. Without prejudice to the limits laid down in paragraph D., the limits laid down in this paragraph C. shall be 20% for investments in shares and/or bonds issued by the same body when the aim of a Sub-Fund's investment policy is to replicate the composition of a certain stock or bond index which is recognised by the Luxembourg supervisory authority, provided

- the composition of the index is sufficiently diversified,
- the index represents an adequate benchmark for the market to which it refers,
- it is published in an appropriate manner.

The limit laid down in the subparagraph above is raised to 35% where it 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 investment up to 35% is only permitted for a single issuer.

vii. Where any Sub-Fund has invested in accordance with the principle of risk spreading in transferable securities and money market instruments issued or guaranteed by an EU member state, by its local authorities or by an Eligible State which is an OECD member state, or by public international bodies of which one or more EU member states are members, the Fund may invest 100% of the net asset value of any Sub-Fund in such securities and money market instruments provided that such Sub-Fund must hold securities from at least six different issues and the value of securities from any one issue must not account for more than 30% of the net asset value of the Sub-Fund.

Subject to having due regard to the principle of risk spreading, a Sub-Fund need not comply with the limits set out in this paragraph C. for a period of 6 months following the date of its authorisation and launch.

D. i. The Fund may not acquire shares carrying voting rights which would enable the Fund to exercise significant influence over the management of the issuing body.

ii. The Fund may acquire no more than:

(a) 10% of the non-voting shares of any single issuing body
(b) 10% of the value of debt securities of any single issuing body
(c) 10% of the money market instruments of the same issuing body and/or
(d) 25% of the units of the same collective investment undertaking.

However, the limits laid down in (b), (c) and (d) above may be disregarded at the time of acquisition if at that time the gross amount of the debt securities or of the money market instruments or the net amount of securities in issue cannot be calculated.

The limits set out in paragraph D. i. and ii. above shall not apply to:

(i) transferable securities and money market instruments issued or guaranteed by an EU member state or its local authorities;

(ii) transferable securities and money market instruments issued or guaranteed by any other Eligible State;

(iii) transferable securities and money market instruments issued by public international bodies of which one or more EU member states are members; or

(iv) shares held in the capital of a company incorporated in a non EU-member state which invests its assets mainly in the securities of issuing bodies having their registered office in that state where, under the legislation of that state, such holding represents the only way in which such Sub-Fund's assets may invest in the securities of the issuing bodies of that state, provided, however, that such company in its investment policy complies with the limits laid down in Articles 43, 46 and 48 (1) and (2) of the Law of 17 December 2010;

(v) shares held by one or more investment companies in the capital of subsidiary companies which, exclusively on its or their behalf carry on only the business of management, advice, or marketing in the country where the subsidiary is located, with regard to the redemption of shares at the request of the Shareholders.

E. Each Sub-Fund may invest more than 10% of its net asset value in units of UCITS or other UCIs. The following limits shall apply.

i. Each Sub-Fund may acquire units of the UCITS and/or other UCIs referred to in paragraph A. iv., provided that no more than 20% of a Sub-Fund's net assets be invested in the units of a single UCITS or other UCI.

For the purpose of the application of investment limit, each sub-fund of a UCI with multiple compartments is to be considered as a separate issuer provided that the principle of segregation of the obligations of the various compartments vis-à-vis third parties is ensured.

ii. Investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of a Sub-Fund.

iii. When a Sub-Fund invests in the units of other UCITS and/or other UCIs linked to the Fund by common management or control, or by a substantial direct or indirect holding, or managed by a management company linked to the Fund (hereafter defined as "UCITS Connected"), no subscription or redemption fees may be charged to the Fund on account of its investment in the units of such other UCITS and/or UCIs. In addition, for such cases, the Board identified appropriate procedures to manage potential conflicts of interest, i.e. the portion of the assets represented by units of UCITS Connected, will not be detected in the calculation of the management and performance fees

Cross investments within New Millennium SICAV are submitted to the same above procedures and they are allowed for all the sub-funds except if differently specified in the investment policy, providing that the target fund investment policy is consistent with the sub-fund objective; cross investments will be compliant with the art. 181 (8) of the Law 2010.

In respect of a Sub-Fund's substantial investments in UCITS and other UCIs linked to the Fund, or other sub-funds within the SICAV, as described in the preceding paragraph, the total management fee (excluding any performance fee, if any) charged to such Sub-Fund and each of the UCITS or other UCIs concerned shall not exceed 2% of the relevant net assets under management. The Fund will indicate in its annual report the total management fees charged both to the relevant Sub-Fund and to the UCITS and other UCIs in which such Sub-Fund has invested during the relevant period.

iv. The Fund may acquire no more than 25% of the units of the same UCITS and/or other UCI. This limit may be disregarded at the time of acquisition if at that time the gross amount of the units in issue cannot be calculated. In case of a UCITS or other UCI with multiple compartments, this restriction is applicable by reference to all units issued by the UCITS/UCI concerned, all sub-funds combined.
The underlying investments held by the UCITS or other UCIs in which the Sub-Funds invest do not have to be considered for the purpose of the investment restrictions set forth under 1. (C) above.

v. In compliance with the applicable laws and regulations any feeder sub-fund of the Fund (hereinafter referred to as a "**Feeder Compartment**") may be authorised to invest at least 85% of its assets in the units of a another UCITS or sub-fund thereof (the "**Master UCITS**"). A Feeder Compartment may hold up to 15% of its assets in one or more of the following:

- ancillary liquid assets in accordance with Article 41 (2) second paragraph of the UCI Law;
- financial derivative instruments, which may be used only for hedging purposes, in accordance with Article 41(1) point g) and Article 42(2) and (3) of the UCI Law;
- movable and immovable property which is essential for the direct pursuit of its business.

For the purposes of compliance with paragraph 3, the Feeder Compartment shall calculate its global exposure related to financial derivative instruments by combining its own direct exposure under point b) of the first sub-paragraph with either:

- the Master UCITS actual exposure to financial derivative instruments in proportion to the Feeder Compartment investment into the Master UCITS; or
- the Master UCITS potential maximum global exposure to financial derivative instruments provided for in the Master UCITS management regulations or instruments of incorporation in proportion to the Feeder Compartment investment into the Master UCITS.

vi. A sub-fund of the Fund may in addition and to the full extent permitted by applicable laws and regulations but in compliance with the conditions set-forth by applicable laws and regulations, be launched or converted into a Master UCITS in the meaning of Article 77(3) of the Law of 17 December 2010.

2. Investment in other assets

A. The Fund will not make investments in precious metals or certificates representing these.

B. The Fund may invest in transferable securities linked to commodities index and/or derivative on commodities index. The commodity exposure for the Fund may also be obtained through eligible UCITS, other UCIs and Exchange Traded Funds, according to article 41 (1) e. Investments in other UCIs and Exchange Traded Fund that do not comply with the requirements of article 41 (1) e) will be limited to 10% of the net assets of the each Sub-Fund, together with any non-quoted securities according to article 41 (2) a). All derivatives will be cash settled, under the terms of the relevant contract. The Fund will not own commodities directly.

C. The Fund will not purchase or sell real estate or any option, right or interest therein, provided the Fund may invest in securities secured by real estate or interests therein or issued by companies which invest in real estate or interests therein.

D. The Fund may not carry out uncovered sales of transferable securities, money market instruments or other financial instruments referred to in 1.(A) (1) iv), vi) and vii).

E. The Fund may not borrow for the account of any Sub-Fund, other than amounts which do not in aggregate exceed 10% of the net asset value of the Sub-Fund, and then only as a temporary measure. For the purpose of this restriction back to back loans are not considered to be borrowings.

3. Derivatives, techniques and other instruments

The Fund may, for the purpose of efficient portfolio management of its assets or for providing protection against main risks, such as and not limited to exchange rate risk, employ derivatives under the conditions and within the limits laid down by law, regulation and administrative practice. If a Sub-Fund uses such instruments for investment purposes, detailed information on such instruments will be disclosed in the investment policy of the relevant Sub-Fund.

The Management Company of the Fund shall ensure that the global exposure of each Sub-Fund relating to derivative instruments does not exceed the total net assets of that Sub-Fund.

Unless differently stated in the Appendix specific to each Sub-Fund under Section II, the exposure is calculated by the Management Company of the Fund using the "Value at Risk (VaR)" method, taking into account the current value of the underlying assets, the counterparty risk, foreseeable market movements and the time available to liquidate the positions.

The VaR approach is measured at a 99 confidence level, based on a time horizon of one month and is calculated using a Monte Carlo Simulation. The holding period relating to financial derivative instruments, for the purpose of calculating global exposure, is one month.

It is an expected VaR based on the current holdings of the portfolios, so ex ante.

Furthermore, the Management Company of the Fund adopted the "Commitment approach" to calculate and monitor the financial leverage level for each Sub-Fund.

Both the above mentioned methods are applied in strict compliance with Luxembourg laws, regulations and ESMA guidelines.

This shall also apply to the following subparagraphs.

Each Sub-Fund may invest, as a part of its investment policy and within the limits laid down in restriction 1. C. v., in financial derivative instruments provided that the exposure to the underlying assets does not exceed in aggregate the investment limits laid down in restrictions 1. C. i. to v.. When a Sub-Fund invests in index-based financial derivative instruments, these investments do not have to be combined to the limits laid down in restriction 1.C.

When a transferable security or money market instrument embeds a derivative, the latter must be taken into account when complying with the requirements of this restriction.

For each Sub-Fund, the Fund may, for efficient portfolio management, participate in transactions relating to repurchase agreements under respect of the limits as specified hereafter.

4. Miscellaneous

A. The Fund may not make loans to other persons or act as a guarantor on behalf of third parties provided that this restriction shall not prevent the Fund from acquiring transferable securities or money market instruments or other financial instruments referred to in paragraph 1. (A) (1) (iv), (vi) and (vii) which are not fully paid.

B. The Fund needs not comply with the limits laid down in chapter 8. Investment Restrictions when exercising subscription rights attached to transferable securities or money market instruments which form part of its assets.

If the limits referred into paragraph 8. are exceeded for reasons beyond the control of the Fund, or as a result of the exercise of subscription rights, the Board of Directors must, as a priority, take all steps as necessary within a reasonable period of time to rectify that situation, taking due account of the interests of its Shareholders.

RATING LIMIT CHECK:

The investments of a Sub-Fund may have to comply with some levels of ratings, as further described in the relevant Sub-Fund's schedule. Whenever the investment policy of a specific Sub-Fund refers to such a rating, the rating primarily applies to, and shall be checked at the level of, the issued securities. Nevertheless, if the rating so specified is complied with at the level of the issuer but not at the level of the issued securities, the compliance with such rating requirement shall also be met.

Where in the investment policy of the relevant Sub-Funds there is a provision about the maximum percentage invested in non-investment grade securities, the minimum rating for direct investment in bonds is equal to B-, however under exceptional circumstances:

- this direct investment may be up to a maximum of 5% of the net asset in bonds with a rating between C and CCC+; and
- the Sub-Fund may, where the securities have been subject to downgrade, maintain up to a maximum of 3% of the net asset in securities with a minimum rating equal D.

Securities whose rating is downgraded to a rating between C and CCC+ shall fall within the above 5% limit.

The 5% limit for direct investment in bonds with a rating between C and CCC+ and the 3% limit for downgraded D securities shall be cumulative but shall be included in the maximum percentage of the investment in non-investment grade securities specified in the relevant Sub-Fund schedule.

These exceptions shall only apply to those Sub-Funds where specified in the relevant Sub-Fund's schedule.

In order to determine the rating of either the issued securities or the issuers the Fund will use the ratings of four rating agencies, Fitch, Moody's, Standard & Poor's, DBRS. In case where different ratings are given by such agencies for the same issued securities or issuer, the highest rating shall be used.

REPURCHASE TRANSACTIONS AND SECURITIES LENDING

The Fund may, on an ancillary basis, enter into repurchase agreements which comply with the Circular CSSF 08/356 and CSSF Circular 14/592, as further amended and supplemented, and which consist in the purchase and sale of securities whereby the terms of the agreement entitle the seller to repurchase from the purchaser the securities at a price and at a time agreed amongst the two parties at the conclusion of the agreement.

The Fund may act either as purchaser or as seller in repurchase transactions. Its entering in such agreements is however subject to the following rules:

a. Rules intended to ensure the proper completion of repurchase agreements

The Fund may purchase or sell securities in the context of a repurchase agreement only if its counterparty is a financial institution subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by Community law and specialized in this type of transactions.

b. Conditions and limits of repurchase transactions

Where the Fund enters into a repurchase agreement it should ensure that it will be able at all times (i) to recall the full amount of cash or to terminate the reverse repurchase agreement on either an accrued basis or mark-to market basis; and, (ii) to recall any securities subject to the repurchase agreement or to terminate the repurchase agreement in which it has entered.

Fixed-term repurchase and reverse repurchase agreements 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 Fund.

The Fund must ensure to maintain the importance of purchased securities subject to a repurchase obligation at a level such that it is able, at any time, to meet its obligations to redeem its own Shares.

The securities subject to repurchase transactions must be in the form prescribed by CSSF Circular 08/356 and circular 14/592, as further amended and supplemented, and must comply with the Fund's investment policy and, together with the other securities that the UCITS holds in its portfolio, globally comply with the Fund’s investment restrictions and other provisions specifically set out hereafter.

The Fund may enter into securities lending transactions only in accordance with the applicable provisions of the Law of 17 December 2010 and respective CSSF Circulars (in particular CSSF Circular 08/356 and CSSF Circular 14/592, as further amended and supplemented).

The techniques and instruments mentioned in this section may only be applied for the purpose of efficient portfolio management. They are further only allowable provided (i) they are economically appropriate in that they are realised in a cost-effective manner, (ii) they are entered into to reduce risks, reduce costs and/or generate additional capital or income for a Sub-Fund in consistence with the risk profile and risk diversification rules applying to such Sub-Fund, and (iii) their risks are adequately captured by the risk management process of the Fund.

Such techniques and instruments may comprise the following:

a) securities lending (*operations de prêt de titres*);

b) sale with a right to repurchase transactions (*operations à réméré*); and

c) reverse repurchase and repurchase agreement transactions (*operations de prise/mise en pension*).

The Fund will respect all rules established by the CSSF in relation to the transactions carried out under section III. 4. a) through c) in the CSSF-Circular 08/356 and any additional laws, regulations and provisions, including CSSF-Circular 14/592, as further amended and supplemented, which may apply to such transactions.

The Fund involvement in such transactions is, however, subject to the additional following rules:

(i) The counterparty to these transactions must be subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by EU law;

(ii) The Fund will ensure that the volume of securities lending transactions is limited to an appropriate level and that it will be able all times (i) to request the restitution of the securities lent or (ii) to terminate any securities lending transaction into which it has entered, in such a way that it can meet its redemption obligations at all times and so that such transactions do not compromise the management of the Fund's assets in compliance with its investment policy.

The risk exposure to a single counterparty of the UCITS arising from OTC financial derivative transactions and efficient portfolio management shall be combined when calculating the counterparty risk limits and will not exceed 10% of the assets of the concerned Sub-Fund when the counterparty is a credit institution referred to Article 41, paragraph (1) (f) of the Law of 17 December 2010 or 5% of the concerned Sub-Fund's assets in other cases.

The Fund may, on an ancillary basis, enter into securities lending transactions in line with the applicable provisions of the Law of 17 December 2010 and respective CSSF Circular 08/356 and CSSF circular 14/592, as further amended and supplemented:

The Fund may only participate in securities lending transactions with a standardized lending system organized by a recognized securities 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 prescribed by Community law and specialized in that type of transactions.

Lending transactions may not be carried out on more than 50% of the aggregate market value of the securities in the portfolio, and may not extend beyond a period of 30 days. These limits are not applicable where the Fund has the right, at any time, to terminate the contract and obtain restitution of the securities lent.

As of the date of this Prospectus no total return swap transactions are envisaged nor any Securities Financing Transactions (SFTs) program is active; in case of future activation of a specific program, the Prospectus will be updated complying with the Regulation EU 2015/2365 ("SFTR"). For the purpose, and according to art. 3.11, of SFTR, Securities Financial Transactions means: a) repurchase transaction, b) securities or commodities lending and securities or commodities borrowing; c) buy-sell back transaction or sell-buy back transaction; d) margin lending transaction.

Policy regarding direct and indirect operational costs and/or fees arising from securities lending transactions

The Fund has named State Street Bank GmbH, London Branch as its agent to enter into Lending Transactions and administer Collateral on its behalf. The remuneration for the services provided under the Lending Transactions will be deducted from the revenue delivered to the Fund currently representing 25% of the income generated from such transactions (subject to change without notice).

Collateral Management

For each securities lending transaction, the Fund must receive a guarantee the value of which is, during the lifetime of the lending agreement, at least equivalent to 90% of the global valuation (interests, dividends and other eventual rights included) of the securities lent.

This collateral must be given in the form of cash and/or of securities compliant with the requirements set out in CSSF Circular 08/356 section II/b and CSSF Circular 14/592, as further amended and supplemented.

If the collateral has been provided in the form of cash, the Fund may reinvest such cash in the instruments specified in CSSF Circular 08/356 section III, as amended by CSSF Circular 11/512 and CSSF Circular 14/592, as further amended and supplemented.

Where the Fund enters into OTC financial derivative transactions and efficient portfolio management techniques, all collateral used to reduce counterparty risk exposure shall comply with the following criteria at all times:

a. Liquidity – any collateral received other than cash should all be 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. Collateral received should also comply with the provisions of Directive 2009/65/EC.
b. Valuation – collateral received should all be valued on at least a daily basis and assets that exhibit high price volatility should all not be accepted as collateral unless suitably conservative haircuts are in place.
c. Issuer credit quality – collateral received should all be of high quality.
d. Correlation – the collateral received by the Fund should all be issued by an entity that is independent from the counterparty and is expected not to display a high correlation with the performance of the counterparty.
e. Collateral diversification (asset concentration) – collateral shall be sufficiently diversified in terms of country, markets and issuers.
f. Risks linked to the management of collateral, such as operational and legal risks, shall be identified, managed and mitigated by the risk management process.
g. Where there is a title transfer, the collateral received should all be held by the depositary of the Fund. For other types of collateral arrangement, the 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.
h. Collateral received should all be capable of being fully enforced by the FUND at any time without reference to or approval from the counterparty.
i. Non-cash collateral received should all not be sold, re-invested or pledged.
j. Cash collateral received should all only be:
    - placed on deposit with entities prescribed in Article 50(f) of the Directive 2009/65/EC;
    - invested in high-quality government bonds;
    - used for the purpose of reverse repo transactions provided the transactions are with credit institutions subject to prudential supervision and the FUND is able to recall at any time the full amount of cash on accrued basis;
    - invested in short-term money market funds as defined in the ESMA Guidelines on a Common Definition of European Money Market Funds (Ref. CESR/10-049).

The haircuts applied to the assets received as collateral are carefully defined keeping in consideration the type, liquidity, maturity, and the creditworthiness of the issuer.

The level of haircuts applied normally ranges between:

[102]% and [108] % for collateral received in the form of equities;

[102]% and [108] % for collateral received in the form of bonds.

Cash received as collateral is generally reinvested in the State Street Global Advisors Liquidity PLC, which is an open-ended investment company with variable capital organized under the laws of Ireland as a public limited company and is authorized as a UCITS pursuant to the UCITS regulations.

9. RISK MANAGEMENT PROCESS

The Management Company of the Fund employs a risk-management process which enables it to monitor and measure at any time the risk of the individual positions and their contribution to the overall risk profile of each Sub-Fund. The Management Company of the Fund will employ, if applicable, a process for accurate and independent assessment of the value of any OTC derivative instruments.

10. THE MANAGEMENT COMPANY

The Board of Directors of the Fund has designated NATAM MANAGEMENT COMPANY S.A. (the "Management Company"), having its registered office at 11, rue Béatrix de Bourbon, L-1225 Luxembourg as its management company registered under Chapter 15 of the Law of 2010, in accordance with a "Management Company Agreement" effective from 1st January 2017.

The Management Company is a company incorporated in Luxembourg as a "*société anonyme*" on August 30th, 2016 for an indefinite duration and registered in the Luxembourg Commercial Register under Number B208754. Its registered capital is set at seven-hundred fifty thousand euro (EUR 750,000) divided into seven hundred and fifty (750) registered shares, with a nominal value of one thousand euro (EUR 1.000), each fully paid up. The issued capital upon incorporation has been entirely subscribed by Banca Finnat Euramerica S.p.A.

The Management Company is in charge of the tasks set in Annex II to the law of 17 December 2010 relating to undertakings for collective investments, namely:

- Investment management;
- Administration, which encompasses:
  a) legal and fund management accounting services;
  b) customer inquiries;
  c) valuation of the portfolio and pricing of the units (including tax returns);
  d) regulatory compliance monitoring;
  e) maintenance of unitholder register;
  f) distribution of income;
  g) unit issue and repurchase;
  h) contract settlements (including certificate dispatch);
  i) record keeping.
- Marketing the Fund's Shares.

The Management Company is entitled to delegate under its control and responsibility the above mentioned tasks.

Remuneration Policy of the Management Company

The Management Company of the Fund has in place a remuneration policy which is in line with the Directive 2014/91/EU.

The remuneration policy of the Management Company sets out principles applicable to the remuneration of the senior management, all staff members having a material impact on the risk profile of the Fund as well as all staff members carrying out independent control functions.

The remuneration policy of the Management Company is in line with the business strategy, objectives, values and interests of the Management Company and of the other UCITS that is manages and of the interests of the Fund and of its Shareholders, and includes measures to avoid conflicts of interest.

Where the Management Company pays variable remuneration same will be paid by the Management Company on the basis of the assessment of performance which is set in a multi-year framework appropriate to the holding period recommended to the Shareholders of the Fund managed by the Management Company 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.

Moreover where the Management Company pays variable remuneration the fixed and variable components of total remuneration paid by the Management Company are appropriately balanced and the fixed component represents a sufficiently high proportion of the total remuneration to allow the operation of a fully flexible policy on variable remuneration components, including the possibility to pay no variable remuneration component.

The remuneration policy of the Management Company is reviewed at least on annual basis by the board of directors of the Management Company.

The remuneration policy of the Management Company promotes and is consistent with sound and effective risk management and does not encourage risk taking that would be inconsistent with the risk profiles of the Sub-Funds, this Prospectus and the Articles of Incorporation of the Fund.

The remuneration policy of the Management Company is consistent with the business strategy, objectives, values and interests of the Management Company itself, of the other UCITS that it manages and of the Fund and the investors of the Fund and includes measures to avoid conflicts of interest.

The up-to-date remuneration policy of the Management Company containing further details and information in particular on how the remuneration and advantages are calculated and the identity of the persons responsible for the attribution of the remuneration and advantages is available at the registered office of the Management Company and on the following website:

http://www.natam.lu/uploads/documents/en/REMUNERATION_POLICY.pdf.

A hard copy of the remuneration policy may be obtained free of charge upon request.

Conflict of Interest policy

The Board of Directors of the Fund and/or of the Management Company will (in the event that any conflict of interest actually arises) endeavour to ensure that in case any potential conflict of interests arises, such conflict is resolved fairly and in the best interests of the Fund and its shareholders.

The directors of the Management Company may also be directors of the Fund and the interest of the Fund and/or of the Management Company could result potentially in conflicts. In the event where such a conflict arises, the directors of the Management Company will endeavour to ensure that it is resolved in a fair manner and in the best interests of the Fund /of its Sub-Funds and their respective shareholders.

Natam Management Company S.A. shall act as Management Company of the Fund and may also engage in investment management activities and distribution activities.

Banca Finnat Euramerica S.p.A., which is the sole shareholder of the Management Company, may also act as investment manager and Global distributor of several Sub-Funds of the Fund as well as act in other role, as may be from time to time defined. As a result, such functions of the Management Company and of Banca Finnat Euramerica S.p.A. may result in conflicts of interest between the various activities of these companies and their duties and obligations to the Fund and its Sub-Funds. The Management Company, under the rules of conduct applicable to it, must try to avoid conflicts of interest and, when they cannot be avoided, ensure that its clients (including the Fund) are fairly treated.

The Management Company of the Fund may from time to time act as Management Company, investment manager or adviser, principal placement and distribution agent, or be otherwise involved with, other funds or UCITS, UCIs and other investment vehicles. It is therefore possible that any of them may, in the due course of their business, have potential conflicts of interest with the Fund or any Sub-Fund. In such event, each will at all times have regard to its obligations under any agreements to which it is party or by which it is bound in relation to the Fund or any Sub-Fund. In particular, when undertaking any dealings or investments where conflicts of interest may arise, each will respectively endeavour to ensure that such conflicts are resolved fairly.

Sub-Funds of the Fund may invest from time to time in UCITS and other UCIs and other investment vehicles managed by the Management Company: it is therefore possible that the Management Company may, in the due course of their business, have potential conflicts of interest with the Fund or any Sub-Fund. When undertaking any investments where conflicts of interest may arise, each will respectively endeavour to ensure that such conflicts are resolved fairly.

The Management Company and/or Banca Finnat Euramerica S.p.A. and/or delegated Investment Managers may effect transactions in which they have, directly or indirectly, an interest which may involve a potential conflict with the Management Company's duty to the Fund. Neither the Management Company nor Banca Finnat Euramerica S.p.A. nor any other delegated Investment Manager shall be liable to account to the Fund for any profit, commission or remuneration made or received from or by reason of such transactions or any connected transactions nor will the Management Company's fees, unless otherwise provided, be abated. The Management Company and/or Banca Finnat Euramerica S.p.A. and/or the delegated Investment Managers will ensure that such transactions are effected on terms that are at least as favourable to the Fund and it's Sub-Fund than if the potential conflict had not existed.

There is no prohibition on the Fund/on its Sub-Funds in entering into any transactions with the Management Company, or Banca Finnat Euramerica S.p.A or any delegated Investment Manager or global distributor, provided that such transactions are carried out as if effected on normal commercial terms negotiated at arm's length. In such case, in addition to the Management fees the Management Company or Banca Finnat Euramerica S.p.A. or the delegated Investment Managers earn for managing the applicable Sub-Fund, they may also have an arrangement with the issuer, dealer and/or distributor of any products entitling them to a share in the revenue from such products that they purchase on behalf of the Fund and its applicable Sub-Funds. In addition, there is no prohibition on the Management Company or on Banca Finnat Euramerica S.p.A. or on other delegated Investment Manager to purchase any products on behalf of the Fund and its Sub-Funds where the issuer, dealer and/or distributor of such products are their affiliates provided that such transactions are carried out as if effected on normal commercial terms negotiated at arm's length, in the best interest of the Fund.

Potential conflicting interests or duties may arise because the Management Company and/or Banca Finnat Euramerica S.p.A. and/or delegated Investment Managers may have invested directly or indirectly in the Fund or in its Sub-Funds. The Management Company and/or Banca Finnat Euramerica S.p.A. and/or delegated Investment Managers could hold a relatively large proportion of Shares and voting rights in any Sub-Fund or Share Class.

The Management Company and/or Banca Finnat Euramerica S.p.A. and/or delegated Investment Managers, may make substantial investments in a Sub-Fund or a Share Class for various purposes including, but not limited to, facilitating the growth of the Sub-Fund or Share Class, for facilitating the investment management or tax reporting of a Sub-Fund or Share Class, or for meeting future remuneration payment obligations to certain employees.

In order to identify and manage potential conflicts of interests which may rise in the performance of its duties, the Management Company has implemented a conflict of interest policy which may be obtained in paper form free of charge at the registered office of the Management Company or available for download in electronic form directly at the website:

http://www.natam.lu/uploads/documents/en/CONFLICT_OF_INTEREST_POLICY.pdf

Management Company fees

The Management Company is entitled to receive from each Sub-Fund a remuneration consisting of two components:

- a fixed fee up to EUR 11.000 (excluding any applicable taxes), payable on a quarterly basis in arrears;
- a fee as a portion of the Management fees. The Management fees are detailed in Section II (Description of the Sub-Funds) and besides being the remuneration of the Management Company, it includes also the remuneration of the Investment Managers, the Investment Advisors (if any), the Global Distributor and any other financial agent acting in connection with the Global Distributor with the placing of the Fund's Shares. Such fee shall be payable in arrears at the end of each quarter and based on the value of the average net assets during the relevant quarter.
- a fee as a portion of the Performance fees, as may be agreed from time to time with the Investment Managers. The Performance fees are detailed under Section II Management fees are detailed in Section II (Description of the Sub-Funds).

11. INVESTMENT ADVICE AND MANAGEMENT DELEGATION AND RESPECTIVE FEES

Investment management delegation Agreements

The Management Company can give total or partial delegation for the management of the individual Sub-Funds to an Investment Manager (hereinafter referred to as "Investment Manager") duly authorized to carry out such activity.

The Management Company currently has appointed as Investment Manager:

- Banca Finnat Euramerica S.p.A. ("BFE"), a public limited company incorporated under Italian law whose shareholders' equity as of 31.12.15 amounted to EUR 72.576.000.
- AZ Swiss & Partners S.A. ("AZ Swiss"), a *société anonyme* incorporated under the Swiss law on 25 October 2012, with registered office at Via Carlo Frasca 5, Ch-6900 Lugano (Switzerland), whose deposited shareholders' equity as of 31.12.15 amounted to CHF 200.000.
- Open Capital Partners SGR S.p.A, a public limited company incorporated under Italian law on 3 November 2016, with registered office at Via Santo Spirito 14, 20121 Milan, whose deposited shareholders' equity as of 31.05.17 amounted to EUR 1.000.000.
- Diaman Partners Ltd, (Diaman) a limited company incorporated under the Maltese law on 30 January 2018, with registered office at 259, St. Paul Street, VLT 1213, Valletta, Malta, whose deposited shareholders' equity as of 31 December 2019 amounted to EUR 350.000

  They have been granted, by the Management Company, a mandate to carry out the activities of stock picking and time selection for some Sub-Funds, as indicated in Section II (Description of the Sub-Funds). They shall carry out their assignments in compliance with the asset allocation indications set out for the relevant Sub-Funds from time to time by the Management Company.

Investments advisory agreements

The Management Company and/or the Investment Managers may also sign agreements to receive investments advisory services from one or several Investment Advisers.

Investment advisory fee, management fee and performance fees

As mentioned under paragraph 11, as remuneration for the above-mentioned services, the Management Company and the Investment Managers and the Investment Advisors (if any) shall receive a fee the amount of which is included in the Management fee indicated in Section II (Description of the Sub-Funds). Such a fee shall be payable at the end of each quarter and based on the value of the average net assets during the relevant quarter.

In addition, the Management Company and the Investment Managers or the Investment Advisors (if any) could receive a performance fee. The calculation methodology of such fees will be as follows:

The performance fees shall be calculated on each Net Asset Value calculation, based on the shares in circulation on the working day before each Valuation day and payable annually to the Management Company and Investment Manager or Investment Advisor (if any) at the beginning of the following period.

Unless otherwise stated in Section II, the Fund will apply at all times the High Water Mark Principle, i.e. no performance fee shall be paid in the case where the Gross Asset Value (the "GAV") which is the Net asset value per share after deducting all fees and liabilities and the management fee (but not the performance fee) as at the end of the reference period is lower than the highest Net asset value per share calculated as at the end of any preceding period and giving rise to the payment of a performance fee since the first period, or the first Net asset value per share of the first period in which a performance fee was calculated ("High-Water Mark"). The reference period shall start on the 1st January of each year and end on the 31st December.

Performance fees are payable annually to the Management Company and the Investment Manager or Investment Advisor (if any) at the beginning of the following period but if shares are redeemed during the reference period, when a performance fee has been provisioned, the portion of the performance fee attributable to redeemed shares will be paid at the end of each quarter. The performance fee crystallized in case of redemptions will be calculated according to the following formula: performance fee crystallized on redemption (t) = (number of units redeemed (t) / number of units (t-1)) * performance Fee (t-1).

The performance fees chargeable to such redeemed shares will already be reflected in the redemption price of the redeemed shares and will be deducted from the accrued performance fee.

Also in case of subscriptions there will be an adjustment consisting of removing, from the provision for the performance fee calculated on the number of underlying shares, the performance fee related to the underlying shares subscribed in the period prior to the subscription date. Thus, for these shares, no performance fee will be provisioned for performance prior to the subscription date.
The performances of the Shares are calculated considering the reinvestment of dividends, if any.

a) For Sub-Funds with absolute performance fee:

Unless as otherwise stated in the Section II under the description of the relevant Sub-Fund, the performance fee will be based on the difference, if positive, between the last computed GAV (Gross Asset value or net asset value per share before deduction of performance fees) as at the end of a 12 month period, starting the 1st January of each year, and the highest net asset value per share calculated as at the end of any preceding period and giving rise to the payment of a performance fee, since the first period, or the first net asset value of the first period subject to a performance fee calculation. The performance fee shall be a percentage, indicated in Section II under the description of the relevant Sub-Fund, of the difference so determined, multiplied by the number of shares in circulation of the Sub-Fund.

b) For Sub-Funds with relative performance fee:

Unless as otherwise stated in the Section II under the description of the relevant Sub-Fund, the performance fee shall be a percentage, indicated in Section II under the description of the relevant Sub-Fund, of the excess return over the relevant benchmark/target indicated under the description of the relevant Sub-Fund. The reference period shall start on the 1st January of each year and end on the 31st December of the same year. The performance fees are submitted to the occurrence of the following conditions:

- GAV of the Sub-Fund is above HWM
- In the reference period the performance of the Sub-Fund is positive and higher than the performance of the benchmark/target.

Once verified the above two conditions, a double scenario can raise:

a) HWM is equal or higher than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark/target starting on the date the HWM has been beaten. For the Sub-Fund it will be calculated the difference between the GAV and the HWM, for the benchmark/target it will be calculated the difference between the daily value and the closing price of the day before that on which the HWM was beaten (i.e. if the HWM is beaten on the 20th April, the performance of the benchmark/target to be considered on the 20th April is the one between the 20th and the 19th April);

b) HWM is lower than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark/target over the reference period.

The Shareholders will be informed of any change related to the advisory, management or performance fees by the means considered the most suitable by the Board of Directors (e.g. press, mailing or website). In case of any increase of such fees, the Shareholders will have the possibility to sell their Shares without any commission or charge within one month.

The remuneration of BFE, AZ Swiss, Open Capital and Diaman is included in the Management fee as specified in the Section II (Description of the Sub-Funds).

The amounts, expressed as percentages, of all the above fees are detailed in the Section II (Description of the Sub-Funds).

12. GLOBAL DISTRIBUTOR

The Management Company grants BFE mandate to act as Global Distributor of the SICAV in those countries where the SICAV obtains public offering authorisation.

The remuneration of BFE for these activities is included in the Management fee as specified under paragraph 11 above and indicated in Section II (Description of the Sub-Funds).

13. DEPOSITARY BANK AND CENTRAL ADMINISTRATION

State Street Bank Luxembourg S.C.A. (hereinafter referred to as the "**Depositary**") has been appointed as Depositary within the meaning of the 2010 Law pursuant to the Depositary Agreement. State Street Bank Luxembourg S.C.A. is a partnership limited by shares (S.C.A.) under the laws of Luxembourg and has been incorporated on 19 January 1990. It is authorized by the CSSF in Luxembourg in accordance with Directive 2006/48/EC as implemented in Luxembourg by the 1993 Law and is specialized in custody, fund administration, and related services. The Depositary is registered in the Luxembourg Commercial and Companies' Register (RCS) under number B 32 771.

As part of an internal restructuring with the aim to streamline State Street's banking entity structure across Europe, State Street Bank Luxembourg S.C.A. has merged into State Street Bank International GmbH.. As from the Merger Date, State Street Bank International GmbH will, as legal successor of State Street Bank Luxembourg S.C.A., continue to act as depositary of the Fund through its Luxembourg Branch. As a result of the universal legal succession of all rights and obligations of the merger, State Street Bank International GmbH, Luxembourg Branch assumes the same duties and responsibilities, and have the same rights under the existing Depositary Agreement with the Fund as State Street Bank Luxembourg S.C.A. currently has.

State Street Bank International GmbH is a limited liability company organized under the laws of Germany, having its registered office at Brienner Str. 59, 80333 München, Germany and registered with the commercial register court, Munich under number HRB 42872. It is a credit institution supervised by the European Central

Bank (ECB), the German Federal Financial Services Supervisory Authority (BaFin) and the German Central Bank. State Street Bank International GmbH, Luxembourg Branch is authorized by the CSSF in Luxembourg to act as depositary and is specialized in depositary, fund administration, and related services. State Street Bank International GmbH, Luxembourg Branch is registered in the Luxembourg Commercial and Companies' Register (RCS) under number B 148 186. State Street Bank Luxembourg S.C.A. and State Street Bank International GmbH are members of the State Street group of companies having as their ultimate parent State Street Corporation, a US publicly listed company.

The relationship between the Fund and the Depositary is subject to the terms of the Depositary Agreement. Under the terms of the Depositary Agreement, the Depositary is entrusted with following main functions:

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

In the event of a loss of a financial instrument held in custody, determined in accordance with the UCITS Directive, and in particular Article 18 of the UCITS Regulation, the Depositary shall return financial instruments of identical type or the corresponding amount to the Fund without undue delay.

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

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

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

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

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

The Depositary has delegated those safekeeping duties set out in Article 22(5)(a) of the UCITS Directive to State Street Bank and Trust Company with registered office at Copley Place 100, Huntington Avenue, Boston, Massachusetts 02116, USA, whom it has appointed as its global sub-depositary. State Street Bank and Trust Company as global sub-depositary has appointed local sub-depositaries within the State Street Global Custody Network.

Information about the safe-keeping functions which have been delegated and the identification of the relevant delegates and sub-delegates are available at the registered office of the Fund or at the following internet site:

http://www.statestreet.com/about/office-locations/luxembourg/subcustodians.html.

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

(i) providing nominee, administration, registrar and transfer agency, research, agent securities lending, investment management, financial advice and/or other advisory services to the Fund;

(ii) engaging in banking, sales and trading transactions including foreign exchange, derivative, principal lending, broking, market making or other financial transactions with the Fund either as principal and in the interests of itself, or for other clients.

In connection with the above activities the Depositary or its affiliates:

(i) will seek to profit from such activities and are entitled to receive and retain any profits or compensation in any form and are not bound to disclose to, the Fund, the nature or amount of any such profits or compensation including any fee, charge, commission, revenue share, spread, mark-up, mark-down, interest, rebate, discount, or other benefit received in connection with any such activities;

(ii) may buy, sell, issue, deal with or hold, securities or other financial products or instruments as principal acting in its own interests, the interests of its affiliates or for its other clients;

(iii) may trade in the same or opposite direction to the transactions undertaken, including based upon information in its possession that is not available to the Fund;

(iv) may provide the same or similar services to other clients including competitors of the Fund;

(v) may be granted creditors' rights by the Fund which it may exercise.

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

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

The Fund may also be a client or counterparty of the Depositary or its affiliates.

Potential conflicts that may arise in the Depositary's use of sub-depositaries include four broad categories:

(1) conflicts from sub-depositary selection and asset allocation among multiple sub-depositaries influenced by (a) cost factors, including lowest fees charged, fee rebates or similar incentives and (b) broad two-way commercial relationships in which the Depositary may act based on the economic value of the broader relationship, in addition to objective evaluation criteria;

(2) sub-depositaries, both affiliated and non-affiliated, act for other clients and in their own proprietary interest, which might conflict with clients' interests;

(3) sub-depositaries, both affiliated and non-affiliated, have only indirect relationships with clients and look to the Depositary as its counterparty, which might create incentive for the Depositary to act in its self-interest, or other clients' interests to the detriment of clients; and

(4) sub-depositaries may have market-based creditors' rights against client assets that they have an interest in enforcing if not paid for securities transactions.

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

The Depositary has functionally and hierarchically separated the performance of its depositary tasks from its other potentially conflicting tasks. The system of internal controls, the different reporting lines, the allocation of tasks and the management reporting allow potential conflicts of interest and the depository issues to be properly identified, managed and monitored. Additionally, in the context of the Depositary's use of sub-depositaries, the Depositary imposes contractual restrictions to address some of the potential conflicts and maintains due diligence and oversight of sub-depositaries to ensure a high level of client service by those agents. The Depositary further provides frequent reporting on clients' activity and holdings, with the underlying functions subject to internal and external control audits. Finally, the Depositary internally separates the performance of its custodial tasks from its proprietary activity and follows a Standard of Conduct that requires employees to act ethically, fairly and transparently with clients.

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

With the consent of the Fund, the Management Company has appointed State Street Bank Luxembourg S.C.A. also as administrative, registrar and transfer agent and as domiciliary and paying agent of the Fund (the Administrator) pursuant to the Administration Agreement.

As described above, as part of an internal restructuring with the aim to streamline State Street's banking entity structure across Europe, State Street Bank Luxembourg S.C.A. has merged into State Street Bank International GmbH. State Street Bank International GmbH will, as legal successor of State Street Bank Luxembourg S.C.A., continue to act as Administrator of the Fund through its Luxembourg Branch. As a result of the universal legal succession of all rights and obligations of the merger, State Street Bank International GmbH, Luxembourg Branch assumes the same duties and responsibilities and have the same rights under the existing Administration Agreement with the Fund as State Street Bank Luxembourg S.C.A. currently has. The relationship between the Fund, the Management Company and the Administrator is subject to the terms of the Administration Agreement. Under the terms of the Administration Agreement, the 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, as registrar and transfer agent of the Fund, the 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 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 Administration Agreement has no fixed duration and each party may, in principle, terminate the agreement on not less than ninety (90) calendar days' prior written notice. The Administration Agreement may also be terminated on shorter notice in certain circumstances, for instance where one party commits a material breach of a material clause of the Administration Agreement. The Administration 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 Administration Agreement contains provisions exempting the Administrator from liability and indemnifying the Administrator in certain circumstances. However, the liability of the Administrator towards the Management Company and the Fund will not be affected by any delegation of functions by the Administrator.

The fees payable to the Depositary and to the Administrative Agent, Registrar and Transfer Agent and Paying Agent are at such rates and/or amounts as may be agreed from time to time with the Fund in accordance with customary banking practice in Luxembourg. The maximum fee payable to the Depositary is 0,04% per annum (VAT non included) and to the Administrative Agent, Registrar and Transfer Agent and Paying Agent 0,021% per annum (exclusive specific fees payable for the processing of multiple Share Classes but inclusive compliance testing services), in each case based on the Net Asset Value of the relevant Sub-Fund, unless the Net Asset Value of the Sub-Fund falls below certain levels in which case agreed minimums which are not higher than 5,400 EUR per Sub-Fund per year (applicable to the accounting services including compliance testing services) will apply. In addition, the Depositary and the Administrative Agent, Paying Agent, Registrar and Transfer Agent are entitled, as the case may be, to a charge per transaction, a flat fee for certain services or products, reimbursements by the Company for out-of-pocket expenses and disbursements and for charges of any correspondents.

These fees are calculated monthly based on the average assets of each Sub–Fund, are accrued at each Valuation day and paid within the first 10 calendar days of the following month.

14. NET ASSET VALUE

The net asset value per Share of each class of every Sub-Fund is determined each Valuation day under the responsibility of the Board of Directors, and is expressed in the valuation currency, as specified in the Appendix specific to each Sub-Fund under Section II. The consolidation currency is the Euro.

The net asset value per Share is determined by dividing the net assets of each class by the total number of Shares of that class outstanding. If a Valuation day is a (legal or bank) holiday in Luxembourg, the Valuation day shall be the following business day. The number obtained shall be rounded to two decimal places.

No Net Asset Value (NAV) shall be calculated on December 24th due to the half bank holiday in Luxembourg. The NAV shall be calculated again on December 27th or, if this day is not a bank business day, on the next bank business day.

The percentage of the total net asset attributed to each class within the Sub-Fund in question shall be adjusted on the basis of the dividends and of the subscription/redemption for that class as follows:

- when a dividend is paid to the distribution share class of a Sub-Fund, the net assets attributed to the Shares of that class of the Sub-Fund in question are reduced by the total amount of the dividends (causing thus a decrease in the percentage of the net assets attributed to that share class), while the net assets of the Sub-Fund attributed to the capitalisation share classes remain unchanged (causing an increase in the percentage of the net assets attributed to those share classes;
- at the time of issue or redemption of Shares of a class in any Sub-Fund, the corresponding net assets will be increased by the amount received or decreased by the amount paid.

The net assets of the different classes of the Sub-Funds shall be assessed as follows:

1. In particular, the Fund's assets shall include:

    - all cash at hand and on deposit, including interest due but not yet received as well as interest accrued on these deposits up to the Valuation day;
    - all bills and demand notes and accounts receivable (including the proceeds of securities sold insofar as the proceeds have not yet been collected);
    - all securities, units or shares in undertakings for collective investment, stocks, debt securities, option or subscription rights, financial instruments and other investments and transferable securities owned by the Fund;
    - all dividends and distribution proceeds to be received by the Fund in cash or securities insofar as the Fund is aware of such;
    - all interest accrued but not yet received and all interest produced until the Valuation day on securities owned by the Fund, unless this interest is included in the principal amount of such assets;
    - the incorporation expenses of the Fund, insofar as they have not yet been written off;
    - all other assets of whatever kind and nature, including prepaid expenses.

The value of these assets shall be determined as follows:

(a) the value of any cash on hand or on deposit, bills and demand notes and accounts receivable, prepaid expenses, dividends and interests declared or due but not yet received shall be deemed to be the full value of such assets, unless it is unlikely that such values be received, in which case the value thereof shall be determined by deducting such amount the Fund may consider appropriate to reflect the true value of these assets;

(b) the valuation of securities and/or financial derivative instruments listed on an official stock exchange or dealt in on another regulated market which operates regularly, is recognised and open to the public, is based on the last quotation known in Luxembourg on the Valuation day and, if such security and/or financial derivative instrument is traded on several markets, on the basis of the last available price known on the market considered to be the main market for trading this security and/or financial derivative instrument. If the last available price is not representative, the valuation shall be based on the probable sales value estimated by the Board of Directors with prudence and in good faith;

(c) securities not listed on a stock exchange or dealt in on another regulated market which operates regularly, is recognised and open to the public shall be assessed on the basis of the probable sales value estimated with prudence and in good faith;

(d) shares or units in open-ended undertakings for collective investment shall be valued at their last available calculated net asset value, as reported by such undertakings;

(e) the value of each position in each currency, security or derivative instrument based on currencies or interest rates will be determined on the basis of quotations provided by a pricing service selected by the Fund. Instruments for which no such quotations are available will be valued on the basis of quotations furnished by dealers or market makers in such instruments selected by the Fund; and positions in instruments for which no quotations are available from pricing services, dealers or market makers shall be determined prudently and in good faith by the Board of Directors in its reasonable judgement;

(f) liquid assets and money market instruments may be valued at nominal value plus any accrued interest or on an amortised cost basis;

(g) swaps are valued at their fair value based on the underlying securities as well as on the characteristics of the underlying commitments or otherwise in accordance with usual accounting practices;

(h) all other securities and other assets will be valued at fair market value as determined in good faith pursuant to procedures established by the Board of Directors.

The Board of Directors and/or the Management Company are authorised to apply other appropriate valuation principles for the assets of the Fund and/or the assets of a given Sub-Fund if the aforesaid valuation methods appear impossible or inappropriate due to extraordinary circumstances or events.

Securities expressed in a currency other than the currency of the respective Sub-Fund shall be converted into that currency on the basis of the last available exchange rate.

2. The liabilities of the Fund shall include:

- all loans, bills matured and accounts due;
- all known liabilities, whether matured or not, including all matured contractual obligations that involve payments in cash or in kind (including the amount of any unpaid dividends declared by the Fund);
- all reserves, authorised or approved by the Board of Directors, in particular those formed for covering potential depreciation on some of the Fund's investments;
- all other liabilities of the Fund, of whatever kind and nature with the exception of those represented by the Fund's own resources. To assess the amount of such other liabilities, the Fund shall take into account all expenses payable by it, including, without limitation, the formation expenses and those for subsequent amendments to the Articles of Incorporation, fees and expenses payable to the Management Company, the Investment Managers, the Investment Advisors (if any) accountants, Depositary and correspondents and Central Administration, paying agents or other agents of the Fund, as well as the permanent representatives of the Fund in countries where it is subject to registration, the costs for legal assistance and for the auditing of the Fund's annual reports, the costs of assistance and advisory in the performance of corporate activities, development of marketing tools, definition of new products and strategies, the costs for promoting, printing and publishing the sales documents for the Shares, printing costs of annual and interim financial reports, the cost of convening and holding Shareholders' and Board of Directors' meetings, reasonable travelling

expenses of Directors, Directors' fees and liabilities insurance, the costs of registration statements, all taxes and duties charged by governmental authorities and stock exchanges, the costs of publication of the issue and redemption prices as well as any other operating costs, including financial costs, bank charges and brokerage incurred at purchase or sale of assets or otherwise, expenses relative to risk limits monitoring as well as any other administrative charges. For the valuation of the amount of such liabilities, the Fund shall take into account administrative and other expenses of a regular or periodic nature on a pro rata *temporis* basis.

3. The assets, liabilities, charges and expenses which are not attributable to a Sub-Fund shall be attributed to all the Sub-Funds, in equal proportions or as long as justified by the amounts concerned, to the pro rata of their respective net assets.

4. Each share of the Fund to be redeemed is considered as an issued and existing share until the close of business on the Valuation day applicable to the redemption of such share and its price shall be considered as a liability of the Fund from the close of business on such day and this, until the relevant price is paid.

   Each share to be issued by the Fund in accordance with subscription applications received shall be considered as having been issued as from the close of business on the Valuation day of its issue price and such price shall be considered as an amount to be received by the Fund until the Fund shall have received it.

5. As far as possible, each investment or disinvestment decided by the Fund until the Valuation day shall be taken into account by the Fund.

15. SUSPENSION OF THE CALCULATION OF NET ASSET VALUE, ISSUE AND REDEMPTION OF SHARES

The Board of Directors is authorised to suspend temporarily the calculation of the net asset value of one or several classes of Sub-Funds, as well as the issue, the redemption and the conversion of Shares under the following circumstances:

a. for any period during which a market or stock exchange which is the main market or stock exchange on which a substantial part of the Fund's investments is listed from time to time, is closed for periods other than regular holidays, or when trading on such markets is subject to major restrictions, or suspended;

b. when the political, economic, military, monetary or social situation, or Act of God or beyond the Fund's responsibility or control, make the disposal of its assets impossible under reasonable and normal conditions, without being seriously prejudicial to the interests of the Shareholders;

c. during any breakdown in communications networks normally used to determine the value of any of the Fund's investments or current price on any market or stock exchange;

d. whenever exchange or capital movement restrictions prevent the execution of transactions on behalf of the Fund or in case purchase and sale transactions involving the Fund's assets cannot be effected at normal exchange rates;

e. as soon as a General meeting is called during which the dissolution of the Fund shall be put forward;

f. in the case of a breakdown of the data processing system which would make the net asset value calculation impossible;

g. following the suspension of the calculation of the net asset value of shares or units of the master fund in which the Fund or any of its Sub-Fund invests as its feeder fund.

Under exceptional circumstances that may adversely affect the interest of Shareholders or in case of applications for redemption exceeding 10% of a Sub-Fund's net assets, the Board of Directors of the Fund shall reserve the right to determine the share price only after having carried out, as soon as possible, the necessary sales of transferable securities on behalf of the Sub-Fund. In such case, outstanding applications for subscription, redemption and conversion shall be treated on the basis of the net asset value thus calculated.

Subscribers and Shareholders offering Shares for redemption or conversion shall be notified of the suspension of the net asset value calculation. Pending applications for subscription, redemption and conversion may be withdrawn in writing insofar as notification thereon be received by the Fund or by any other entity duly appointed by and acting in the name of the Fund before the end of suspension.

Pending subscriptions, redemptions and conversions shall be taken into consideration on the first Valuation day immediately following the end of suspension.

16. ISSUE OF SHARES, SUBSCRIPTION AND PAYMENT PROCEDURE

The Board of Directors is authorised to issue Shares in each class of every Sub-Fund at any time and without limitation.

Pursuant to the Luxembourg law of 19 February 1973, as amended, to combat drug addiction, the law of 5 April 1993, as amended, relating to the financial sector, the law of 12 November 2004 relating to money laundering and to the relevant circular of the Luxembourg supervisory authority, obligations have been imposed on professionals of the financial sector to prevent the use of UCITS funds such as the Fund for money-laundering purposes. Within this context a procedure for the identification of investors has been imposed. Issue requests must therefore include a certified copy (by one of the following authorities: consulate, embassy, police officer or public notary) of (I) the applicant's identity documents in the case of individuals or (ii) the Articles of Incorporation as well as an extract of the commerce register in the case of corporate entities, and this in the following cases:

(a) direct application (i.e. submitted directly to the Central Administration),

(b) application via a professional of the financial sector who is domiciled in a country which has not implemented the conclusions of the FATF report (Financial Action Task Force on Money Laundering), and who is thus not considered as being subject to a client identification procedure equal to the one required by the laws and regulations of the Grand-Duchy of Luxembourg,

(c) application via a subsidiary or a branch of a corporate entity subject to a client identification procedure equal to the one required by the laws and regulations of the Grand-Duchy of Luxembourg, in case, however, the laws and regulations applicable to the parent company do not make it compulsory for the former to see it that such procedure be also followed by its subsidiaries or branches.

The Shares are issued at a price corresponding to the net asset value per share of each class of every Sub-Fund increased by a subscription fee as defined in the Appendix specific to each Sub-Fund under Section II.

Subscription and payment procedure

Subscriptions are made on the basis of unknown price.

Applications for subscription may, at the subscriber's choice, pertain to a number of Shares to be subscribed or to an amount to be invested in one or several Sub-Funds. In this latter case, fractional Shares may be issued.

Applications for subscription received by the Fund or by any other entity duly appointed by and acting in the name of the Fund at the latest the working day before the Valuation day at 16.00 (Luxembourg time) shall be carried out, if accepted, on the basis of the net asset value determined on the Valuation day. Applications notified after this deadline shall be executed on the following Valuation day. The subscription price of each Share is payable in the respective currency of the relevant Sub-Fund within 2 business days following the Valuation day.

Shareholders should note that Clearstream will accept deliveries of fractional Units, whereas Euroclear shall only accept deliveries for whole numbers of Shares. Shares held by Clearstream or Euroclear will be registered in the name of the relevant depository.
The Management Company has the discretion, from time to time, to waive any applicable minimum subscription amounts.

The Fund does not allow practices related to "market timing".

Market Timing is to be understood as an arbitrage method through which an investor systematically subscribes and redeems or converts units or shares of the same fund within a short time period, by taking advantage of time differences for example.

The Fund keeps the right to reject subscription and conversion orders from an investor who it suspects of using such practices and to take, if appropriate, the necessary steps to protect the other investors of the Fund.

The Fund also retains the right to:

- refuse all or part of an application for subscription of Shares;
- repurchase, at any time, Shares held by persons not authorised to buy or own the Fund's Shares;
- at any time, buy Shares back from Shareholders suspected of executing "market timing" transactions.

The Fund does not allow practices related to ‘Late trading’.

Late trading” is to be understood as the acceptance of a subscription, switch or redemption order after the cut-off time on the relevant valuation day and the execution of such an order at a price based on the net asset value as set out under " Net Asset Value of Shares" applicable to orders received prior to the cut-off time.

The Fund considers that the practice of late trading is not acceptable as it violates the provisions of this Prospectus which provide that an order received after the Valuation day deadline is dealt with a Subscription or Redemption Price based on the Net Asset Value calculated on the next applicable Valuation day. As a result, subscriptions, conversions and redemptions of Shares shall be dealt with an unknown Net Asset Value.

17. CONVERSION OF SHARES

Conversions of Shares are made on the basis of unknown price. Conversions involving Class “L” are not allowed.

Any Shareholder may request the conversion of all or part of his Shares of one Sub-Fund into Shares of another Sub-Fund or class, at a price equal to the respective net values of the Shares of each Sub-Funds' classes.

The Shareholder who wishes such a conversion of Shares shall make a written request by telex or by fax to the Fund or to any other entity duly appointed by and acting in the name of the Fund, indicating the number, the reference name, the class and Sub-Fund of the Shares to be converted.

The conversion shall be made without any fees for the Shareholder.

Except in the case of a suspension of the calculation of the net assets, the conversion shall be carried out on the Valuation day, provided that the request is notified to the Fund at the latest one working day before the Valuation day at 16.00 (Luxembourg time) and that the day is a Valuation day for both Sub-Funds concerned. The number of Shares allocated in the new Sub-Fund or new class shall be established as follows:

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

A **number of Shares allotted in the new Sub-Fund (or share class);**

B **number of Shares presented for conversion in the original Sub-Fund’s class;**

C **net asset value, on the applicable Valuation day, of the Shares of the original Sub-Fund’s class presented for conversion;**

D **eventual exchange rate applicable on the day of the operation between the currencies of the Shares of the two Sub-Funds or classes;**

E **net asset value on the applicable Valuation day of the Shares allotted in the new Sub-Fund or new share class;**

XP **balance, applied or not, at the choice of the Shareholder. It may be inapplicable and, in such case, reimbursed to the Shareholder.**

After the conversion, the Fund shall inform the Shareholders of the number of new Shares obtained after conversion as well as their price.

Conversions of shares between different sub-funds of the same UCI in Italy are treated, for fiscal purposes, as redemptions and subsequent subscriptions for the net amount, and a withholding tax will be applied on the reimbursed amount. As a result, in order to allow the local paying agent to apply said withholding tax, subscriptions into the new Sub-Fund are executed only after the redemptions have been executed and as a result the settlement (i.e. valuation date) of the subscription are delayed with respect to the redemption and therefore the timeline of the two transactions does not coincide.

18. REDEMPTION OF SHARES

Redemptions are made on the basis of unknown price.

Any Shareholder is entitled, at any time and without limitation to have his Shares redeemed by the Fund. Shares redeemed by the Fund shall be cancelled.

Procedure

Applications for redemption must be sent to the Fund or to any other entity duly appointed by and acting in the name of the Fund in writing, by telex or fax. The application is irrevocable (subject to the provisions of chapter 16) and must indicate the number, the class and Sub-Fund of the Shares to be redeemed as well as all useful references for the settlement of the redemption.

All the Shares presented for redemption, must be received at the registered office of the Fund in Luxembourg or at any other entity duly appointed by and acting in the name of the Fund at the latest on the working day before the Valuation day at 16.00 (Luxembourg time) except if otherwise is provided for in the Section II "Description of the Sub-Funds". Shares shall be repurchased at the net asset value of the share class of the relevant Sub-Fund as determined on the Valuation day. Applications notified after this deadline shall be dealt with on the following Valuation day. Redemption fees are defined for each Sub-Fund in the Section II.

The payment for Shares redeemed shall be made within 2 banking business days following the Valuation day, except if otherwise is provided for in the Section II "Description of the Sub-Funds", provided the Fund has received all the documents pertaining to the redemption. Payment shall be made in the reference currency of the share class of the respective Sub-Fund.

The redemption price for Shares of the Fund may be higher or lower than the purchase price paid by the Shareholder at the time of subscription due to the appreciation or depreciation of the net assets.

19. DISTRIBUTION IN ITALY, SAVINGS PLANS AND ITALIAN PAYING AGENTS

Savings plans

The distribution of the retail classes of the Fund in Italy can be organised through savings plans arranged by the distributors. The Paying Agent and Correspondent Banks might charge commissions and fees to the Shareholders subscribing through its services and to the Sub-Fund in question.

As long as the commercialization of the Fund is carried out in Italy, any Italian potential Shareholders can subscribe the shares of each Sub-Fund of the Fund through an accumulation plan, the conditions of which are described on the application form applicable in Italy.

Italian Paying Agents

The Depositary Bank and the Fund have signed agreements of an indeterminate period with some Italian banks which act in Italy as Paying Agents.

Italian Shareholders can give the Paying Agent a non-representative appointment to act as nominee ("Nominee") for the transactions regarding investment in the Fund. In carrying out such mandate, the Nominee, amongst other things, shall transmit to the Fund the requests for subscription, redemption and conversion of the Shares on a cumulative basis, shall request the registration of the Shares in the Fund's Shareholders' register in its own name and with the wording "for third-party account", and shall carry out all services and procedures relating to the exercise of voting rights on the basis of the instructions received from the investors. The Nominee shall keep up-to-date an electronic archive with all the details of the investors and their respective shareholdings. The investor status will be attested by the letter confirming the investment, sent to the investor by the Nominee or by the Distributor.

In addition to the fees and expenses indicated in the Prospectus, Italian Shareholders will be charged fees relating to these Paying Agent activities as defined and specified in the latest version of the Italian application form. For further information, please refer to the Italian application form.

With regards to such subscription or redemption (both single transactions and those relating to regular savings plans) a variable fee could be charged to the relevant Sub-Fund, calculated with a regressive marginal rate, on the daily assets of the Sub-Funds registered in the Paying Agent's books as indicated in the table below, with a minimum and fixed monthly fee of EUR 600. The fees are payable on a quarterly basis.

Assets (million EUR) processed by the Paying Agent	Bps per annum
0-6	0
6-150	4,50
150-300	4,00
Over 300	3,50

20. TAX CONSIDERATIONS

Taxation of the Fund

In accordance with the law in force and current practice, the Fund is not liable to any Luxembourg tax on income and capital gains. Likewise, dividends paid by the Fund are not subject to any Luxembourg withholding tax. However, the Fund is subject to an annual tax in Luxembourg corresponding to 0.05% of the value of the net assets for the Share Classes A, D and L, and 0.01% of the value of the net assets for the Share Classes I and Y. This tax is payable quarterly on the basis of the Fund's net assets calculated at the end of the relevant quarter.

Certain income of the Fund's portfolio, consisting of dividends and interests, may be subject to payment of withholding tax at various rates in its country of origin.

Taxation of the Shareholders

Subject to section 3.below, Shareholders are, under current legislation, not subject to whatever tax in Luxembourg on capital gains, income, donations or inheritance, nor to withholding taxes, with the exception of Shareholders having their domicile, residence or permanent establishment in Luxembourg, and certain Luxembourg ex-residents, owning more than 10% of the Fund's capital.

The provisions above are based on the law and practices currently in force and may be amended.

Potential subscribers should inform themselves and, if necessary, take advice on the laws and regulations (such as those on taxation and exchange control) applicable to the subscription, purchase, holding and sale of their Shares in the country of respectively their citizenship, residence or domicile.

Automatic exchange of information

Under the law of December 18th 2015 implementing the EU Council Directive 2014/107/UE on administrative cooperation in the field of direct taxation (the "**DAC Directive**") and the OECD Common Reporting Standard (the "**CRS**") (the "**DAC Law**"), since January 1st 2016, except for Austria which will benefit from a transitional period until January 1st 2017, the financial institutions of an EU Member State or a jurisdiction participating to the CRS are required to provide to the fiscal authorities of other EU Member States and jurisdictions participating to the CRS details of payments of interest, dividends and similar type of income, gross proceeds from the sale of financial assets and other income, and account balances held on reportable accounts, as defined in the DAC Directive and the CRS, of account holders residents of, or established in, an EU Member State and certain dependent and associated territories of EU Member States or in a jurisdiction which has introduced the CRS in its domestic law.

Payment of interest and other income derived from the Shares will fall into the scope of the DAC Directive and the CRS and are therefore be subject to reporting obligations.

Prospective investors should consult their own tax advisor with respect to the application of the DAC Directive and the CRS to such Investor in light of such investor's individual circumstances.

The foregoing is only a summary of the implications of the Directive and the Law, is based on the current interpretation thereof and does not purport to be complete in all respects. It does not constitute investment or tax advice and investors should therefore seek advice from their financial or tax adviser on the full implications for themselves of the Directive and the Law.

21. FEES AND EXPENSES

The fees relating to the Fund's incorporation and launching, amounting to approximately EUR 30,000.- have been fully written off.

The fees and charges related to the launching of any new Sub-Funds will be sustained by the relevant new Sub-Fund(s) and will be amortised over a period not exceeding the first five fiscal years of the relevant Sub-Fund(s).

The Fund shall bear all operating costs as per chapter 14, section 2.

Fees payable by the Shareholders of each Sub-Fund:

Subscription fee	Class A and D: Maximum 3% to the benefit of the placing agents. Special financial terms are possible for certain categories of investors. Class I, Y and L: Nil Class Z: Nil.
Redemption fee	Nil for all classes
Conversion fee	Nil for all classes

22. GENERAL MEETINGS OF SHAREHOLDERS

The annual general meeting of Shareholders is held each year at the Fund's registered office or at any other place in Luxembourg specified in the convening notice.

The annual general meeting of Shareholders shall be held on the third Wednesday of the month of April at 10.00 a. m. or if such day is a legal or banking holiday, on the following banking business day.

Furthermore, the Shareholders of each Sub-Fund may be required to resolve in a separate general meeting deciding, according to the prescriptions of quorum and majority as laid down by the law, any matter that does not result in any amendment of the Articles of Incorporation and deals mainly with the allotment of the annual profit balance of their Sub-Fund.

Notices for all general meetings shall be sent by mail to all registered Shareholders to their address indicated in the Shareholders' register, at least eight days before the general meeting.

All the shares are in registered form and if no publications are made, notices to shareholders may be mailed by registered mail only.

Pursuant to the 2013 Law holders of dematerialized shares are entitled to attend the general meeting and exercise their rights only if they hold such dematerialized shares at the latest at midnight, Luxembourg time, on the 14th day preceding the day of such general meeting.

These notices shall indicate the time and place of the general meeting, the conditions for admission, the agenda and the prescriptions of Luxembourg law regarding quorum and majority.

23. LIQUIDATION AND MERGER OF THE FUND

The liquidation of the Fund shall take place in accordance with the provisions of the Law of 17 December 2010.

If the capital of the Fund is lower than two thirds of the minimum capital, the directors are required to submit the question of liquidation of the Fund to the General meeting for which no quorum shall be prescribed and which shall decide by a simple majority of the Shares represented at the meeting.

If the capital of the Fund is lower than one fourth of the minimum capital, the directors are required to submit the question of liquidation of the Fund to the General meeting for which no quorum shall be prescribed; dissolution may be resolved by Shareholders holding one fourth of the Shares at the meeting.

The meeting must be convened so that it is held within forty days as from the ascertainment that the net assets have fallen below two thirds or one fourth of the minimum capital. In addition, the Fund may be dissolved by a decision taken by the General Meeting deliberating in accordance with the statutory provisions in this matter. Applications for subscription, redemption and conversion shall be carried out until publication of the convening notice for the general meeting deliberating on the liquidation of the Fund.

The decisions of the General meeting or of the law courts pronouncing the dissolution or the liquidation of the Fund shall be published in the Recueil électronique des sociétés et associations and three newspapers with adequate circulation, including at least one Luxembourg newspaper. These publications shall be made at the request of the liquidator(s).

In case of dissolution of the Fund, liquidation shall be carried out by one or several liquidators appointed in accordance with the Fund's Articles of Incorporation and the Luxembourg Law of 17 December 2010.

The net proceeds of the liquidation shall be distributed to Shareholders in proportion to the number of Shares held. Any amounts unclaimed by Shareholders at the close of liquidation shall be deposited with the *Caisse de Consignations* in Luxembourg pursuant to article 146 of the Law of 17 December 2010. Failing their being claimed before expiry of the prescription period (30 years), these amounts can no longer be claimed.

Merger

a) Merger of the Fund decided by the Board of Directors.

The Board of Directors may decide to proceed with a merger of the Fund, either as receiving or absorbed UCITS, with:

- another Luxembourg or foreign UCITS (the “New UCITS”); or
- a sub-fund thereof,

and, as appropriate, to re-designate the Shares of the Fund concerned as Shares of this New UCITS, or of the relevant Sub-Fund thereof as applicable.

In case the Fund involved in a merger is the receiving UCITS (within the meaning of the Law of 17 December 2010), solely the Board of Directors will decide on the merger and effective date thereof.

In the case the Fund involved in a merger is the absorbed UCITS (within the meaning of the Law of 17 December 2010), and hence ceases to exist, the general meeting of the Shareholders has to approve, and decide on the effective date of such merger by a resolution adopted with (a) a presence quorum requirement of at least 51% of the share capital of the Fund; and (b) a majority requirement of at least two-third (2/3) of the shareholders present or represented.

b) Merger of the Fund decided by the shareholders

The general meeting of the Shareholders may decide to proceed with a merger (within the meaning of the Law of 17 December 2010) of the Fund, either as receiving or absorbed UCITS, with:

- a New UCITS; or
- a sub-fund thereof.

The decision shall be adopted by a general meeting of the Shareholders for which there shall be (a) a presence quorum requirement of at least 51% of the share capital of the Fund; and (b) a majority requirement of at least two-third (2/3) of the shareholders present or represented.

24. LIQUIDATION AND MERGER OF SUB-FUNDS

The Board of Directors may decide on the liquidation of one or several Sub-Funds if important changes of the political or economic situation would, in the opinion of the Board of Directors, make this decision necessary, and if the net assets of any one Sub-Fund fall below EUR 1.000,000.

Unless otherwise decided by the Board of Directors, the Fund may, until the execution of the decision to liquidate, continue to redeem the Shares of the Sub-Fund for which liquidation was decided. For such redemption, the Fund shall take as a basis the net asset value as established to account for the liquidation costs, but without deduction of a redemption fee or any other commission. The activated costs of incorporation are to be fully amortised as soon as the decision to liquidate has been taken. The liquidation proceeds shall be distributed to each Shareholder in proportion to the number of Shares held.

Amounts not claimed by the Shareholders or their beneficiaries at the close of liquidation of one or several Sub-Funds shall be kept in deposit with the Depositary Bank for a period not exceeding 9 months as from that date. After that date, such assets shall be deposited with the *Caisse de Consignations* in Luxembourg on behalf of the persons entitled thereto.

In case of important changes in the political or economic situation which would influence the management of one or several Sub-Funds, or if the amount of the net assets is no longer sufficient or does not allow to carry out an adequate management, the Board of Directors may also decide on the closing of one or several Sub-Funds through a merger with one or several other Sub-Funds in the Fund (merger).

Merger

c) <u>Merger of Sub-Funds decided by the Board of Directors</u>

The Board of Directors may decide to proceed with a merger (within the meaning of the Law of 17 December 2010) of any sub-Fund, either as receiving or absorbed sub-Fund, with:

- another existing sub-Fund within the Fund or another sub-fund within a New UCITS (the “New Sub-Fund”); or
- a New UCITS,

and, as appropriate, to re-designate the Shares of the sub-Fund concerned as Shares of the New UCITS, or of the New Sub-Fund as applicable.

d) <u>Merger of Sub-Funds decided by the shareholders</u>

Notwithstanding the powers conferred to the Board of Directors under the preceding section, the general meeting of Shareholders may decide to proceed with a merger (within the meaning of the Law of 17 December 2010) of one of the relevant Sub-Funds, either as receiving or absorbed Sub-Fund, with:

- any New UCITS; or
- a New Sub-Fund

by a resolution adopted with (a) a presence quorum requirement of at least 51% of the share capital of the Company; and (b) a majority requirement of at least two-third (2/3) of the shareholders present or represented.

During a minimum period of one month as from the date of publication of the decision to merge, the Shareholders of the Sub-Fund(s) concerned may request the redemption of their Shares free of charge. At expiry of this period, the decision to merge is binding on all the Shareholders that have not taken advantage of the aforementioned possibility.

The relevant decisions of the Board of Directors are made public in the same way as the financial notices.

Assets which may not be distributed to the relevant beneficiaries upon the implementation of the redemption will be deposited with the Depositary for the period required by Luxembourg law; after such period, the assets will be deposited with the “Caisse de Consignation” on behalf of the persons entitled thereto.

25. INFORMATION FOR SHAREHOLDERS

Publication of the net asset value

The net asset value of each class of every Sub-Fund is available at the Registered Office of the Fund and will be published in any newspaper the Board of Directors deems appropriate.

Financial notices and publications

Financial notices shall be published in those countries where the Fund is marketed and, concerning the Grand-Duchy of Luxembourg, in a regularly distributed Luxembourg newspaper. Legal notices will also be published in the Recueil électronique des sociétés et associations.

Financial year and reports for Shareholders

The financial year begins on 1st January and ends on 31st December.

Every year, the Fund publishes a detailed report on its activities and the management of its assets, including the balance sheet and consolidated profit and loss accounts expressed in EUR, the detailed breakdown of each Sub-Fund's assets and the report of the independent auditor.

Furthermore, at the end of each half-year, it shall establish a report including inter alia, the composition of the portfolio, statements of portfolio changes during the period, the number of Shares outstanding and the number of Shares issued and redeemed since the last publication.

Independent auditor

The audit of the Fund's accounts and annual reports is entrusted to PricewaterhouseCoopers Sàrl, 2, rue Gerhard Mercator L-2182 Luxembourg.

Documents available to the public

The Prospectus, copy of the Articles of Incorporation, the last financial annual report as well as the last semi-annual report of the Fund are kept free of charge at the disposal of the public at the Fund's registered office. The agreements with the Fund and with the Management Company may also be consulted. The up-to-date remuneration policy, conflict of interest policy, voting right policy and complaints handling policy of the Management Company may be freely available for consultation as well on the website of the management company at www.natam.lu.

Benchmark and target

Two different approaches may be followed:

- benchmark: an index, or a set of indices, whose composition is consistent with the investment policies of the sub-fund and which can therefore represent a useful comparison with the trend overtime of the portfolio.
- target: represents the performance the fund manager aims to achieve. Is typically employed by total/absolute return funds.

In accordance with the requirements of Regulation (EU) 2016/1011 of the European Parliament and Council of 6 June 2016 it is disclosed that, as of March 2018, the Fund adopts the following Benchmarks:

- The benchmark "World Local Currency" is provided by the administrator MSCI, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark "World Ex EMU Net Ret Eur Hedged Index" is provided by the administrator MSCI, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark "AC World Net Ret Unhedged Eur Index" is provided by the administrator MSCI, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark "EMU TOP 50 TR Index" is provided by the administrator MSCI, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark "Europe Net Ret Eur Index" is provided by the administrator MSCI, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark "Italy Net Return" is provided by the administrator MSCI, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark "Global Agg Corp 1-3Y TR Index Value Hedged Eur" is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark "Italy Govt 1 to 3 Year TR" is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark "Eur Govt Inflation-Linked 3-5 Years TR Index" is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark "Pan-Eur Corp FRN Index TR Hedged Eur" is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark "Eur-Agg Corp 3-5 Years TR Index Eur" is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark "Eur-Agg Corp 5-7 Years TR Index Eur" is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “Euro-Agg Corporate TR Index Value Unhedged EUR” is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “Eur-Agg Govt TR Index Eur” is provided by the administrator Bloomberg Index Services, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “Eur FRN TR Index Eur” is provided by the administrator Bloomberg Index Services, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “Euro Corp TR 1-5 Years” is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “Euro-Agg Govt 1-3 Years TR Index Eur” is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “Eur-Agg Govt 3-5 Years TR Index Eur” is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “Bond Italian Aggregate Issuers TR” is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “Bond Global-Agg 1-3 YR TR Hedged Eur” is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation")

- The benchmark “Global High Yield TR Index Value Hedged EUR” is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “Global Agg Corp TR Index Value Hedged Eur” is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “Pan-European High Yield (Euro) TR Index Value Unhedged EUR” is provided by the administrator Bloomberg Index Services Limited which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “3 Month Euribor Swap Index TR Eur” is provided by the administrator Bloomberg Index Services Limited, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “1-3 Year Global Government Excluding Euro Governments Index in LOC” is provided by the administrator ICE Data Indices, LLC, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “3-5 Year Global Government Excluding Euro Governments Index in LOC” is provided by the administrator ICE Data Indices, LLC, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “EURIBOR 3 Months Index” is provided by the administrator EMMI, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “EURIBOR 6 Months Index” is provided by the administrator EMMI, which is included in the register referred to in Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation").

- The benchmark “Euro Swap Annual Rate 3 Years” does not have an administrator. The Article 36 of the Regulation (EU) 2016/1011" (the "BMR Regulation") is not applicable.

In accordance with art. 28(2) the Management Company has produced and maintains robust written plans (contingency plan) setting out the actions that they would take in the event that a benchmark materially changes or ceases to be provided. Copy of the contingency plan is available for inspection upon demand at the registered office of the Management Company.

SECTION II - DESCRIPTION OF THE SUB-FUNDS

1. EQUITY FUNDS

NEW MILLENNIUM Euro Equities	
Investment objective	The aim of the Sub-Fund is to provide real capital growth deriving from the economic development of the countries in which it invests.
Investment policy	The net assets of this Sub-Fund are invested in transferable securities such as shares, convertible bonds and warrants on transferable securities issued mainly by large-cap companies, denominated in Euro and included in the main European indexes. The Investment manager may use its discretion to invest in companies not included in the benchmark in order to take advantage of specific investment opportunities; this active management approach involves a deviation from the reference index which may be limited because the investment strategy is based on keeping a "sector exposure" which replicates that of the benchmark. The Sub-Fund may also invest, in a residual way, in debt securities that can be assimilated to money market securities, with a maximum duration of six months. The use of financial derivatives instruments for investment purposes is allowed on the condition that the global exposure, calculated through the "commitment approach", does not at any moment exceed 50% of the Sub-Fund's net asset value. The expected leverage (calculated as a sum of notional) is not expected to exceed 100% while the expected leverage (calculated through the Commitment approach, as defined under ESMA guidelines 10/788) is not expected to exceed 50%. Higher level of leverage may occur under certain circumstances. As an exception to the investment restrictions contained in the main part of this Prospectus, the Sub-Fund will not invest more than 10% of its net assets in UCITS and/or UCIs.
Main risk factors	The main investment risks the Sub-Fund is exposed to are:

	• equity risk • warrants risk • derivatives risk For a detailed analysis of the risks please refer to paragraph 6 “Risk factors”.
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: - one-tailed confidence interval of 99% - holding period of 1 month (20 business days) - Montecarlo simulation
Profile of the typical investor	The sub fund target market covers all the typology of investors. Given the sub fund main features, it cannot be excluded that a loss may occur even if never it will exceed the invested amount. The medium/long term growth objectives are consistent with the investment policy, even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a long-term time horizon (> 5 years).
Investment Manager	BANCA FINNAT EURAMERICA S.P.A.
Valuation currency	EURO
Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: shares suited for all investors. Class D: Shares suited for all investors, with an annual distribution of a dividend equal to the achieved return with a limit of 8% of the net assets. A minimum dividend of 1.5% will be anyway processed even in case of negative performance. Class I: shares reserved for Institutional investors only. Class L: dematerialized shares listed and tradable on Borsa Italiana. Class Y: shares reserved for Institutional investors only with an annual distribution of dividend equal to the achieved return with a limit of 8% of the net assets. A minimum

	dividend of 1.5% will be anyway processed even in case of negative performance.
Minimum single initial subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class I and Y: EUR 25.000 Class L: 1 share
Minimum subsequent subscription amount	Class A: EUR 1.500 Class D: EUR 1.000
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.
Management fee	Class A and D: 1.50% per year of the net assets. Class I and Y: 0.70% per year of the net assets. Class L: 0.85% per year of the net assets.
Benchmark	• 95% MSCI EMU TOP 50 TR • 5% Bloomberg Barclays 3 month Euribor Swap Index TR Eur (LS01TREU)
Performance fee	By derogation from the general methodology described under paragraph 11 (Investment advice and management delegation and respective fees) to this Prospectus, the Sub-Fund applies the following mechanism for the determination of the performance fees: The performance fees shall be calculated on each Net Asset Value calculation and payable annually to the Management Company and Investment Manager or Investment Advisor (if any) at the beginning of the following period. The Fund will apply at all times the High Water Mark Principle, i.e. no performance fee shall be paid in the case where the Gross Asset Value (the "GAV") which is the Net asset value per share after deducting all fees and liabilities and the management fee (but not the performance fee) as at the end of the reference period is lower than the highest Net asset value per share calculated as at the end of any preceding period and giving rise to the payment of a performance fee since the first period, or the first Net asset value per share of the first period in which a performance fee was calculated ("High-Water Mark"). The reference period shall start on the 1st January of each year and end on the 31st December.

The performances of the Shares are calculated considering the reinvestment of dividends, if any.

The performance fee shall be the 20% of the excess return over the benchmark.

The choice of the benchmark has been based upon an assessment of coherence between the index, the investment objective and strategy of the Sub-Fund and its expected risk and return profile.

The performance fee is applied to the smallest value between the total net assets of the Sub-Fund at the calculation day and the average total net Assets of the Sub-Fund during the reference period.

The reference period shall start on the 1st January of each year and end on the 31st December of the same year. The performance fees are submitted to the occurrence of the following conditions:

- GAV of the Sub-Fund is above HWM
- In the reference period the performance of the Sub-Fund is positive and higher than the performance of the benchmark.

Once verified the above two conditions, a double scenario can raise:

a) HWM is equal or higher than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark starting on the date the HWM has been beaten. For the Sub-Fund it will be calculated the difference between the GAV and the HWM, for the benchmark it will be calculated the difference between the daily value and the closing price of the day before that on which the HWM was beaten (i.e. if the HWM is beaten on the 20th April, the performance of the benchmark to be considered on the 20th April is the one between the 20th and the 19th April);

b) HWM is lower than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark over the reference period.

	Sample of calculation of the Performance Fees method: **Performance fee** (**Pf**) = [**(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.]** Where: **min(TNA_t; TNA_{AVG}) =** is the lowest between the total net assets of the Sub-Fund at the calculation day and the average total net assets of the reference period. **PERC =** is the percentage of performance fee as defined within each Sub-fund Schedule **PB =** is the performance of the benchmark during the reference period, expressed in percentage **P =** is the performance of the sub-fund during the reference period, expressed in percentage, through the following formula: **P =** ((GAV_t / HWM) – 1) x 100, subject to the following conditions: GAV_t > HWM; and P > PB where: GAV_t = is the Gross Asset Value at the calculation day HWM: is the High-Water Mark, as defined above e.g. GAV_t = 108 HWM_t = 105 PB = 2% TNA_t = 2.000.000 € TNA_{AVG} = 2.500.000 € PERC = 20% P = ((GAV_t / HWM) – 1) x 100 = ((108 / 105) – 1) x 100 = 2,86% **Pf = [(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.] = [(2.86%-2%) x min(2.000.000; 2.500.000) x 20%] = [(2.86%-2%) x 2.000.000 € x 20%] = 3.440 €**
Fee cap	The aggregate Management and Performance fees borne by the Sub-Fund cannot exceed five per cent (5%) of the net assets.

NEW MILLENNIUM Global Equities (Eur Hedged)	
Investment objective	The aim of the Sub-Fund is to provide real capital growth deriving from the economic development of the countries in which it invests.
Investment policy	The Sub-Fund shall invest in equities issued by issuers of any nationality outside the Euro-zone. Although possible, any exposure to Euro-denominated securities, and to Emerging Markets, shall have a residual weight in the portfolio of the Sub-Fund. The Sub-Fund may also invest, in a residual way, in debt securities that can be assimilated to money market securities, with a maximum duration of six months. The investment selection process aims at achieving an adequate sectoral and geographical diversification, with a focus on large-cap equities comprised in the main indexes. The Investment manager may use its discretion to invest in companies or sectors not included in the benchmark in order to take advantage of specific investment opportunities. This active management approach involves a deviation from the reference index which can be significant. The use of financial derivatives instruments for investment purposes is allowed on the condition that the global exposure, calculated through the "commitment approach", does not at any moment exceed 50% of the Sub-Fund's net asset value. The expected leverage (calculated as a sum of notional) is not expected to exceed 150% while the expected leverage (calculated through the Commitment approach, as defined under ESMA guidelines 10/788) is not expected to exceed 50%. Higher level of leverage may occur under certain circumstances. As an exception to the investment restrictions contained in the main part of this Prospectus, the Sub-Fund will not invest more than 10% of its net assets in UCITS and/or UCIs.

	In order to mitigate currency risk, the main currency positions shall be hedged against the Euro.
Main risk factors	The main investment risks the Sub-Fund is exposed to be: • equity risk • liquidity risk • risk inherent in investing in Emerging Markets • warrants risk • derivatives risk • foreign currency risk For a detailed analysis of the risks please refer to paragraph 6 “Risk factors”.
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: - one-tailed confidence interval of 99% - holding period of 1 month (20 business days) - Montecarlo simulation
Profile of the typical investor	The sub fund target market covers all the typology of investors. Given the sub fund main features, it cannot be excluded that a loss may occur even if never it will exceed the invested amount. The medium/long term growth objectives are consistent with the investment policy, even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a long-term time horizon (> 5 years).
Investment Manager	BANCA FINNAT EURAMERICA S.P.A.
Valuation currency	EURO
Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: shares suited for all investors. Class I: shares reserved for Institutional investors only. Class L: dematerialized shares listed and tradable on Borsa Italiana.
Minimum single initial subscription amount	Class A:EUR 1.500

	Class I: EUR 25.000 Class L: 1 share
Minimum subsequent subscription amount	Class A: EUR 1.500 Class L: 1 share
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.
Management fee	Class A: 1.60% per year of the net assets. Class I: 0.80% per year of the net assets. Class L: 0.95% per year of the net assets.
Benchmark	• 95% MSCI world ex EMU Net Ret Eur Hedged Index (M0WOMHEU) • 5% Bloomberg Barclays 3 month Euribor Swap Index TR Eur (LS01TREU)
Performance fee	By derogation from the general methodology described under paragraph 11 (Investment advice and management delegation and respective fees) to this Prospectus, the Sub-Fund applies the following mechanism for the determination of the performance fees: The performance fees shall be calculated on each Net Asset Value calculation and payable annually to the Management Company and Investment Manager or Investment Advisor (if any) at the beginning of the following period. The Fund will apply at all times the High Water Mark Principle, i.e. no performance fee shall be paid in the case where the Gross Asset Value (the "GAV") which is the Net asset value per share after deducting all fees and liabilities and the management fee (but not the performance fee) as at the end of the reference period is lower than the highest Net asset value per share calculated as at the end of any preceding period and giving rise to the payment of a performance fee since the first period, or the first Net asset value per share of the first period in which a performance fee was calculated ("High-Water Mark"). The reference period shall start on the 1st January of each year and end on the 31st December.

The performances of the Shares are calculated considering the reinvestment of dividends, if any.

The performance fee shall be the 20% of the excess return over the benchmark.
The choice of the Benchmark has been based upon an assessment of coherence between the index, the investment objective and strategy of the Sub-Fund and its expected risk and return profile.

The performance fee is applied to the smallest value between the total net assets of the Sub-Fund at the calculation day and the average total net Assets of the Sub-Fund during the reference period.

The reference period shall start on the 1st January of each year and end on the 31st December of the same year. The performance fees are submitted to the occurrence of the following conditions:

- GAV of the Sub-Fund is above HWM
- In the reference period the performance of the Sub-Fund is positive and higher than the performance of the benchmark.

Once verified the above two conditions, a double scenario can raise:

a) HWM is equal or higher than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark starting on the date the HWM has been beaten. For the Sub-Fund it will be calculated the difference between the GAV and the HWM, for the benchmark it will be calculated the difference between the daily value and the closing price of the day before that on which the HWM was beaten (i.e. if the HWM is beaten on the 20th April, the performance of the benchmark to be considered on the 20th April is the one between the 20th and the 19th April);

b) HWM is lower than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the

Sub-Fund and the performance of the benchmark over the reference period.

Sample of calculation of the Performance Fees method:

Performance fee (**Pf**) = [**(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.]**

Where:

Min (TNA_t; TNA_{AVG}) = is the lowest between the total net assets of the Sub-Fund at the calculation day and the average total net assets of the reference period.

PERC = is the percentage of performance fee as defined within each Sub-fund Schedule

PB = is the performance of the benchmark during the reference period, expressed in percentage

P = is the performance of the sub-fund during the reference period, expressed in percentage, through the following formula: **P =** ((GAV_t / HWM) – 1) x 100, subject to the following conditions:

GAV_t > HWM; and

P > PB

where:

GAV_t = is the Gross Asset Value at the calculation day

HWM: is the High-Water Mark, as defined above

e.g.

GAV_t =	108
HWM_t =	105
PB =	2%
TNA_t =	2.000.000 €
TNA_{AVG} =	2.500.000 €
PERC =	20%

P = ((GAV_t / HWM) – 1) x 100 = ((108 / 105) – 1) x 100 = 2,86%

Pf = **[(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.] = [(2.86%-2%) x min(2.000.000; 2.500.000) x 20%] = [(2.86%-2%) x 2.000.000 € x 20%] = 3.440 €**

Fee cap	The aggregate Management and Performance fees borne by the Sub-Fund cannot exceed five per cent (5%) of the net assets.

2. BOND FUNDS

NEW MILLENNIUM Euro Bonds Short Term	
Investment objective	The Sub-Fund seeks a higher level of return than that usually achievable through money market instruments, while maintaining a low level of risk.
Investment policy	The net assets of this Sub-Fund are invested in deposits, money market instruments, fixed and floating rate bonds denominated in Euro, issued mainly by Government and Supranational issuers. A potential investment in non-investment grade or not-rated securities is allowed, with an adequate diversification and with a limit of 5% of the net asset value. The average portfolio duration will be maintained at a low level. The Investment manager may use its discretion to invest in financial instruments not included in the benchmark in order to take advantage of specific investment opportunities. This active management approach involves a deviation from the reference index which can be significant. The use of financial derivatives instruments for investment purposes is allowed on the condition that the net global exposure, calculated through the "commitment approach", does not at any moment exceed 20% of the Sub-Fund's net asset value. The expected leverage (calculated as a sum of notional) is not expected to exceed 100% while the expected leverage (calculated through the Commitment approach, as defined under ESMA guidelines 10/788) is not expected to exceed 20%. Higher level of leverage may occur under certain circumstances. As an exception to the investment restrictions contained in the main part of this Prospectus, the Sub-Fund will not invest more than 10% of its net assets in UCITS and/or UCIs.
Main risk factors	The main investment risks the Sub-Fund is exposed to are

	• issuer risk • interest rate risk • derivatives risk For a detailed analysis of the risks please refer to paragraph 6 "Risk factors".
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: - one-tailed confidence interval of 99% - holding period of 1 month (20 business days) - Montecarlo simulation
Profile of the typical investor	The sub fund target market covers all the typology of investors. Given the sub fund main features, it cannot be excluded that a loss may occur, even if limited, anyway not exceeding the invested amount. The objectives of liquidity allocation are consistent with the sub fund investment policy with a time horizon in line with the sub fund's one; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a short-term time horizon (< 3 years).
Investment Manager	BANCA FINNAT EURAMERICA S.P.A.
Valuation currency	EURO
Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: shares suited for all investors with income capitalized. Class D: Shares suited for all investors, with an annual distribution of a dividend equal to the annual average of the Euribor 3 months + 30 bps. The distribution will occur even if the net income is lower than the annual average of the Euribor 3 months + 30 bps. A minimum dividend of 0.50% will be anyway processed. Class I: Shares reserved for Institutional investors only, with income capitalized. Class Y: Shares reserved for Institutional investors only with an annual distribution of a dividend equal to the annual

	average of the Euribor 3 months + 30 bps. The distribution will occur even if the net income is lower than the annual average of the Euribor 3 months + 30 bps. A minimum dividend of 0.50% will be anyway processed. Class L: dematerialized shares listed and tradable on Borsa Italiana
Minimum single initial subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class I and Y: EUR 25.000 Class L: 1 share
Minimum subsequent subscription amount	Class A: EUR 1.500. Class D: EUR 1.000 Class L: 1 share
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.
Management fee	Classes A and D: 0.55% per year of the net assets. Classes I and Y: 0.30% per year of the net assets. Class L: 0.45% per year of the net assets.
Benchmark	• 90% Bloomberg Barclays Euro-Agg Govt 1-3 Years TR Index Eur (LEG1TREU) • 10% Bloomberg Barclays Pan-Eur Corp FRN Index TR Hedged Eur (BPE2TREH)
Performance fee	By derogation from the general methodology described under paragraph 11 (Investment advice and management delegation and respective fees) to this Prospectus, the Sub-Fund applies the following mechanism for the determination of the performance fees: The performance fees shall be calculated on each Net Asset Value calculation and payable annually to the Management Company and Investment Manager or Investment Advisor (if any) at the beginning of the following period. The Fund will apply at all times the High Water Mark Principle, i.e. no performance fee shall be paid in the case where the Gross Asset Value (the "GAV") which is the Net asset value per share after deducting all fees and liabilities and the management fee (but not the performance fee) as at the end of the reference period is lower than the highest Net asset value per share calculated as at the end of any preceding period and giving rise to the payment of a

	performance fee since the first period, or the first Net asset value per share of the first period in which a performance fee was calculated ("High-Water Mark"). The reference period shall start on the 1st January of each year and end on the 31st December. The performances of the Shares are calculated considering the reinvestment of dividends, if any. The performance fee shall be the 15% of the excess return over the benchmark. The choice of the Benchmark has been based upon an assessment of coherence between the index, the investment objective and strategy of the Sub-Fund and its expected risk and return profile. **The performance fee is applied to the smallest value between the total net assets of the Sub-Fund at the calculation day and the average total net Assets of the Sub-Fund during the reference period.** The reference period shall start on the 1st January of each year and end on the 31st December of the same year. The performance fees are submitted to the occurrence of the following conditions: - GAV of the Sub-Fund is above HWM - In the reference period the performance of the Sub-Fund is positive and higher than the performance of the benchmark. Once verified the above two conditions, a double scenario can raise: a) HWM is equal or higher than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark starting on the date the HWM has been beaten. For the Sub-Fund it will be calculated the difference between the GAV and the HWM, for the benchmark it will be calculated the difference between the daily value and the closing price of the day before that on which the HWM was beaten (i.e. if the HWM is beaten on the 20th April, the performance of the benchmark to be considered on the 20th April is the one between the 20th and the 19th April);

b) HWM is lower than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark over the reference period.

Sample of calculation of the Performance Fees method:

Performance fee (**Pf**) = **[(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.]**

Where:

min(TNA_t; TNA_{AVG}) = is the lowest between the total net assets of the Sub-Fund at the calculation day and the average total net assets of the reference period.

PERC = is the percentage of performance fee as defined within each Sub-fund Schedule

PB = is the performance of the benchmark during the reference period, expressed in percentage

P = is the performance of the sub-fund during the reference period, expressed in percentage, through the following formula: **P =** ((GAV_t / HWM) – 1) x 100, subject to the following conditions:

GAV_t > HWM; and

P > PB

where:

GAV_t = is the Gross Asset Value at the calculation day

HWM: is the High-Water Mark, as defined above

e.g.

GAV_t =	108
HWM_t =	105
PB =	2%
TNA_t =	2.000.000 €
TNA_{AVG} =	2.500.000 €
PERC =	15%

P = ((GAV_t / HWM) – 1) x 100 = ((108 / 105) – 1) x 100 = 2,86%

Pf = **[(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.] = [(2.86%-2%) x min(2.000.000; 2.500.000) x 15%] =**

	[(2.86%-2%) x 2.000.000 € x 15%] = 2.580 €
Fee cap	The aggregate Management and Performance fees borne by the Sub-Fund cannot exceed two per cent (2%) of the net assets.

NEW MILLENNIUM Augustum High Quality Bonds	
Investment objective	The Sub-Fund seeks to maintain a stable trend in performance, while aiming to obtain a higher level of return than are usually achievable through money market instruments and at the same time keeping risk levels low.
Investment policy	The net assets of this Sub-Fund are invested in debt securities, such as bonds, both with fixed and floating coupon rates, issued mainly by European issuers. The breakdown will be as follows: i. Mainly bonds issued by Government and Supranational issuers, of which at least 20% issued by Government belonging to the G8 countries and Supranational issuers, ii. corporate bonds with investment grade rating. Investments in securities not-rated or non-investment grade is not permitted. The Sub-Fund may invest in credit derivative instruments, including credit default swaps and credit spread derivatives, in order to hedge the credit risk specific to some issuers present in the portfolio. In order to mitigate currency risk, the main currency positions shall be hedged against the Euro. Unhedged positions will not exceed 20% of the net asset value. The Investment manager may use its discretion to invest in financial instruments not included in the benchmark in order to take advantage of specific investment opportunities. This active management approach involves a deviation from the reference index which can be significant. The use of financial derivatives instruments for investment purposes is allowed on the condition that the net global exposure, calculated through the “commitment approach", does not at any moment exceed 50% of the Sub-Fund’s net asset value. The expected leverage (calculated as a sum of notional) is not expected to exceed 150% while the expected leverage (calculated through the Commitment approach, as defined

	under ESMA guidelines 10/788) is not expected to exceed 50%. Higher level of leverage may occur under certain circumstances. As an exception to the investment restrictions contained in the main part of this Prospectus, the Sub-Fund will not invest more than 10% of its net assets in UCITS and/or UCIs.
Main risk factors	The main investment risks the Sub-Fund is exposed to are**:** • interest rate risk • issuer risk • currency risk • derivatives risk For a detailed analysis of the risks please refer to paragraph 6 "Risk factors".
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: **-** one-tailed confidence interval of 99% **-** holding period of 1 month (20 business days) **-** Montecarlo simulation
Profile of the typical investor	The sub fund target market covers all the typology of investors. Given the sub fund main features, it cannot be excluded that a loss may occur, even if limited, anyway not exceeding the invested amount. The sub fund investment policy is consistent with the objectives of liquidity allocation with a time horizon in line with the sub fund's one, or also with the growth in a medium/long term even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a medium-term time horizon (< 5 years).
Investment Manager	AZ SWISS & PARTNERS S.A.
Valuation currency	EURO
Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: shares suited for all investors. Class D: Shares suited for all investors, with an annual distribution of dividend equal to 2.5% of the net assets. The

	distribution will occur even if the annual performance of the investment Class is not positive. Class I: shares reserved for Institutional investors only. Class Y: shares reserved for Institutional investors only with an annual distribution of dividend equal to 2.5% of the net assets. The distribution will occur even if the annual performance of the investment Class is not positive. Class L: dematerialized shares listed and tradable on Borsa Italiana. Class A-CHF-Hedged: hedged CHF class shares suited for all investors. Class A-USD-Hedged: hedged USD class shares suited for all investors.
Minimum single initial subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class I e Y: EUR 25.000 Class L: 1 share Class A-CHF-Hedged: CHF 1.500 Class A-USD-Hedged: USD 1.500
Minimum subsequent subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class L: 1 share Class A-CHF-Hedged: CHF 1.500 Class A-USD-Hedged: USD 1.500
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.
Management fee	Class A and D: 1.20% per year of the net assets. Class I and Y: 0.70% per year of the net asset. Class L: 0.85% per year of the net asset. Class A-CHF-Hedged: 1.20% per year Class A-USD-Hedged: 1.20% per year
Benchmark	• 30% Bloomberg Barclays 3 month Euribor Swap Index TR Eur (LS01TREU) • 40% Bloomberg Barclays Euro-Agg Govt 1-3 Years TR Index Eur (LEG1TREU) • 30% Bloomberg Barclays Eur-Agg Govt TR Index Eur (LEEGTREU)

Performance fee	7.5% absolute fee calculated pursuant to the methodology set forth in paragraph 11 (Investment advice and management delegation and respective fees) of the Prospectus.

NEW MILLENNIUM Augustum Extra Euro High quality Bond	
Investment objective	The aim of the Sub-Fund is to achieve an excess return on the one usually achievable through euro bond market, investing in debt instruments not denominated in euro currency, combining interest income and capital appreciation also coming from the exchange rate performance.
Investment policy	The net assets of this Sub-Fund are invested in investment grade debt securities, such as bonds, both with fixed and floating coupon rates, issued in currencies other than euro by Government, Supranational and company issuer. The Sub-Fund does not have any limit on the geographical allocation. At least 70% of the assets will be invested in securities with minimum rating A-. The exposure to a single currency may not exceed 50% of the net assets of the Sub-Fund; the percentage is reduced to 25% in case of currencies other than USD, GBP, JPY, AUD and CAD. The temporary detention of cash or instrument equivalent to cash is allowed up to 10% of the net assets. The Sub-Fund may invest in credit derivative instruments, including credit default swaps and credit spread derivatives, in order to hedge the credit risk specific to some issuers present in the portfolio. The Investment manager may use its discretion to invest in financial instruments not included in the benchmark in order to take advantage of specific investment opportunities. This active management approach involves a deviation from the reference index which can be significant. The use of financial derivatives instruments for investment purposes is allowed on the condition that the net global exposure, calculated through the “commitment approach", does not at any moment exceed 50% of the Sub-Fund’s net asset value. The expected leverage (calculated as a sum of notional) is not expected to exceed 150% while the expected leverage (calculated through the Commitment approach, as defined

	under ESMA guidelines 10/788) is not expected to exceed 50%. Higher level of leverage may occur under certain circumstances. As an exception to the investment restrictions contained in the main part of this Prospectus, the Sub-Fund will not invest more than 10% of its net assets in UCITS and/or UCIs.
Main risk factors	The main investment risks the Sub-Fund is exposed to are**:** • interest rate risk • issuer risk • currency risk • derivatives risk For a detailed analysis of the risks please refer to paragraph 6 “Risk factors”.
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: **-** one-tailed confidence interval of 99% **-** holding period of 1 month (20 business days) **-** Montecarlo simulation
Profile of the typical investor	The sub fund target market covers all the typology of investors provided that for retail investors with medium knowledge and financial experience, the effective understanding of the characteristics of the investment policy has been verified. Given the sub fund main features, it cannot be excluded that a loss may occur even if never it will exceed the invested amount. The medium/long term growth objectives are consistent with the investment policy, even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a medium-term time horizon (< 5 years).
Investment Manager	AZ SWISS & PARTNERS S.A.
Valuation currency	EUR
Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: shares suited for all investors.

	Class D: Shares suited for all investors, with an annual distribution of dividend equal to 4,00% of the net assets. The distribution will occur even if the annual performance of the investment Class is not positive. Class I: shares reserved for Institutional investors only. Class Y: shares reserved for Institutional investors only with an annual distribution of dividend equal to 4,00% of the net assets. The distribution will occur even if the annual performance of the investment Class is not positive. Class L: dematerialized shares listed and tradable on Borsa Italiana.
Minimum single initial subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class I and Y: EUR 25.000 Class L: 1 share
Minimum subsequent subscription amount	Class A : EUR 1.500 Class D: EUR 1.000 Class L: 1 share
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.
Management fee	Class A and D: 1.60% per year of the net assets. Class I and Y: 0.80% per year of the net assets. Class L: 0.95% per year of the net assets.
Benchmark	• 60% ICE BofAML 1-3 Year Global Government Excluding Euro Governments Index in LOC (N1Q1 Index); • 40% ICE BofAML 3-5 Year Global Government Excluding Euro Governments Index in LOC (N2Q1 Index);
Performance fee	20% of the excess return over the benchmark, calculated pursuant to the methodology set forth in paragraph 11 (Investment advice and management delegation and respective fees) of the Prospectus.

NEW MILLENNIUM Inflation Linked Bond Europe	
Investment objective	The aim of the Sub-Fund is to provide a return above the Eurozone inflation rate over a minimum time period of 3 years.
Investment policy	The net assets of this Sub-Fund are invested: - for at least 70% in inflation-linked bonds denominated in European currencies and issued mainly by governments; - up to 30% in money market instruments and European currency-denominated bonds not linked to inflation; - up to 15% in commodity-linked financial instruments. (transferable securities linked to commodities index, derivatives on commodities index, eligible UCITS, other UCIs and ETFs. All derivatives will be cash settled. The Sub-Fund will not invest in commodities directly). Investment in corporate bonds will not exceed 25% of the net asset value. Non-investment grade and not-rated investments are not allowed. Investments in convertible bonds, shares and other instruments with voting rights are not allowed. Duration at all times shall be maintained at a medium level, with a maximum of 5 years. The Investment manager may use its discretion to invest in financial instruments not included in the benchmark in order to take advantage of specific investment opportunities. This active management approach involves a deviation from the reference index which can be significant. The use of financial derivatives instruments for investment purposes is allowed on the condition that the global exposure calculated through the “commitment approach", does not at any moment exceed 30% of the Sub-Fund’s net asset value. The expected leverage (calculated as a sum of notional) is not expected to exceed 100% while the expected leverage (calculated through the Commitment approach, as defined under ESMA guidelines 10/788) is not expected to exceed 30%. Higher level of leverage may occur under certain circumstances.

	As an exception to the investment restrictions contained in the main part of this Prospectus, the Sub-Fund will not invest more than 10% of its net assets in UCITS and/or UCIs. In order to mitigate currency risk, the main currency positions shall be hedged against the Euro. Unhedged positions will not exceed 10% of the net asset value.
Main risk factors	The main investment risks the Sub-Fund is exposed to are: • issuer risk • interest rate risk • derivatives risk • foreign currency risk • liquidity risk • commodity-linked risk For a detailed analysis of the risks please refer to paragraph 6 “Risk factors”.
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: - one-tailed confidence interval of 99% - holding period of 1 month (20 business days) - Montecarlo calculation
Profile of the typical investor	The sub fund target market covers all the typology of investors. Given the sub fund main features, it cannot be excluded that a loss may occur even if never it will exceed the invested amount. The medium/long term growth objectives are consistent with the investment policy, even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a medium-term time horizon (< 5 years).
Investment Manager	BANCA FINNAT EURAMERICA S.P.A.
Valuation currency	EURO
Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: shares suited for all investors.

	Class D: Shares suited for all investors, with an annual distribution of dividend equal to the annual average of the Euribor 3 months (daily data) + 70 bps. The distribution will occur even if the annual performance of the investment class is not positive. A minimum dividend of 0.50% will be anyway processed. Class I: shares reserved for Institutional investors only. Class Y: shares reserved for Institutional investors only with an annual distribution of dividend equal to the annual average of the Euribor 3 months (daily data) + 70 bps. The distribution will occur even if the annual performance of the investment class is not positive. A minimum dividend of 0.50% will be anyway processed. Class L: dematerialized shares listed and tradable on Borsa Italiana.
Minimum single initial subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class I and Y: EUR 25.000 Class L: 1 share
Minimum subsequent subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class L: 1 share
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.
Management fee	Class A and D: 0.80% per year of the net assets. Class I and Y: 0.40% per year of the net assets. Class L: 0.55% per year of the net assets.
Benchmark	• 80% Bloomberg Barclays Eur Govt Inflation-Linked 3-5 Years TR Index (BEIG0T) • 20% Bloomberg Barclays Eur FRN TR Index Eur (LEF1TREU)
Performance fee	By derogation from the general methodology described under paragraph 11 (Investment advice and management delegation and respective fees) to this Prospectus, the Sub-Fund applies the following mechanism for the determination of the performance fees:

	The performance fees shall be calculated on each Net Asset Value calculation and payable annually to the Management Company and Investment Manager or Investment Advisor (if any) at the beginning of the following period. The Fund will apply at all times the High Water Mark Principle, i.e. no performance fee shall be paid in the case where the Gross Asset Value (the "GAV") which is the Net asset value per share after deducting all fees and liabilities and the management fee (but not the performance fee) as at the end of the reference period is lower than the highest Net asset value per share calculated as at the end of any preceding period and giving rise to the payment of a performance fee since the first period, or the first Net asset value per share of the first period in which a performance fee was calculated ("High-Water Mark"). The reference period shall start on the 1st January of each year and end on the 31st December. The performances of the Shares are calculated considering the reinvestment of dividends, if any. The performance fee shall be the 15% of the excess return over the benchmark. The choice of the Benchmark has been based upon an assessment of coherence between the index, the investment objective and strategy of the Sub-Fund and its expected risk and return profile. **The performance fee is applied to the smallest value between the total net assets of the Sub-Fund at the calculation day and the average total net Assets of the Sub-Fund during the reference period.** The reference period shall start on the 1st January of each year and end on the 31st December of the same year. The performance fees are submitted to the occurrence of the following conditions: - GAV of the Sub-Fund is above HWM - In the reference period the performance of the Sub-Fund is positive and higher than the performance of the benchmark. Once verified the above two conditions, a double scenario can raise: a) HWM is equal or higher than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark starting on the date the HWM has been beaten. For the Sub-Fund it will be

calculated the difference between the GAV and the HWM, for the benchmark it will be calculated the difference between the daily value and the closing price of the day before that on which the HWM was beaten (i.e. if the HWM is beaten on the 20th April, the performance of the benchmark to be considered on the 20th April is the one between the 20th and the 19th April);

b) HWM is lower than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark over the reference period.

Sample of calculation of the Performance Fees method:

Performance fee (**Pf**) = [**(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.]**

Where:

min(TNA_t; TNA_{AVG}) = is the lowest between the total net assets of the Sub-Fund at the calculation day and the average total net assets of the reference period.

PERC = is the percentage of performance fee as defined within each Sub-fund Schedule

PB = is the performance of the benchmark during the reference period, expressed in percentage

P = is the performance of the sub-fund during the reference period, expressed in percentage, through the following formula: **P =** ((GAV_t / HWM) – 1) x 100, subject to the following conditions:

GAV_t > HWM; and

P > PB

where:

GAV_t = is the Gross Asset Value at the calculation day

HWM: is the High-Water Mark, as defined above

e.g.

GAV_t =	108
HWM_t =	105
PB =	2%
TNA_t =	2.000.000 €
TNA_{AVG} =	2.500.000 €
PERC =	15%

P = ((GAV_t / HWM) – 1) x 100 = ((108 / 105) – 1) x 100 = 2,86%

	Pf =	**[(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.] = [(2.86%-2%) x min(2.000.000; 2.500.000) x 15%] = [(2.86%-2%) x 2.000.000 € x 15%] = 2.580 €**
Fee cap	The aggregate Management and Performance fees borne by the Sub-Fund cannot exceed two per cent (2%) of the net assets.	

NEW MILLENNIUM Large Europe Corporate	
Investment objective	The Sub-Fund seeks to create a highly diversified exposure to corporate bond issues in order to obtain the best possible risk-return combination offered by that asset class, following a strict risk containment policy.
Investment policy	The Sub-Fund invests in debt securities, mainly corporate bonds, denominated in Euro. On an ancillary basis and however up to maximum 10% of the net asset, the Sub-Fund may invest in convertible bonds, denominated in Euro. The selection of the issues is based on a well-established, partly quantitative, valuation methodology, which aims at picking securities with interesting income potential for the investors. Particular attention is given to fundamental data and to the credit-worthiness of the issuer as well as to the liquidity of the issues. Furthermore, the selection process provides for a high level of diversification, both on the sector and on the issuer level. A potential investment in non-investment grade or not-rated investments is allowed, with an adequate diversification and with a limit of 10% of the net asset value. Under exceptional circumstances a maximum of 5% of the investments may be made in bonds with a minimum rating between C and CCC+. Downgraded instruments that reach a rating between C and CCC+ shall also be taken into account for the purposes of calculating the above 5% limit. Furthermore, a residual exposure to government bonds is allowed. The exposure to interest rate risk is set and portfolio duration is at any moment maintained within a narrow range at a medium level. The Investment manager may use its discretion to invest in financial instruments not included in the benchmark in order to take advantage of specific investment opportunities. This active management approach involves a deviation from the reference index which can be significant.

	The Sub-Fund may invest in credit derivative instruments, including credit default swaps and credit spread derivatives, in order to hedge the credit risk specific to some issuers present in the portfolio. The use of derivatives instruments for investment purposes and the use of financial leverage are not allowed. The expected leverage, calculated through the commitment approach, is therefore maintained at zero, with the exception of the derivative component of the convertible bonds. The expected leverage (calculated as a sum of notionals) is not expected to exceed 100%. Higher level of leverage may occur under certain circumstances. As an exception to the investment restrictions contained in the main part of this Prospectus, the Sub-Fund will not invest more than 10% of its net assets in UCITS and/or UCIs.
Main risk factors	The main investment risks the Sub-Fund is exposed to are: • interest rate risk • issuer risk • derivatives risk For a detailed analysis of the risks please refer to paragraph 6 "Risk factors".
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: - one-tailed confidence interval of 99% - holding period of 1 month (20 business days) - Montecarlo simulation
Profile of the typical investor	The sub fund target market covers all the typology of investors. Given the sub fund main features, it cannot be excluded that a loss may occur, even if limited, anyway not exceeding the invested amount. The sub fund investment policy is consistent with the objectives of liquidity allocation with a time horizon in line with the sub fund's one, or also the growth in a medium/long term even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio.

	The investment should be considered in a medium-term time horizon (< 5 years).
Investment Manager	BANCA FINNAT EURAMERICA S.P.A.
Valuation currency	EURO
Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: Shares suited for all investors, with income capitalized. Class D: Shares suited for all investors, with an annual distribution of a dividend equal to the annual average of the Euribor 3 months + 50 bps. The distribution will occur even if the net income is lower than the annual average of the Euribor 3 months + 50 bps. A minimum dividend of 0.50% will be anyway processed. Class I: Shares reserved for Institutional investors only, with income capitalized. Class Y: Shares reserved for Institutional investors only with an annual distribution of a dividend equal to the annual average of the Euribor 3 months + 50 bps. The distribution will occur even if the net income is lower than the annual average of the Euribor 3 months + 50 bps. A minimum dividend of 0.50% will be anyway processed. Class L: dematerialized shares listed and tradable on Borsa Italiana.
Minimum single initial subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class I and Y: EUR 25.000 Class L: 1 share
Minimum subsequent subscription amount	Class A : EUR 1.500 Class D: EUR 1.000 Class L: 1 share
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.
Management fee	Classes A and D: 0.90% per year of the net assets.

	Class I and Y: 0.45% per year of the net assets. Class L: 0.60% per year of the net assets.
Benchmark	95% B-Barclays Euro Corp TR 1-5 Y (LEC4TREU) + 5% B-Barclays 3 M euribor/swap TR (LS01TREU)
Performance fee	By derogation from the general methodology described under paragraph 11 (Investment advice and management delegation and respective fees) to this Prospectus, the Sub-Fund applies the following mechanism for the determination of the performance fees: The performance fees shall be calculated on each Net Asset Value calculation and payable annually to the Management Company and Investment Manager or Investment Advisor (if any) at the beginning of the following period. The Fund will apply at all times the High Water Mark Principle, i.e. no performance fee shall be paid in the case where the Gross Asset Value (the "GAV") which is the Net asset value per share after deducting all fees and liabilities and the management fee (but not the performance fee) as at the end of the reference period is lower than the highest Net asset value per share calculated as at the end of any preceding period and giving rise to the payment of a performance fee since the first period, or the first Net asset value per share of the first period in which a performance fee was calculated ("High-Water Mark"). The reference period shall start on the 1st January of each year and end on the 31st December. The performances of the Shares are calculated considering the reinvestment of dividends, if any. The performance fee shall be the 20% of the excess return over the benchmark. The choice of the Benchmark has been based upon an assessment of coherence between the index, the investment objective and strategy of the Sub-Fund and its expected risk and return profile. **The performance fee is applied to the smallest value between the total net assets of the Sub-Fund at the calculation day and the average total net Assets of the Sub-Fund during the reference period.** The reference period shall start on the 1st January of each year and end on the 31st December of the same year. The

performance fees are submitted to the occurrence of the following conditions:

- GAV of the Sub-Fund is above HWM
- In the reference period the performance of the Sub-Fund is positive and higher than the performance of the benchmark.

Once verified the above two conditions, a double scenario can raise:

a) HWM is equal or higher than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark starting on the date the HWM has been beaten. For the Sub-Fund it will be calculated the difference between the GAV and the HWM, for the benchmark it will be calculated the difference between the daily value and the closing price of the day before that on which the HWM was beaten (i.e. if the HWM is beaten on the 20th April, the performance of the benchmark to be considered on the 20th April is the one between the 20th and the 19th April);

b) HWM is lower than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark over the reference period.

Sample of calculation of the Performance Fees method:

Performance fee (**Pf**) = [**(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.]**

Where:

min(TNA_t; TNA_{AVG}) = is the lowest between the total net assets of the Sub-Fund at the calculation day and the average total net assets of the reference period.

PERC = is the percentage of performance fee as defined within each Sub-fund Schedule

PB = is the performance of the benchmark during the reference period, expressed in percentage

P = is the performance of the sub-fund during the reference period, expressed in percentage, through the following

	formula: **P =** $((GAV_t / HWM) - 1) \times 100$, subject to the following conditions: $GAV_t > HWM$; and $P > PB$ where: GAV_t = is the Gross Asset Value at the calculation day HWM: is the High-Water Mark, as defined above e.g. GAV_t = 108 HWM_t = 105 PB = 2% TNA_t = 2.000.000 € TNA_{AVG} = 2.500.000 € PERC = 10% $P = ((GAV_t / HWM) - 1) \times 100 = ((108 / 105) - 1) \times 100 = 2,86\%$ **Pf = [(P-PB) x min(TNA$_t$; TNA$_{AVG}$) x PERC.] = [(2.86%-2%) x min(2.000.000; 2.500.000) x 10%] = [(2.86%-2%) x 2.000.000 € x 10%] = 1.720 €**
Fee cap	The aggregate Management and Performance fees borne by the Sub-Fund cannot exceed three per cent (3%) of the net assets.

NEW MILLENNIUM Augustum Corporate Bond	
Investment objective	The Sub-Fund seeks to achieve maximum return on investments through a combination of interest income and capital appreciation.
Investment policy	The net assets of this Sub-Fund are invested in debt securities, such as bonds, both with fixed and floating rates and convertible bonds, issued mainly by European issuers. It is permitted to invest in transferable securities issued by not-rated issuers. Under exceptional circumstances a maximum of 5% of the investments may be made in bonds with a minimum rating between C and CCC+. Downgraded instruments that reach a rating between C and CCC+ shall also be taken into account for the purposes of calculating the above 5% limit. The Sub-Fund may, under exceptional circumstances and where the securities have been subject to downgrade, maintain up to a maximum of 3% of the net asset in instruments with a minimum rating equal D. The Sub-Fund may invest in credit derivative instruments, including credit default swaps and credit spread derivatives, both for hedging the credit risk specific to some issuers present in the portfolio and for selling protection, through the use of CDS, and thus acquire a specific credit position. The use of credit derivatives instruments for investment purposed may not exceed 15% of the Sub-Fund's net assets. In order to mitigate currency risk, the main currency positions shall be hedged against the Euro. Unhedged positions will not exceed 30% of the net asset value. The Investment manager may use its discretion to invest in financial instruments not included in the benchmark in order to take advantage of specific investment opportunities. This active management approach involves a deviation from the reference index which can be significant. The use of financial derivatives instruments for investment purposes is allowed on the condition that the global exposure calculated through the "commitment approach", does not at any

	moment exceed 50% of the Sub-Fund's net asset value. The expected leverage (calculated as a sum of notional) is not expected to exceed 150% while the expected leverage (calculated through the Commitment approach, as defined under ESMA guidelines 10/788) is not expected to exceed 50%. Higher level of leverage may occur under certain circumstances. As an exception to the investment restrictions contained in the main part of this Prospectus, the Sub-Fund will not invest more than 10% of its net assets in UCITS and/or UCIs.
Main risk factors	The main investment risks the Sub-Fund is exposed to are: • interest rate risk • issuer risk • currency risk • warrants risk • derivatives risk For a detailed analysis of the risks please refer to paragraph 6 "Risk factors".
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: - one-tailed confidence interval of 99% - holding period of 1 month (20 business days) - Montecarlo simulation
Profile of the typical investor	The sub fund target market covers all the typology of investors provided that for retail investors with medium knowledge and financial experience, the effective understanding of the characteristics of the investment policy has been verified. Given the sub fund main features, it cannot be excluded that a loss may occur even if never it will exceed the invested amount. The medium/long term growth objectives are consistent with the investment policy, even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a medium-term time horizon (< 5 years).

Investment Manager	AZ SWISS & PARTNERS S.A.
Valuation currency	EURO
Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: shares suited for all investors. Class D: Shares suited for all investors, with an annual distribution of dividend equal to 3,5% of the net assets. The distribution will occur even if the annual performance of the investment Class is not positive. Class I: shares reserved for Institutional investors only. Class Y: shares reserved for Institutional investors only with an annual distribution of dividend equal to 3,5% of the net assets. The distribution will occur even if the annual performance of the investment Class is not positive. Class L: dematerialized shares listed and tradable on Borsa Italiana. Class A-CHF-Hedged: hedged CHF class shares suited for all investors. Class A-USD-Hedged: hedged USD class shares suited for all investors. Class Z: shares reserved for insurance company investing through their proprietary account and Italian Social Security institutions ("Enti Previdenziali") only, with a quarterly distribution of dividend equal to 3.5% annual of the net assets. The distribution will occur even if the annual performance of the investment Class is not positive.
Minimum single initial subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class I and Y: EUR 25.000 Class L: 1 share Class A-CHF-Hedged: CHF 1.500 Class A-USD-Hedged: USD 1.500 Class Z: EUR 5.000.000
Minimum subsequent subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class L: 1 share Class A-CHF-Hedged: CHF 1.500

	Class A-USD-Hedged: USD 1.500
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.
Management fee	Class A and D: 1.50% per year of the net assets Class I and Y: 0.75% per year of the net asset. Class L: 0.90% per year of the net asset. Class A-CHF-Hedged: 1.50% per year of the net asset. Class A-USD-Hedged: 1.50% per year of the net asset. Class Z: 0.50% per year of the net assets.
Benchmark	• 80% Bloomberg Barclays Euro-Agg Corp TR Index Eur (LECPTREU) • 20% Bloomberg Barclays 3 month Euribor Swap Index TR Eur (LS01TREU)
Performance fee	10% absolute fee calculated pursuant to the methodology set forth in paragraph 11 (investment advice and management delegation and respective fees).

NEW MILLENNIUM Augustum Italian Diversified Bond	
Investment objective	The Sub-Fund seeks to achieve a moderate growth in the value of capital invested in a medium-term time horizon, through a highly concentrated exposure to bond instruments of Italian issuers, without any currency risk.)
Investment policy	The net assets of this Sub-Fund are invested in debt securities, such as fixed and floating rates bonds and deposits with banks. The sub fund's units are included among eligible investments that shall be held in a "Piano Individuale di Risparmio a lungo termine" PIR under the Italian 2017 and 2020 Budget Law (Law No 232 of 11 December 2016 and No 157 of 19 December 2019). The fund shall invest at least 70% ("qualified investments" as per the PIR regulation) of the portfolio in financial instruments issued by companies resident in Italy, or in an EU or EEA Member State and have a permanent establishment in Italy. At least 25% of the qualified investments, which corresponds to 17.5% of the fund's total net assets, shall be issued by companies which are not listed in the FTSE MIB index or in any other equivalent indices**.** At least 5% of the qualified investments, which corresponds to 3.5% of the sub fund's total net assets, shall be issued by companies which are not listed in the FTSE MIB and on the FTSE Mid Cap index or in any other equivalent indices of regulated markets The fund cannot invest more than 10% of the portfolio in financial instruments issued by the same company, or companies belonging to the same group, or in a cash deposit. The fund cannot invest in financial instruments issued by companies which are not resident in countries that allow an adequate exchange of information with Italy. Up to 30% ("free investments" as per the PIR Law) of the total net assets may be invested in: - Italian Government Bond - Bond issued by non-Italian issuers, both Government and corporate

	- Derivatives for hedging purposes Non-investment grade and not-rated investments are allowed but they will not exceed 49% of the net asset value. Regarding the non- investment grade instruments the minimum rating will be B-.
	However, under exceptional circumstances a maximum of 5% of the investments may be made in bonds with a minimum rating between C and CCC+. Downgraded instruments that reach a rating between C and CCC+ shall also be taken into account for the purposes of calculating the above 5% limit. The Sub-Fund may, under exceptional circumstances and where the securities have been subject to downgrade, maintain up to a maximum of 3% of the net asset in instruments with a minimum rating equal D. The Sub-Fund cannot assume currency risk: the securities will be denominated in Euros or where they are denominated in other currencies, the currency risk will be hedged. The Investment manager may use its discretion to invest in financial instruments not included in the benchmark in order to take advantage of specific investment opportunities. This active management approach involves a deviation from the reference index which can be significant. The use of financial derivatives instruments for investment purposes is not allowed; hedging derivatives will be included in the "free investments" quota as per the PIR Law.The expected leverage (calculated as a sum of notional) is not expected to exceed 100% while the expected leverage (calculated through the Commitment approach, as defined under ESMA guidelines 10/788) is not expected to exceed 10%. Higher level of leverage may occur under certain circumstances. Within the defined limits and in order to achieve a more efficient portfolio management, the Sub-Fund may invest in credit derivative instruments, including credit default swaps

	and credit spread derivatives for hedging the credit risk specific to some issuers present in the portfolio. The Sub-Fund will not invest more than 10% of its net assets in UCITS and/or UCIs which have, however, Investment limits consistent with the Sub-Fund.
Main risk factors	The main investment risks the Sub-Fund is exposed to are: • interest rate risk • issuer risk • warrants risk • derivatives risk For a detailed analysis of the risks please refer to paragraph 6 “Risk factors”.
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: - one-tailed confidence interval of 99% - holding period of 1 month (20 business days) - Montecarlo simulation
Profile of the typical investor	The fund’s units are included among eligible investments that shall be held in a “Piano Individuale di Risparmio a lungo termine” (PIR), under the Italian 2017 and 2020 Budget Law (Law No 232 of 11 December 2016 and No 157 of 19 December 2019). Accordingly, the investor can take advantage of tax benefits envisaged by the mentioned law only if all requirements provided in that law are satisfied. The sub fund target market covers all the typology of investors. Given the sub fund main features, it cannot be excluded that a loss may occur even if never it will exceed the invested amount. The medium/long term growth objectives are consistent with the investment policy, even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a long-term time horizon (> 5 years).

Investment Manager	AZ SWISS & PARTNERS S.A.
Valuation currency	EURO
Valuation day	Every bank business day in Luxembourg
Class of shares	Class A: shares suited for all investors Class D: Shares suited for all investors, with an annual distribution of dividend equal to 3,00% of the net assets. The distribution will occur even if the annual performance of the investment class is not positive. Class I: shares reserved for Institutional investors only. Class Y: shares reserved for Institutional investors only with an annual distribution of dividend equal to 3,00% of the net assets. The distribution will occur even if the annual performance of the investment class is not positive. Class L: dematerialized shares listed and tradable on Borsa Italiana.
Minimum single initial subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class I and Y: EUR 25.000 Class L: 1 share
Minimum subsequent subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class L: 1 share
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.
Management fee	Class A and D: 1.50% per year of the net assets. Class I and Y: 0.75% per year of the net assets. Class L: 0.90% per year of the net assets.
Benchmark	• 10% Bloomberg Barclays Italy Govt 1 to 3 Year TR (BCEI6T) • 70% Bloomberg Barclays Bond Italian Aggregate Issuers TR (LEI2TREU Index) • 20% Bloomberg Barclays Euro-Agg Corporate TR Index Value Unhedged EUR (LECPTREU)

Performance fee	10% absolute fee calculated pursuant to the methodology set forth in paragraph 11 (investment advice and management delegation and respective fees).

NEW MILLENNIUM – Evergreen Global High Yield Bond	
Investment objective	To achieve a return in excess of global bond markets by investing primarily in global below investment grade debt securities, both corporate and Government, without geographical limits, and with an active management of the exchange rates and derivatives.
Investment policy	At least 70% of the Sub-Fund's net assets will be invested in below investment grade and not rated debt securities; the exposure to not rated bonds will not exceed 30% of the net assets. The exposure to investment grade debt securities is therefore allowed up to 30% of the Sub-Fund's net assets. Issuers, mainly corporate, may be located in any country, including emerging markets, for which the focus will be on avoiding an excess of concentration. The Sub-Fund may invest in credit derivative instruments, including credit default swaps and credit spread derivatives, both for hedging the credit risk specific to some issuers present in the portfolio and for selling protection, through the use of CDS, and thus acquire a specific credit position. The use of credit derivatives instruments for investment purposed may not exceed 15% of the Sub-Fund's net assets. The use of ETFs is also allowed with a limit of 10% of the net assets. The securities can be denominated in any currency through an adequate diversification. Up to 20% of net assets may be invested in ABS/MBS. The Investment manager may use its discretion to invest in financial instruments not included in the benchmark in order to take advantage of specific investment opportunities. This active management approach involves a deviation from the reference index which can be significant. The use of financial derivatives instruments for investment purposes is allowed on the condition that the global exposure calculated through the "commitment approach", does not at any moment exceed 50% of the Sub-Fund's net asset value.

	The expected leverage (calculated as a sum of notional) is not expected to exceed 200% while the expected leverage (calculated through the Commitment approach, as defined under ESMA guidelines 10/788) is not expected to exceed 50%. Higher level of leverage may occur under certain circumstances. As an exception to the investment restrictions contained in the main part of this Prospectus, the Sub-Fund will not invest more than 10% of its net assets in UCITS and/or UCIs.
Main risk factors	The main investment risks the Sub-Fund is exposed to are: • market risk • Emerging markets risk • interest rate risk • issuer risk • currency risk • warrants risk • derivatives risk For a detailed analysis of the risks please refer to paragraph 6 “Risk factors”.
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: - one-tailed confidence interval of 99% - holding period of 1 month (20 business days) - Montecarlo simulation
Profile of the typical investor	The sub fund target market covers all the typology of investors as long as they are different from the retail ones that operate autonomously being without experience and with limited financial knowledge (unless their investment is marginal compared to their entire assets). Given the sub fund main features, it cannot be excluded that a loss may occur even if never it will exceed the invested amount. The medium/long term growth objectives are consistent with the investment policy, even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio.

	The investment should be considered in a medium-term time horizon (< 5 years).
Investment Manager	AZ SWISS & PARTNERS S.A.
Valuation currency	EURO
Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: shares suited for all investors. Class I: shares reserved for Institutional investors only. Class L: dematerialized shares listed and tradable on Borsa Italiana.
Minimum single initial subscription amount	Class A: EUR 1.500 Class I: EUR 25.000 Class L: 1 share
Minimum subsequent subscription amount	Class A: EURO 1.500Class L: 1 share
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.
Management fee	Class A: 1.70 % per year of the net assets. Class I: 0.85% per year of the net assets. Class L: 1.00 % per year of the net assets.
Benchmark	• 40% Bloomberg Barclays Global High Yield TR Index Value Hedged EUR (LG30TREH); • 30% Bloomberg Barclays Pan-European High Yield (Euro) TR Index Value Unhedged EUR (LP01TREU); • 20% Bloomberg Barclays Euro-Agg Corp TR Index Value Unhedged EUR (LECPTREU); • 10% Bloomberg Barclays 3 month Euribor Swap Index TR Eur (LS01TREU).
Performance fee	20% of the excess return over the benchmark, calculated pursuant to the methodology set forth in paragraph 11

	(Investment advice and management delegation and respective fees) of the Prospectus.

3. BALANCED AND FLEXIBLE FUNDS

NEW MILLENNIUM Balanced World Conservative	
Investment objective	The Sub-Fund seeks higher levels of return than are usually achievable on bond markets, through investment, to a limited extent, in equity markets.
Investment policy	The Sub-Fund is a global moderate balanced fund, characterized by a high degree of diversification on an asset class, geographical and sectorial level, as well as by a focus on different investment strategies, put into practice also significantly through investments in shares of other funds. The net assets of this Sub-Fund are invested in: - units of UCITS and/or UCIs; - transferable securities, such as shares, convertible bonds and warrants on transferable securities; - fixed and floating rate debt securities, and money market instruments. Exposure to equity markets shall at no point exceed 30% of the net assets. Non-investment grade and not-rated investments are allowed. An eventual investment in such securities, if not effected through shares of funds, will be of a residual nature. Under exceptional circumstances a maximum of 5% of the investments may be made in bonds with a minimum rating between C and CCC+. Downgraded instruments that reach a rating between C and CCC+ shall also be taken into account for the purposes of calculating the above 5% limit. The securities can be denominated in any currency, issued by issuers of any nation, with a focus on industrialized Countries but not excluding Emerging Countries. The Investment manager may use its discretion to invest in financial instruments not included in the benchmark, as well as in other funds actively managed, in order to take advantage of specific investment opportunities. This active management

	approach involves a deviation from the reference index which can be significant. The use of financial derivatives instruments for investment purposes is allowed on the condition that the global exposure, calculated through the “commitment approach", does not at any moment exceed 50% of the Sub-Fund’s net asset value. The expected leverage (calculated as a sum of notional) is not expected to exceed 100% while the expected leverage (calculated through the Commitment approach, as defined under ESMA guidelines 10/788) is not expected to exceed 50%. Higher level of leverage may occur under certain circumstances.
Main risk factors	The main investment risks the Sub-Fund is exposed to are: • interest rate risk • issuer risk • equity risk • liquidity risk • risk inherent in investing in emerging markets • risk inherent in investing in emerging European markets • currency risk • warrants risk • derivatives risk For a detailed analysis of the risks please refer to paragraph 6 “Risk factors”.
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: - one-tailed confidence interval of 99% - holding period of 1 month (20 business days) - Montecarlo simulation
Profile of the typical investor	The sub fund target market covers all the typology of investors. Given the sub fund main features, it cannot be excluded that a loss may occur even if never it will exceed the invested amount. The medium/long term growth objectives are consistent with the investment policy, even with potential value fluctuation; it can be considered however the consistency with other

	objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a long-term time horizon (> 5 years).
Investment Manager	BANCA FINNAT EURAMERICA S.P.A.
Valuation currency	EURO
Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: shares suited for all investors. Class D: Shares suited for all investors, with an annual distribution of a dividend equal to the achieved return with a limit of 5% of the net assets. A minimum dividend of 1% will be anyway processed even in case of negative performance. Class I: shares reserved for Institutional investors only. Class L: dematerialized shares listed and tradable on Borsa Italiana. Class Y: shares reserved for Institutional investors only with an annual distribution of dividend equal to the achieved return with a limit of 5% of the net assets. A minimum dividend of 1% will be anyway processed even in case of negative performance.
Minimum single initial subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class I and Y: EUR 25.000 Class L: 1 share
Minimum subsequent subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class L: 1 share
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.
Management fee	Class A and D: 1.10% per year of the net assets. Class I and Y: 0.55% per year of the net assets. Class L: 0.70% per year of the net assets.
Benchmark	• 20% MSCI AC World Net Ret Unhedged Eur Index

	(NDEEWNR) • 50% Bloomberg Barclays Eur-Agg Govt 3-5 Years TR Index Eur (LEG3TREU) • 30% Bloomberg Barclays Global Agg Corp 1-3Y TR Index Value Hedged Eur (BAC1TREH)
Performance fee	By derogation from the general methodology described under paragraph 11 (Investment advice and management delegation and respective fees) to this Prospectus, the Sub-Fund applies the following mechanism for the determination of the performance fees: The performance fees shall be calculated on each Net Asset Value calculation and payable annually to the Management Company and Investment Manager or Investment Advisor (if any) at the beginning of the following period. The Fund will apply at all times the High Water Mark Principle, i.e. no performance fee shall be paid in the case where the Gross Asset Value (the "GAV") which is the Net asset value per share after deducting all fees and liabilities and the management fee (but not the performance fee) as at the end of the reference period is lower than the highest Net asset value per share calculated as at the end of any preceding period and giving rise to the payment of a performance fee since the first period, or the first Net asset value per share of the first period in which a performance fee was calculated ("High-Water Mark"). The reference period shall start on the 1st January of each year and end on the 31st December. The performances of the Shares are calculated considering the reinvestment of dividends, if any. The performance fee shall be the 20% of the excess return over the benchmark. The choice of the Benchmark has been based upon an assessment of coherence between the index, the investment objective and strategy of the Sub-Fund and its expected risk and return profile. **The performance fee is applied to the smallest value between the total net assets of the Sub-Fund at the calculation day and the average total net Assets of the Sub-Fund during the reference period.** The reference period shall start on the 1st January of each year and end on the 31st December of the same year. The

performance fees are submitted to the occurrence of the following conditions:

- GAV of the Sub-Fund is above HWM
- In the reference period the performance of the Sub-Fund is positive and higher than the performance of the benchmark.

Once verified the above two conditions, a double scenario can raise:

a) HWM is equal or higher than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark starting on the date the HWM has been beaten. For the Sub-Fund it will be calculated the difference between the GAV and the HWM, for the benchmark it will be calculated the difference between the daily value and the closing price of the day before that on which the HWM was beaten (i.e. if the HWM is beaten on the 20th April, the performance of the benchmark to be considered on the 20th April is the one between the 20th and the 19th April);

b) HWM is lower than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark over the reference period.

Sample of calculation of the Performance Fees method:

Performance fee (**Pf**) = [**(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.]**

Where:

min(TNA_t; TNA_{AVG}) = is the lowest between the total net assets of the Sub-Fund at the calculation day and the average total net assets of the reference period.

PERC = is the percentage of performance fee as defined within each Sub-fund Schedule

PB = is the performance of the benchmark during the reference period, expressed in percentage

P = is the performance of the sub-fund during the reference period, expressed in percentage, through the following

	formula: **P =** $((GAV_t / HWM) - 1) \times 100$, subject to the following conditions: $GAV_t > HWM$; and $P > PB$ where: GAV_t = is the Gross Asset Value at the calculation day HWM: is the High-Water Mark, as defined above e.g. GAV_t = 108 HWM_t = 105 PB = 2% TNA_t = 2.000.000 € TNA_{AVG} = 2.500.000 € PERC = 20% $P = ((GAV_t / HWM) - 1) \times 100 = ((108 / 105) - 1) \times 100 = 2,86\%$ **Pf = [(P-PB) x min(TNA$_t$; TNA$_{AVG}$) x PERC.] = [(2.86%-2%) x min(2.000.000; 2.500.000) x 20%] = [(2.86%-2%) x 2.000.000 € x 20%] = 3.440 €**
Fee cap	The aggregate Management and Performance fees borne by the Sub-Fund cannot exceed four per cent (4%) of the net assets.

NEW MILLENNIUM Total Return Flexible	
Investment objective	The Sub-Fund seeks to achieve higher levels of positive net returns than those usually achievable through risk-free investments. Through a dynamic allocation, the Sub-Fund intends to take advantage of particular investment opportunities and positive market trends, while keeping losses to a minimum in negative market phases.
Investment policy	The Sub-Fund is actively managed, with a wide power to dynamically change the asset allocation of the portfolio, in function of the different market conditions: - fixed and floating rate debt securities: with an exposure between 20% and 100% of the total net assets; the investment will include warrants, corporate, government and convertible bond. Investment in fixed income instruments will be prevalently in investment grade instruments with a minimum rating of BBB/Baa, although a residual investment in not-rated and non-investment grade securities is allowed, with a limit of 25% of the net asset value. Under exceptional circumstances a maximum of 5% of the investments may be made in bonds with a minimum rating between C and CCC+. Downgraded instruments that reach a rating between C and CCC+ shall also be taken into account for the purposes of calculating the above 5% limit. - equities: with an exposure of max 49% including direct investment and through derivatives. - derivatives: will be used for both, hedging and investment purposes within the limits set in the following paragraph. The expected leverage (calculated as a sum of notional) is not expected to exceed 200% while the expected leverage (calculated through the Commitment approach, as defined under ESMA guidelines 10/788) is not expected to exceed 100%. Higher level of leverage may occur under certain circumstances. In order to mitigate the currency risk the main extra euro positions will be hedged against the Euro; unhedged position will not exceed 30% of the total net assets.

	The active management of the fund implies that the deviation from the target may be significant. As an exception to the investment restrictions contained in the main part of this Prospectus, the Sub-Fund will not invest more than 10% of its net assets in UCITS and/or other UCIs.
Main risk factors	The main investment risks the Sub-Fund is exposed to are: • interest rate risk • issuer risk • equity risk • liquidity risk • currency risk • warrants risk • derivatives risk For a detailed analysis of the risks please refer to paragraph 6 “Risk factors”.
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: - one-tailed confidence interval of 99% - holding period of 1 month (20 business days) - Montecarlo calculation.
Profile of the typical investor	The sub fund target market covers all the typology of investors. Given the sub fund main features, it cannot be excluded that a loss may occur, even if limited, anyway not exceeding the invested amount. The sub fund investment policy is consistent with the objectives of liquidity allocation with a time horizon in line with the sub fund's one, or also the growth in a medium/long term even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a medium-term time horizon (< 5 years).
Investment Manager	AZ SWISS & PARTNERS S.A.
Valuation currency	EURO

Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: shares suited for all investors. Class I: shares reserved for Institutional investors only. Class L: dematerialized shares listed and tradable on Borsa Italiana.
Minimum single initial subscription amount	Class A: EUR 1.500 Class I: EUR 25.000 Class L: 1 share
Minimum subsequent subscription amount	Class A: EUR 1.500.
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.
Management fee	Class A: 1.35% per year of the net assets. Class I: 1.00% per year of the net assets. Class L: 1.15% per year of the net assets.
Target	• EURIBOR 6 months Index + 300 bps
Performance fee	By derogation from the general methodology described under paragraph 11 (Investment advice and management delegation and respective fees) to this Prospectus, the Sub-Fund applies the following mechanism for the determination of the performance fees: The performance fees shall be calculated on each Net Asset Value calculation and payable annually to the Management Company and Investment Manager or Investment Advisor (if any) at the beginning of the following period. The Fund will apply at all times the High Water Mark Principle, i.e. no performance fee shall be paid in the case where the Gross Asset Value (the “GAV”) which is the Net asset value per share after deducting all fees and liabilities and the management fee (but not the performance fee) as at the end of the reference period is lower than the highest Net asset value per share calculated as at the end of any preceding

	period and giving rise to the payment of a performance fee since the first period, or the first Net asset value per share of the first period in which a performance fee was calculated ("High-Water Mark"). The reference period shall start on the 1st January of each year and end on the 31st December. The performances of the Shares are calculated considering the reinvestment of dividends, if any. The performance fee shall be the 10% of the excess return over the target. The choice of the target has been based upon an assessment of coherence between the index, the investment objective and strategy of the Sub-Fund and its expected risk and return profile. **The performance fee is applied to the smallest value between the total net assets of the Sub-Fund at the calculation day and the average total net Assets of the Sub-Fund during the reference period.** The reference period shall start on the 1st January of each year and end on the 31st December of the same year. The performance fees are submitted to the occurrence of the following conditions: - GAV of the Sub-Fund is above HWM - In the reference period the performance of the Sub-Fund is positive and higher than the performance of the target. Once verified the above two conditions, a double scenario can raise: a) HWM is equal or higher than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the target starting on the date the HWM has been beaten. For the Sub-Fund it will be calculated the difference between the GAV and the HWM, for the target it will be calculated the difference between the daily value and the closing price of the day before that on which the HWM was beaten (i.e. if the HWM is beaten on the 20th April, the performance of the target to be considered on the 20th April is the one between the 20th and the 19th April);

b) HWM is lower than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the target over the reference period.

Sample of calculation of the Performance Fees method:

Performance fee (**Pf**) = **[(P-PB) x min(TNA$_t$; TNA$_{AVG}$) x PERC.]**

Where:

min(TNA$_t$; TNA$_{AVG}$) = is the lowest between the total net assets of the Sub-Fund at the calculation day and the average total net assets of the reference period.

PERC = is the percentage of performance fee as defined within each Sub-fund Schedule

PB = is the performance of the target during the reference period, expressed in percentage

P = is the performance of the sub-fund during the reference period, expressed in percentage, through the following formula: **P =** ((GAV$_t$ / HWM) – 1) x 100, subject to the following conditions:

GAV$_t$ > HWM; and

P > PB

where:

GAV$_t$ = is the Gross Asset Value at the calculation day

HWM: is the High-Water Mark, as defined above

e.g.

GAV$_t$ =	108
HWM$_t$ =	105
PB =	2%
TNA$_t$ =	2.000.000 €
TNA$_{AVG}$ =	2.500.000 €
PERC =	10%

P = ((GAV$_t$ / HWM) – 1) x 100 = ((108 / 105) – 1) x 100 = 2,86%

Pf = [(P-PB) x min(TNA$_t$; TNA$_{AVG}$) x PERC.] = [(2.86%-2%) x min(2.000.000; 2.500.000) x 10%] = [(2.86%-2%) x 2.000.000 € x 10%] = 1.720 €

Fee cap	The aggregate Management and Performance fees borne by the Sub-Fund cannot exceed two point five per cent (2.5%) of the net assets.

NEW MILLENNIUM Augustum Market Timing	
Investment objective	The Sub-Fund seeks to achieve the capital appreciation over the medium term through an active exposure to all major asset classes, implemented primarily through investment in different types of UCITS.
Investment policy	The Sub-Fund is a fund of funds whose net assets are invested primarily in units of UCITS and other open-ended UCIs mainly denominated in Euro which invest in securities such as fixed and floating rate debt securities, equities, securities assimilated to equities and money market instruments. Issuers will be mainly European. The Sub-Fund will be characterized by an active management style. The exposure to the equity asset class, directly or through UCITS and/or UCIs will not exceed 50% of the value of the portfolio. The UCIs will not exceed 30% of the value of the portfolio. The direct Investment in equities, bonds, currencies and derivative financial instruments is not excluded as, the possibility to hold part of the assets in liquid assets. Direct Investment in bonds will concern primarily investment grade instruments although a residual investment in non-investment grade and not-rated instruments is allowed with adequate diversification and it will not exceed 20% of the net asset value. Regarding the non-investment grade instruments, the minimum rating will be BB-. This active management approach involves a deviation from the reference index which can be significant. The commodity exposure will not exceed 25% of the Sub-Fund's net asset value and will be obtained through transferable securities linked to commodities indexes, derivatives on commodities indexes, eligible UCITS, other UCIs and ETFs. The underlying of those is to be in compliance with article 43 of the Law of December 2010, and the Grand Ducal regulation of February 8, 2008. The Sub-Fund will not invest in commodities directly.

	All derivatives will be cash settled. Investment in UCITS may lead to indirect exposure to emerging markets, or to non investment-grade bonds. Such exposures will not be taken into account to calculate the respect of the investment limits applied to the direct exposure of this type of asset. The expected leverage (calculated as a sum of notional) is not expected to exceed 100% while the expected leverage (calculated through the Commitment approach, as defined under ESMA guidelines 10/788) is not expected to exceed 50%. Higher level of leverage may occur under certain circumstances.
Main risk factors	The main investment risks the Sub-Fund is exposed to are: • interest rate risk • issuer risk • equity risk • warrants risk • derivatives risk • liquidity risk • commodity-linked risk • risk associated with investments in units or shares of UCITS and/or UCIs. With specific reference to liquidity risks potentially deriving from investments in non-investment grade and not-rated issuers, the specific risk monitoring procedures adopted by the Sub-fund shall allow at any moment to adequately monitor, cover or at least mitigate the predictable potential adverse condition which might impact the capability of the Sub-Fund to face its redemptions. For a detailed analysis of the risks please refer to paragraph 6 “Risk factors”.
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: - one-tailed confidence interval of 99% - holding period of 1 month (20 business days) - Montecarlo simulation

Profile of the typical investor	The sub fund target market covers all the typology of investors. Given the sub fund main features, it cannot be excluded that a loss may occur, even if limited, anyway not exceeding the invested amount. The objectives of liquidity allocation are consistent with the sub fund investment policy with a time horizon in line with the sub fund's one, also the growth in a medium/long term even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a medium-term time horizon (< 5 years).
Investment Manager	AZ SWISS & PARTNERS S.A.
Valuation currency	EURO
Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: shares suited for all investors. Class D: Shares suited for all investors, with an annual distribution of dividend equal to 2.5% of the net assets. The distribution will occur even if the annual performance of the investment Class is not positive. Class I: shares reserved for Institutional investors only. Class Y: shares reserved for Institutional investors only with an annual distribution of dividend equal to 2.5% of the net assets. The distribution will occur even if the annual performance of the investment Class is not positive. Class L: dematerialized shares listed and tradable on Borsa Italiana.
Minimum single initial subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class I and Y: EUR 25.000 Class L: 1 share
Minimum subsequent subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class L: 1 share
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.

Management fee	Class A, D, I and Y: 0.60% per year of the net assets. Class L: 0.75% per year of the net assets.
Distribution fees	Class A and D: 1% per year of the net assets. The fee will be calculated and accrued on a daily basis with reference to the Net Asset Value per Share of such Shares and will be paid quarterly to the Distributors.
Benchmark	• 30% Bloomberg Barclays 3 month Euribor Swap Index TR Eur (LS01TREU); • 45% Bloomberg Barclays Euro-Aggregate Government 3-5 Year TR Index Value Unhedged EUR (LEG3TREU); • 15% MSCI World Local Index (MSDLWI); • 10% MSCI EMU TOP 50 TR (M7CXBFB).
Performance fee	10% absolute fee calculated pursuant to the methodology set forth in paragraph 11 (Investment advice and management delegation and respective fees) of the Prospectus.

NEW MILLENNIUM VolActive	
Investment objective	The Sub-Fund seeks to achieve capital growth in every market condition supporting the main investment in monetary and fixed income instruments with an active management on the volatility through the investment on the VIX index.
Investment policy	The Sub-Fund will invest mainly in monetary, fixed income instruments and futures on VIX Index, and residually in equities. Fixed income instruments will be denominated in EUR and/or USD, issued mainly by government and supranational issuers; the investment in not investment grade instruments is allowed up to 35% of the Sub-Fund's net asset value. Exposure to listed equities will not exceed 30% of the Sub-Fund net assets. The active approach, which characterizes the management of the fund, implies that the deviation from the target may be significant Under exceptional circumstances a maximum of 5% of the investments may be made in bonds with a minimum rating between C and CCC+. Downgraded instruments that reach a rating between C and CCC+ shall also be taken into account for the purposes of calculating the above 5% limit. Further to the above, in order to achieve an extra return the sub-fund is also characterized by an active management of the market volatility through the use of exchange traded futures on the VIX Index. The VIX Index is a popular measure of the volatility calculated on the S&P 500 index options, and its future is commonly used as protection against the increase in the market's volatility. The Sub-Fund aims to achieve a profit selling protection against the volatility acting as counterparty in the futures contract (short positions) or through long positions for hedging purposes. The Sub-Fund will invest in the VIX Index, depending on market conditions, from 0% to 49% in terms of exposure calculated through the commitment approach. The exposure will be low at low index values (low volatility) and

	will increase at the increasing of the index (high volatility). Also, in case of predicted high values of the index the sub-fund will close the positions in order to limit the risk of losses. The investment decision on VIX futures is generally taken on technical analysis in order to identify the volatility trends over short and long periods. The Sub-Fund may be exposed to currency risk, however, in order to reduce this risk, the main currency positions are expected to be hedged against Euro. The leverage (calculated as the sum of notionals) is not expected to exceed 400% while the expected leverage (calculated through the Commitment approach, as defined under ESMA guidelines 10/788) is not expected to exceed 100%. Higher levels of leverage may occur depending on market volatility. As an exception to the investment restrictions contained in the main part of this Prospectus, the Sub-Fund will not invest more than 10% of its net assets in UCITS and /or other UCIs.
Main risk factors	The main investment risks the Sub-Fund is exposed to are: • interest rate risk • issuer risk • equity risk • liquidity risk • currency risk • counterparty risk • derivative risk: with specific reference to the investment in VIX Index future, the sub-fund is subject to high level of risk being linked to potential high level of exposure to the underlying Index. For a detailed analysis of the risks, please refer to paragraph 6 (Risk factors) of the Prospectus.
Global Risk Exposure	Absolute VaR approach is based on a standard market model with the following features: - one-tailed confidence interval of 99%; - holding period of 1 month (20 business days) - Montecarlo calculation
Profile of typical investor	The sub fund target market covers all the typology of investors as long as they are different from the retail ones

	that operate autonomously being without experience and with limited financial knowledge (unless their investment is marginal compared to their entire assets) and provided that even for retail investors with medium knowledge and financial experience, the effective understanding of the characteristics of the investment policy has been verified Given the sub fund main features, it cannot be excluded that a loss may occur even if never it will exceed the invested amount. The medium/long term growth objectives are consistent with the investment policy, even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a long-term time horizon (> 5 years).
Investment Manager	Diaman Partners Ltd.
Valuation currency	EURO
Valuation day	Every bank business day in Luxembourg
Class of shares	Class A: shares suited for all investors. Class D: shares suited for all investors. In case of positive year-to-date performance, a dividend will be distributed for an amount equal to the achieved return with a limit of 7% of the net assets. The excess return will not be distributed to the investors and will be kept in the Sub-Fund net assets. Class I: shares reserved for Institutional investors only. Class L: dematerialized shares listed and tradable on Borsa Italiana.
Minimum single initial subscription amount	Class A: EURO 1.500 Class D: EURO 1.000 Class I: EURO 25.000 Class L: 1 share
Minimum subsequent subscription amount	Class A: EUR 1.500 Class D:EUR 1.000 Class L: 1 share
Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each of four quarterly payments of EUR 300 each.

Management fee	Class A and D: 2.20% of the net assets per year. Class I: 1.10% of the net assets per year. Class L: 1.25% of the net assets per year.
Target	• EURIBOR 3 months index + 350 bps.
Performance fee	By derogation from the general methodology described under paragraph 11 (Investment advice and management delegation and respective fees) to this Prospectus, the Sub-Fund applies the following mechanism for the determination of the performance fees: The performance fees shall be calculated on each Net Asset Value calculation and payable annually to the Management Company and Investment Manager or Investment Advisor (if any) at the beginning of the following period. The Fund will apply at all times the High Water Mark Principle, i.e. no performance fee shall be paid in the case where the Gross Asset Value (the "GAV") which is the Net asset value per share after deducting all fees and liabilities and the management fee (but not the performance fee) as at the end of the reference period is lower than the highest Net asset value per share calculated as at the end of any preceding period and giving rise to the payment of a performance fee since the first period, or the first Net asset value per share of the first period in which a performance fee was calculated ("High-Water Mark"). The reference period shall start on the 1st January of each year and end on the 31st December. The performances of the Shares are calculated considering the reinvestment of dividends, if any. The performance fee shall be the 20% of the excess return over the target. The choice of the target has been based upon an assessment of coherence between the index, the investment objective and strategy of the Sub-Fund and its expected risk and return profile. **The performance fee is applied to the smallest value between the total net assets of the Sub-Fund at the calculation day and the average total net Assets of the Sub-Fund during the reference period.**

The reference period shall start on the 1st January of each year and end on the 31st December of the same year. The performance fees are submitted to the occurrence of the following conditions:

- GAV of the Sub-Fund is above HWM
- In the reference period the performance of the Sub-Fund is positive and higher than the performance of the target.

Once verified the above two conditions, a double scenario can raise:

a) HWM is equal or higher than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the target starting on the date the HWM has been beaten. For the Sub-Fund it will be calculated the difference between the GAV and the HWM, for the target it will be calculated the difference between the daily value and the closing price of the day before that on which the HWM was beaten (i.e. if the HWM is beaten on the 20th April, the performance of the target to be considered on the 20th April is the one between the 20th and the 19th April);

b) HWM is lower than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the target over the reference period.

Sample of calculation of the Performance Fees method:

Performance fee (**Pf**) = [**(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.]**

Where:

min(TNA_t; TNA_{AVG}) = is the lowest between the total net assets of the Sub-Fund at the calculation day and the average total net assets of the reference period.

PERC = is the percentage of performance fee as defined within each Sub-fund Schedule

	PB = is the performance of the target during the reference period, expressed in percentage **P =** is the performance of the sub-fund during the reference period, expressed in percentage, through the following formula: **P =** ((GAV_t / HWM) – 1) x 100, subject to the following conditions: GAV_t > HWM; and P > PB where: GAV_t = is the Gross Asset Value at the calculation day HWM: is the High-Water Mark, as defined above e.g. GAV_t = 108 HWM_t = 105 PB = 2% TNA_t = 2.000.000 € TNA_{AVG} = 2.500.000 € PERC = 20% P = ((GAV_t / HWM) – 1) x 100 = ((108 / 105) – 1) x 100 = 2,86% **Pf =** **[(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.] = [(2.86%-2%) x min(2.000.000; 2.500.000) x 20%] = [(2.86%-2%) x 2.000.000 € x 20%] = 3.440 €**
Fee cap	The aggregate Management and Performance fees borne by the Sub-Fund cannot exceed seven per cent (7%) of the net assets.

NEW MILLENNIUM – Multi Asset Opportunity	
Investment objective	The Sub-Fund seeks the capital appreciation over the long term through a portfolio diversified on different asset classes, taking advantage of opportunities at global level through the investment in UCITS and UCIs shares, bonds, equities, commodities, money market instruments and derivative instruments, where appropriate.
Investment policy	The Sub-Fund is a balanced, multi-asset fund with geographical and sectorial diversification at global level. The net asset of this Sub-Fund are invested in: - Transferable securities, such equities, convertible bonds and warrants on transferable securities; - fixed and floating rate debt securities, and money market instruments; - units of UCITS and/or UCIs; - financial instruments investing in commodities. The Sub-Fund shall be actively managed. The global asset allocation is determined on the basis of a top-down macroeconomic analysis and the components of the Sub-Fund's portfolio are the outcome of a fundamental analysis conducted on the global world economy. The investment in units of UCITS and/or UCIs shall not exceed 49% of the Sub-Fund net asset. The exposure to equity markets and commodities will be dynamic and based on the markets expectations and it shall at no point exceed 40% of the net assets. Exposure to equity markets will be done also through Contracts for Differences ("CFD") Exposure to commodities will mainly be through ETF and eligible ETC not embedding derivatives, compliant with art. 2 of the grand-ducal regulation dated 8 February 2008 and article 41 (1) of the 2010 Law and derivatives on commodities' indices. Such indices will be financial indices within the meaning of Article 9 of the Grand Ducal Regulation of 8 February 2008. Commodities will mainly be energy and precious metal and marginally row materials.

	Non investment grade and not rated investments are allowed; the eventual investment in such securities will be residual and it will not exceed 20% of the net assets. Under exceptional circumstances a maximum of 5% of the investments may be made in bonds with a minimum rating between C and CCC+. Downgraded instruments that reach a rating between C and CCC+ shall also be taken into account for the purposes of calculating the above 5% limit. The financial instruments, denominated in any currencies, can be issued by issuers of any nation but with a minimum exposure of 50% of the net assets in issuers based in Europe. The Investment manager may use its discretion to invest in financial instruments not included in the benchmark in order to take advantage of specific investment opportunities. This active management approach involves a deviation from the reference index which can be significant.The use of financial derivatives instruments for investment purposes is allowed on the condition that the global exposure, calculated through the commitment approach (as defined under ESMA guidelines 10/788), does not at any moment exceed 100% of the Sub-Fund's net asset value. The expected leverage (calculated as a sum of notionals) is not expected to exceed 200%. Higher level of leverage may occur under certain circumstances.
Main risk factors	The main investment risks the Sub-Fund is exposed to, are: • interest rate risk • issuer risk • equity risk • liquidity risk • risk inherent in investing in emerging markets • currency risk • commodity risk • warrants risk • derivative risk For a detailed analysis of the risks please refer to paragraph 6 "risk factors".

Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: - one-tailed confidence interval of 99% - holding period of 1 month (20 business days) - Montecarlo simulation
Profile of typical investor	The sub fund target market covers all the typology of investors. Given the sub fund main features, it cannot be excluded that a loss may occur even if never it will exceed the invested amount. The medium/long term growth objectives are consistent with the investment policy, even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a long-term time horizon (> 5 years).
Investment Manager	Open Capital Partners SGR S.p.A.
Valuation currency	EURO
Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: shares suited for all investors Class I: shares reserved for Institutional investors only. Class L: dematerialized shares listed and tradable on Borsa Italiana
Minimum single initial subscription amount	Class A: EURO 1.500 Class I: EURO 25.000 Class L: 1 share
Minimum single initial subscription amount	Class A: EURO 1.500. Class L: 1 share

Minimum savings plan subscription amount	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.
Management fees	Class A: 1.80% per year of the net assets. Class I: 1.35% per year of the net assets. Class L: 1.50% per year of the net assets.
Benchmark	• 15% MSCI Europe Net Ret Eur Index (MSDEE15N) • 10% MSCI AC World Net Ret Eur Index (NDEEWNR) • 40% Bloomberg Barclays Eur-Agg Govt 3-5 Years TR Index Eur (LEG3TREU) • 25% Bloomberg Barclays Global Agg Corp TR Index Value Hedged Eur (LGCPTREH) • 10% Bloomberg Barclays 3 month Euribor Swap Index TR Eur (LS01TREU)
Performance fees	By derogation from the general methodology described under paragraph 11 (Investment advice and management delegation and respective fees) to this Prospectus, the Sub-Fund applies the following mechanism for the determination of the performance fees: The performance fees shall be calculated on each Net Asset Value calculation and payable annually to the Management Company and Investment Manager or Investment Advisor (if any) at the beginning of the following period. No High Water Mark principle is applied to this sub-fund. The performances of the Shares are calculated considering the reinvestment of dividends, if any. The performance fee shall be the 20% of the excess return over the benchmark. The choice of the Benchmark has been based upon an assessment of coherence between the index, the investment objective and strategy of the Sub-Fund and its expected risk and return profile. **The performance fee is applied to the smallest value between the total net assets of the Sub-Fund at the calculation day and the average total net Assets of the Sub-Fund during the reference period.** The reference period shall start on the 1st January of each year and end on the 31st December of the same year. The

performance fees are submitted to the occurrence of the following conditions:

- In the reference period the performance of the Sub-Fund is positive and higher than the performance of the benchmark.

a) Once verified the above condition, the accrual will be calculated on the difference between the performance of the sub-fund and the performance of the benchmark over the reference period.

Sample of calculation of the Performance Fees method:

Performance fee (**Pf**) = [**(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.]**

Where:

min(TNA_t; TNA_{AVG}) = is the lowest between the total net assets of the Sub-Fund at the calculation day and the average total net assets of the reference period.

PERC = is the percentage of performance fee as defined within each Sub-fund Schedule

PB = is the performance of the benchmark during the reference period, expressed in percentage

P = is the performance of the sub-fund during the reference period, expressed in percentage, through the following formula: **P =** ((GAV_t / NAV0) – 1) x 100, subject to the following conditions:

GAV_t > NAV0; and

P > PB

where:

GAV_t = is the Gross Asset Value at the calculation day

NAV0: Net Asset Value as at the end of the previous year e.g.

GAV_t =	108
NAV0 =	105
PB =	2%
TNA_t =	2.000.000 €
TNA_{AVG} =	2.500.000 €
PERC =	20%

P = ((GAV_t / NAV0) – 1) x 100 = ((108 / 105) – 1) x 100 = 2,86%

Pf = [(P-PB) x min(TNA_t; TNA_{AVG}) x PERC.] = [(2.86%-2%) x min(2.000.000; 2.500.000) x 20%] = [(2.86%-2%) x 2.000.000 € x 20%] = 3.440 €

Fee cap	The aggregate Management and Performance fees borne by the Sub-Fund cannot exceed three per cent (3%) of the net assets.

<table>
<tr><th colspan="2">NEW MILLENNIUM PIR Bilanciato Sistema Italia.</th></tr>
<tr><td>Investment objective</td><td>The Investment objective of the Sub-Fund is to achieve, in the medium/long-term, a return higher than the one usually achievable through a moderate exposure to equity markets, and through a focus on the real economy and the growth of the Italian entrepreneurial system</td></tr>
<tr><td>Investment policy</td><td>The Sub-Fund is a moderate balanced fund, characterized by a focus on the Italian real economy and on the productive investments linked, also, to medium-small size companies, although applying appropriate limits and diversification parameters.

The fund’s units are included among eligible investments that shall be held in a “Piano Individuale di Risparmio a lungo termine” (PIR) under the Italian 2017 and 2020 Budget Law (Law No 232 of 11 December 2016 and No 157 of 19 December 2019).

The net assets are invested in debt securities and, up to 50% in equity-related securities, such as equities, warrants and convertible bonds.

In details:

• At least 70% (“qualified investments” as per the PIR regulation) of the total net assets is invested in financial instruments issued by companies resident in Italy, or in an EU or EEA Member State and have a permanent establishment in Italy.

At least 25% of the qualified investments, which corresponds to 17.5% of the sub fund’s total net assets, shall be issued by companies which are not listed in the FTSE MIB index or in any other equivalent indices of other regulated markets.

At least 5% of the qualified investments, which corresponds to 3.5% of the sub fund’s total net assets, shall be issued by companies which are not listed in the FTSE MIB nor in the FTSE Mid Cap index or in any other equivalent indices of regulated markets.</td></tr>
</table>

Investments in financial instruments issued by medium-small size issuers is allowed provided the compliance with the following limits:

- the exposure to issuers with capitalization below 500 M eur will not exceed 30% of the total net assets;
- the exposure to issuers with capitalization below 100 M eur will not exceed 10% of the total net assets.

The sub-fund cannot invest more than 10% of the portfolio in financial instruments issued by the same company, or companies belonging to the same group, or in cash deposits. Such limit is set at 4% in case of issuer with capitalization below 100 M eur.

The exposure to a single equity issue will not exceed 5% of the total net assets; such limit is set at 2% in case of issuer with capitalization below 100 M eur.

- Up to 30% (“free investments” as per the PIR Law) of the total net assets could be invested in:
  - Governative and supranational money market instruments and bonds, both fixed and floating rates, issued mainly by EU or G8 countries;
  - Equity and debt financial instruments issued by not Italian issuers, nor issuers with a permanent establishment in Italy.
  - Units of UCITS and/or UCIs with investment policies consistent with those of the sub-fund, with a limit of 10% of the total net assets.
  - Derivatives for hedging purposes

The fund cannot invest in financial instruments issued by companies which are not resident in countries that allow an adequate exchange of information with Italy.

The exposure to equity and debt asset class may dynamically change for tactical and strategical reasons, however always in compliance with the above limits.

The Investment manager may use its discretion to invest in financial instruments not included in the benchmark, in order to take advantage of specific investment opportunities. This

	active management approach involves a deviation from the reference index which can be significant. The use of financial derivatives instruments for investment purposes is not allowed; hedging derivatives will be included in the "free investments" quota as per the PIR Law. The expected leverage (calculated as a sum of notional) is not expected to exceed 100% while the expected leverage (calculated through the Commitment approach, as defined under ESMA guidelines 10/788) is not expected to exceed 10%. Higher level of leverage may occur under certain circumstances. In order to mitigate potential currency risk, unhedged positions will not exceed 10% of the total net assets.
Main risk factors	The main investment risks the Sub-Fund is exposed to are: • interest rate risk • issuer risk • equity risk • liquidity risk • warrants risk • derivatives risk For a detailed analysis of the risks, please refer to paragraph 6 "Risk factors".
Global Risk Exposure	Absolute VaR approach based on a market standard model with the following features: - one-tailed confidence interval of 99% - holding period of 1 month (20 business days) - Montecarlo simulation
Profile of the typical investor	The fund's units are included among eligible investments that shall be held in a "Piano Individuale di Risparmio a lungo termine" (PIR), under the Italian 2017 and 2020 Budget Law (Law No 232 of 11 December 2016 and No 157 of 19 December 2019). Accordingly, the investor can take advantage of tax benefits envisaged by the mentioned law only if all requirements provided in that law are satisfied." The sub fund target market covers all the typology of investors. Given the sub fund main features, it cannot be excluded that

	a loss may occur even if never it will exceed the invested amount. The medium/long term growth objectives are consistent with the investment policy, even with potential value fluctuation; it can be considered however the consistency with other objectives, even more if combined with other financial instrument investments and therefore within a diversified portfolio. The investment should be considered in a long-term time horizon (> 5 years).
Investment Manager	BANCA FINNAT EURAMERICA SPA
Valuation currency	EUR
Valuation day	Every bank business day in Luxembourg.
Class of shares	Class A: shares suited for all investors. Class D: Shares suited for all investors, with an annual distribution of a dividend equal to the achieved return with a limit of 5% of the net assets. A minimum dividend of 1% will be anyway processed even in case of negative performance. Class I: shares reserved for Institutional investors only. Class L: dematerialized shares listed and tradable on Borsa Italiana. Class Y: shares reserved for Institutional investors only with an annual distribution of dividend equal to the achieved return with a limit of 5% of the net assets. A minimum dividend of 1% will be anyway processed even in case of negative performance.
Minimum single initial subscription amount	Class A:EUR 1.500 Class D: EUR 1.000 Class I and Y: EUR 25.000 Class L: 1 share
Minimum subsequent subscription amount	Class A: EUR 1.500 Class D: EUR 1.000 Class L: 1 share
Minimum savings plan subscription amount:	Twelve monthly payments of EUR 100 each or four quarterly payments of EUR 300 each.

Management fees	Class A and D: 1.20% per year of the net assets Class I and Y: 0.60% per year of the net assets Class L: 0.75% per year of the net assets
Benchmark	• 40% MSCI Italy Net return (M7IT Index) • 30% Bloomberg Barclays bond Italian Aggregate Issuers Tot Ret (LEI2TREU Index) • 30% Bloomberg Barclays bond Global Aggregate 1-3 YR Tot Ret Hedged Eur (LG13TREH Index)
Performance fees	By derogation from the general methodology described under paragraph 11 (Investment advice and management delegation and respective fees) to this Prospectus, the Sub-Fund applies the following mechanism for the determination of the performance fees: The performance fees shall be calculated on each Net Asset Value calculation and payable annually to the Management Company and Investment Manager or Investment Advisor (if any) at the beginning of the following period. The Fund will apply at all times the High Water Mark Principle, i.e. no performance fee shall be paid in the case where the Gross Asset Value (the "GAV") which is the Net asset value per share after deducting all fees and liabilities and the management fee (but not the performance fee) as at the end of the reference period is lower than the highest Net asset value per share calculated as at the end of any preceding period and giving rise to the payment of a performance fee since the first period, or the first Net asset value per share of the first period in which a performance fee was calculated ("High-Water Mark"). The reference period shall start on the 1st January of each year and end on the 31st December. The performances of the Shares are calculated considering the reinvestment of dividends, if any. The performance fee shall be the 20% of the excess return over the benchmark. The choice of the Benchmark has been based upon an assessment of coherence between the index, the investment objective and strategy of the Sub-Fund and its expected risk and return profile. The performance fee is applied to the smallest value between the total net assets of the Sub-Fund at the calculation day and

	the average total net Assets of the Sub-Fund during the reference period. The reference period shall start on the 1st January of each year and end on the 31st December of the same year. The performance fees are submitted to the occurrence of the following conditions: - GAV of the Sub-Fund is above HWM - In the reference period the performance of the Sub-Fund is positive and higher than the performance of the benchmark. Once verified the above two conditions, a double scenario can raise: a) HWM is equal or higher than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark starting on the date the HWM has been beaten. For the Sub-Fund it will be calculated the difference between the GAV and the HWM, for the benchmark it will be calculated the difference between the daily value and the closing price of the day before that on which the HWM was beaten (i.e. if the HWM is beaten on the 20th April, the performance of the benchmark to be considered on the 20th April is the one between the 20th and the 19th April); b) HWM is lower than the NAV as at the end of the previous year: the accrual will be calculated on the difference between the performance of the Sub-Fund and the performance of the benchmark over the reference period. Sample of calculation of the Performance Fees method: Performance fee (Pf) = [(P-PB) x min(TNAt; TNAAVG) x PERC.] Where: min((TNAt; TNAAVG) = is the lowest between the total net assets of the Sub-Fund at the calculation day and the average total net assets of the reference period. PERC = is the percentage of performance fee as defined within each Sub-fund Schedule

	PB = is the performance of the benchmark during the reference period, expressed in percentage P = is the performance of the sub-fund during the reference period, expressed in percentage, through the following formula: P = ((GAVt / HWM) – 1) x 100, subject to the following conditions: GAVt > HWM; and P > PB where: GAVt = is the Gross Asset Value at the calculation day HWM: is the High-Water Mark, as defined above e.g. GAVt = 108 HWMt = 105 PB = 2% TNAt = 2.000.000 € TNAAVG = 2.500.000 € PERC = 20% P = ((GAVt / HWM) – 1) x 100 = ((108 / 105) – 1) x 100 = 2,86% Pf = [(P-PB) x min(TNAt; TNAAVG) x PERC.] = [(2.86%-2%) x min(2.000.000; 2.500.000) x 20%] = [(2.86%-2%) x 2.000.000 € x 20%] = 3.440 €
Fee cap	The aggregate Management and Performance fees that are borne by the Sub-Fund cannot exceed, on a yearly average, four per cent (4%) of the net assets.

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