

## **LUMINOR BANK AS LITHUANIAN BRANCH INDUCEMENT POLICY FOR THE PROVISION OF INVESTMENT AND ANCILLARY SERVICES**

### **1. General provisions**

- 1.1. The goal of this inducement policy for the provision of investment and ancillary services (the Policy) is to ensure that while providing investment and/or ancillary services to the clients and performing investment activities (the Investment Services), Luminor Bank AS Lithuanian branch (the Bank), acts honestly, fairly and professionally, in accordance with the best interests of its clients, avoids conflicts of interest and implements all necessary measures to identify conflicts of interest arising due to the monetary or non-monetary benefit received from or paid to third persons or in the course of the provision of the Investment Services to the client.
- 1.2. The Bank's subsidiary Luminor investicijų valdymas UAB (the Subsidiary) shall also comply with this policy when providing financial instruments' portfolio management services. In this case, when applicable, all references to the Bank in the Policy are references to the Subsidiary as well.
- 1.3. An inducement is usually considered as a payment or other benefit given by one person to another in relation to the services provided to the client. For example, that can be a payment made by a company providing investment services to another person who brought a client to that company. In this situation, there is a risk that such inducement may affect the receiving person so that it will not act in accordance with the best interests of its clients.
- 1.4. For the purpose of this Policy, Inducement is considered to be any benefit paid to or received from the third persons by the Bank, i.e. reward, commission fee and other monetary or non-monetary benefits related to the provision of investment services to the clients.
- 1.5. Compliance department of the Bank performs control of due implementation of the Policy.

### **2. Restrictions on payment and receiving Inducement**

- 2.1. The Bank may pay or receive Inducement in relation to the provision of investment services, only in cases where the respective Inducements comply with all conditions provided in Section 2 of the Policy below and they: (a) are designed to enhance the quality of services provided to the client (this applies to payments received from the order execution places and for the purpose of investment research performed by the Bank); and (b) do not impair compliance with the Bank's duty act honestly, fairly and professionally in accordance with the best interests of its clients.
- 2.2. As indicated in paragraph 2.1(a) of this Policy, Inducement may be considered as that designed to enhance the quality of services provided to the client where the following conditions are satisfied on an ongoing basis:
  - 2.2.1. It is justified by the provision of additional or higher-level services to the relevant client in the proportion to the level of the Inducement received, such as: (i) the provision of non-independent investment advice on and access to a wide range of suitable financial instruments including an appropriate number of instruments from third party product providers having no close links with the investment firm (ii) the provision of non-independent investment advice come together with: an offer for the client to evaluate at least once in a year the future suitability of the financial instruments wherein the client has invested; or together with another regular nature service which may bring value to the client, e.g. consulting on the offered optimal allocation of the client's assets; or (iii) the possibility to receive various financial instruments for a competitive price that may correspond to the client's needs, including the acceptable number of instruments provided by third parties that do not have close relations with the investment company by also providing either value-added tools (instruments) such as objective information provision tools (instruments) helping the client to make investment decisions or enables the client to monitor, simulate and adjust the range of financial instruments wherein the client has invested, or by providing periodic reports on the results, costs and fees relating to the financial instruments;
  - 2.2.2. The Inducement does not bring direct benefit to the Bank as the receiver, its shareholders or employees without material benefit to the respective client;
  - 2.2.3. The Inducement is justified by the fact that the respective client receives permanent benefit for permanent inducement.
- 2.3. By receiving and paying Inducements, the Bank must make sure that such Inducements enhance the quality of

the respective investment services to the client, and collect and store evidence thereof. Pursuant to that the Bank:

- 2.3.1. Keeps the list of all Inducements received from third parties for the provision of investment or ancillary services; and
  - 2.3.2. Registers how the incentives received or paid by the Bank or those that the Bank intends to use enhance the quality of the respective investment services to the client and what actions were taken so as not to impair compliance with the Bank's duty act honestly, fairly and professionally in accordance with the best interests of its clients.
- 2.4. The Bank only can receive or pay Inducements if the Bank properly discloses information on such Inducements to the clients as provided in this Policy.
- 2.5. If the Bank receives the fees, commission fees or any monetary reward that do not comply with the requirements specified above, the Bank transfers them to the respective clients immediately after such payments were received.
- 2.6. The Bank's unit providing respective services to the clients, in order to use or receive any Inducement provided by other person than the Bank, must evaluate whether such Inducement complies with the requirements provided in Section 2 of the Policy. For this purpose, the authorised Bank's unit must be contacted. Authorised unit upon evaluation of the available information decides whether such Inducement complies with the conditions provided in Section 2 of the Policy. Where necessary, the authorised Bank's unit employs other units of the Bank in order to conduct proper evaluation. If upon evaluation it appears that the benefit does not comply with the requirements provided in Section 2 of the Policy, the Bank must not accept and use such benefit. In addition any such non-monetary benefit shall be returned to the provider which must be requested to cease provision of such benefit in the future. In case of monetary benefits, requirements of 2.4 of this Policy shall additionally apply.

### **3. Limitations related to investment researches**

- 3.1. In case an investment research prepared by a third party is required by the Bank for the provision for services, the Bank acquires such research by paying the price for the research from own funds.
- 3.2. Having received any investment research free of charge or any other similar service which according to the above procedure is considered as acceptable Inducement, the Bank puts such Inducement received on the list as provided by paragraph 2.3 and ensures that both the investment research received and the information prepared individually by the Bank on the basis of such research will not be submitted to the Bank's unit responsible for the provision of independent investment advice services to the clients.
- 3.3. In order to avoid situations where the services provided by the Bank are considered to be Inducement by the investment service providers that received such services, the Bank will separately price the services provided thereby, including transaction processing and investment research services and will offer such services for a separate fee set to each of such services.
- 3.4. To avoid potential conflict of interest, the Bank will not provide the individually prepared investment research information to other investment service providers without charge.

### **4. Disclosing information on Inducement**

- 4.1. In the performance of its duty to disclose information on the Inducement, the Bank:
  - 4.1.1. Prior to the provision of an investment service to the client, discloses information to the client about the Inducement received and paid (including information on the amounts received from order execution places), and in case the amount cannot be precisely defined, then discloses information on the calculation method. In respect of minor non-monetary benefit, the information is disclosed in the form of a summary. Other non-monetary benefit which the Bank receives or pays in relation to the provision of investment services is priced and specified separately. Where applicable, the Bank also notifies the clients on the procedure for transferring the fee, commission fee and other monetary or non-monetary benefit received by the bank in course of the provision of investment services to the clients.
  - 4.1.2. In case the Bank was not able to disclose the precise information in advance, then the Bank discloses the precise information about received or paid incentives after such Inducement was received or paid;
  - 4.1.3. As long as the Bank permanently receives Inducement in respect of the provided investment services, the Bank periodically, at least once in a year, indicates the precise amount of the received or paid Inducement to each client. In respect of minor non-monetary benefit, the information is disclosed in the form of a summary.

4.2. In order to comply with the above requirement to disclose to the clients information on the received or paid Inducements related to the services provided to the clients prior to the provision of an investment service, the Bank has prepared the description of the Inducements received and paid which is provided as annex of this Policy.

## **5. Minor non-monetary benefits**

5.1. Minor non-monetary benefits shall be reasonable and proportionate and of such a scale that they are unlikely to influence the Bank's behaviour in any way that is detrimental to the interests of the relevant client.

5.2. Minor non-monetary benefits can be:

- 5.2.1. Information or documentation relating to a financial instrument or an investment service. Such information or documents are generic in nature or personalised provided to reflect the circumstances of an individual client;
- 5.2.2. Written material from a third party that is commissioned and paid for by an corporate issuer or potential issuer to promote a new issuance by the company, or where the third party firm is contractually engaged and paid by the issuer to produce such material on an ongoing basis, provided that the relationship is clearly disclosed in the material and that the material is made available at the same time to any investment firms wishing to receive it or to the general public;
- 5.2.3. Participation in conferences, seminars and other training events on the benefits and features of a specific financial instrument or an investment service;
- 5.2.4. Hospitality of a reasonable de minimis value, such as food and drink during a business meeting or a conference, seminar or other training events;
- 5.2.5. Other minor non-monetary benefits.

## **6. Inducement related to an independent investment advice and (or) portfolio management services**

6.1. Providing services of independent investment advice and (or) portfolio management services, the Bank shall comply with the special procedure related to the Inducement:

- 6.1.1. Fully transfers to the client all and any fees, commission fees or any monetary reward that is paid or provided to the Bank by a third party or a person acting on behalf of a third party for the respective services provided to that client immediately after the receipt of such fees. To this end, the Bank implements and follows the procedure for defining the amount to be refunded to that particular client in cases where the received amount cannot be attributed to the amount refundable to the particular client;
- 6.1.2. Periodically informs the clients on the fees, commission fees or any other monetary reward transferred thereto by specifying such information in the provided reports;
- 6.1.3. May receive and accept just minor non-monetary benefit which is designed to enhance the quality of services provided to the clients as it is established in this Policy.
- 6.1.4. The Bank's unit providing services of investment advice and/or portfolio management, in order to use or receive any non-monetary benefit provided by other person than the Bank, must evaluate whether such non-monetary benefit meets a) the requirements provided in Section 2 of this Policy and b) the requirements of minor non-monetary benefit. For this purpose, the authorised Bank's unit must be contacted. The authorised Bank's unit upon evaluation of the available information decides whether such Inducement complies with the conditions provided in Section 2 of the Policy. Where necessary, the authorised Bank's unit employs other units of the Bank in order to conduct proper evaluation. If upon evaluation it appears that the benefit does not comply with such aforementioned conditions, the Bank must not accept and use such benefit. In addition any such non-monetary benefit shall be returned to the provider which must be requested to cease provision of such benefit in the future.

## Annex No. 1 to the Policy

### PRIOR NOTIFICATION ON INDUCEMENT

By such notification, Luminor Bank AS Lithuanian branch informs about Inducement received and paid by the Bank which have been evaluated by the Bank as (a) designed to enhance the quality of services provided to the clients; and (b) not impairing compliance with the Bank's duty act honestly, fairly and professionally in accordance with the best interests of its clients.

### INDUCEMENT RECEIVED

The Bank receives a commission fee from Saxo Bank A/S for the Bank's intermediation for the clients who use Saxo Bank A/S trade platform. Following the agreement signed with Saxo Bank A/S, the Bank looks for clients wishing to use the platform, signs agreements with them, provides practical and methodological assistance, provides market information and transfers the clients' orders to Saxo Bank A/S for execution. The commission fee paid by Saxo Bank A/S to the Bank amounts to:

Object	Commission type	Part of commission received as inducement
Forex Rolling spot and forwards	Spread	20 - 56%
	Position rollover: Mark-up on interbank bid/ask rate	10 - 40% from mark-up
Forex Options	Commission	1 - 5%
	Spread	2 - 60%
CFD Indices	Spread	7 - 60%
Stock CFDs	Commission	7 - 50%
Expiring CFDs	Spread	10 - 40%
Futures	Commission	50 - 73%
	Carrying cost: Mark-up on interbank bid/ask rate	17%
Stocks	Commission	7 - 50%
Cash	Account interest	Up to 50%

The Bank receives periodic payments from the investment fund managers when the clients using the services provided by the Bank acquire the units/shares of the investment funds provided below. These periodic payments received by the Bank depend on the investment funds' management fees, while the amount of the payment received typically is calculated as a percentage on the annual management fee of a specific investment fund.

More detailed information on the Inducements received by the Bank in relation to the distribution of investment fund units is indicated in a separate list attached hereto.

In case the clients of the Bank acquire units/shares of these investment funds in relation to services of independent advice and/or portfolio management, the Bank distributes all above mentioned fees and transfers them to the clients immediately after the receipt thereof.

### INDUCEMENT PAID

Under the cooperation agreements the Bank appointed Luminor Bank AS in Estonia (Luminor Estonia) and Luminor Bank AS Latvian branch (Luminor Latvia) as the Bank's introducing brokers responsible for presenting the Bank's services to their clients in respective jurisdiction. Introducing brokers are remunerated for the services provided.

Under the cooperation agreement signed with the Bank, Luminor Estonia's remuneration is calculated based on the *principle of sharing of the earned profit/loss* from the transactions/deals concluded between the Bank and clients referred by to the Bank by the introducing broker. The introducing broker's remuneration (proportion of the profit/loss) is calculated by taking into consideration the functions performed, risk assumed and assets used by the parties, as required by transfer pricing guidelines and other related regulations in force.

Under the cooperation agreement signed with the Bank, Luminor Latvia's remuneration is 80% of the commission fees paid to the Bank by the clients in the Latvian jurisdiction.

**List of inducements received by the Bank in relation to the distribution of investment fund units**

<b>Investment fund</b>	<b>ISIN</b>	<b>Annual investment fund management fee</b>	<b>Inducement (Parto of annual investment fund management fee received by Bank)</b>
LU0274209237	LU0229945570	1,60%	40,0%
Aberdeen Global - Russian Equity Fund	LU0505785260	1,92%	40,0%
Fidelity China Consumer Fund	LU0594300096	1,50%	40,0%
JPMorgan Funds - ASEAN Equity Fund	LU0441852612	1,50%	40,0%
Templeton Asian Growth Fund (ex-Japan)	LU0229940001	1,60%	40,0%
AVIVA INVESTORS EUROPEAN REAL ESTATE	LU0274935567	1,80%	40,0%
BARING GLOBAL EMG MKTS FR-\$	IE0000838304	1,50%	40,0%
BGF European Special Situations A2 EUR	LU0154234636	1,50%	40,0%
BGF European Value A2 EUR	LU0072462186	1,50%	40,0%
BGF Global Corporate Bond Fund	LU0825403933	0,90%	40,0%
BlackRock Global Corporate Bond Fund	LU0297942434	0,90%	40,0%
BlackRock World Financials Fund	LU0171304719	1,50%	40,0%
Amundi Funds Bond Global Aggregate	LU0319687637	0,05%	40,0%
Amundi Funds Bond Global Aggregate IHE (C)	LU0839535357	0,05%	40,0%
AXA IM FIIS US Corporate Bonds Fund	LU0231443523	0,35%	40,0%
Axa IM FIIS-US Corp BD-I HDG	LU0231443010	0,35%	40,0%
AXA IM FIIS-US CORP BD-IUSD	LU0231442988	0,35%	40,0%
BlackRock Asian Tiger Fund	LU0841166456	1,00%	40,0%
BlackRock Global Corporate	LU0297942194	0,90%	40,0%
Blackrock Global Corporate Bond Fund A4 Hedged EUR	LU0303846876	0,90%	40,0%
Deutsche Invest I China Bonds	LU0632805262	1,10%	40,0%
Emerging Local Currency Debt-HP EUR - Pictet	LU0340553949	1,20%	40,0%
Emerging Local Currency Debt-P EUR - Pictet	LU0280437673	1,20%	40,0%
Fidelity European High Yield Fund	LU0251130802	1,00%	40,0%
JPMorgan Funds - Emerging Markets Corporate Bond Fund	LU0512127548	1,00%	40,0%
JPMorgan Funds - Emerging Markets Corporate Bond Fund	LU0512127621	1,00%	40,0%
JPMorgan Funds - Emerging Markets Corporate Bond Fund	LU0714440665	1,00%	40,0%
MGOIEAH LN Equity	GB00B933FW56	1,00%	40,0%
Morgan Stanley Eur Corp. Bond Fund - Class A EUR	LU0132601682	0,96%	40,0%
PIMCO Diversified Income Duration Hedged Fund	IE00B7JKSP07	1,43%	40,0%
PIMCO Diversified Income Duration Hedged Fund EUR (Hedged)	IE00B4TJVF73	1,43%	40,0%
PIMCO Emerging Markets 2018 Fund	IE00BQPWD032	1,17%	40,0%
BRIC - Franklin Temp	LU0229946628	1,60%	40,0%
CEE: East Europe - Franklin Tem	LU0078277505	1,60%	40,0%
De.Inv.I-Em.Mkts Top Dividend Inhaber - Anteile LC o.N.	LU0329760002	1,50%	40,0%
DEUTCH MITTELSTANLEIHEN	LU0974225590	0,60%	40,0%
Deutsche Invest I China Bonds	LU0740830996	1,10%	40,0%
Deutsche Invest I China Bonds	LU0616856422	1,10%	40,0%

DJE - Zins & Dividende PA	LU0553164731	1,26%	40,0%
DNB fund - Asian Small Cap	LU0067059799	1,75%	40,0%
DNB fund - Global Emerging ESG	LU0090738252	1,75%	40,0%
DNB fund - Global SRI ESG	LU0029375739	1,25%	40,0%
DNB fund - India	LU0302237721	1,50%	40,0%
DNB fund - Nordic Equities	LU0083425479	1,25%	40,0%
DNB fund - Private Equity - B	LU0302296065	1,75%	40,0%
DNB fund - Technology	LU0302296495	1,50%	40,0%
DNB fund - Technology (USD)	LU1047850349	1,50%	40,0%
DWS Global Natural Resources Equity Typ O	DE0008474123	1,80%	40,0%
DWS Invest - GL Emerg - Anteile LC	LU0210301635	1,50%	40,0%
DWS Invest Chinese Equities Fund	LU0273157635	1,50%	40,0%
DWS MOPs LD	LU0989117667	1,40%	40,0%
Emerging: Emerging Markets Smaller Comp - Franklin Tem	LU0300743431	1,60%	40,0%
Europe: Euro-Markets - BlackRock	LU0162689763	1,50%	40,0%
Europe: Euro-Markets - BlackRock(A2)	LU0093502762	1,50%	40,0%
Europe: Europe Potential - Pioneer	LU0271656307	1,50%	40,0%
Europe: European Growth - Fidelity	LU0048578792	1,50%	40,0%
Europe: European Value Equ - MSI	LU0073234501	1,44%	40,0%
European High Yield Fund- Fidelity	LU0110060430	1,00%	40,0%
FIDELITY FUNDS-EMERGING Markets - SS (Sicav)	LU0048575426	1,50%	40,0%
FRANK TEMP INV LAT AMER-A- (Equity )	LU0128526570	1,60%	40,0%
FRANK TP LAT AMR-A	LU0260865158	1,60%	40,0%
Franklin Euro High Yield A Acc EUR	LU0131126574	1,20%	40,0%
Franklin European Small Cap Growth Fund	LU0260871552	1,60%	40,0%
Franklin Templeton Biotech Discovery fund A Acc	LU0109394709	1,60%	40,0%
Franklin Templeton European Growth Fund	LU0122612848	1,60%	40,0%
FRANKLIN TEMPLETON FUNDS - MENA Fund	LU0352132285	1,60%	40,0%
Franklin Templeton Inv.Fund - European Small-Mid Cap Growth Fund	LU0138075311	1,60%	40,0%
FTIF-F Japan Fund Namens-Ant (acc) EUR o.N.	LU0231790675	1,60%	40,0%
FTIF-F Japan Fund Names-Ant A (acc) USD o.N.	LU0231790832	1,60%	40,0%
GAM Multistock - Emerging Markets Equity EUR	LU1112791014	1,50%	40,0%
Invesco Pan European Equity A Acc	LU0028118809	1,50%	40,0%
Invesco Pan European High Income Fund	LU0243957312	1,25%	40,0%
Japonija: Japonijos akciju fondas, Metzler	IE0003722711	1,00%	40,0%
JPM Eastern Europe Equity	LU0210529144	1,50%	40,0%
JPM Europe Equity Plus A (perf) Acc EUR	LU0289089384	1,50%	40,0%
JPM-EUROPE ST.VAL.A D.EO	LU0107398884	1,50%	40,0%
JPMorgan Funds - Europe Small Cap Fund	LU0210531637	1,50%	40,0%
JPMorgan Funds - Global Focus Fund	LU0210534227	1,50%	40,0%
JPMorgan IF - Global Balanced Fund A (acc) - EUR	LU0070212591	1,45%	40,0%
JPMorgan JPN RUSSIA- A-DIS ( SICAV)	LU0215049551	1,50%	40,0%

JPMorganF-JF CHINA - A-ACC( SICAV)	LU0210526637	1,50%	40,0%
JPMorganJPM Russia -ACC (Sicav)	LU0215050484	2,50%	40,0%
KAPITAL PLUS OPEN END FUND	DE0008476250	0,72%	40,0%
Latin: Latin America - Gartmore	LU0200080918	1,50%	40,0%
Liuksemburgo banko inv. fondas BL-BOND DOLLAR- B- CAP-	LU0093570926	0,60%	40,0%
Liuksemburgo banko inv. fondas SOU/BL-BOND EURO- B- CAP	LU0093570769	0,60%	40,0%
Liuksemburgo banko inv. fondas SOU/BL-EQUITIES AMERICA	LU0093570256	1,25%	40,0%
MFS Global Equity Fund	LU0094560744	1,50%	40,0%
MFS MERIDIAN European Value Fund	LU0125951151	1,50%	40,0%
Mirova Global Sustainable Equity Fund	LU0914729453	0,22%	40,0%
Natixis Har Assc Useqf-Iausd	LU0130102931	0,38%	40,0%
Nordea I SIC - Global P BP-EUR	LU0476541221	0,75%	40,0%
Nordlux Pro-Aktiv-A	LU1046626096	1,00%	40,0%
Pictet Emerging Local Currency Debt Fund	LU0255798109	1,20%	40,0%
PIONEER FUNDS- EAST EU EQ - A	LU0119336021	1,50%	40,0%
Russia: Russia - DWS	LU0146864797	1,23%	40,0%
Schroder ISF European Smaller Companies A Acc Open.	LU0106237406	1,50%	40,0%
Sector: DNB Renewabl. Energy- DNB	LU0302296149	1,50%	40,0%
Sector: Global Health Care - Fidelity	LU0114720955	1,50%	40,0%
Sector: Global Technology - Fidelity	LU0099574567	1,50%	40,0%
Sector: World Commodities CHE Parvest	LU0823449425	1,50%	40,0%
Sector: World Gold - BlackRock (Hedged A2)	LU0326422689	1,75%	40,0%
SHRODER INT EURO CORP A1 D	LU0406854488	0,45%	40,0%
Templeton Asia Growth fund USD	LU0128522157	1,60%	40,0%
Templeton Asian Bond Fund A USD	LU0229949994	1,00%	40,0%
Templeton Emerging Markets bond fund A USD	LU0029876355	1,60%	40,0%
Templeton Euroland A (acc) EUR	LU0093666013	1,60%	40,0%
Templeton US Equity fund USD	LU0098860363	1,60%	40,0%
UBS (Lux) Equity SICAV-Emerging Markets High Dividend	LU1081987536	1,76%	40,0%
UBS (Lux)Equity - USA Multi St.DL Inhaber	LU0098995292	1,44%	40,0%
US: US Equity- Franklin Temp.	LU0139291818	1,60%	40,0%
US: US Growth - Morgan ST	LU0073232471	1,68%	40,0%
World: DWS Invest Top Dividend Fund	LU0507265923	1,50%	40,0%
World: World FD - Fidelity	LU0069449576	1,50%	40,0%
African Equity fund	LU0390857042	1,95%	40,00%
African Equity fund	LU0390856747	1,95%	40,00%
African Equity Fund	LU0390856663	1,95%	40,00%
Alpha 15	LU0607983896	2,00%	60,00%
Asian Focus Equity Fund	LU0533596630	1,50%	60,00%
Asian Focus Equity Fund	LU0173782102	1,50%	60,00%
Asian Focus Equity Fund	LU0174358928	1,50%	60,00%
Asian Focus Equity Fund	LU0174359496	1,50%	60,00%
Asian Focus Equity Fund	LU0064675985	1,50%	60,00%

Chinese Equity Fund	LU0975278499	1,80%	60,00%
Chinese Equity Fund	LU0975278572	1,80%	60,00%
Danish Bond Fund	LU0064319766	0,60%	60,00%
Danish Bond Fund	LU0173778845	0,60%	60,00%
Danish Kroner Reserve	LU0173919332	0,13%	60,00%
Danish Kroner Reserve	LU0064321317	0,13%	60,00%
Danish Kroner Reserve	LU0173785030	0,13%	60,00%
Danish Mortgage Bond Fund	LU0173919688	0,60%	60,00%
Danish Mortgage Bond Fund	LU0076315968	0,60%	60,00%
Danish Mortgage Bond Fund	LU0173779223	0,60%	60,00%
Emerging Consumer Fund	LU0390857638	1,50%	60,00%
Emerging Consumer Fund	LU0390857554	1,50%	60,00%
Emerging Consumer Fund	LU0533589775	1,50%	60,00%
Emerging Consumer Fund	LU0390857471	1,50%	60,00%
Emerging Consumer Fund	LU0533589858	1,50%	60,00%
Emerging Market Bond Fund	LU0772926084	1,00%	40,00%
Emerging Market Bond Fund	LU0772926670	1,00%	40,00%
Emerging Market Bond Fund	LU0772927215	1,00%	40,00%
Emerging Market Bond Opportunitites Fund	LU0772919543	1,20%	40,00%
Emerging Market Bond Opportunitites Fund	LU0772920129	1,20%	40,00%
Emerging Market Corporate Bond Fund	LU0637302547	1,20%	40,00%
Emerging Market Corporate Bond Fund	LU0634509870	1,20%	40,00%
Emerging Market Corporate Bond Fund	LU0637304675	1,20%	40,00%
Emerging Market Local Debt Fund	LU0772932488	1,00%	60,00%
Emerging Market Local Debt Fund	LU0772933023	1,00%	60,00%
Emerging Markets Focus Equity Fund	LU0772938840	1,50%	60,00%
Emerging Markets Focus Equity Fund	LU0772938410	1,50%	60,00%
Emerging Markets Focus Equity Fund	LU0772938923	1,50%	60,00%
Emerging Markets Small Cap Fund	LU0975279117	1,60%	40,00%
Emerging Stars Equity Fund	LU0602539867	1,50%	60,00%
Emerging Stars Equity Fund	LU0602539602	1,50%	60,00%
European Corporate Bond Fund	LU0173921312	0,60%	60,00%
European Corporate Bond Fund	LU0173921403	0,60%	60,00%
European Corporate Bond Fund	LU0173783928	0,60%	60,00%
European Covered Bond Fund	LU0076315455	0,60%	60,00%
European Covered Bond Fund	LU0173920348	0,60%	60,00%
European Cross Credit Fund	LU0733673288	1,00%	60,00%
European Diversified Corporate Bond Fund	LU0533591169	0,50%	60,00%
European Financial Debt Fund	LU0772944145	1,00%	60,00%
European Focus Equity Fund	LU0982408295	1,50%	60,00%
European High Yield Bond Fund	LU0236489380	1,00%	40,00%
European High Yield Bond Fund	LU0236489893	1,00%	40,00%
European High Yield Bond Fund	LU0141799501	1,00%	40,00%
European High Yield Bond Fund (HB)	LU0637316331	1,00%	60,00%



European High Yield Bond Fund II	LU0602544602	1,00%	60,00%
European Small and Mid Cap Equity Fund	LU0087942271	1,30%	60,00%
European Small and Mid Cap Equity Fund	LU0417818589	1,30%	60,00%
European Small and Mid Cap Equity Fund	LU0417818407	1,30%	60,00%
European Value Fund	LU0064319337	1,50%	40,00%
European Value Fund	LU0173921072	1,50%	40,00%
European Value Fund	LU0173920934	1,50%	40,00%
European Value Fund	LU0968814441	1,50%	40,00%
Flexible Fixed Income Fund	LU0915365364	0,80%	60,00%
Flexible Fixed Income Plus Fund	LU0634509953	1,20%	60,00%
Global Bond Fund	LU0064321150	0,60%	60,00%
Global Bond Fund	LU0173921668	0,60%	60,00%
Global Bond Fund	LU0173921585	0,60%	60,00%
Global Climate and Environment	LU0348926527	1,50%	60,00%
Global Climate and Environment Fund	LU0348926287	1,50%	60,00%
Global Climate and Environment Fund	LU0348926360	1,50%	60,00%
Global Dividend Fund	LU0772951512	1,50%	60,00%
Global Dividend Fund	LU0772951785	1,50%	60,00%
Global Dividend Fund	LU0772951355	1,50%	60,00%
Global Dividend Fund	LU0772951868	1,50%	60,00%
Global High Yield Bond Fund	LU0476539324	1,00%	40,00%
Global Ideas Equity Fund	LU1002951728	1,50%	60,00%
Global Ideas Equity Fund	LU1002951645	1,50%	60,00%
Global Opportunity Fund	LU0975280552	1,50%	40,00%
Global Portfolio Fund	LU0476541221	0,75%	60,00%
Global Real Estate Fund	LU0705260007	1,50%	60,00%
Global Real Estate Fund	LU0705259843	1,50%	60,00%
Global Real Estate Fund	LU0705259686	1,50%	60,00%
Global Real Estate Fund	LU0705259769	1,50%	60,00%
Global Real Estate Fund	LU0705260189	1,50%	40,00%
Global Small Cap Fund	LU1029333462	1,50%	40,00%
Global Small Cap Fund	LU1029332142	1,50%	40,00%
Global Stable Equity Fund	LU0236490636	1,50%	60,00%
Global Stable Equity Fund	LU0112467450	1,50%	60,00%
Global Stable Equity Fund	LU0236490123	1,50%	60,00%
Global Stable Equity Fund - Euro Hedged	LU0278529986	1,50%	60,00%
Global Stable Equity Fund - Euro Hedged	LU0278530562	1,50%	60,00%
Heracles Long/Short MI Fund	LU0343921457	2,00%	40,00%
Heracles Long/Short MI Fund	LU0375726329	2,00%	40,00%
Indian Equity Fund	LU0637335638	1,80%	40,00%
Indian Equity Fund	LU0634510613	1,80%	40,00%
International High Yield Bond Fund - USD Hedged	LU0826393653	1,00%	40,00%
International High Yield Bond Fund - USD Hedged	LU0826393067	1,00%	40,00%
Latin American Equity Fund	LU0309470531	1,60%	40,00%

Latin American Equity Fund	LU0309470028	1,60%	40,00%
Latin American Equity Fund	LU1005863557	1,60%	40,00%
Latin American Equity Fund	LU0309468808	1,60%	40,00%
Latin American Equity Fund	LU0607982732	1,60%	40,00%
Low Duration US High Yield Bond Fund	LU0602537226	1,00%	40,00%
Low Duration US High Yield Bond Fund	LU0602537069	1,00%	40,00%
Multi Asset Fund	LU0445386369	1,70%	60,00%
Multi Manager Fund Aggressive	LU0946759445	1,50%	60,00%
Multi Manager Fund Aggressive	LU0946760021	1,50%	60,00%
Multi Manager Fund Balanced	LU0946760294	1,25%	60,00%
Multi Manager Fund Balanced	LU0946760708	1,25%	60,00%
Multi Manager Fund Conservative	LU0946760880	1,00%	60,00%
Multi Manager Fund Conservative	LU0946761342	1,00%	60,00%
Multi Manager Fund Equity FoF	LU1138504185	1,50%	60,00%
Nordic Equity Fund	LU0173922476	1,50%	60,00%
Nordic Equity Fund	LU0064675639	1,50%	60,00%
Nordic Equity Fund	LU0173922559	1,50%	60,00%
Nordic Equity Fund	LU0607985677	1,50%	60,00%
Nordic Equity Small Cap Fund	LU0278528665	1,50%	60,00%
Nordic Equity Small Cap Fund	LU0278527428	1,50%	60,00%
Nordic Equity Small Cap Fund	LU0278528152	1,50%	60,00%
Nordic Ideas Equity Fund	LU0915372659	1,50%	60,00%
Nordic Ideas Equity Fund	LU0915373897	1,50%	60,00%
Nordic Stars Equity Fund	LU1079987720	1,50%	60,00%
North American All Cap Fund	LU0772958442	1,50%	40,00%
North American All Cap Fund	LU0772958103	1,50%	40,00%
North American All Cap Fund	LU0772958012	1,50%	40,00%
North American All Cap Fund	LU0772958285	1,50%	40,00%
North American All Cap Fund	LU0772958525	1,50%	40,00%
North American All Cap Fund	LU0772959259	1,50%	40,00%
North American High Yield Bond Fund	LU0826399429	1,00%	40,00%
North American High Yield Bond Fund	LU0826398702	1,00%	40,00%
North American Small Cap Fund	LU0826405176	1,50%	40,00%
North American Value Fund	LU0533600259	1,50%	40,00%
North American Value Fund	LU0173783092	1,50%	40,00%
North American Value Fund	LU0173922989	1,50%	40,00%
North American Value Fund	LU0173922807	1,50%	40,00%
North American Value Fund	LU0076314649	1,50%	40,00%
Norwegian Bond Fund	LU0173781559	0,60%	60,00%
Norwegian Bond Fund	LU0087209911	0,60%	60,00%
Norwegian Equity Fund	LU0173923102	1,50%	60,00%
Norwegian Equity Fund	LU0173784223	1,50%	60,00%
Norwegian Equity Fund	LU0081952003	1,50%	60,00%
Norwegian Kroner Reserve	LU0173923284	0,13%	60,00%
Norwegian Kroner Reserve	LU0173786863	0,13%	60,00%

Norwegian Kroner Reserve	LU0078812822	0,13%	60,00%
Renminbi High Yield Bond Fund	LU1221952101	1,50%	40,00%
Stable Emerging Markets Equity Fund	LU0637346080	1,80%	60,00%
Stable Emerging Markets Equity Fund	LU0637345868	1,80%	60,00%
Stable Emerging Markets Equity Fund	LU0637345785	1,80%	60,00%
Stable Emerging Markets Equity Fund	LU0637345942	1,80%	60,00%
Stable Emerging Markets Equity Fund	LU0634510886	1,80%	60,00%
Stable Equity Long/Short Fund - Euro Hedged	LU0826409327	1,70%	60,00%
Stable Equity Long/Short Fund - Euro Hedged	LU0826410093	1,70%	60,00%
Stable Return Fund	LU0227384020	1,50%	60,00%
Stable Return Fund	LU0227384459	1,50%	60,00%
Stable Return Fund	LU0227384707	1,50%	60,00%
Stable Return Fund	LU1032955483	1,50%	60,00%
Swedish Bond Fund	LU0173781047	0,60%	60,00%
Swedish Bond Fund	LU0064320186	0,60%	60,00%
Swedish Kroner Reserve	LU0173923524	0,13%	60,00%
Swedish Kroner Reserve	LU0173785626	0,13%	60,00%
Swedish Kroner Reserve	LU0064321663	0,13%	60,00%
Tactical Allocation Balanced	LU0091716570	1,25%	60,00%
Tactical Allocation Conservative	LU0091716737	1,00%	60,00%
US Corporate Bond Fund	LU0458979076	0,70%	40,00%
US Corporate Bond Fund	LU0458979746	0,70%	40,00%
US Corporate Bond Fund	LU0458980595	0,70%	40,00%
US High Yield Bond Fund	LU0278531701	1,00%	40,00%
US High Yield Bond Fund	LU0278531610	1,00%	40,00%
US High Yield Bond Fund	LU0410959117	1,00%	40,00%
US Total Return Bond Fund	LU0826414087	1,10%	40,00%
US Total Return Bond Fund	LU0826414673	1,10%	40,00%
US Total Return Bond Fund	LU0826415480	1,10%	40,00%